

**REPUBLIC OF IRAQ
MINISTRY OF PLANNING**

**Central Statistical Organization (CSO)
and
Kurdistan Region Statistics Office (KRSO)**

**IRAQ HOUSEHOLD SOCIOECONOMIC SURVEY
(IHSES III)**

P176590

**Environmental and Social Management
Plan (ESMP)**

July 2021

Abbreviations and Acronyms

BP	Bank Procedures
BOD	Biochemical Oxygen Demand
CAPI	Computer Assisted Personal Interview
CAT	Convention Against Torture
CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
CO ₂	Carbon Dioxide
COVID-19	Coronavirus Disease 2019
CRC	Convention on the Rights of Child
CSO	Central Statistical Organization
DCVAW	Directorate to Combat Violence Against Women
E&S	Environmental and Social
EHS	Environmental, Health and Safety
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESCP	Environmental and Social Commitment Plan
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GOI	Government of Iraq
GPS	Global Positioning System
GRM	Grievance Redress Mechanisms
GRS	Grievance Redress Service
I3RF	Iraq Reform, Recovery and Reconstruction Fund
ICCPR	International Covenant on Civil and Political Rights
ICPPED	International Convention for the Protection of all Persons from Enforced Disappearance
IDP	Internally Displaced Persons
IEA	International Energy Agency
IED	Improvised Explosive Devices
ISES III	Iraq Household Socioeconomic Survey
ILO	International Labor Organization
IPF	Investment Project Financing
ISIS	Islamic State of Iraq and Syria
IT	Information Technology
KPI	Key Performance Indicator
KRG	Kurdistan Regional Government
KRI	Kurdistan Region of Iraq

KRSO	Kurdistan Region Statistics Office
KRI	Kurdistan Region of Iraq
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation
MENA	Middle East and North Africa
MGF	Mashreq Gender Facility
MOF	Ministry of Finance
MOP	Ministry of Planning
MSMEs	Micro Small and Medium Enterprises
NGO(s)	Non-Governmental Organization(s)
OHS	Occupational Health and Safety
OP	Operational Policies
PAPs	Project Affected Parties
PDO	Project Development Objective
PM	Particulate Matter
PMU	Project Management Unit
POM	Project Operation Manual
PPE	Personal Protection Equipment
PRS	Poverty Reduction Strategy
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SFP	Security Focal Point
SMP	Security Management Plan
TAL	Transitional Administrative Law
TDS	Total Dissolved Solids
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNICEF	United Nations International Children's Emergency Fund
US\$	United States Dollar
WHO	World Health Organization
WB	The World Bank
WHO	World Health Organization
WRO	Women Rehabilitation Organization

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Executive Summary in Arabic and Kurdish (will be added after the ESMP clearance)

Executive Summary

1- Introduction

This Environmental and Social Management Plan (ESMP) is prepared for the Iraq Household Socioeconomic Survey III. It has the purpose to ensure that activities under the Project fully address the ways in which Environmental and Social (E&S) impacts can be avoided and minimized, and where they cannot be avoided, the ways in which they can be adequately mitigated. The ESMP includes also Labour Management Procedures (LMP) and a Security Management Plan (SMP) according to the agreed ESCP.

2- Project Description

Under the Ministry of Planning (MOP), the Proposed Project will be implemented by the Central Statistical Organization (CSO) and the Kurdistan Region Statistics Office (KRSO) of the Government of Iraq. The Project will meet the data needs for updating the national accounts and allow to monitor the implementation of the previous national Poverty Reduction Strategy (PRS) and update with a new strategy. Data collection will last for 12 months and will cover all governorates to be representative at the district (qhada) level¹. The project will provide a US\$4.11 million recipient-executed grant from the Iraq Reform, Recovery and Reconstruction Fund (I3RF) to the Government of Iraq.

The set of activities included for the proposed IHSES III Project are:

1. Survey preparation and design
2. Hiring of survey personnel
3. Purchase of goods required to conduct the survey
4. Survey implementation and data collection
5. Data processing and dissemination

3- Legislative and Institutional Framework

The Bank has undertaken an initial screening of the proposed Project activities to determine the Environmental and Social Risk Classification of the Project and to identify the specific ESSs that are relevant to the Project. Based on the initial screening, the Environmental risk is rated as Moderate, and the Social risk is also rated as Moderate. Thus, the overall Environmental and Social Risk of this Project is rated as Moderate. The initial screening process has also established that five (05) of the ten (10) ESSs are relevant to this Project. The relevant ESSs and their objectives are (i) ESS1: Assessment and Management of Environmental and Social Risks and Impacts, (ii) ESS2: Labor and Working Conditions, (iii) ESS3: Resource Efficiency and Pollution Prevention and Management, (iv) ESS4: Community Health and Safety; and (v) ESS10: Stakeholder Engagement and Information Disclosure.

¹ WB, ESRS Concept Stage*/-

In addition to the relevant ESSs, the WB Environmental, Health and Safety (“EHS”) Guidelines are also relevant to this Project.

National legislation and regulations in Iraq address most of the potential E&S issues associated with the Project. The key national legislation and regulations in Iraq that are material to the Project are: (i) Law No.27 of 2009 on the Protection and Improvement of the Environment; (ii) Law No. 20 of 2008 on the environmental protection and improvement law in the KRI, (iii) Law No. 27 of 2009 on provisions for the handling of hazardous substances and wastes, (iv) Labor Law No.37 of 2015 and Ministerial Instruction No.12 of 2016 on Occupational Health and Safety Requirements and (v) Law No. 71 of 1987 in the KRI on OHS.

The Constitution guarantees fundamental rights to all Iraqi citizens. In particular, the Law proclaims that all Iraqis discrimination based on gender, race, ethnicity, origin, colour, religion, creed, belief, opinion, or economic and social status is prohibited. The Constitution also guarantees to all Iraqis, especially women and children, social and health security, basic requirements for living a free and decent life, income and housing, health care, care for the persons with disabilities, and education. Iraq is also a party to eight of the nine core international human rights instruments.

4- Environmental and Social Baseline Data

The baseline information relevant to the IHSES III

- The mean annual temperature in Iraq is around 23°C. The mean annual precipitation is around 181 mm.
- In accordance with the WHO guidelines, the air quality in Iraq is considered unsafe.
- Main causes of car accidents are due to improper and unsafe driving.
- The electricity does not meet demand due to constrained budgets and damage caused by conflicts.
- According to a 2012 UNICEF report, 91% of the population has access to potable water with significant differences among governorates and between urban and rural areas. The water quality is declining leading to a decrease in reliability of the water supply.
- 31,000 tons of solid waste are produced per day. There is currently an absence of modern, efficient waste handling and disposal infrastructure. Landfill are not of sanitary type; they are rather dumpsites.
- Iraq produces around 716,000 tons of e-waste annually, most of this e-waste is collected, separated, and dismantled informally.
- In 2019, Iraq’s labour force participation rate was one of the lowest in the world at 48.7%, with approximately 58% of the workforce in the private sector. It is estimated that 2.5 million people are unemployed, of which a large portion consists of the economically active population.
- Children in Iraq are exposed to variety of forms of child labour, including domestic work, construction work, and factory work.

- The labour market in Iraq has poor gender balance. Only a fifth of the Iraqi women participate in the workforce, indicating widespread exclusion from economic life.
- The bibliography of OHS in Iraq focuses mainly on infrastructure works. The safety systems in Iraqi construction work are very poor in many aspects for management safety requirements and neutral with respect to site safety and labour safety requirements.
- Women suffer from high levels of sexual harassment and sexual exploitation and abuse. 8 in 10 women in Iraq had experienced some form of sexual harassment including blackmail. Sexual harassment is a taboo subject in Iraq and often associated with negative reputation upon exposure. The will of women to report violence is very limited.
- COVID-19 was first reported in Najaf, Iraq on 24 February 2020. To control the spread strict lockdowns measures and closure of international borders were established. The COVID-19 surge has been overstressing the health sector's capacity and had drastic impacts on the economy. COVID-19 vaccination Program started in Iraq by the end of March 2021 and on July 16, 2021, only 12.6% of the population is reported as vaccinated.
- The Islamic State of Iraq and Syria (ISIS) invasion and military operations against ISIS led to the internal displacement of 6.1 million Iraqis between 2014 to 2017. The number of IDP and returnees in acute need has therefore increased significantly over the last year.

5- Identification of Potential Environmental and Social Risks and Impacts

Pertinent Project activities may be associated with some negative E&S risks. The **environmental risk** of the project is assessed to be moderate mainly due to community and OHS issues such as those related to COVID-19 and to road accidents that the surveyors might have during travel to different locations to conduct the survey. E-waste may be generated from the deflection of the electronic devices and accessories (such as tablets, computers, phone and internet cards and other accessories) that will be used during the survey and papers waste may also be generated from printing and translation of questionnaire, manuals and other documents used during the survey implementation and data collection and that might result from workshops and trainings.

The **social risk** rating of the Project is Moderate. There are no direct adverse social impacts resulting from project activities. The project does not involve any land acquisition and does not affect indigenous peoples. The social risks are limited to possible labour issues and working conditions, including gender and Gender-Based Violence (GBV) risks, in recruitment and management of project workers, such as project management staff and contracted workers of CSOs and in conducting the survey activities. There could also be insufficient community engagement and inadequate awareness of communities regarding the purpose of the survey and data privacy. But overall, the risks are rather limited in nature and scale.

The environmental and social risks severity and associated mitigation measures are provided in Table 4 of the main report.

6- Institutional Arrangement

CSO and KRSO are responsible for the overall implementation of the Project. They shall:

- Prepare and adopt the ESMP instrument for the IHSES III project;
- Monitor the implementation of the ESMP instruments and ensure the Project is executed in strict accordance with such safeguard instruments; and conduct site inspection when needed;
- Implement, maintain and facilitate Grievance Redress Mechanisms (GRMs) throughout the Project, ensuring that mechanisms are consistent and in place;
- Address grievances that arise from the GRMs;
- Prepare quarterly and annual reports to inform the WB on the progress; and
- Ensure that the Project is implemented in accordance with the annual work plan and budget as approved by MOP and the WB.

7- Labor Management Procedures

IHSES III Project prepared Labor Management Procedures (LMP) as per ESS2. The primary objective of the LMP is to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the Project fairly while also providing them with safe and healthy working conditions. The LMP provides a brief overview of Labor Legislation and the terms and conditions of that will be adopted under IHSES III including: (i) Wages, (ii) Working hours, (iii) Rest breaks, (iv) Leaves, (v) Overtime work, (vi) Discrimination and Non-Equal Opportunities, (vii) Trade Unions, (viii) Maximum Number of Hours per day, (ix) Provisions on Termination and (x) child labour. The LMP provides also the details of the GRM for workers that constitute a clear and transparent framework for addressing grievances related to the recruitment process and in the workplace.

8- Security Management Plan

IHSES III Project prepared a Security Management Plan (SMP) focusing on (i) Awareness, (ii) Management and (iii) Response. The responsibilities of the Project Management Units (PMUs), Social Focal point (SFP) and all Project Personnel are detailed. Details are also provided regarding the management and the reporting of an accident and incidents. Under the SMP, an alert status matrix was prepared. It provides a tool for the PMUs and/or the SFP to evaluate the overall environment and recommend a potential course of action.

Alert Status are closely linked with information gathered by project staff from multiple open and closed reporting mediums, including embassies, media reports, partners, other companies, and groups. The Alert Status Matrix is provided in Table 6 in the main text.

Project workers can take some general precautions and steps to safeguard themselves and/or respond to a particular incident. Personnel may encounter many different situations. There is never one response to cover every scenario. A guideline (Table 7) is provided for informational purposes to raise general security awareness and readiness for situations in which personal security may be in question.

The behavior of project personnel, both on and off duty, gives important signals to people—local and other, including local government officials. If personnel are consistently considerate, modest, and interested in local people, these efforts can promote the acceptance of the project. If personnel appear arrogant, rude, or immoral by local standards, or express opinions or over-sympathize with one party more than another, the project’s reputation can diminish and so will its level of security. If personnel cause a serious breach of security or persists in insecure behavior after being warned, formal disciplinary action up to termination may occur.

The SFP is responsible for communicating Important Contact Numbers such as (i) Provide project personnel with external contact information for in case of an emergency, (ii) Provide in-country health information and contact numbers for approved medical providers project personnel may want to contact in case of need, and (iii) Create and use of a project warden system for potential emergencies.

The MOP and the PMUs shall maintain constructive relations with public security (typically the police and, under certain circumstances, the military) operating in the project area or responsible for assisting project security.

9- Stakeholder Consultations and disclosure

In accordance with WB’s ESF, stakeholder consultation was conducted during the preparation of the ESMP. Stakeholder consultation aims to involve, inform, and consult the public in the planning, management, and decision-making activities of the Project.

The stakeholders’ consultation process can be summarized as per the following steps:

- An invitation was sent to stakeholders to be informed about the IHSES III Project and consulted about the ESMP.
- On June 23, 2021, Mr. Serwan Mohamed presented IHSS III Project, the draft ESMP and the different channels of the ESMP using a power point presentation. The handouts of the presentation are included in [Annex 2](#).
- Stakeholders were invited to share their thoughts, questions and concerns regarding the current project design and the associated environmental and social risks during a 1.5-hour virtual session. Below is a summary of the main points raised by the stakeholders during the consultation session held on (June 23, 2021).

The virtual session took about 1.5-hour and was attended by 19 participants from members of government and non-governmental agencies, Officials from lines of ministries and National NGOs and (i) CSO and KRSO different departments, (ii) the Ministry of Education of Kurdistan

region, (iii) Medya Medical Organization for health Awareness, (iv) the Directorate to Combat Violence Against Women (DCVAW); and (v) from the World Bank. The list of participants in the stakeholders' consultation is provided in [Annex 3](#).

The main topics discussed are as follows.

- Need for adequate support to the IHSES III
- The engagement of Stakeholders
- The E&S risks and mitigation measures
- The GRM.

Overall, the stakeholders expressed a very clear understanding of the planned project and confirmed that the Project has the potential to achieve the planned impact in its current form. More details are provided in [Section 9](#) of the main text. The ESMP will be announced and published on the websites of the CSO and KRSO. The ESMP will subsequently be disclosed on the WB website after in-country disclosure. Disclosure in-country and on the WB website will take place before the board date.

10- Grievance Redress Mechanism

A project-level GRM is established to provide affected people by the Project to file their grievances and seek resolution with no intimidation or coerciveness. Through providing a transparent and credible channel, it aims to build trust and cooperation with all parties involved, which is an integral component to enhance the Project's effectiveness. Individuals and/or groups are free to choose the method that best suits them to file a grievance, they may do so in writing or verbally. The following channels of communication are made available to register a general grievance, including methods for anonymous grievance.

1. By telephone on the following number: Hotline 5610 (CSO) and 00964662559170/009647508963143 (KRSO).
2. By email on gusayraof@gmail.com (CSO) and contact@krso.gov.krd (KRSO).
3. By using an online form on [Republic Of Iraq Ministry Of Planning \(mop.gov.iq\)](http://RepublicOfIraqMinistryOfPlanning(mop.gov.iq)) and [Kurdistan Regional Government | Ministry of Planning](http://KurdistanRegionalGovernment|MinistryofPlanning).

Another uptake channel for internal complaints is through the grievance boxes allocated throughout the CSO and KRSO offices.

The aim is to resolve or respond to the enquiries within the same call where no follow up is required. Where more time is required or for complex enquiries, the enquirer will be kept updated on the progress. All complaints/concerns and feedback will be documented in a grievance log. CSO and KRSO will ensure that the GRM is culturally appropriate and accessible for Project Affected Parties (PAPs). All staff and operators who will be handling the GRM will receive the necessary training for effective handling of complaints including on any potential

SEA/SH related complaints, complaints from the elderly or other vulnerable groups and grievances regarding the conduct of security personnel. The principles of confidentiality and anonymity will also be applied to the internal grievances redress mechanism. Grievances will be handled efficiently and in a specified timeline and not exceeding 5 days. The GRM will be clearly documented with close follow up by the responsible persons who will follow up and monitor the GRM in a GRM log. Details on the procedures for addressing grievances are provided in the main text.

11 Budget for ESMP Implementation

The preliminary cost estimate for the implementation of sub-project specific ESMP is 50, 000 USD. More details are provided in Table 10 of the main text

12 Monitoring and Reporting of ESMP Implementation

Monitoring is a key component of the ESMP during project implementation, as it helps verify the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. CSO/KRSO will engage a dedicated M&E specialist who will be responsible for facilitating the M&E activities. Details on the ESMP Monitoring indicators, their frequency and responsibilities are provided in Table 11 of the main report.

As a part of the Project's management support, the M&E specialist of the safeguards shall provide inputs on an intermittent basis to monitor the quality of the Project implementation and the compliances with E&S safeguards. The report in discussion is the Environmental and Social Safeguards Monitoring Report.

During implementation stage of the Project, regular monitoring reports on ESHS performance of the Project, including but not limited to, the implementation of the ESCP, status of preparation of the E&S documents required under the ESCP, stakeholder engagement activities, implementation of the LMP, implementation of the SMP and functioning of the grievance mechanism(s), including grievance logs from workers.

The monitoring report shall be prepared by CSO/KRSO and relevant E&S safeguard specialist(s) or M&E specialist on a quarterly basis throughout the Project implementation, as part of the overall progress report to MOP and WB.

MAIN REPORT

1.0 Introduction

1.1 Purpose and Objectives of the ESMP

The Environmental and Social Management Plan (ESMP) is an instrument that consists of the set of mitigation, monitoring, and institutional measures to be taken during the implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, reduce them to acceptable levels or mitigate them. The purpose of this particular ESMP is to ensure that works carried out under the Iraq Household Socioeconomic Survey III - P176590 (IHSES III Project or the Project) fully addresses the ways in which Environmental and Social (E&S) impacts can be avoided and minimized, and where they cannot be avoided, the ways in which the impacts are adequately mitigated.

The detailed objectives of the ESMP are as follows:

- To identify measures and actions in accordance with the **mitigation** hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels and include compensatory measures, if applicable;
- To identify **monitoring** objectives and specify the type of monitoring with linkages to the mitigation measures described in the ESMP;
- To describe the existing **institutions**, their role and capacities and the need to strengthen their E&S management capabilities or expand their responsibilities or personnel
- To determine the training, **capacity building** and technical assistance needed to successfully implement the provisions of the ESMP;
- To establish the Project **funding** required to implement the ESMP requirements; and
- To identify practical **resources** for implementing the ESMP.

In the IHSES III particular case, the ESMP includes also **Labour Management Procedures** and **Security Management Plan**.

1.2 Rationale of the ESMP

In order to achieve these objectives, this ESMP sets out the principles, guidelines and procedures required to assess the E&S risks and impacts of the IHSES III Project. It contains measures and plans to reduce or mitigate adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information about the agencies responsible for addressing project risks and impacts. It also includes adequate information about the area(s) in which the Project is expected to take place, including any potential E&S vulnerabilities, as well as the potential impacts that may occur or the mitigation measures

that should be adopted. This ESMP is intended to certify compliance with the relevant E&S policies, laws and regulations of Iraq and the WB Environmental and Social Standards (ESS), and also ensure that the proposed Project will be environmentally and socially sound and sustainable.

1.2 Other safeguard instruments

Apart from this ESMP, a stand-alone Stakeholder Engagement Plan (SEP) covering all stakeholders' aspects will also be prepared, cleared, and disclosed prior to project appraisal.

In addition, an Environmental and Social Commitment Plan (ESCP) will be prepared and agreed on with the Bank prior to project appraisal.

2.0 Project Context and Description

The Proposed Development Objective (PDO) of this Project is to support the Central Statistical Organization (CSO) and the Kurdistan Region Statistics Office (KRSO) of the Government of Iraq in implementing the third round of the Household Socioeconomic Survey (IHSES III).

The national survey measures almost all elements of household welfare and provides the basis for monitoring economic and governance reforms as well as designing, targeting, and monitoring of the government's programs and policies and the Bank's operations. It is foundational in enhancing the capacity to bringing a poverty and equity lens to all the Bank's operations².

Since December 2019, COVID-19 has become an ongoing public health issue. COVID-19 was declared a pandemic by the World Health Organization (WHO) and has had severe consequences on populations living in fragile countries where health systems, government structures and social safety nets are weak. In fragile contexts, such as Iraq, the impacts of COVID-19 both highlight and deepen social inequalities, particularly hitting vulnerable populations such as the poor and the refugee population.

The COVID-19 outbreak is stressing an already strained socio-economic condition and setting back Iraq's efforts in its fight against poverty. This is coupled by the fact that the country is undergoing high levels of conflict and a drop in oil revenues, which will further devastate livelihoods, raise prices, disrupt essential services such as education and health care, increase extreme poverty, and severely damage the broader macroeconomic environment³.

The proposed IHSES III Project is a WB grant that aims at providing financing for implementation of the third round of the Iraq Household Socioeconomic Survey (IHSES III). Building on the previous experiences, the third round will utilize international best practice on survey design, sampling, and data collection, like Computer Assisted Personal Interview (CAPI) and data cloud. It will provide comprehensive information on measure of poverty, drivers of household welfare, health and education, employment and job search, displacement, disability, housing and access to services, and many other socioeconomic indicators. It will meet the data needs for updating the national accounts, and allow to monitor the implementation of the previous national Poverty Reduction Strategy (PRS) and update with a new strategy. The sample will cover both displaced and non-displaced population. Data collection will last for 12 months and will cover all governorates to be representative at the district (qhada) level⁴. The project will provide a US\$4.11 million

² WB, ESRS Concept Stage

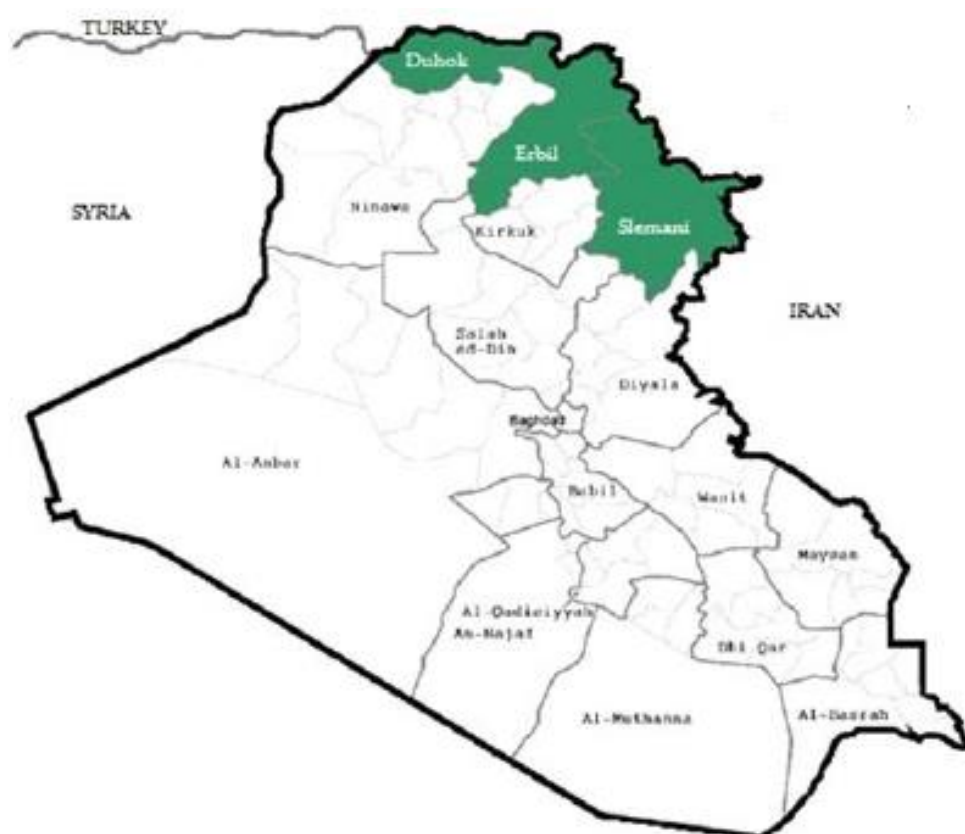
³ IOM UN Migration. (2020). Impact of COVID-19 on Small and Medium Enterprises in Iraq. Retrieved from: <https://reliefweb.int/sites/reliefweb.int/files/resources/IOM%20Iraq%20Impact%20of%20COVID-19%20on%20Small%20and%20Medium-Sized%20Enterprises%20in%20Iraq.pdf>

⁴ WB, ESRS Concept Stage*/-

recipient-executed grant from the Iraq Reform, Recovery and Reconstruction Fund (I3RF) to the Government of Iraq. The grant will be used for purchasing of some goods that the CSO and KRSO requires to conduct the survey. However, the amount allocated for purchasing of goods is less than 20% of the total grant.

The CSO under the Ministry of Planning (MOP) is the implementing agency of the proposed grant. While KRSO will implement the data collection in the four governorates (Duhok, Sulaymaniyah, Halabja, and Erbil) of Iraqi Kurdistan, CSO will implement the data collection in the rest of the 15 governorates (See figure 1 below)

Figure 1: Governorates of Iraq covered by the Project



2.1 Project Activities

The set of activities included for the proposed IHSES III Project are:

1. Survey preparation and design
 - a. Workshops on indicator and questionnaire design
 - b. Pre-test of the survey instrument
 - c. Training of main trainers
 - d. Training of enumerators and field supervisors
 - e. Printing and translation of questionnaire, manuals, and other documents

2. Hiring of survey personnel
 - a. Enumerator
 - b. Field supervisor
3. Purchase of goods required to conduct the survey
 - a. Tablets, computers, and other accessories
 - b. Coronavirus Personal Protective Equipment (PPE)
 - c. Phone and internet cards
4. Survey implementation and data collection
5. Data processing and dissemination

3.0 Legislative and Institutional Framework

This section highlights all WB and National requirements that are anticipated to be relevant to the Project.

3.1 The World Bank's Environmental and Social Framework

Since October 2018, all WB funded Investment Project Financing (IPF) operations are required to follow the Environmental and Social Framework (ESF), as a means of better managing E&S risks of projects and improving development outcomes. The ESF consists of ten ESSs, which sets out the E&S requirements and responsibilities of the borrowers throughout the life cycle of the Project, including the identification and assessment of E&S risks and impacts associated with the Project.

The Bank has undertaken an initial screening of the proposed Project activities to determine the Environmental and Social Risk Classification of the Project and to identify the specific ESSs that are relevant to the Project. Based on the initial screening, the Environmental risk is rated as **Moderate**, and the Social risk is rated also as **Moderate**. The overall Environmental and Social Risk of this Project is rated as **Moderate**. The initial screening process has also established that six of the ten ESSs are relevant to this Project. The relevant ESSs and their objectives are given in table 1 below. The requirements for each ESS can be found in the respective Guidance Notes at <https://www.worldbank.org/en/environmental-and-social-framework/environmental-and-social-standards>.

Table 1: The World Bank ESSs Relevant to IHSES III Project

ESS	Objectives
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Sets out the Borrower's responsibilities for assessing, managing and monitoring E&S risks and impacts associated with each stage of a project supported by the WB through IPF, in order to achieve E&S outcomes consistent with the ESS.
ESS2: Labor and Working Conditions	Recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the Project fairly and providing safe and healthy working conditions.
ESS3:	Recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite

ESS	Objectives
Resource Efficiency and Pollution Prevention and Management	resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the Project life cycle.
ESS4: Community Health and Safety	Addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.
ESS10: Stakeholder Engagement and Information Disclosure	Recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the E&S sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

3.2 The World Bank Environmental, Health and Safety Guidelines

In addition to the relevant ESSs, the WB Environmental, Health and Safety (“EHS”) Guidelines are also relevant to this Project. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (“GIIP”) and contain the performance levels and measures that are normally acceptable to the WB. The General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. A complete list of industry-sector guidelines can be found at www.ifc.org/ehsguidelines.

The relevant General EHS guidelines are listed in table 2 below:

Table 2: The World Bank General EHS Guidelines Relevant to the Project

Topic	General EHS Guidelines
Environmental	<ul style="list-style-type: none"> ● Air Emissions and Ambient Air Quality ● Waste Management
Occupational Health and Safety (OHS)	<ul style="list-style-type: none"> ● Communication and Training ● Personal Protective Equipment ● Monitoring
Community Health and	<ul style="list-style-type: none"> ● Traffic Safety ● Disease Prevention

Safety	<ul style="list-style-type: none"> ● Emergency Preparedness and Response
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3.3 National Legislations and Regulations

National legislation and regulations in Iraq address most of the potential E&S issues associated with the Project. This section will highlight the key national legislation and regulations in Iraq that are material to the Project.

It shall be noted that in addition to the Iraqi legislations, this section will also touch upon legislations in the Kurdistan Region of Iraq (KRI). According to Article 117 of the 2005 Constitution of Iraq (Constitution), it recognizes the KRI as a federal region, while Article 53 of the Transitional Administrative Law (2004) (TAL) states that the Kurdistan Regional Government (KRG) was recognized as the official government of the governorates of Diyala, Duhok, Erbil, Kirkuk, Nineveh, and Sulaymaniyah. Article 54 of the TAL further stipulates that the KRG had the right to continue to perform its current functions, including its right to exercise executive, legislative, and judicial powers in accordance with the Constitution, except with regard to those powers which fall within the exclusive competence of the federal government. According to Human Rights Watch, in general, the effectiveness in terms of law enforcement in the KRI is higher compared to south and central Iraq.

3.3.1. General Environmental Legislation

Law No.27 of 2009 on the Protection and Improvement of the Environment aims to protect and improve the environment and natural resources, by preserving public health, biodiversity and cultural and natural heritage, and by encouraging sustainable development and international and regional cooperation. The Law establishes a Council for the protection and improvement of the environment by referring to the Ministry of Environment and cooperating with other Ministries. The Law also sets forth provisions for the regulation of air pollution and noise reduction; earth protection; biodiversity protection; management of hazardous waste; protection of the environment from pollution resulting from exploration and extraction of oil wealth and natural gas; establishment of an environmental protection fund; rewards; compensation for damages; and penal provisions.

An environmental protection and improvement law has also been established in the KRI, namely **Law No. 20 of 2008**. This Law, consisting of 48 Articles and divided into five sections, aims at protecting and preserving the environment, particularly considering the problems of urban expansion and population increase and lack of awareness among the population. Main objectives of the Law are: maintaining the environment of the region, protecting, improving and preventing it from pollution; protecting the environment and public health from dangerous activities and harmful works; maintaining and developing the natural resources and rationing their utilization; making the environmental policy a part of general development planning; raising the level of environmental awareness, and establishing individual and

community responsibility to environmental protection. To achieve these objectives, rules of protection and improvement of the environment are provided by the Law, banning possible pollutants, radioactive, hazardous and harmful substances, in the following fields: water (surface, ground, and drinking water), air (including noise level), soil, biodiversity, recycling of the wastes and dangerous substances, pesticides and chemical compounds. An Environmental Protection and Improvement Fund in the Region together with an Environmental Protection and Improvement Council in the Region is also required to be established under the Law.

3.3.2. Hazardous Substances and Wastes

Law No. 27 of 2009 provides provisions for the handling of hazardous substances and wastes and stipulates that they should conform to international standards and best practices. Furthermore, consisting of 5 Articles, instruction No. 2 of 2014 aims at protecting the urban environment by organizing the management of hazardous wastes. The instruction stipulates that the Ministry of Municipalities and Public Works and the Municipality of Baghdad are responsible for collecting and transporting waste materials in places for treatment and disposal; for creating the necessary supplies and equipment; for identifying appropriate locations and the development of containers to throw municipal waste; for distributing of special bags for waste producers; and for identifying waste collection dates. The said Ministry and Municipality will also need to decide how to treat reusable materials. Special provisions are further established for waste weighing more than 50 kg and for farms owners and investors in farming.

3.3.3. Occupational Health and Safety and child labour

Labor Law No.37 of 2015 and **Ministerial Instruction No.12 of 2016**: Occupational Health and Safety Requirements Regulations are the main OHS legislations. They govern employment relationships in most of the country, however, in the KRI, **Law No. 71 of 1987** remains in force, as Law No. 37 of 2015 is pending its endorsement by the local Parliament of the KRI.

Law No. 37 of 2015 highlights the rights, duties and commitments of employers and employees. Containing 18 chapters and 171 Articles, its purposes are to protect and support both the work force and employers; to help workers find appropriate work through training; to help employers recruit the right workers for the right job; to protect Trade Unions and Workers Associations; and to organize foreign workers who are interested in working in Iraq

The Law regulates the health and safety of employees and stipulates that the National Center of Occupational Health and Safety is to oversee the planning and inspecting the implementation of health affairs, in a manner that guarantees the safety of employees at work sites from occupational diseases and injuries. Notably, the Law prohibits all types of compulsory and child labor and any discrimination or harassment, whether direct or indirect. Article 6, chapter 3 of the Law states that the minimum age for employment is 15 years old.

However, Iraq is also signatory to the 1989 International Convention on the Rights of the Child, which defines everyone under the age of 18 as a child who must have special protection and care.

3.3.4. Women Employment

Chapter 10 of the Iraqi Labor **Law No. 37 of 2015** concentrates on the protection of the female worker. Crucially, the Law aims for gender equality, specifically regarding wages, hiring and working conditions. It requires employers to provide onsite childcare, and increases paid maternity leave to 14 weeks, with the option of additional unpaid leave for up to a year. Employers must also allow women workers to return to their jobs or equivalent positions. Law No. 37 further stipulates that sexual harassment and any other behaviour that is offensive or results in intimidation or hostility in employment and occupation, whether at the level of job search, vocational training, recruitment or work conditions and terms is strictly prohibited.

3.3.5. Human Rights

Adopted by the Transitional National Assembly of Iraq, the **Constitution guarantees fundamental rights to all Iraqi citizens**, including equality before the Law, equal treatment before the Law (Article 14); treatment with justice in judicial proceedings (Article 19(6)); participation in public affairs (Article 20); right to work (Article 22); and the preservation of the family, the protection of motherhood, childhood and old age, and the prohibition of child labour and violence in the family (Article 29). In particular, the Law proclaims that all Iraqis discrimination based on gender, race, ethnicity, origin, colour, religion, creed, belief, opinion, or economic and social status is prohibited. The Constitution also guarantees to all Iraqis, especially women and children, social and health security, basic requirements for living a free and decent life, income and housing (Article 30), health care (Article 31), care for the persons with disabilities (Article 32), and education (Article 34).

Article 2 (1) of the Constitution stipulates that no law may be enacted that contradicts the principles of democracy (Article 2 (1)). Currently, Iraq is a party to eight of the nine core international human rights instruments, including: the International Covenant on Civil and Political Rights (ICCPR), the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), the Convention on the Rights of the Child (CRC) and its Optional Protocol on the involvement of children in armed conflict; the International Convention for the Protection of All Persons from Enforced Disappearance (ICPPED), and the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT). The country has further established a Penal Code, Law No. 111 of 1969, which stipulates basic penalties for offences, including death, life imprisonment, imprisonment for specific periods, penal servitude, detention, fines, confinement to a centre for young offenders and confinement to a reformatory.

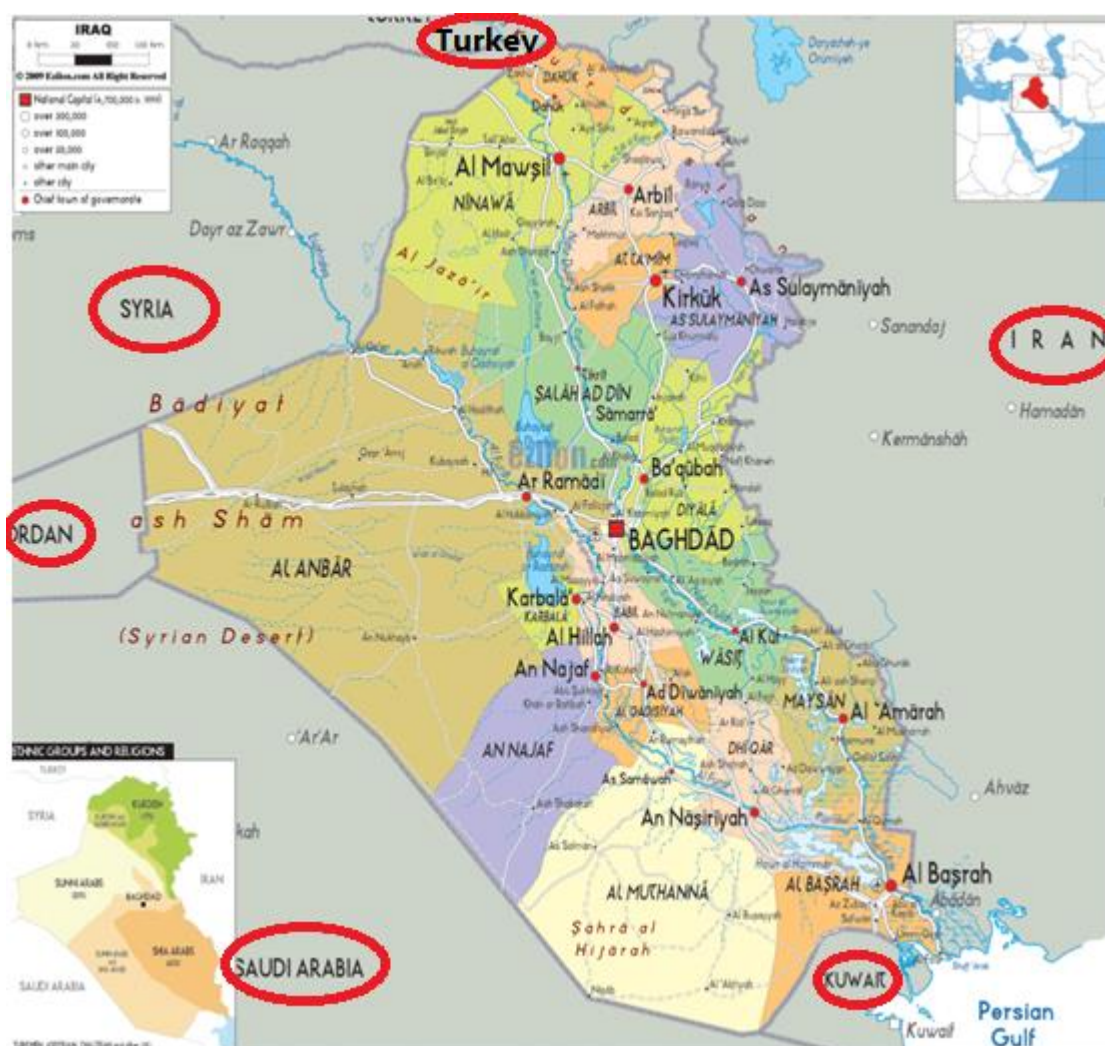
4.0 Environmental and Social Baseline Data

This section provides a general overview of the relevant E&S characteristics of Iraq.

4.1 General Project Location

Iraq is located in the south-western Asia region and bordered to the north by Turkey, to the east by Iran, to the west by Syria and Jordan, and to the south by Saudi Arabia and Kuwait. (Figure 2). Topographically, Iraq is shaped like a basin, consisting of the Great Mesopotamian alluvial plain of the Tigris and the Euphrates rivers and surrounded by mountains in the north and the east, which can reach altitudes of 3,550 m above sea level, and by desert areas in the south and west, which account for over 40% of the land area. Iraq has an area of 434,128 km² and a population of 39,309,783.⁵

Figure 2: Map of Iraq⁶



⁵ The World Bank. (2019). Population, Total - Iraq. Retrieved from: <https://data.worldbank.org/indicator/SP.POP.TOTL?locations=IQ>

⁶ Retrieved from political-map-of-Iraq.gif (1412x1235) (ezilon.com)

4.2 Climate

The climate in Iraq is subtropical mainly of the continental and subtropical semi-arid type, except for the north and north-eastern mountainous regions that have a Mediterranean climate. The mean annual temperature is around 23°C. Depending on the season, the average daytime temperatures range between 17 and 46°C. The mean annual precipitation is around 181 mm. Rainfall is seasonal and occurs mostly during the winter season from December through February for most of the country except in the north and northeast, where the rainy season is from November to April. The climate is also influenced by South and South-easterly Sharqi, which are sand and dry dust storms. The North, Northwest Shamal Winds also impact the climate, leading to extensive surface heating⁷.

4.3 Air Emissions and Air Quality

In accordance with the WHO guidelines, the air quality in Iraq is considered unsafe. The degradation of air quality in Iraq is linked to the continual flaring of gas in oil fields, as well as the use of low-quality fuel in transport, power generation, emissions from industrial facilities, dust storms and open burning of waste⁸.

The concentration of Particulate Matter (PM) is a key air quality indicator since it is the most common air pollutant that affects short term and long-term health, producing symptoms such as breathing problems, chronic diseases and even premature mortality. The WHO's air quality guidelines recommend that the annual mean concentrations of PM_{2.5} should not exceed 10 µg/m³ and 20 µg/m³ for PM₁₀. The most recent data (2017) indicates that Iraq's annual mean concentration of PM_{2.5} and PM₁₀ are 62 and 100 µg/m³, respectively which exceeds the recommended maximum⁹.

Regarding greenhouse gases emissions, according to the WB, in 2016, the country emitted 190,061 kilotons of carbon dioxide (CO₂)¹⁰. Data for carbon dioxide emissions include gases from the burning of fossil fuels and cement manufacturing but excludes emissions from land use such as deforestation. In 2012, the country emitted 5,007 thousand metric tons of CO₂

⁷ Sissakian, V., Al-Ansari, N. and Knutsson, S., 2013. Sand and dust storm events in Iraq. *Journal of Natural Science*, 5(10), pp.1084-1094.

⁸ The World Bank Group. (2017). Iraq Systematic Country Diagnostic. Retrieved from: <http://documents1.worldbank.org/curated/en/54281148727729890/pdf/IRAQ-SCD-FINAL-cleared-02132017.pdf>

⁹ International Association for Medical Assistance for Travellers. (2020). Iraq General Health Risks: Air Pollution. Retrieved from: <https://www.iamat.org/country/iraq/risk/air-pollution#:~:text=In%20accordance%20with%20the%20World,in%20Iraq%20is%20considered%20unsafe.&text=Contributors%20to%20poor%20air%20quality,%2C%20and%20war%2Dinduced%20pollution> and Brauer, M. et al. 2017, for the Global Burden of Disease Study 2017 accessed through <https://data.worldbank.org/indicator/EN.ATM.PM25.MC.ZS?locations=IQ>

¹⁰ The World Bank. (2016). CO₂ Emissions. Retrieved from: https://data.worldbank.org/indicator/EN.ATM.CO2E.KT?end=2016&locations=IQ&most_recent_value_desc=false&start=1960&view=chart

equivalent of nitrous oxide¹¹. Nitrous oxide emissions mainly stem from fossil fuel combustion, fertilizers, rainforest fires, and animal waste.

4.4 Roads Conditions and Traffic Safety

Motorists are one of the leading causes of cars collisions in Iraq. In numbers, 50% of the crashes are attributed to the motorist. In terms of age, young people are the most involved group in road traffic accidents. Car accidents are often due to improper parking, wrong turning, and high speed. Approximately 75% of victims of car accidents were not using safety seat belts, 50% do not having a driving license and about 60% had previous collision history. The occurrence of crash in Iraq is also largely affected by the low periodic maintenance of vehicles and the bad road condition and traffic. More than 28% of the crashes involved fatalities. Studies have reported that highest rates of collision occurred on Thursdays, day when the Iraq wedding ceremonies take place and usually involves a group of cars ranging over city main streets for fun. With respect to the spatial analysis of accidents, several studies have reported that car accidents are more frequently on the main urban streets and highways than in rural areas.¹²

4.5 Electricity

Currently, electricity does not meet demand in Iraq due to constrained budgets and damage caused by conflicts. The gap between supply and demand is particularly significant in summer when the demand is at its peak because of greater cooling needs. As per the International Energy Agency (IEA), in 2018, the peak electricity demand was 27.3 GW and the maximum grid supply of power was 16.4 GW.¹³

4.6 Water Supply

Tigris and Euphrates Rivers are the main sources of domestic water supply in Iraq in addition to import from nearby countries. According to a 2012 UNICEF report, 91 percent of the population has access to potable water with significant differences among governorates and between urban and rural areas. For example, in rural areas, only 77% of the population has access to improved drinking water sources compared to 98% in urban areas.

Also, in Iraq, the water quality is declining leading to a decrease in reliability of the water supply. The quality of water used for drinking and agriculture is poor and violates both Iraqi National Standards and WHO guidelines. In 2010, the Biochemical Oxygen Demand (BOD) was

¹¹ The World Bank. (2012). Nitrous Oxide Emissions. Retrieved from: <https://data.worldbank.org/indicator/EN.ATM.NOXE.KT.CE?end=2012&locations=IQ&start=2012&view=bar>

¹² Firas Hasan Alwan Asad, Road traffic Accidents in Iraq: a review of Evidence based literature, International Journal for traffic and Transport Engineering, 2017, 7(2): 256-275

¹³ IEA. (2019). Iraq's Energy Sector: A Roadmap to a Brighter Future. Retrieved from: <https://www.iea.org/reports/iraqs-energy-sector-a-roadmap-to-a-brighter-future>

equal to 36.2 mg/l, more than three times the national limit of 10 mg/l, the Total Dissolved Solids (TDS) in the Euphrates' river water was 1200ppm in 2009. According to a UNICEF Survey conducted in 2011, in 27 % of households tested there were no traces of chlorine in the water and in 15 %, the concentration of chlorine was below 0.5ppm - the standard considered necessary to prevent waterborne diseases¹⁴.

4.7 Solid Waste

In 2013, Iraq produced 31,000 tons/day solid waste, and the capital of Iraq, Baghdad, produced more than 1.5 million tons of solid waste annually¹⁵. However, there is currently an absence of modern, efficient waste handling and disposal infrastructure. Landfills are not of sanitary type, they are rather dumpsites leading to groundwater contamination, surface water pollution, spontaneous fires, large-scale greenhouse gas emissions and increasing numbers of insects and rodents in the area¹⁶. Surface and ground water near dumpsites have a great possibility of contamination due to percolation of leachate. The effects of dumping activity on surface and ground water are high concentrations of total dissolved solids, electrical conductivity, total hardness, chlorides, chemical oxygen demand, nitrates and sulphates¹⁷. Such contamination of groundwater results in a substantial risk to local groundwater resource user and to the natural environment. Thus, solid waste management is considered one of the most complex issues in Iraq, leading as well to other concerns such as air and soil water pollution¹⁸.

4.8 Electronic Waste

E-waste in Iraq largely consists of computer equipment and accessories (about 40%) followed by telecommunications equipment (42%), electrical equipment (8%), medical equipment (7%) and household sector waste (around 11%)¹⁹ and ²⁰. Iraq produces around 716,000 tons of e-waste annually²¹. About 95% of the e-waste generated in Iraq is managed by the informal sector and scrap dealers who dismantle discarded products instead of recycling them. Only 9%

¹⁴ Retrieved from <https://reliefweb.int/sites/reliefweb.int/files/resources/Water-Factsheet.pdf>

¹⁵ Alnajjar, A. (2019). Solid Waste Management in Iraq. Retrieved from: <https://www.ecomena.org/swm-iraq/>

¹⁶ Al-Ansari, N., 2013. Locating landfills in arid environment. *Journal of Earth Sciences and Geotechnical Engineering*, 3(3), pp.11-24.

¹⁷ Vasanthi P, Kaliappan S, Srinivasaraghavan R. Impact of poor solid waste management on ground water. *Environ Monit Assess.* 2008 Aug;143(1-3):227-38. doi: 10.1007/s10661-007-9971-0. Epub 2007 Nov 13. PMID: 17999155.

¹⁸ Ibid 16.

¹⁹ Allsopp M., Santillo D., Johnston P. (2006) Environmental and Human Health Concerns in the Processing of Electrical and Electronic Waste. Greenpeace Research Laboratories, Technical Note: 04/2006.

²⁰ Hasanain Abdalridha Abed Alshadoodee, Mohammed Jawad Shabaa, Lamyaa Abed Taha Al-Edhari. (2020). The Effect of Electronic Waste on Environmental Development in Iraq Using GIS. *International Journal of Advanced Science and Technology*, 29(4s), 2453 - 2464.

²¹ Antrekowitsch, H., Potesser, M., Spruzina, W. and Prior, F., 2006, March. Metallurgical recycling of electronic scrap. In *EPD Congress* (pp. 899-908).

of the total e-waste in Iraq finds its way into the formal and informal recycling units due to the poor infrastructure and recycling framework.²²y.

4.9 Labour Force and Conditions

In 2019, Iraq's labour force participation rate was one of the lowest in the world at 48.7%, with approximately 58% of the workforce in the private sector²³. It is estimated that 2.5 million people are unemployed, of which a large portion consist of the economically active population²⁴.

Many Iraqis lack the skills to find a job in a precarious job market. About 33% of the youth between the ages of 15 and 29 are illiterate or only semi-literate, 33% have completed primary school, 28% have finished middle or high school, and only seven percent have completed post-secondary education²⁵.

The COVID-19 pandemic and the decline in oil prices in recent years are likely to further compound the inability of job creation in Iraq.

Children in Iraq are exposed to variety of forms of child labour, including domestic work, construction work, and factory work. As of 2020, Iraq had 7.3% of children between the ages of eight and sixteen years engaged in child labour that are hazardous, dangerous and exploitative that may compromise their physical, mental, social or educational development²⁶. Children living in rural areas are more likely to work than children living in cities due to the poverty divide.

The labour market in Iraq has poor gender balance. Only a fifth of the Iraqi women participate in the workforce, indicating widespread exclusion from economic life²⁷. The distribution of working females largely lies in the government and public sector as it is perceived as stable employment. Of those Iraqi women employed, 40% work in the private sector while 60% are in the public sector.

4.10 Occupational Health and Safety

²² Hasanain Abdalridha Abed Alshadoodee, 2Mohammed Jawad Shabaa, 3 Lamyaa Abed Taha AlEdhar 9 (2020), The Effect of Electronic Waste on Environmental Development in Iraq Using GIS, International Journal of Advanced Science and Technology Vol. 29, No. 4s, (2020), pp. 2453 - 2464

²³ UNESCO (2020). Impact of the Oil Crisis and COVID-19 on Iraq's Fragility

²⁴ Bandiera, L., Chandra, V., Fosque, J., Von Der Goltz, J., Peterburs, T. M., Piffaretti, N., ... & Wheeler, C. (2019). Jobs in Iraq: A Primer on Job Creation in the Short-Term. World Bank.

²⁵ Ibid.

²⁶ UNICEF (2018). 018 Multiple Indicator Cluster Survey (MICS6) Briefing

²⁷ World Bank. (2018). Bringing Back Business in Iraq: Analytical Note

The bibliography of OHS in Iraq focuses mainly on infrastructure works. Hatem (2017) evaluated the safety systems in Iraqi construction projects. The results of the research demonstrated that the safety systems in Iraqi construction sector were very poor in many aspects for management safety requirements and neutral with respect to site safety and labour safety requirements²⁸. Some private initiatives for instance the Iraqi Society for OHS (non- profitable) has organized conferences, seminars & awareness programs in various subjects of occupational health & safety including conferences, trainings, awareness on job injuries compensation.

4.11 Sexual Harassment, Sexual Exploitation and Abuse

In Iraq, women suffer from high levels of sexual harassment and sexual exploitation and abuse. 8 in 10 women in Iraq had experienced some form of sexual harassment including blackmail Sexual harassment is a taboo subject in Iraq and often associated with negative reputation upon exposure. The will of women to report violence is very limited because women are afraid of scandal and of tarnishing their reputation. In Iraqi society, the accusing fingers point first to the victim herself, so the majority of harassment victims prefer not to talk about their suffering²⁹.

Some private initiatives such as the Women Rehabilitation Organization (WRO) (non-profit, non-government and independent organization) are focused on SH/SEA prevention and response such as psychological and physical health support to meet Syrian refugee, Iraqi IDP, and Host Community women, men, and children. Through their prevention campaigns these initiatives help those who have experienced SH/SEA report their cases and get access to protection, food, health, education, shelter, and legal services.

4.12 COVID-19 Pandemic

COVID-19 was first reported in Najaf, Iraq on 24 February 2020. To control the spread, the Government of Iraq (GoI) and the KRG established strict lockdowns measures and closed international borders. These preventive actions have enabled Iraq to keep low case numbers compared to neighbouring countries, until restrictions of movement were partially lifted. On February 18, 2021, travellers were permitted to enter on the basis of following testing and quarantine periods. Limitations on mobility included movement across governorates as well as commercial and trade activities, curfews, government and residency office operation hours and legal regulations. As of July 16, 2021, there have been 1,466,529 confirmed cases and 17,707 associated deaths in Iraq³⁰. The COVID-19 surge has been overstretching the health

²⁸ Hatem, W., 2017. Evaluation of safety systems in Iraqi construction projects. *International Journal of Applied Engineering Research*, 12(21), pp.11714-11726.

²⁹ Iraqi Women's Journalists Forum (2015). A New Study Reveals Facts about the Phenomenon of Sexual Harassment in Iraqi Society. Retrieved from: https://www.iraqicivilsociety.org/wp-content/uploads/2015/10/Shahrazad-Study-FINAL.En_.pdf

³⁰ Retrieved from Iraq COVID: 1,156,137 Cases and 16,102 Deaths - Worldometer (worldometers.info)

sector's capacity and had drastic impacts on the economy. The vaccination turned out to be essential to protect lives and enable Iraq to reboot the economy and recover. Iraq has initiated preparedness activities for COVID-19 vaccine introduction. COVID-19 vaccination Program started in Iraq by the end of March 2021 and on July 16, 2021, only 12.6% of the population is reported as vaccinated ³¹.

4.13 Internally Displaced Persons

The Islamic State of Iraq and Syria (ISIS) invasion and military operations against ISIS led to the internal displacement of 6.1 million Iraqis between 2014 to 2017. Although the attacks were formally concluded three years ago, yet the humanitarian context in Iraq remains fragile. More than 1 million Iraqis remain Internally Displaced Persons (IDP), while two out of five Iraqis who have returned home still do not have adequate housing, economic self-sufficiency, or access to basic services or other conditions essential to durable solutions³².

The closure of most IDP camps in areas under government administrative control in late 2020 resulted in increased population movements, including forced evictions, premature returns and secondary displacement. The number of IDP and returnees in acute need has therefore increased significantly over the last year. The project management unit (PMU) in both implementing agencies CSO & KRSO will coordinate with the local governments to assure inclusion of the rest IDPs camps in this survey to achieve the project development objectives and considered as key indicators.

³¹ Retrieved from https://ourworldindata.org/covid-vaccinations?country=OWID_WRL

³² OCHA. (2021). Humanitarian Needs Overview. Retrieved from:

https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/iraq_hno_2021_humanitarian_needs_overview_-_feb_2021.pdf

5.0 Identification of Potential Environmental and Social Risks and Impacts

Based on the initial scoping activities, the E&S impacts are considered as Moderate. Through identifying the potential E&S risks, the ESMP aims to achieve the avoidance, minimization or mitigation, including offset or compensation, of adverse E&S impacts of the Project and to ensure compliance with the ESSs. The expected positive impact of the Project is to measure almost all elements of household welfare and provide the basis for monitoring economic and governance reforms as well as designing, targeting and monitoring of the government's programs and policies and the Bank's operations. The results of the project will enhance the capacity to bringing a poverty and equity lens to all the Bank's operations. Pertinent activities may be associated with some negative E&S risks. The following sections will detail the negative E&S risks and impacts in detail, along with suggestions on mitigation measures.

The IHSES III project finances capacity building and household survey without any civil work that could have potential negative **environmental risks** or impacts. The environmental risk is assessed moderate mainly due to community and OHS issues such as those related to COVID-19 and to road accidents that the surveyors might have during travel to different locations to conduct the survey. E-waste may be generated from the disposal of end-of life and outdated electronic devices and accessories (such as tablets, computers, phone and internet cards and other accessories) that will be used during the survey and papers waste may also be generated from printing and translation of questionnaire, manuals and other documents used during the survey implementation and data collection and that might result from workshops and trainings.

The **social risk** rating of the Project is Moderate. There are no direct adverse social impacts resulting from project activities. The project does not involve any land acquisition and does not affect indigenous peoples. The social risks are limited to possible labour issues and working conditions, including gender and Gender-Based Violence (GBV) risks, in recruitment and management of project workers, such as project management staff and contracted workers of CSO and KRSO and in conducting the survey activities. There could also be insufficient community engagement and inadequate awareness of communities regarding the purpose of the survey and data privacy. But overall, the risks are rather limited in nature and scale. The survey will be designed and implemented to include all vulnerable groups, disabled, women and socially excluded groups. However, the risk of exclusion is always possible and implementation of the survey should be monitored closely by the Project Management Unit (PMU) to eliminate this risk.

The environmental and social risks severity and associated mitigation measures can be summarized as follows in table 3 below:

Table 3: Environmental and Social Risks and associated mitigation measures for IHSES III

Risk	Specific Risk	Severity	Mitigation Measures
Solid Waste	<ul style="list-style-type: none"> • Improper management and disposal of solid waste • Consumed COVID-19 Wastes 	+	<ul style="list-style-type: none"> • Implement office waste management plan • Train employees on proper ways to dispose waste and dedicated waste disposal area • Transportation and disposal of waste should be done through authorized entities
Electronic Waste	Improper management and disposal of end-of-life-equipment e.g. hardware infrastructure, computers, tablets	+	<ul style="list-style-type: none"> • Set-up designated areas for recycling bins affixed with clear signs • Source licensed recycling contractors to collect and remove e-waste and if these can't be found, collect all the e-waste in one dedicated location for disposal when proper disposal means are available.
OHS and security of personnel during data collection and office work	Car accidents	++	<ul style="list-style-type: none"> • Respect the speed limits • Watch for red light runners • Reduce in-car distractions such as cell phones, eating or momentarily taking a hand off the wheel • Perform engine maintenance regularly
	Infection and transmission of COVID-19 and Impact on labour income through the loss of earnings due to sickness, reduced hours and/or lower salaries, or unemployment	++	<ul style="list-style-type: none"> • Follow COVID-19 precautions and measures in accordance with the Iraqi supreme committee for health and national safety and the WHO recommendations • Provide COVID-19 PPEs to the project workers and beneficiaries as appropriate • Provide timely information on COVID-19 status updates and good practices for preventing spread and transmission to all employees • Confirm workers are fit for work, to include temperature testing and refusing entry to sick workers. Any staff showing symptoms or confirmed case of COVID-19 should stay home • Ensure Proper hygiene and sanitation practice by all employees including cough

Risk	Specific Risk	Severity	Mitigation Measures
			<p>etiquette, hand sanitation, mask wearing, and maintaining social distancing guidelines</p> <ul style="list-style-type: none"> • Provide enough disposable tissues and garbage bins or hand sanitizing gel • Ensure clearing and disinfection in the workplace • Consider increasing ventilation or installing high-efficient air filters especially in the offices where close personal proximity cannot be prevented • Ensure enough cars so that no more than 3 persons used the same car during field survey (including the driver) • Provision of medical insurance for workers covering treatment for COVID-19, sick pay for workers who either contract the virus or are required to self-isolate due to close contact with infected fellow workers. Insurance should provide compensation for COVID-19 fatalities during on job. • Ensure that staff do not feel pressured to attend work even if HR policies should be temporarily revised • Source a list of facilities in Iraq providing vaccination programs and make available to employees • Prepare procedures for working-from-home arrangements through setting up remote infrastructure in case of lockdowns.
	Risk on the security of the personnel due to post conflict situations in different parts of Iraq,	+	<ul style="list-style-type: none"> • Ensure security before undertaking fieldwork in any area • Prepare and implement a Security Management Plan (SMP) during all the phases of the Project
Labor Working Conditions	Hiring of unskilled and unqualified labour	+	<ul style="list-style-type: none"> • Adopt transparency and equal-opportunity policy in the recruitment process • Conduct thorough hiring checks that considers the individual’s education qualification and past work experience
	Exclusion of vulnerable/ disadvantaged groups and/or by unconscious discrimination	++	<ul style="list-style-type: none"> • Establish an equal opportunity and transparent hiring process that does not discriminate based on sex, nationality, marital status, disability or religious

Risk	Specific Risk	Severity	Mitigation Measures
	Unfair or illegal labour procedures	+	<p>belief. the implementation of proper LMP will ensure fair engagement and benefit from project work for vulnerable groups including women, this will also be checked as one the key indicators in the submitted progress report to the world bank task team</p> <ul style="list-style-type: none"> • Prepare and implement Labour Management Procedures (LMP) during all the phases of the project • Maintain an employee log that tracks the number of employees, working hours, gender, nationality, age, number of incidents, vulnerability, and trainings conducted • Abide by specific Iraqi labour laws determining the minimum wage and to comply with working conditions and hour. • Establish and make operational and available an internal Grievance Redress Mechanism (GRM) for employees to express any complaints during all the phases of the project • Establish a work contact that include specific condition which require a minimum age to be 18, and attach a copy of Iraqi identification cards for age verification.
Sexual Harassment and Sexual Exploitation and Abuse	Gender-Based Violence (GBV) in the workplace and during survey works	++	<ul style="list-style-type: none"> • Establish whistle-blowing mechanism and channels that are made known to employees • Train all employees on GBV risks, the applicable laws and regulations, and what type of behaviours are inappropriate especially women that will be conducting surveying works • Ensure that management and security staff are adequately trained to identify and eradicate all forms pertaining to GBV • Ensure employees sign a code of conduct that includes commitment to adequate behaviour vis a vis Sexual Exploitation and Abuse/harassment (SEA/H) and put

Risk	Specific Risk	Severity	Mitigation Measures
			strict sanctions (i.e. dismissal) for workers involved in any form of abuse, inappropriate behaviour or GBV <ul style="list-style-type: none"> • An internal GRM should be available for employees to express any complaints as well as GBV complaints along with a redress pathway
Data Privacy	Risk of disclosure of data that leads to breach of confidential information.	+	<ul style="list-style-type: none"> • Implement policies detailing systematic approaches to confidentiality of information.

6.0 Institutional Arrangement

To execute the proposed activities, it is imperative to establish a well-defined institutional and implementation mechanism for identifying, appraising, managing and monitoring safeguards at all levels.

CSO and KRSO are responsible for the overall implementation of the Project. They have conducted two large household surveys (IHSES) in 2007 and 2012 with the technical assistance from the WB. They shall maintain capacity, functions, staffing and resources satisfactory to MOP and the WB including among others specialists in procurement, financial management, safeguards and monitoring and evaluation. Where events or conditions are likely to interrupt or interfere with the smooth implementation of the Project, CSO and KRSO shall act promptly to deal with or address such events or conditions and inform the WB accordingly.

The following responsibilities are maintained by CSO and KRSO:

- Prepare and adopt the ESMP instrument for the IHSES III project;
- Monitor the implementation of the ESMP instruments and ensure the Project is executed in strict accordance with such safeguard instruments; and conduct site inspection when needed;
- Implement, maintain and facilitate Grievance Redress Mechanisms (GRMs) throughout the Project, ensuring that mechanisms are consistent with the principles and are in place;
- Address grievances that arise from the GRMs;
- Prepare quarterly and annual reports to inform the WB on the progress; and
- Ensure that the Project is implemented in accordance with the annual work plan and budget as approved by MOP and the WB.

7.0 Labour Management Procedures

7.1 Introduction

The Project is being prepared as per the requirements of the ESS2 Labour and Working Conditions of the WB's ESF. The primary objective of ESS2 is to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the Project fairly while also providing them with safe and healthy working conditions. Other objectives of ESS2 include the following:

- To promote safety and health at work;
- To promote the fair treatment, non-discrimination and equal opportunity of project workers;
- To protect project workers, including vulnerable workers such as women, persons with disabilities, migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
- To prevent the use of all forms of forced labour and child labour;
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- To provide project workers with accessible means to raise workplace concerns.

Accordingly, the purpose of these Labour Management Procedures (LMP) is to facilitate the planning and implementation of the Project by identifying the main labour requirements, the associated risks and to determine the resources necessary to address the Project-related labour issues. The LMP will enable different project stakeholders to have a clear understanding of what is required on a specific labour issue. The LMP is a living document, which is initiated early in the Project preparation stage and is reviewed and updated throughout the development and implementation of the Project, as needed.

7.2 Overview of Labor Use in the Project

The Project Coordination Unit will assign the CSO and KRSO staff at federal and KGR levels, consultants, survey administrators and surveyors. The CSO and KRSO staff will be working for the project as civil servants maintaining their terms and conditions of employment at federal and KGR levels. There are ongoing discussions to determine the number and type of workers who will be involved in the survey however, their total number is estimated at around **343 persons**.

7.2.1 Number and Characteristics of Project Workers

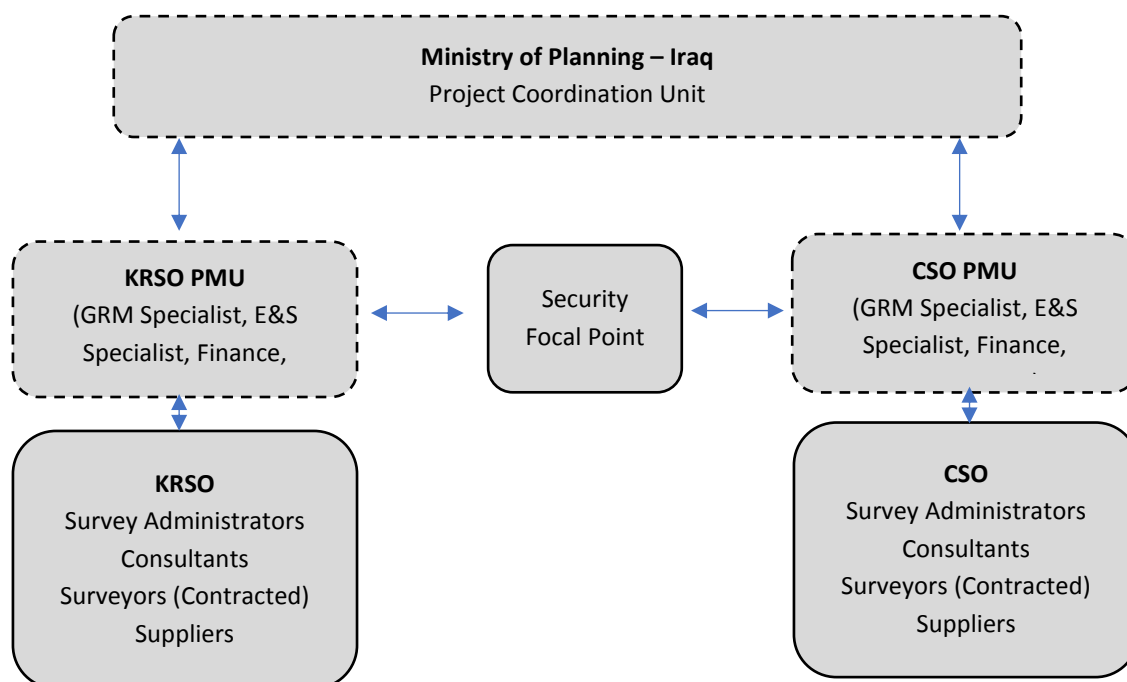
Based on available information, this section describes the Project workers, their characteristics, the timing of labour requirements, the anticipated or known contracting

structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by CSO and KRSO.

Staffing structure:

The chart of figure 3 below presents the planned staffing structure, which includes both full-time (framed with a continuous line) and part-time (framed with a dashed line).

Figure 3: IHSES III Organizational Structure



Number of Project Workers:

The staff structure foresees the deployment of a total of **(343)** workers as depicted in table 4 below:

- (25) involved on part-time basis (they are CSO and KRSO Staff);
- (20) involved on full-time basis as consultants (for CSO and KRSO);
- (148) involved as contracted interviewers for CSO;
- (34) involved as contracted interviewers for KRSO;
- (74) involved as contracted supervisors for CSO;
- (17) involved as contracted supervisors for KRSO; and
- (25) Suppliers’ workers.

Characteristics of Project Workers:

The project workers will all be direct workers (employed or engaged directly by the CSO/KRSO to work specifically in relation to the project). The interviewers will be contracted by CSO/KRSO and will be mostly recruited from Iraq where they will also be based. Workers will be male and female and will not be under the minimum age.

Table 4: Overview of labour use on IHSES III Project

Workers Type	Number of Workers	Local Residents	Imported/ Foreign Workers	Staff Under 18	Timing of Engagement	Type of Job or Skills
Direct Workers (CSO and KRSO Staff and Consultants)	318	310	8	0	Q4 2021- Q4 2022	Technical & Financial Staff including E&S specialist and surveyors
Primary Supply Workers (tablets, mobile phones, software,...)	25	25	0	0	Q4 2021-Q4 2022	IT / Computer Engineers / Communication Specialists
Community Workers	0	0	0	0	-	-

7.3 Assessment of Key Potential Labor Risks

The key labor risks identified for the Project were detailed in [section 5](#). Below are some risks specifically related to workers. They are listed below:

1. **Unfair and/or unclear contract terms and conditions including wages, overtime, compensation, benefits and working hours:** In some cases, there might be employment practices that are not in compliance with either the national Labour Law or ESS2. For example, not providing written documents of assignments, wages do not proportionate with tasks performed or industry standards, excess workload without provision of adequate rests and leisure, lack of hygiene facilities, and/or discrimination towards women.
2. **OHS risks:** The main causes of OHS risks were listed in section 5 above.
3. **Child labour or forced labour**
4. **Hiring of unskilled and unqualified labour**
5. **Community health and safety issues,** including but not limited to traffic-related accidents and increased risks of communicable diseases.
6. **Discrimination and non-equal opportunities:** The large-scale and geographical extent of the IHSEE Project may increase the occurrence of discrimination and non-equal opportunities.
7. **GBV/sexual exploitation and abuse**

8. Inadequate GRM to handle complaints and concerns for all the Project workers

7.4 Brief Overview of Labour Legislation: Terms and Conditions

The terms and conditions of employment applying to workers in this Project will largely depend on the nature of their employment contracts and shall be governed by the Iraqi Labour Law. These terms and conditions will be clearly mentioned in the written contracts for all types of workers, whether full-time or part-time, and be made known to project workers prior to commencement of work.

As mentioned in [section 3.4.3](#), The essential provisions of Iraqi Labour Law are embodied in **Law No. 37 of 2015**, which aims to regulate the work relationship between the workers and employers and their associations, in order to protect their rights and achieve sustainable development based on social justice and equity and secure decent work for all. The Social Security Law (**Law No. 39/1971**) contains further provisions relevant to the employer employee relationship.

The Iraqi Labour Law does not impose an obligation on employers to employ a certain percentage of Iraqi nationals. An exception applies where an investment license is required for a project, in which case, according to the Investment Law, at least 50% of the employees in the workforce of the Project must be Iraqi nationals. Furthermore, in projects conducted under a foreign investment license, Iraqi nationals must be given priority over foreign workers, unless it can be shown that there are no Iraqi nationals whose skills and qualifications would match the relevant position. Foreign investment law also imposes an obligation on foreign investors to train their Iraqi employees and to enhance their skills.

7.4.1 Wages

As per the Iraqi Labor Law, the wages of employees are calculated based on the amount of work performed or the amount of time the employee has put in or on some other criteria. Wages paid shall be no less than the amount specified in employment contracts or standard salaries agreed upon in collective labour contracts. In Iraq, the minimum wage for contracted workers is about 293.29 USD. The employer shall be subject to a penalty of not less than twice the legally prescribed minimum wage if it violates the Labour Law's provisions governing the minimum wage.

7.4.2 Working hours

As per the Iraqi Labour Law:

- The standard work week is 40 hours.
- The maximum working hours are 48 hours per week.
- The minimum rest duration per week is 24 hours.
- If the worker is a contracted worker, he/she will receive full payment by the end of the month despite national holidays (i.e. national holidays will be paid). However, there is no

compensation for national holidays with respect to daily wages in both the public and private sector.

- As a result of COVID-19, working hours may be reduced, subject to local authorities.

7.4.3 Rest breaks

As per the Iraqi Labour Law, the employees must be granted a rest and meal break during the workday. Time and duration are regulated by the Iraqi Labour Law at 30 to 60 minutes per day.

7.4.4 Leaves

As per the Iraqi Labour Law:

- Ordinary leave: An employee will have the right to take a paid leave up to the equivalent of 3 calendar days per month regardless of his/her position, terms of employment or the effective period of their employment contract. The duration may vary depending on the type of workers, causes and reasons.
- Sick leave: For every year of work, the worker is entitled to thirty days' sick leave period paid by the employer. The sick leave period to which a worker is entitled may be accumulated for a total of up to 180 days.
- Maternity/Paternity leave: A female worker is entitled to a maternity leave at full pay of not less than 14 weeks per year.

7.4.5 Overtime work

As per the Iraqi Labour Law, no worker shall be employed for more than 40 hours of overtime for 90 days, and 120 hours of overtime for 12 months. Wages for every hour of overtime work shall be paid to employees as follows:

- If wages are based on time worked, the amount paid per hour shall not be less than twice the standard hourly wage;
- If wages are paid based on piece of work performed by the employee, extra wages must be paid in an amount not less than the hourly wages of employees with the same pay scale.

7.4.6 Discrimination and Non-Equal Opportunities

The CSO and KRSO shall:

- Issue procedures to assure that no employee or job applicant will be subject to discrimination and/or harassment.
- Practice a strict Code of Conduct in which harassment, violence or discrimination of any kind is not allowed. This includes discrimination based on any bias, including gender, age, disability, ethnicity, or religion.

7.4.7 Trade Unions

CSO/KRSO should comply with the International Labour Organization Agreements and the Iraqi Labour Law and allow labourer to organize themselves in a union to protect and improve production and bring about economic and social prosperity and to defend their rights.

7.5 Brief Overview of Labour Legislation: Occupational Health and Safety

As alluded to in [Section 3.4.3](#), Labour Law No.37 of 2015 and Ministerial Instruction No.12 of 2016: Occupational Health and Safety Requirements Regulations are the main OHS legislations. In addition to these laws, the following are additional legislation requirements on OHS.

Occupational Health and Safety Instructions No. 3/1985 Concerning Occupational Safety:

- Provides for the enforcement of occupational safety provisions at places of work.
- Regulates that all workplaces are to appoint a person in charge of occupational safety and an occupational safety committee.
- Provides for the appointment and duties of the person responsible for occupational safety and for the occupational safety committee at each workplace.
- Establishes the functions and duties of employers and employees with regard to occupational safety.

Law No. 6 of 1988 concerning the National Commission for Occupational Hygiene and Safety governs the enforcement of OHS regulations.

- Provides for inspections of places of employment and inspections reports.
- Establishes the duties and responsibilities of the employer's OHS.
- Establishes the functions of safety commissions at places of work.
- Regulates the responsibilities and duties of workers with respect to OHS.

7.6 Responsible Staff

IHSES PMUs will oversee and guide all the workers associated with the Project.

Social and Environmental specialists will be responsible for the following:

- Implementation of the LMP.
- Monitoring of the LMP implementation including OHS standards at all workplaces and training on LMP and OHS for Project workers.
- Ensure that Project prepare OHS plans before mobilizing to the field.
- Ensure the contracts with the contracted workers are developed in line with the provisions of this LMP and the Project's ESMP,
- Ensure that the GRM 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 labour and OHS performance.

- Monitor implementation of the Code of Conduct.

LMP and OHS responsibilities of the PMUs at the CSO and KRSO include the following:

- Follow the labour management procedures and OHS requirements in line with the ESMP provisions and stated in the contracts.
- Maintain records of recruitment and employment of contracted workers as provided in their contracts.
- Communicate clearly job descriptions and employment conditions to all workers along with their rights and responsibilities.
- Ensure the project has an effective Grievance Redress Mechanism including multiple channels at sub-project level to receive feedbacks.
- Provide induction (including social induction) and regular training to employees in labour protection requirements, including training on their rights on safe labour conditions under the Labour Law, on the risks of their jobs, and on measures to reduce risks to acceptable levels.
- Provide training on GBV and SEA/SH to all Project workers.
- Ensure that all contracted workers understand and sign the Code of Conduct prior to the commencement of works and supervise compliance with the Code.

7.7 Policies and Procedures

The project's identified risks and impacts will be mitigated with a number of policies and procedures. These will address OHS risks, working conditions and management of worker relationships, labour working conditions, non-discrimination and equal opportunities, terms and conditions of employment. The different policies and procedures, which the Project will prepare, adopt and implement are listed below.

To achieve adequate levels of OHS performance, the MOP through CSO/KRSO is committed to:

- Provide a clear assignment of OHS responsibilities;
- Comply with legislation which relate to OHS requirements as stipulated in Labour Law 37 of 2015, in addition to the WB's EHS Guidelines and, as appropriate, other Good International Industry Practice (GIIP),
- Prevent OHS risks through promotion of appropriate skills, knowledge and attitudes toward hazards;
- Contribute to improve OHS management system and performance during project implementation;
- Communicate OHS provisions to all persons;
- Include clauses in the contracts throughout the implementation period to prepare, adapt and implement OHS plans.

To avoid workplace health and safety issues including accidents and injuries, the MOP through CSO/KRSO will:

- Apply GIIP to protect and conserve the natural environment and to minimize unavoidable impacts;
- Provide and maintain a healthy and safe work environment and safe systems of work;
- Protect the health and safety of local communities, with particular concern for those who are disabled, elderly, or otherwise vulnerable;
- Ensure that the terms of employment and working conditions of all the Project workers meet the requirements of the labour legislation of Iraq and the International Labour Organization (ILO) conventions to which Iraq is a signatory;
- Be intolerant of, and enforce disciplinary measures for illegal activities.
- Be intolerant of, and enforce disciplinary measures for GBV, inhumane treatment, sexual activity with children, and sexual harassment;
- Incorporate a gender perspective and provide an enabling environment where women and men have equal opportunity to participate in, and benefit from, planning and development
- Work co-operatively, including with end users of the IHSES III, relevant authorities, and local communities;
- Engage with and listen to affected persons and organizations and be responsive to their concerns, with special regard for vulnerable, disabled, and elderly people;
- Provide an environment that fosters the exchange of information, views, and ideas that are free of any fear of retaliation, and protects whistle-blowers;
- Minimize the risk of pandemic notably COVID-19 transmission and to mitigate the effects of COVID-19 associated with the execution of the Project activities;
- Make relevant policies available to all employees in their language.
- Ensure that workers have access to and are aware about the GRM.
- The health and safety risk on the workers should be covered by appropriate insurance schemes for all the types of workers. In addition, the insurance should be covering work related accidents (injuries and fatalities), as well as insurance for third parties, where applicable.

7.7.1 COVID-19 Considerations

The PMU will develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19. These measures include but are not limited to:

- Assessing the characteristics of the workforce, including those with underlying health issues or who may be otherwise at risk.
- Confirming workers are fit for work, to include temperature testing and refusing entry to sick workers.
- Considering ways to minimize entry/exit to site or the workplace and limiting contact between workers and the community/general public.

- Training workers on hygiene and other preventative measures and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected workers.
- Treatment of workers who are or should be self-isolating and/or are displaying symptoms.
- Assessing risks to continuity of supplies, taking into account international, national and local supply chains
- Adjustments to work practices, to reduce the number of workers and increase social distancing.
- Expanding health facilities on-site compared to usual levels, developing relationships with local health care facilities, and organizing for the treatment of sick workers.
- Establishing a procedure to follow if a worker becomes sick (following WHO guidelines).
- Implementing a communication strategy with the community, community leaders and local government in relation to COVID-19 issues on the site.

7.8 Age of Employment

The Iraqi Labour Law No. 37 for 2015 Article 21 defines the child as anyone who has not completed 15 years old. However, Iraq is also signatory to the 1989 International Convention on the Rights of the Child, which defines everyone under the age of 18 as a child who must have special protection and care. Considering the type of work in the Project, the minimum age for employment will be 18. If a child under the minimum age is discovered working on the Project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

In order to prevent under-aged workers, the PMUs will be required to maintain a labour registry of all contracted workers, as well as verify the identity and age of all workers. This will require workers to provide official documentation, which could include a national identification card, passport, or medical or school record.

7.9 Terms and Conditions of work under IHSES III

7.9.1 Maximum Number of Hours that can be Worked on the Project

The standard work week shall be 40 hours and the maximum working hours are 48 hours per week. The minimum rest duration shall be 24 hours per week. If the worker is a contracted worker, he/she will receive full payment by the end of the month despite national holidays (i.e. national holidays will be paid). However, there is no compensation for national holidays with respect to daily wages in both the public and private sector. As a result of COVID-19, working hours may be reduced, subject to local authorities.

7.9.2 Provisions on Termination

Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship, either directly to the Project workers or where appropriate, for the benefit of the Project workers. Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments.

7.9.3 Leave

The following terms and conditions shall apply on Leave:

- Ordinary Annual leave: An employee will have the right to take a paid leave regardless of his/her position (profession), terms of employment or the effective period of their employment contract. The duration may vary depending on the type of workers, causes and reasons (up to 3) calendar days per month.
- Sick leave: The employee is entitled to a sick leave based on a report from concerned medical authority. For every year of work, the worker is entitled to thirty days' sick leave period paid by the employer. The sick leave period to which a worker is entitled may be accumulated for a total of up to 180 days. During the sick leave an employee is entitled to his/her full salary, half the salary for the second leave and without salary for the third (for a period of time that shall not exceed 180 days). Where the employee is not able to resume his work after taking all the sick leaves with full/half/without salary, he/she will be released.
- Maternity/Paternity leave: Female workers will get paid a maternity leave. An expectant mother would be entitled to 21-day maternity leave, to be extended to 51 days after submission of the necessary documents. This is followed by 12 months with half the salary. Pregnant women will be reassigned and allowed to work in non-hazardous, non-arduous work as per medical advice without pay severance or penalty. A woman worker is entitled to a maternity leave at full pay of not less than 14 weeks per year.

7.9.4 Rest Breaks

The employees must be granted a rest and meal break during the workday. Time and duration shall be regulated by Iraqi Labour Law (30-60 min) per day.

7.9.5 Injuries and Death

It is the MOP's responsibility (through CSO and KRSO) that all workers, including temporary and daily laborers if any, are appropriately insured against injuries and death.

7.9.6 Child Work

No child will be allowed to work under the IHSES III Project. PMUs will keep registers and logs of their employees and contracted workers. The minimum age shall be 18 years old.

7.10 Laborers' Grievance Mechanism

A grievance mechanism is a procedure that provides a clear and transparent framework for addressing grievances related to the recruitment process and in the workplace. This typically takes the form of an internal procedure for complaints, followed by consideration and management response and feedback. As described in [Section 10](#), the implementing entities will put in place a GRM for the IHSES III Project through which communities (including community workers) and individuals who believe they are adversely affected by the Project may submit complaints.

This GRM will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Direct workers and contracted workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the GRM is easily accessible to all such project workers. The project will ensure that a dedicated staff responsible for receiving and filing grievances is in place and that a mechanism is in place to address grievances filed and procedures to escalate grievances. The project grievance mechanism is gender sensitive. It is a standard of good practice that aims to provide appropriate channels for complaints to be received from women. In cases of increased risk of discrimination, harassment, rape or assault to ensures that women subject to physical or sexual abuse, or rape, can file confidential complaints

The workplace GRM will be designed to be easily understandable, clear, and transparent and to provide timely feedback. The policy of confidentiality and non-retribution will be reinforced, along with ability to raise anonymous grievances. The mechanism will include multiple communication channels dedicated for workplace complaints only, including but not limited to an email address/website link, phone number, and a physical address for handing the complaints and grievances in person. Workers will have the freedom to pick the one they are comfortable using. The exact design will be finalized and will be disseminated prior to the launch of any contracts signatures and all contractors will be aware that those are systems related to the project that they need to comply to. The workplace grievance mechanism will not impede access to other judicial or administrative remedies that are available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

Besides submitting complaints to existing project-level GRM, communities and individuals who believe that they are adversely affected by a WB-supported project may also make use of the WB's Grievance Redress System ("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

noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the WB's corporate GRS, please visit:

<https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redressservice>.

8.0 Security Management Plan

The below section details the Security Management Plans (SMPs) for the IHSES III Project. This SMPs will be reviewed after any incident, and updated as needed, throughout the project's life.

8.1 Purpose and Scope

The purpose of this policy is to inform project staff of the overarching security protocols and applicable procedures. It guides the PMUs through the process of planning for unexpected security situations. It defines roles and responsibilities within the project, the guiding security concepts, and the safety measures and contingency plans of the project.

The safety and security section is designed to protect staff and project assets and to enable project staff to safely implement the Project within the varying risk environments of the country. For the purposes of Project Policies and Procedures, the term "project personnel" includes all Projects workers as defined in the Labor Management Procedures (LMP).

8.2 Policies and Objectives

This entire section of the SMP shall be readily accessible during office hours to all project personnel.

While project personnel shall exercise all due care and diligence to protect project assets, no project personnel shall put lives at risk to protect property.

Every project personnel, regardless of position, has a responsibility to promote security, and shall follow all rules and procedures contained in this SMP and/or instructions issued by the PM and the Security Focal Point (SFP). Failure to follow security or safety policies and procedures is a disciplinary matter. Project workers who do not follow safety or security guidelines put others at risk and shall face disciplinary action, including possible termination of service. Project personnel shall abide by local laws, except where compliance would involve a fundamental breach of human rights or negate Project's responsibilities to its workers and/or donors.

The PMUs manage risk on their projects to the maximum extent possible, taking into account project activities, the external environment, staff safety, and project assets.

Project personnel have the right to decline to take risks without suffering disciplinary action. However, PMUs, in consultation with the SFP as appropriate, shall determine if any project personnel's risk tolerance is too low to conduct his/her job and may change the location or position of the personnel. The Project has the right to withdraw the Project workers from situations that it considers to be too dangerous in which to work.

All project personnel are prohibited from using, carrying, or possessing weapons. Firearms are considered to be any weapon that has an explosive projectile of any form and include, but not limited to, a handgun, rifle, semi-automatic or automatic.

The SMP shall be seen as a working document and kept current based on the security environment, staffing and operations. The plan shall be updated as necessary and formally reviewed by the project when needed.

8.3 Policy Implementation

Security and safety measures can be broadly categorized in the following three areas:

- Awareness: Be alert to the surroundings and risks involved
- Management: Follow the established procedures
- Response: Report and handle all incidents accordingly

All project personnel are expected to be observant of their surroundings. Project personnel shall never engage in any activity at the office or while on project travel that might potentially put themselves, others, or project assets at risk of injury or other harm.

Project personnel are responsible for their personal belongings. The Project does not carry insurance to cover damage or theft of personal items including, but not limited to, clothes, computers, stereos, watches, money, or cameras that may occur during employment with the project.

Desks, lockers, computers, tablets, and other storage devices may be provided for the convenience of project personnel, but still remain the sole property of the project. Accordingly, they, as well as any articles found within them, including computer files, can be inspected by any authorized representative of the project at any time, either with or without prior notice.

The Project shall advise project personnel facing particular risks because of origin, ethnicity, nationality, and/or gender, vulnerability and recommend what measures they shall take, but they shall not be subject to additional restrictions.

All project personnel shall use care and sound judgment in the use of the project facilities and equipment in the way intended, and not to engage in activities inappropriate to their job description and role.

The project shall ensure all domestic travel is implemented following established protocols and procedures, particularly when utilizing project vehicles.

The project shall report any and all security incidents to the PMU within a reasonable amount of time using their best judgment.

Project personnel shall report to the SFP any of the following:

- Any threat or incident directly affecting project personnel safety or project continuity.
- Updates on the security situation in their area of responsibility.

SFP will report any and all incidents and actions to the PMUs.

Reporting procedures shall be followed to facilitate management of the immediate operational needs of the security situation and timely reporting to the PMUs and to the World Bank.

In the event that a curfew is called by the local or national authorities, all project workers shall abide by instructions given. In the event that a 24-hour curfew is in effect, project personnel shall work from home if possible.

8.4 Overview of security situation

Social instability

Violent protests are likely in Basra, as a result of poor services, unemployment, and the government's increasing probable inability to pay public-sector wages given the drastic drop in revenues due to a fall in oil prices. Reduced oil prices will require the implementation of strict measures, likely resulting in renewed mass demonstrations. Unrests are very frequent in Iraq and may become violent in some cases³³.

Terrorism

Islamic State (IS) still poses a substantial threat to Iraq's security, especially in the northern provinces and Diyala, areas, that the extremist group had previously held. The IS cells are concentrated in Kirkuk, Ninewa, Salaheddin, and Diyala provinces. Their tactics include Improvised Explosive Devices (IED) attacks on security personnel, burning of agricultural land, and kidnap and extortion of locals³⁴.

Natural Risks

Several provinces have, in the past, been severely impacted by short periods of torrential rainfall that have led to landslides and flash floods in Baghdad and southern parts of the country. As infrastructure is not prepared for such events, material damages are often significant, including in the capital. Flooding also increases the risk of the spread of cholera³⁵.

8.5 Roles and Responsibilities

8.5.1 PMUs

The PMUs shall have overall responsibility for the safety and security of project personnel, the program, and its assets. The PMUs are responsible for ensuring compliance to this policy and are responsible for ensuring that Projects workers are trained on this policy and supporting procedures.

³³ Retrieved from <https://crisis24.garda.com/insights-intelligence/intelligence/country-reports/iraq>

³⁴ Ibid

³⁵ Ibid

8.5.2 SFP

The SFP is a project staff member designated by the PMUs as the point person in charge of security management within the project. The SFP should be a position of authority within the project reporting to the PMUs and he/she shall report all security and safety incidents and issues, regardless of severity, to the PMUs.

- Ensure that all project personnel are familiar with safety and security precautions.
- Develop the emergency notification system for the project, which shall alert all personnel to critical incidents and relay time-sensitive information
- Review and update as necessary the policy and procedures and communicate any changes or updates to project personnel.
- Ensure that all the Incident Management Plan Guidelines and the Incident Reports are prepared and available by all the Project workers.
- Make sure all emergency supplies are on hand as necessary within the context of the Project environment.
- Notify all project personnel of any incident or security issue and steps personnel may take to protect themselves.
- Ensure that the following information is kept on file:
 - Names, medical conditions, and blood types of personnel on the project.
 - Names and the phone numbers of personnel's emergency contacts (at least two).

8.5.3 All Project personnel

All project personnel are responsible for their own personal safety; and for not putting other project personnel, beneficiaries, project assets, or the client in danger. Project personnel shall adhere to security instructions issued in this SMP and shall report any and all incidents.

All project personnel should familiarize themselves with the immediate project office surroundings, both inside and outside, and any places where they may travel to or visit. The main risks to project personnel include the following:

- Criminal (robbery, burglary);
- Collateral (communal protest, disorder);
- Accidental (water/vector borne diseases, environmental, traffic)
- Terrorism (wrong time, wrong place)
- SEA/SH and GBV

8.6 Incident Management and Reporting

The following section provides guidance on how to report and manage major incidents that impact project personnel and assets.

The Project Personnel notifies the SFP in the event of an accident, incident, or unsafe condition, regardless of how insignificant it may appear.

- If the incident or accident results in injury, seek treatment immediately. Any injury should be reported at the earliest time possible.
- In cases where a SFP is not yet established, project personnel should notify the PM.

The SFP shall ensure the immediate safety of the personnel and/or that the situation is stable when possible, given timing and location and notify the PMUs of any and all incidents.

The PMUs shall notify the WB if appropriate as the Project is handling the response and when the next update shall be provided to the WB. The PMUs then instruct the SFP to investigate and report on the incident.

- If assistance is needed within-country to deal with the incident, convene the Incident Management Team to help control the immediate effects of the event.
- In the event of significant incidents that may have impacted personnel or suggest a potential further threat to personnel, halt non-essential movement or operations until risks are assessed, and account for personnel whereabouts and status.

SFP uses the appropriate incident management guidelines and Incident Report to investigate the incident and document findings. The incident management guidelines and data call reports are designed to support first responders and incident managers in walking through an event in a logical and structured manner. The SFP shall keep the PMUs updated during the investigation if it takes more than four hours. He shall also complete the corresponding Incident Report and submit all documentation and reports to the PMUs at the conclusion of the investigation.

The PMUs shall review the report and any other materials and notify the WB if appropriate.

8.7 Alert Status Matrix

The primary purpose of this matrix is to provide a tool for the PMUs and/or the SFP to evaluate the overall environment and recommend a potential course of action.

Alert Statuses are closely linked with information gathered by project staff from multiple open and closed reporting mediums, including embassies, media reports, partners, other companies, and groups. Refer to the table 5 below.

Table 5: Alert Status Matrix

Alert	Political	Social	Security Agency	Hostile Group
1	Normal political stability within the Country and region in general	Social stability with no significant gathering or public disorder	Government law and order effective, with manageable levels of crime and risk	No attacks against similar organizations or foreign groups
2	Tensions within the political arena with possible government instabilities	Public gatherings and minor disorder within parts of the country	Security agencies experiencing difficulties in managing crime and risk factors	Occasional targeting of similar organizations or foreign groups
3	Obvious political tensions with anti-government demonstrations	Civil and political group sporadic violence and large scale gathering	Security agencies struggling to deal with isolated incidents, or using incidents, or using excessive force	Foreign operations and similar activities targeted frequently
4	Political offices closed and municipal services suspended. No clear political control	Civil and political group violence common, with frequent attacks and large-scale demonstrations	Security agencies unable to contain public disorder and overwhelmed by hostilities. At times complicit in problems	Direct attacks launched against project sites or personnel by hostile groups
5	Loss of political governance with no political leadership in country	No social mechanisms in place to contain ethnic cleansing, with looting and murders occurring	Security agencies absent or unable to contain criminal activities. Security agencies complicate problems	Frequent and target attacks against the company, their personnel, and contractors

To determine the particular alert status for the project's location (city, region, country), locate the type of incident at the top of the matrix (political, social, security agency, or hostile group) and read each of the generalized situation descriptions in each box below. Select the situation that corresponds as closely as possible with the project's incident and locate the corresponding alert level in the row of the first column. For guidance on macro-level actions to take, move to the right along the row until reaching the last box in the last column.

An alert status may vary between different areas within a country (cities and regions). Therefore, the overall rating for a country may not apply to a particular region. For example, a country may be otherwise stable except for a remote, restive province. In this case, the alert status for the capital city may be lower than for cities in that particular region, and different security precautions will need to be taken by project staff.

8.8 Security and Safety Prevention

Project workers can take some general precautions and steps to safeguard themselves and/or respond to a particular incident. Personnel may encounter many different situations. There is never one response to cover every scenario, but the following guidelines are provided for informational purposes to raise general security awareness and readiness for situations in which personal security may be in question, as represented in table 6 below.

Table 6: Preventive or Mitigation actions for different situations or events

Situation or Event	Preventive or Mitigating Actions
Personnel behavior and attitude	<ul style="list-style-type: none"> • Be friendly, respectful, and tactful when meeting people. • Understand acceptable cultural practices for greeting and conversation. • Learn as much as you can of the local language(s). Even a few words of greeting can make a big difference. • Dress appropriately, bearing in mind the local culture. • Build good relationships with local people, making sure that you show no bias towards one group or another. • Get involved in community activities outside of work (depending on the security situation). • Respect security procedures in a methodical and disciplined manner. • Use initiatives and common sense at all times. • Be aware of your surroundings and stay alert. • Be suspicious of anything out of the ordinary. • Check that you have and carry the recommended security-related equipment. • Keep communications equipment well-maintained and charged at all times. • Vary the routes that you take to and from work, and the timing of your commute. • Avoid inappropriate sexual behavior and behavior which is contrary to local customs).
General personal security precautions	<ul style="list-style-type: none"> • Know where you are going and look as though you know where you are going. If you look confident (even if don't feel confident), you are less likely to appear vulnerable to attack. • If meeting someone you don't know well, inform a colleague of your plan. Consider meeting him/her in a public place where there will be other people. • Listen to your instincts. If you are unsure about a location or a person, leave immediately. • In many situations, it may not be advisable to walk alone, or drive alone, particularly at night. • Have an alarm if you have to venture into unknown areas. • Have a reliable form of communication, mobile phones, and reporting times to call and check in. • Do not walk alone in unfamiliar areas nor walk at night. • Take all recommended health precautions. • Do not use illegal drugs. • Do not drink alcohol, if it is illegal and only in moderation, if it is legal

Situation or Event	Preventive or Mitigating Actions
Common criminal mitigation tactics	<ul style="list-style-type: none"> • Keep belongings in view at all times. • Carry bags in a secure manner. • Do not accept food or drink from strangers in case it is drugged. • Beware of jostling in a crowd or being distracted by one person while his accomplice tries to pick your pocket. • Do not accept rides or lifts from strangers. • Avoid walking at night, or near bushes, dark doorways, and other places of concealment. Keep to well-used roads. • If asked for directions by the driver of a vehicle, do not approach the vehicle. A common criminal technique in some contexts is to ask a potential victim to come closer to look at a map. • If you think you are being followed, cross the road. If the person follows you, cross it again. If you are still worried, go at once to a place where there are lots of people, and tell someone what is going on. • Consider carrying a flashlight or whistle, or better still a very loud alarm. • Do not have your cell phone clip to your side (belt); it is better in your pocket. • Do not count money in public or carry large amounts. • Carry money in secure pockets or pouches close to your body and not all in one location.
Precautions for female personnel (In many situations, women can be at risk for different or greater threats than men.)	<ul style="list-style-type: none"> • What would be considered crude blatant sexual harassment in some countries is considered the normal male behavior in others, and reactions against this can make matters worse and escalate to violence. You should use your judgment as to which of them are applicable in your situation. • Insist on having a chaperone, especially when in an environment for the first time. • Female personnel shall avoid walking alone, if possible. • Female workers should not hang purses on hooks on the inside of lavatory doors, nor place them on the floor in stalls—two favorite locations for grab-and-run thefts.
Work-related issues	<ul style="list-style-type: none"> • All security-related incidents must be immediately reported to the PMUs. • All personnel must carry a phone at all times • Any changes of phone number and address shall be reported to the HR Specialist. • Respect local laws. • Do not request or accept personal favors of any kind. • Do not misuse the resources of your organization. • On travel in the regional areas, lock your hotel room door, even when you are inside the room. Use the chain on the door if you are not expecting a visitor.
Arrest or detention (Workers may be arrested or detained by local	<ul style="list-style-type: none"> • Maintain good relations with local authorities and groups. • Obey local laws and customs. • Ensure that all legal documentation is correct and carried by all personnel and vehicles as required. • If you have been arrested, ensure that a member of the Project is aware, if possible. • Do not worsen the situation by being overly aggressive.

Situation or Event	Preventive or Mitigating Actions
authorities or militias)	<ul style="list-style-type: none"> Expect a long, bureaucratic, paperwork shuffling exercise before being freed.

The behavior of project personnel, both on and off duty, gives important signals to people—local and other, including local government officials. If personnel are consistently considerate, modest, and interested in local people, these efforts can promote the acceptance of the project. If personnel appear arrogant, rude, or immoral by local standards, or express opinions or over-sympathize with one party more than another, the project’s reputation can diminish and so will its level of security.

If personnel cause a serious breach of security or persists in insecure behavior after being warned, formal disciplinary action up to termination may occur.

Personal security and safety equipment may enhance a person’s protection but will vary depending on the circumstances. The following list in table 7 below gives a few items that can often be helpful. Note that equipment needs to be used properly in order to be effective

Table 7: Essential and recommended equipment for personal security and safety

Essential	Recommended or Useful
<ul style="list-style-type: none"> Suitable clothing for the location Copies of any important authorization documents Emergency contact details Insurance certificate and emergency insurance phone numbers Laptop computer and surge protector Personal First Aid Kit Map of area, preferably laminated or in a map case Mobile phone and charger Wristwatch (robust and reliable, not valuable) 	<ul style="list-style-type: none"> Adaptors for electrical sockets Alarm, such as a rape alarm or aerosol fog horn Flashlight/torch Spare batteries Money belt Notebook and pens Sunscreen and/or brimmed hat Global Positioning System (GPS) Water bottle Whistle

8.9 Communicate Important Contact Numbers

- Provide project personnel with external contact information for, or resources in case of, an emergency. All personnel shall keep this information readily accessible at all times.
- Provide in-country health information and contact numbers for approved medical providers project personnel may want to contact in case of need.
- Create and use of a project warden system for potential emergencies. During an emergency, a warden system is used to initially account for all project personnel, and as an effective method of communication to disseminate information quickly, without placing the burden of work on one individual. The warden system is used for the following situations:

- To account for all personnel after a safety or security incident;
- To pass or receive verbal instructions on the phone;

The SFP is responsible for creating the warden system and ensuring that the contact list is up to date. The SFP also provides training to personnel on using the warden list.

8.10 Create a warden system

- Consult with the PMUs for recommendations on who will be wardens, and on where personnel shall be placed in the warden system. A person from one of the PMUs shall be designated to be at the beginning of the warden system. This person shall contact the SFP and the WB.
- Complete the warden system by filling in the name of each personnel on the appropriate level, along with their contact numbers and email address.
- Confirm with each staff member their placement in the system and whether they are comfortable with the placement. This is particularly important for those designated as wardens.
- Ensure that all staff members are given a hard and electronic copy of the warden system.
- Instruct personnel on how to use the warden system and the importance of the wardens reporting back to the SFP.
- Pass information from the SFP to staff in your list, and relay information from staff to the SFP.
- Review the warden system and ensure that your contact information is correct.
- Understand how to use the warden system. Ask the SFP for directions if it is not clear.
- Keep the phone tree in a place where it is readily accessible. Personnel shall keep one copy in the office and one at their residence. Program your assigned staff members into your cell phone.
- Test the warden system after release and fix any broken connections and/or retrain personnel.
- Update the system on a regular basis, especially when new staff are hired or let go, and confirm telephone numbers frequently.

8.11 Managing Relations with Public Security

- Public security forces have responsibility for responding to and investigating all criminal activity. They also have the primary responsibility for controlling demonstrations or civil disorder. For incidents involving criminal violations or potentially violent confrontations or demonstrations, they are requested to respond to protect company personnel and property.
- The MOP and the PMUs shall maintain constructive relations with public security (typically the police and, under certain circumstances, the military) operating in the project area or responsible for assisting project security. The need to establish a memorandum of understanding between the MOP and the public security forces should be investigated.

9.0 Stakeholder Consultations and disclosure

A Preliminary Stakeholders Engagement Plan (SEP) was prepared and disclosed. It defines a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The Preliminary SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project.

9.1 Objectives and limitations

In accordance with WB's ESF, stakeholder consultation was conducted during the preparation of the ESMP. Stakeholder consultation aims to involve, inform, and consult the public in the planning, management, and decision-making activities of the Project.

In line with the above mentioned national restriction and the available resources for carrying out stakeholder engagement in the context of COVID-19 and the WB's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" (March 20, 2020), the project will avoid public gatherings and minimize physical interaction between people. (Refer to [Annex 1](#)).

9.2 Stakeholders Consultation Process

In order to satisfy the WB requirements, and as per the national restrictions, public gathering was avoided and consultations were done virtually as per the following steps:

- An invitation was sent to stakeholders to be informed about the IHSES III Project and consulted about the ESMP.
- On June 23, 2021, Mr. Serwan Mohamed presented IHSS III Project, the draft ESMP and the different channels of the ESMP using a power point presentation. The handouts of the presentation are included in [Annex 2](#).
- Stakeholders were invited to share their thoughts, questions and concerns regarding the current project design and the associated environmental and social risks during a 1.5-hour virtual session. Below is a summary of the main points raised by the stakeholders during the consultation session held on (June 23, 2021).

[Annex 3](#) provides the list of participants to the stakeholders' consultation. In total 19 persons participated including 5 women.

9.3 Results of the Consultations

The virtual session took about 1.5-hour and was attended by 19 participants. The main topics discussed are as follows.

- Need for adequate support to the IHSES III
- The engagement of Stakeholders
- The E&S risks and mitigation measures
- The GRM.

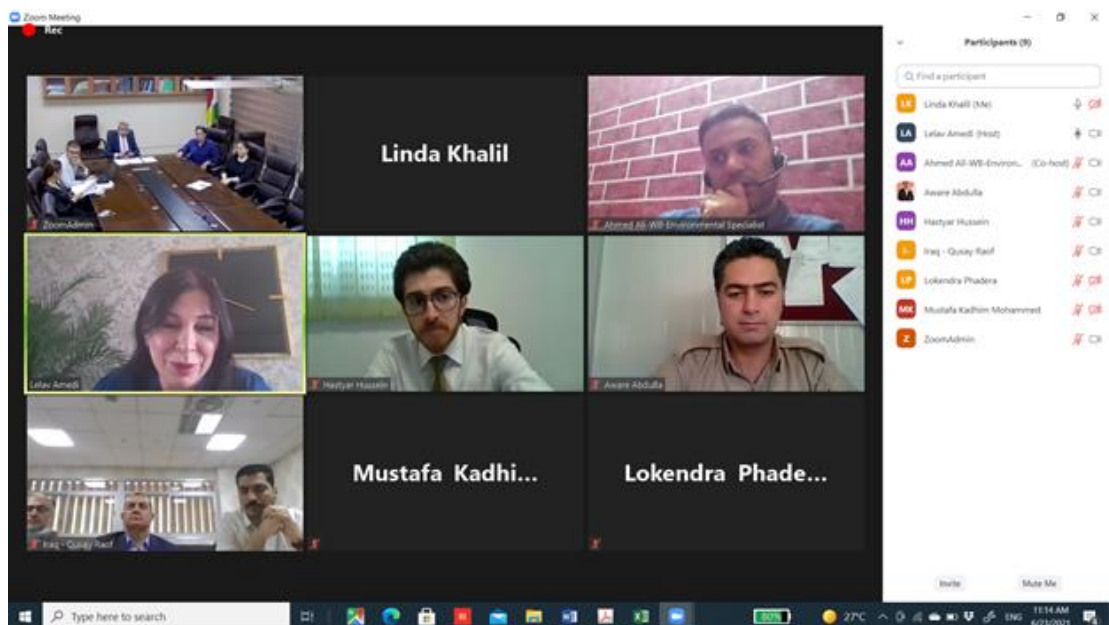
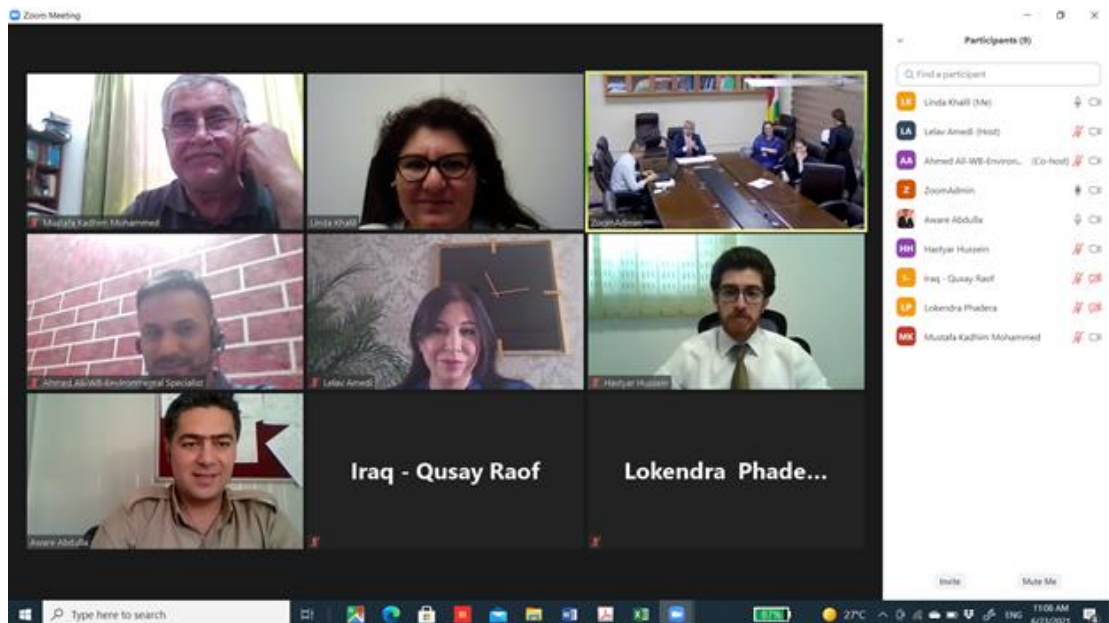
Below is a summary of the main points raised by the stakeholders during the consultation session held on (June 23, 2021):

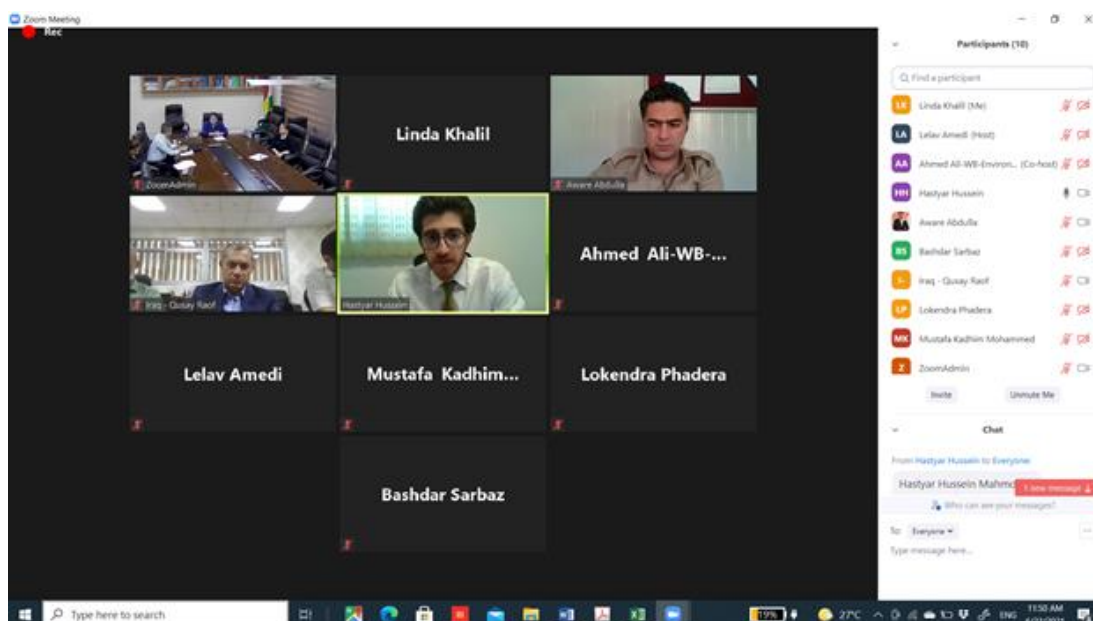
- Mr. Hastyar Hussein Mahmood representing Medya Medical Organization for Health Awareness raised a question concerning the contractual conditions based on which the surveyors will be hired. The recipients confirmed that the process will be transparent and based on equal opportunities. More specific conditions can be discussed in subsequent consultation sessions with the presence on the WB specialists.
- Mr. Hastyar Hussein Mahmood asked also about the process of data collection, the software that will be used during data collection and processing and the monitoring and evaluation tools that will be followed to ensure the data collected is representative and valuable. The recipients explained that the Project was still in the preparation phase and that the NGOs will be involved in all the phases of the Project design and implementation.
- Mr. Hastyar Hussein Mahmood questioned also where the input of the NGOs will be needed and what would be their role. The recipients explained that they will be mainly involved in training the data collectors and in awareness raising among the communities on the importance the Project. They could be of a great help in paving the way to the data collection.
- Mr. Bashar Sarbaz Mawlud, Director of Educational planning at the Ministry of Education in Kurdistan region asked to update the questionnaire because it was prepared some time ago for the 2018 survey and all the social and economic conditions have changed since then. He also asked where and how and where the data will and resulting indicators be used. The recipients answered that the concerned ministries will use the data to update their strategies and to direct further funding to the most needed areas for interventions and future projects. The indicators will help assessing the impacts of the war and the COVID-19 pandemic on the Country.
- Mr. Aware Mouhamad representing the Directorate to Combat Violence Against Women (DCVAW) pointed out that the safety of women during survey implementation should be assured. He also stated that women data collector should be trained on how to protect themselves while accessing houses. He also pointed out the need for equal opportunities between gender. The recipients answered that

SEA/SH risks were taken into account and as explained in the presentation proper mitigation measures were considered and will be implemented and monitored.

The following screen shot was taken during the consultation session.

Figure 4: Screen Shots taken during the virtual Consultation session





Overall, the stakeholders expressed a very clear understanding of the planned project and confirmed that the Project has the potential to achieve the planned impact in its current form.

9.4 Disclosure

After COVID-19 restrictions are lifted, face to face consultations will be conducted with all other stakeholders such as the local communities, NGOs, CSOs, etc. when deemed useful. The ESMP will be updated and disclosed accordingly. Public disclosure of E&S documents is a requirement of the WB as well as the national environmental impact assessment laws and guidelines, and therefore this ESMP will be available to project affected groups, local NGOs, and the public at large.

The ESMP will be announced and published on the websites of the CSO and KRISO in Arabic and Kurdish language. The ESMP will subsequently be disclosed on the WB website after in-country disclosure. Disclosure in-country and on the WB website will take place before the board date.

10.0 Grievance Redress Mechanism (GRM)

A project-level GRM is established to provide for affected people by the Project to file their grievances and seek resolution with no intimidation or coerciveness. Through providing a transparent and credible channel, it aims to build trust and cooperation with all parties involved, which is an integral component to enhance the Project's effectiveness. The GRM will be aligned with specific project needs and be available throughout project implementation.

The specific objectives of the grievance procedures as follows:

- To provide a process by which grievances from communities, groups, individuals, local authorities, NGOs, and other local stakeholders can be processed efficiently, and constructively. The goal is to resolve grievances amicably and if possible, minimize the use of the legal system.
- To offer individuals and groups with a way to express their grievances and problems in a rational and transparent manner and demonstrate the important role of stakeholders in program design and implementation.
- To institutionalize a reporting system to take corrective action.
- To establish a transparent relationship based on mutual respect with the communities and other local stakeholders.
- To establish Project responsibility regarding grievances and establish a course of action to manage the grievances in a timely manner.

The GRMs will be promoted as much as possible as part of a communication campaign so that stakeholders are aware of channels through which they could voice their grievances and complaints. It will be communicated to all stakeholders and remains operational throughout the Project life cycle.

All parties may issue grievances including any individual, local authority, NGO, community group, organization, company, or other local stakeholder who is directly affected or who may have an interest in the Project, including activities, laws and regulation implemented.

While considerable efforts have been made to include social and environmental risk management in the design and implementation of the Project in order to minimize and prevent potential adverse impacts, there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the Project.

10.1 Communication Channels

Individuals and/or groups are free to choose the method that best suits them to file a grievance, they may do so in writing or verbally. The following channels of communication are made available to register a general grievance, including methods for anonymous grievance.

Enquiries or complaints can be raised through different channels:

4. By telephone on the following number: Hotline 5610 (CSO) and 00964662559170/009647508963143 (KRSO).
5. By email on gusayraof@gmail.com (CSO) and contact@krso.gov.krd (KRSO).
6. By using an online form on [Republic Of Iraq Ministry Of Planning \(mop.gov.iq\)](http://RepublicOfIraqMinistryOfPlanning.mop.gov.iq) and [Kurdistan Regional Government | Ministry of Planning](http://KurdistanRegionalGovernment|MinistryofPlanning).

Another uptake channel for internal complaints is through the grievance boxes allocated throughout the CSO and KRSO offices.

The aim is to resolve or respond to the enquiries within the same call where no follow up is required. Where more time is required or for complex enquiries, the enquirer will be kept updated on the progress. All complaints/concerns and feedback will be documented in a grievance log. CSO and KRSO will ensure that the GRM is culturally appropriate and accessible for Project Affected Parties (PAPs). All staff and operators who will be handling the GRM will receive the necessary training for effective handling of complaints including on any potential SEA/SH related complaints, complaints from the elderly or other vulnerable groups and grievances regarding the conduct of security personnel. The principles of confidentiality and anonymity will also be applied to the internal grievance redress mechanisms. Grievances will be handled efficiently and in a specified timeline and not exceeding 5 days. The GRM will be clearly documented with close follow up by the responsible persons who will follow up and monitor the GRM in a GRM log.

Processing Grievances

The following steps describe the method to successfully resolve grievances.

Step 1 - Registration of Grievances

The following information must be collected from the claimant:

- Description of the grievance
- First name and surname of the claimant
- Means of contact (or phone number)
- Date when problem occurred
- Gender/ GBV related complains
- Stakeholder Group (e.g., government, NGO,...) and worker group

This will be documented in the Grievance Register Form. Once this information is collected, the person receiving the grievances will inform the safeguards specialist. If the grievance has been received in writing an acknowledgement letter will be sent to the claimant. The GM system must include GBV measures including training on how to collect SEA/SH cases confidentially, multiple complaint channels, no identifiable information on the survivor should be stored in the GM. The GM should not ask for, or record, information on more than the following related to the SEA/SH allegation. The GM should primarily serve to: (i) refer complainants to the GBV service provider; and (ii) record resolution of the complaint.

Step 2- Investigation of the Grievance

The GRM specialist will inform the claimant that the usual time to resolve the grievance is within 10 days. The GRM specialist will discuss with the claimant the issue and obtain the maximum information from the person who filed the grievance.

The GRM specialist will classify the grievance by level of severity, as per the Grievance Register Form:

0. Non-justifiable
1. Negligible
2. Minimum
3. Moderate
4. Serious
5. Catastrophic

In collaboration with the claimant, the GRM specialist will identify a potential solution and discuss the solution with the PMUs. Once approved, the proposed solution will be formally communicated to the claimant and any other stakeholder involved.

Step 3- Treatment of Grievance

If the problem can be solved immediately

Grievances of this kind are normally negligible or minor: It is often a request for information or clarification which takes the form of a grievance. However, if the grievances are not handled properly, they can grow and become major. In this case, the GRM specialist can provide the claimant a verbal explanation, which most often is enough to close the grievance.

If the grievance is not justified

If the object of the grievance or concern is not justified (e.g. unrelated to the Project), the **GRM specialists** (who are part of the PMUs) will inform the claimant. This type of grievance needs to be registered noting that it was not justified, but it is important to keep a record for future reference.

If the grievance is legitimate and requires financial or in-kind compensation

In this case, the GRM specialist will involve the person and PMUs to determine adequate compensation. If the claimant is satisfied with the compensation proposed, the case will be closed and archived. A Compensation Payment Form will be filled out and signed by the claimant after the payment.

If the claimant is not satisfied with the proposed solution

In such a case, the GRM specialist will contact the country office to identify a solution with the claimant. If the grievance cannot be resolved, the last solution is resorting to the legal system. The PMUs and the WB will be kept up to date with the progress.

Step 4- Closure

The GRM specialist and the PMUs will determine if the grievance has been closed to the satisfaction of the claimant. Once it has been closed, the information will be entered in the grievances register and the grievance can be closed.

Mediation

As discussed above, there are four different ways to resolve a grievance, it will be based on case-by case, depending on the severity of the grievance:

1. Between the GRM specialist and the claimant or his/her representative.
2. Through the CSO/KRSO Offices.
3. Through the judicial system: this is the last resort, to be used in the event that all other approaches have failed.

Note that every effort should be undertaken to reach a settlement agreement with the claimant without resorting to meditations 2 and 3 described above. However, it is important to note that the claimants are entitled to use any of the mediation methods proposed above.



11.0 Budget for ESMP Implementation

Below in table 8 is the preliminary cost estimate for the implementation of sub-project specific ESMP.

Table 8: Budget for the Implementation of ESMP

Contract Title, Description and Category	Estimated Cost (USD)
Technical Assistance to supervise the implementation of the ESMP under CSO	30,000
Technical Assistance to supervise the implementation of the ESMP under KRISO	20,000
TOTAL	50,000

12.0 Monitoring and Reporting of ESMP Implementation

Monitoring is a key component of the ESMP during project implementation, as it helps verify the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented.

More specifically, periodic monitoring of the general project and sub-project activities will help to:

- Improve E&S management practices;
- Check the effectiveness of the implementing entities' safety oversight measures;
- Identify problematic areas of the Project at early stages for quick intervention; and
- Provide the opportunity to report the results on safeguards, impacts and the implementation of mitigating measures in time.

CSO/KRSO will engage a dedicated M&E specialist who will be responsible for facilitating the M&E activities. The following table 9 presents the main monitoring activities to be undertaken to track the progress of ESMP implementation into the sub-projects.

Table 9: ESMP Monitoring Indicators

Activities/ Issues	Key Performance Indicator ("KPI")	Frequency	Responsibility
Reporting of incidents/ accident	Reporting of incident/accident through the Incident/ Accident Form <ul style="list-style-type: none"> ● Number of incidents/ accidents 	Within 48 hours after becomes known	CSO/KRSO/M&E Specialist
Regulatory compliance issues	PMU's approval/ permits obtained as required	Once	CSO/KRSO/M&E Specialist
Implementation of GRM	<ul style="list-style-type: none"> ● Number of grievances recorded ● Number of grievances resolved in the stipulated time frame 	Monthly	CSO/KRSO/GRM Specialist
Stakeholder Engagement	<ul style="list-style-type: none"> ● Numbers of stakeholder engagement events ● Number of stakeholders participating in the stakeholders' engagement events 	Quarterly	CSO/KRSO/M&E Specialist
Implementation of E&S program during the implementation of the Project	Regular monitoring reports on ESHS performance of the Project with aggregate data on:	Quarterly	CSO/KRSO/M&E Specialist

Activities/ Issues	Key Performance Indicator (“KPI”)	Frequency	Responsibility
Training and awareness	<ul style="list-style-type: none"> ● Number of awareness sessions on ESHS and GBV issues ● Number of project beneficiaries attending these sessions ● Number of COC signed ● Number of trainings on LMP ● Number of trainings on SMP 	On a needs basis	CSO/KRSO/M&E Specialist
Security	<ul style="list-style-type: none"> ● Warden in place ● Check if warden is operational ● Check on implementation of the SMP 	Once Quarterly	CSO/KRSO/SFP

As a part of the Project’s management support, the E&S safeguards specialist shall provide inputs on an intermittent basis to the M&E specialist who will monitor the quality of the Project implementation and the compliances with E&S safeguards. The report in discussion is the Environmental and Social Safeguards Monitoring Report.

During implementation stage of the Project, regular monitoring reports on ESHS performance of the Project, including but not limited to, the implementation of the ESCP, status of preparation of the E&S documents required under the ESCP, stakeholder engagement activities, implementation of the LMP, implementation of the SMP and functioning of the grievance mechanism(s), including grievance logs from workers.

The monitoring report shall be prepared by CSO/KRSO and relevant E&S safeguard specialist(s) in collaboration with the M&E specialist on a quarterly basis throughout the Project implementation, as part of the overall progress report to MOP and WB.

LIST OF ANNEXES

ANNEX 1 Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings

ANNEX 2: Handouts of the PPT Presented during stakeholders' consultation

ANNEX 3: List of participants in the stakeholders' consultation

ANNEX 1: Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings

With the outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

These restrictions have implications for World Bank-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

This Note offers suggestions to World Bank task teams for advising counterpart agencies on managing public consultation and stakeholder engagement in their projects, with the recognition that the situation is developing rapidly and careful regard needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

Investment projects under implementation. All projects under implementation are likely to have public consultation and stakeholder engagement activities planned and committed as part of project design. These activities may be described in different project documents and will involve a variety of stakeholders. Commonly planned avenues of such engagement are public hearings, community meetings, focus group discussions, field surveys and individual interviews. With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for task teams' consideration while advising their clients:

Task teams will need to review their project, jointly with the PMUs, and should:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders (international, national, local) etc.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.

- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines. For example, selection of resettlement options by affected people during project implementation. Reflecting the specific activity, consider viable means of achieving the necessary input from stakeholders (see further below).
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, task teams should discuss and agree with PMUs the specific channels of communication that should be used while conducting stakeholder consultation and engagement activities. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and skype;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, such as would be the case for Resettlement Action Plans or Indigenous Peoples Plans preparation and implementation, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PMU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

Investment projects under preparation. Where projects are under preparation and stakeholder engagement is about to commence or is ongoing, such as in the project E&S planning process, stakeholder consultation and engagement activities should not be deferred, but rather designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. Some suggestions for advising clients on stakeholder engagement in such situations are given below. These suggestions are

subject to the coronavirus situation in country, and restrictions put in place by governments. The task team and the PMU should:

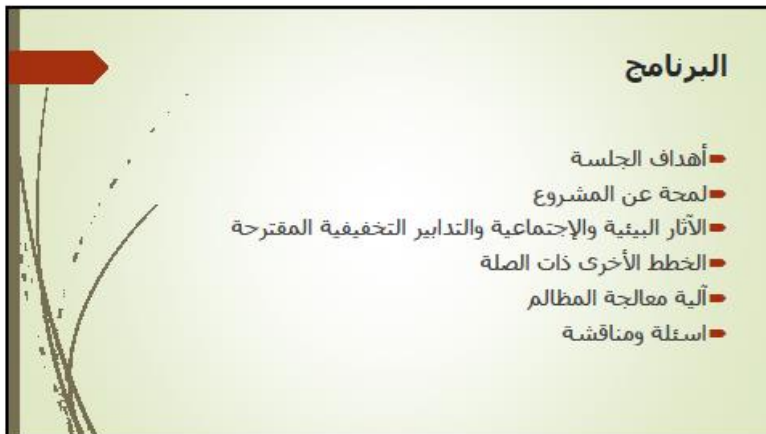
- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. WebEx, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - *Virtual registration of participants:* Participants can register online through a dedicated platform.
 - *Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics:* These can be distributed online to participants.
 - *Review of distributed information materials:* Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
 - *Discussion, feedback collection and sharing:*
 - ✓ Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.

- ✓ Group, team and table discussions can be organized through social media means, such as WebEx, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
 - *Conclusion and summary:* The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project web links/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.
- *Engagement with direct stakeholders for household surveys:* There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of affected people, take inventory of their affected assets, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder engagement approaches that will be appropriate in the specific setting. The teams should reach out to the regional PMs for ENB and Social Development or to the ESSA for the respective region, in case they need additional support to develop such tailored approaches.
- In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

ANNEX 2: Handouts of the PPT Presented during stakeholders' consultation

(double click)

7/1/2021



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ANNEX 3: List of participants in the stakeholders' consultation

Name of Stakeholder	Job title	Contact details	Gender
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