



LABOUR MANAGEMENT PROCEDURES[LMP]

FOR

UGANDA DIGITAL ACCELERATION PROGRAM [UDAP]

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DOCUMENT NUMBER: NITA-U/2021/PLN		
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MARCH 2021

ACRONYMS/ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
CAO	Chief Administrative Officer
CDO	Community Development Officer
EHSS	Environment Health Safety and Social
ESIA	Environment and Social Impact Assessment
ESS	Environmental and Social Standards
FAT	First Aid Treatment
GBV	Gender Based Violence
GIIP	Good international and industry practices
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committees
HIV	Human Immunodeficiency Virus
HIPO	High Potential Incident
JMP	Journey Management Plan
JSA	Job Safety Analysis
LMP	Labour Management Procedures
LTI	Lost Time Injury
MTO	Medical Treatment Only
MOU	Memorandum Of Understanding
NITA-U	National Information Technology Authority Uganda
OHS	Occupational, Health and Safety
POB	Personnel On Board
POP	Persistent Organic Pollutants
PPE	Personal Protective Equipment
POB	Personnel On Board
RCIP	Regional Communication Infrastructure Program
RWC	Restricted Work Cases
TSSA	Task Specific Safety Analysis
UDAP	Uganda Digital Acceleration Programme

DEFINITIONS

Staff: Personnel carrying out work on a NITA-U project site or allowed to spend a night or work at NITA-U project approved facilities

Minor: Any person below the age of 18 years of age. This is the Statutory working age in Uganda. Presence/ Employment of any person below this age bracket brings in vicarious responsibility to the employing entity. According to the labour Union act 2006, minor refers to any person between the age of eighteen years and twenty years.

Child: any person below the age of eighteen years (Employment Act 2006)

Casual employee: a person who works on a daily or hourly basis where payment of wages is due at completion of each day's work (Employment Act 2006)

Gender Issue: A statistical or social indicator of inequality between males and females arising from discrimination and/or marginalization.

Gender Equality: Provision of equal opportunities to access, participate and use public services to all women and men.

Accident: Any unplanned, unwanted, but controllable event which disrupts the work process and causes or results in injury or death to personnel and/or damage to property and /or damage to business opportunity.

Corrective Action: Upon conclusive incident investigations, these are identified initiatives/actions that are to be implemented / put to work to address the incident causal factors so as to prevent a recurrence.

Employer: the organization or entity which utilises the services of someone or another entity for remuneration or compensation in return.

Hazard: A hazard is anything that has the potential to cause injury or illness to people and/or damage to property or the environment or reputational damage of a business entity or a combination of these. The situation could involve a task, chemical or item of equipment/machinery or leaked info to the media.

Incident: Any unplanned and unwanted event (near misses & accidents) which resulted in near miss or accident.

Near miss: A near miss is defined as any occurrence that could have resulted to an accident.

Lost Time Injury (LTI): Any occupational injury or illness which results in an employee being unable to work three (3) full consecutive assigned work days.

Preventive action: is a pro-active approach that involves taking action before an incident occurs, e.g. by identifying a hazard (risk assessments) and taking steps to prevent any incident which may result from the hazard.

Recordable incidents: Are incidents that resulted from an exposure or event in the workplace and that require some type of medical treatment or first Aid.

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1.0 INTRODUCTION

Despite significant recent economic progress, the East and Southern Africa (E&SA) region continues to face a number of development challenges including extreme poverty and hunger (48.5% of the population living with Public Disclosure Copy less than \$1.25 per day (PPP) in Sub-Saharan Africa in 2010), HIV/AIDS prevalence (4.5% of the population ages 15-49 infected with HIV in Sub-Saharan Africa in 2013). ICT is one of the key drivers of socio-economic development in so far as it prevalently enhances service delivery, health services, education, governance, information dissemination and trade.

The proposed Uganda Digital Acceleration Program builds on the foundations being laid down by Regional Communications Infrastructure Program (RCIP)-5 and is designed to accelerate digital transformation of Uganda to achieve the aspirations of the Digital Transformation for Africa initiative. The project will expand access to affordable high-speed internet through a combination of investments and reforms. It will strengthen public sector data infrastructure and digital platforms for improved service delivery, enabling coordinated roll-out of digital services at scale across key ministries and agencies. It aims to ensure a digitally capable and inclusive Uganda, by enhancing ICT research and innovation, improving digital skills and promoting digital inclusion. The project will finance a coordinated effort to build up the core foundations of the digital economy.

1.1 Project Development Objectives:

The Project Development Objectives are to expand access to high-speed internet, improve efficiency of digital government services, and strengthen the digital inclusion of refugees and hosting communities.

The project design includes five components, covering policies and regulations, digital connectivity, digital government, digital capabilities, and finally project management. The project components are:

1.1.1 *Component 1: Expanding Digital Connectivity to unserved and underserved population*

This component will seek to bridge the digital divide by improving access to high-speed internet in underserved or unserved communities in Uganda through a combination of infrastructure investments and policy reforms, in support of the objectives set forth in the Government's Digital Transformation Program under the National Development Plan (NDP III). This component will also enhance Uganda's digital infrastructure by expanding the government's data centre hosting capacity, improving e-waste management and developing e-signature capability. This infrastructure investment will facilitate Uganda's post COVID-19 economic recovery.

This component will contribute to promoting universal access to high-speed, affordable internet in Uganda under a 'Maximizing Finance for Development' (MFD) approach. It will focus on improving government connectivity by pre purchasing international bandwidth, expanding the National Backbone Infrastructure to the regions and connecting government facilities (MDAs, municipal councils, schools, health centres, hospitals) across the country, with a focus on underserved areas. The investments made in the publicly owned backbone infrastructure will be designed with the intention to further promote private sector participation and incentivize investments in digital communications infrastructure and

services in underserved areas where the private sector might otherwise not go due to low commercial viability. This component will focus on the following subcomponents: (1.1) Expanding the digital infrastructure outreach; (1.2) Strengthening of digital infrastructure “complements” and (1.3) Strengthening of the enabling environment, digital capabilities, and inclusiveness of digital services.

1.1.2 Component 2: Enabling Digital Transformation of the Government

This component will leverage the improved internet connectivity and digital government enablers developed under RCIP-5 with the aim to further accelerate the move towards 'digital first' government in Uganda. The activities in this component support the Government’s plans for developing and scale-up of robust, cost-effective, secure and user friendly shared digital government infrastructure and platforms, in line with the Objective 2 of the NDP III, which aims to enhance the development of digital services in business and service delivery across Government. The goal of this component is to transform the way people, governments, businesses, and civil society interact with each other, by supporting digital transactions and e-services that are on-demand, paperless, cashless and available through the internet without requiring physical presence. Doing so will provide a level of Government resilience to digitally respond to COVID-19 and mitigate similar future shocks through strengthened digital government services. The subcomponents are: (2.1) Accelerating Digital Transformation of Service Delivery (2.2) Mainstreaming Digital Services in Priority Sectors and (2.3) Strengthening Cyber Security Resilience.

1.1.3 Component 3: Promoting Digital Inclusion of Refugees and Host Communities

This component will improve the supply of core digital infrastructure in remote refugee hosting districts for the benefit of both refugees and the local population. This will be achieved through implementing the numerous initiatives including; expanding the backbone and provision of last mile solutions, scaling mobile access including campaigns on electronic Know Your Customer (eKYC) and counterfeit products to eleven of the fourteen settlement camps and host communities across the country. In addition, demand side barriers will be addressed, including the cost of mobile devices, the need for basic digital skills, and the limited availability of digital services. In 2016, UNHCR set a goal of universal internet for refugees recognizing the role connectivity plays for protection, communications, education, health, self-reliance, and empowerment.⁴⁵ Similarly, humanitarian organizations are shifting towards digital service delivery to improve efficiency and impact. In Uganda, for example, 55% of WFP beneficiaries now receive cash-transfers digitally (WFP). This trend has been accelerated by the COVID-19 pandemic, where digital solutions are recognized as a means to limit the spread of the pandemic in densely populated refugee settlements, and offer stable services given travel restrictions. Beyond short-term pandemic resilience, digital inclusion can accelerate post-COVID 19 recovery by reducing barriers that stand between refugees and opportunity. Through improved access and digital skills the component aims to stimulate jobs and financial opportunities, which will lay the groundwork for broader long-term social and economic benefits. The subcomponents are: (3.1) Digital inclusion of refugees and host communities through enhanced connectivity and (3.2) Digital inclusion of refugees and host communities through access enablers.

1.1.4 Component 4: Strategic Project Implementation Support

This component will finance project management and coordination, including procurement, financial management, monitoring & evaluation and environmental and social safeguards management.

1.1.5 Component 5: Contingency Emergency Response Component

This component is a ‘zero-assignment’ CERC that will provide funding for immediate response in the event of an eligible crisis or emergency, defined as an event that has caused or is likely to imminently cause a major adverse economic and/or social impact associated with natural or man-made crises or disasters. This will have an initial zero value but may be financed during the project to allow for an agile response to an eligible crisis or emergency. Adding the component in from the beginning, albeit with zero funding, provides for flexibility to respond to crises as they arise. These could include, for instance, humanitarian crises which require the provision of emergency communications services to replace facilities that have been damaged, or to facilitate emergency humanitarian payments using mobile money. The primary issue at the time of writing is the Coronavirus (COVID-19) pandemic which requires an urgent response, for instance in the form of additional broadband internet capacity for Government offices, especially health centers and hospitals, and for Government employees working from home. CERC-related provisions will be added once specific activities are identified and confirmed.

1.2 Objectives of Labour Management Procedure

The main objective is to document labour requirements and identify the risks associated with the project that together with aspects of welfare in line with legal requirements and good international and industry practices (GIIP).

Specific objectives include:

- a) Promote compliance with national employment and labour laws and good international and industry practices
- b) Promote fair and equitable labour practices for the fair treatment, non-discrimination and equal opportunity of workers;
- c) Protect workers’ rights and promote healthy, safe, secure and comfortable accommodation that does not impact negatively on the communities in the surrounding area;
- d) Ensure the management and control of activities that may pose labour-related risks at workplaces.

1.3 Rationale for Labour Management Procedures

This Labour Management Procedures [LMP] are developed by the National Information Technology Authority- Uganda [NITA-U] for the Proposed Uganda Digital Acceleration Program [UDAP] in fulfillment of the requirements of the World Bank’s Environmental and Social Standard 2 (ESS2) under the Environmental and Social Framework (ESF).

This LMP is developed in line with NITA-U’s Environment and Social Management Framework [ESMF] as the main reference document, to provide guidance on how to manage workplace related aspects of the

project. The preparation of this LMP provides both an easy access to information to all project workers, monitors and development partners and emphasises NITA's Top Management commitment to the welfare and safety of workers. The objectives of the procedures are to:

- Ensure fair treatment at work for all employees in NITA-U led projects to protect or mitigate the risks of potential discrimination in employment, remuneration disparities, Gender Based Violence and aspects of Sexual Harassment at the workplace.
- Provide commitment from management towards sustainable project execution in compliance with ESS2
- Ensure safety of workers and remind all project teams of the need to adhere to resident worker related legislation, standards and best in duty practice.
- Provide all project teams with the main legal backings on workers' rights, duties, employer's duties among others

1.3.1 The World Bank Environment and Social Standard 2: Labour and Working Conditions

To promote safety and health at work, fair treatment, non-discrimination and equal opportunity of project workers. It also aims at protecting project workers, including vulnerable workers such as women, persons with disabilities, children and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. Other objectives include prevention of the use of all forms of forced labour and child labour, supporting the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. It presents an opportunity for project workers with accessible means to raise workplace concerns.

2.0 OVERVIEW OF LABOR USE ON THE PROJECT

The Labor Management Plan (LMP) applies to project workers including full-time, part-time, temporary, migrant workers¹ etc. As stated in ESS2, the term “*project worker*” refers to:

- (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers);
- (b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers);
- (c) people employed or engaged by the Borrower’s primary suppliers (primary supply workers); and
- (d) people employed or engaged in providing community labor (community workers).

2.1 Project Specific Labor Categories

2.1.1 Project Planning, supervision and management activities under Component 1 and 3

These shall mainly be manned by skilled and competent labor with formal education or skills acquired through experience and qualification. Such activities shall include project surveying and designing. In this category all personnel utilized shall be skilled. Skilled labor in this phase shall also include primary supply workers like experienced drivers with relevant defensive driving training, engineering teams, monitoring and evaluation teams, surveying teams and E&S compliance teams. They shall also include riggers certified for work at height operations.

2.1.2 Loading, offloading of materials and cable hauling

This shall, mainly have unskilled labor with basic awareness provided on manual handling and other in-house awareness sessions. These shall mainly be community members and shall ensure safe offloading activities, traffic management along routes of interest.

The successful implementation of the project shall entail skilled, semi-skilled and unskilled labor. The project shall include direct workers (working for NITA-U), contracted (working with contractors and sub-contractors), community workers (hired from host communities), and primary supply workers (workers attached to a supplier of project materials where applicable), and government civil servants (attached or relevant to the project). The unskilled Community workers and semi-skilled labor force shall earn daily wages but still hold workman’s compensation during project works execution. UDAP shall enjoy benefits from a pool of personnel that have also developed required skills through apprentice in past phases. In addition to the uniform 8 hours’ work per day, employment terms for various workers shall be as per the table below:

¹ A "migrant worker" is a person who either migrates within their home country or outside it to pursue work.

Category	Employment Terms
NITA-U Employees	Permanent
Specialists	Consultants
Supervisor	Consultant
Specialists	Consultants
Field team members skilled	Waged (daily payment)
Field Team Unskilled	Waged (daily payment)

The labor management plan will be implemented in conjunction with a number of plans, policies and procedures including but not limited to Waste management plan, risk assessments, Journey Management Procedure, Grievance Redress Mechanism and specifically a workers grievance redress mechanism as stated in section 7 that shall cater for all categories of workers including community workers, Archaeological chance finds procedure, new joiners induction procedure, park or protected areas induction forms, permit to Work System and Task Specific Safety Analysis or Job Safety Analysis and Hand tools inspection, developed overtime shall offer guidance to the teams during project implementation.

The conditions and management of workers relations categorized under ESS2 include the following;

1. Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.
2. Project workers will be paid on a regular basis as required by national law and labor management procedures.
3. Where required by national law or the labor management procedures, project workers will receive written notice of termination of employment and details of severance payments in a timely manner.
4. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.
5. The project will provide appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as women, people with disabilities, migrant workers and children.

The Approximate Personnel On Board (POB) is 308 in a month broken down as follows:

Entity	Quantity
NITA-U teams in the field	7
NITA-U teams in Office	14
Contractors workforce- (>60% field workforce hired from host communities- Local Content, < 40% from other parts of the country) Female content on all fronts shall be > 7% in the whole workforce	308

Note: *These numbers vary depending on availability and commitment of staff from one area to another. NITA-U does not compromise on safety and standards in order to employ local content. NITA-U promotes commitment, Integrity and Respect, and discourages Gender Based Violence, drug and alcohol abuse among others.*

3.0 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The project involves several activities including; conducting field surveys, development of designs for last mile connectivity sub- component and extension of the NBI, ground truthing for selected routes after design completion (final project routing and design shall be accomplished after selection of competent contractor), delivery and installation of hardware sub-systems in accordance with the approved design plan, integration of all network elements in the Network Management System for central monitoring and management at the Network Operations Center, conducting standard security verification for all network sub-systems, including configuration, testing and commissioning of all network elements as per approved design.

Site teams shall carry out section specific assessment during toolbox talks and pre-job planning meetings with reference to the ESMF and the generic risk assessment subsequently provided:

Table 1: Generic Risk Assessment

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
<p>1. Pre-project stakeholder engagement and project disclosure meetings</p> <p>(these often take place with prior permissions from District or DLG leadership teams. However, the remoteness of some sites could make communication hard while prior unattended issues from different projects would breed ripple effects on how the project is perceived)</p>	<p>Legacy issues leading to stakeholder fatigue due to numerous similar projects being implemented in the community. Stakeholders could project negativity due to unfulfilled/delayed pledges by various projects implementers e.g. the pipeline project</p>	<p>NITA-U staff and contractors, pre-project launch team</p>	4	2	M	<ul style="list-style-type: none"> • Manage stakeholder expectations and communicate realistic project outcomes • Utilize broader channels of communication to reach teams that may have not been invited for meetings 	L
	<p>Bad project image/un informed project beneficiary, Poor reception, physical attacks and lack of support from local leaders</p>	<p>NITA-U staff and contractors</p>	3	2	M	<ul style="list-style-type: none"> • Ensure stakeholder engagements prior to project implementation and throughout the project life cycle, use project supporters as influencers while engaging new beneficiaries • Communicate the availability of a grievance management system to all stakeholders • Constitute and operationalize the Grievance redress committees to constitute locally voted members 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	<p>Impersonation and conmen on jobs/beneficiaries could lead to loss of finances and abuse of vulnerable groups</p> <p>The project could attract opportunistic/exploitative vices (impersonation and conmen) and expose vulnerable groups(project workers, job seekers)</p>	Host communities or general public	4	3	M	<ul style="list-style-type: none"> ● Introduce legally contracted Service Providers to local leaders through stakeholder engagements/workshops ● Provide identification for Service Providers ● Institute proper recruitment channels that provide for criteria and recommendations from the LC for local content 	M
2. Equipment and personnel mobilization to site	Bad drivers, poor road conditions could lead to accidents	Trucks/equipment, Project personnel, third parties	3	3	M	<ul style="list-style-type: none"> ● Ensure that drivers have relevant permits ● Use permit to work, non-authorized people should not be allowed at the work place ● Contractors should have an accident log to record all these occurrences 	L
	Equipment damage	Trucks/equipment,	3	3	M	<ul style="list-style-type: none"> ● Use competent personnel to man equipment ● Carry out routine equipment inspection and maintenance 	L
	Road accidents due to poor road conditions, incompetent drivers, bad drivers, black spots, Road kills especially in animal keeping communities and protected areas	Access Roads and Highways	3	3	M	<ul style="list-style-type: none"> ● Routine inductions for project teams ● Make use of Journey movement plan (JMP) with known journey managers. ● Ensure that drivers are trained in defensive driving. ● Provide for routine vehicle inspections and servicing 	L
	Injury to people, machines, Equipment damage,	Final destination (offloading equipment)	3	3	M	<ul style="list-style-type: none"> ● Acquire Authorization, use permit to work, use competent personnel to do the work, non-authorized people 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
3. Excavation of the ground	Environmental pollution					<p>should not be allowed at the work place</p> <ul style="list-style-type: none"> • Proper waste disposal • Provide personal protective equipment and train personal on use of PPE 	
	Conflict and community unrest associated with excavation works, low, delayed or no payments	Plant and vegetation loss, Roadside users' disturbances, water bodies' alterations, underground resources/utilities disturbances.	4	4	M	<ul style="list-style-type: none"> • Acquire authorization and notify host communities and leadership prior to excavation works. • Provide for a grievance management system • Use the NITA-U permit to work system • All personnel should be properly inducted • Provide for references from LC chairpersons prior to recruitment of personnel • Contractor should disclose payment structure • Conduct community entry and exit meetings including holding continuous stakeholder engagements throughout project implementation to address any issues. 	L
	Damage to existing underground utilities could lead to loss of business to other stakeholders	Personnel working on the project, third parties utility companies like NWSC, MTN Uganda, UMEME etc.	4	4	H	<ul style="list-style-type: none"> • Liaise/engage with utility service providers to harmonise project works and to minimize as much as possible damage/disruption to public utilities. • Use competent personnel for the works, make sure the site is properly inspected for all potential hazards including underground utilities before work starts, • Cordon off the work place, ensure that the site is properly restored, ensure that 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						<p>dust is properly controlled during the on-going works, use appropriate PPE use equipment that minimise noise pollution while working,</p> <ul style="list-style-type: none"> • Provide for Task Specific Safety Analysis (TSSA) and toolbox talks for staff to understand all controls and steps for works to be undertaken 	
	<p>Body injuries to personnel excavating the trenches and third parties passing by (pinch points, bruises, entanglement)</p>	<p>Project staff Third parties and animals</p>	4	4	H	<ul style="list-style-type: none"> • Awareness sessions on powered tools, excavations to project implementation staff • Provide for appropriate PPE and enforce PPE usage. Also provide reflector jackets for visibility/safety of workers • Barricade off areas to be excavated and utilize warning signs understood by the host communities to reduce on spectators • Carry out community/stakeholder awareness programmes including in schools that are in the proximity of project sites • Provide for rest breaks to reduce on the stress exposed to workers during project execution • Contractor should have a sound PPE policy approved by the project management team • Provide fully stocked first aid kits and trained first aiders for project teams in the field. • Ensure that contractors have known functioning phone contacts for medical personnel or facilities where project staff can 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						<ul style="list-style-type: none"> be taken for medical treatment Follow NITA-U project incident reporting procedure for all near misses and incidents in the project area 	
	Dehydration and harsh weather conditions. Dehydration could lead to headaches and worse reactions while rains could easily lead to water accumulation in excavated points and other impacts related to harsh conditions.	Workers or field teams	3	1	L	<ul style="list-style-type: none"> Provide for enough clean portable drinking water for project team members Provide for shade to be utilized during rainy spells Provide for water pumping prior to entry into excavated points 	L
	Food poisoning and hygiene related issues	Workers or field teams	2	5	M	<ul style="list-style-type: none"> Utilize authorized food vendors during the operations and ensure that these are effectively paid by the contractor Provide awareness sessions to project teams on food safety and hygiene 	L
	Biological hazards like snakes, wasps and disease causing organisms.	Developer, contractor and third parties	2	2	L	<ul style="list-style-type: none"> Provide for proper site screening prior to excavation works especially in swampy areas. Provide for sound waste management and ensure that workers have rangers to guide at all times while in protected areas. Ensure that all project teams are inducted 	L
	Poor or no backfilling works present trap hazards for workers, animals and pedestrians while it also brings in a cost for	Developer, contractor and third parties	4	4	H	<ul style="list-style-type: none"> Provide for awareness sessions on agreed backfilling practices Carry out post backfill inspection and spot checks to ensure compliance with set 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	levelling of the area by the day to day users of these spots.					<p>practice and add fill in areas with depression</p> <ul style="list-style-type: none"> • Provide proper signage, temporary covers, lighting, warnings/ caution tapes and fencing off areas • Reduce open excavation to mainly areas without tarmac, opt for none-surface destructive penetration as has been the practice 	
	Noise and Dust emissions especially during the borrowing tool usage. Loose material excavated is easily blown by wind. This could also impact on workers if no protection is provided	Workers, Office users, Patients in Hospitals, Court disruptions, Neighbouring households, pedestrians	1	3	L	<ul style="list-style-type: none"> • Utilize dust suppressing method like water sprinkling. • Utilize silencers where appropriate. Ensure that units are services to reduce on noise emissions. Provide for excavation works during off peak hours to check on potential disruptions • Provide appropriate PPE like ear muffs for project execution teams • Carry out regular equipment servicing 	L
	Human rights abuse especially discrimination, exploitation and abuse in the recruitment process to vulnerable groups (the girl child, women and children, Under age workers, people with disabilities – forced labour, minorities These including persons with rare conditions like albinism could easily be taken advantage of and not be recruited or	Host communities and contractor staff	2	3	M	<ul style="list-style-type: none"> • Continuous coordination with the labour office in regards to recruitment of all personnel • Provide roles earmarked for vulnerable groups like flag personnel, record or stock taking team members among others • Have the non-discrimination project related policy discussed during inductions to all staff. • Provide secure channels for reporting any actual or suspected abuse of human rights including aspects related to vulnerable groups and GBV. • Provide for appropriate Task Specific Safety Analysis (TSSA) for 	M

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	abused after recruitment					jobs carried out with vulnerable groups provided special attention.	
	Poor housekeeping and associated risks of trips and falls, vermin accumulation among others	Host communities and the contractor	4	3	H	<ul style="list-style-type: none"> Ensure good housekeeping is adhered to and teams provided with awareness sessions on the same Provide for waste collection points and transport waste off site 	L
	Fall from heights/Accidents,	Personnel working, non-authorized personnel on site, existing trees, existing power lines and other utilities, motor vehicles and bodaboda passing near the site.	4	4	H	<ul style="list-style-type: none"> Use well standardized and inspected scaffolds and climbers with reasonable practicability, Non-authorized personnel should not be allowed on site, use appropriate PPE and signage, cordon off the area of work and acquire permission from the district environment officer before cutting any existing tree or altering any water body. Provide for appropriate TSSAs and permit to work issuance prior to works executions 	L
4. Demobilization	Accidents and Environmental pollution		1	3	L	<ul style="list-style-type: none"> Provide for proper journey planning in compliance with the NITA-U journey management plan. Proper equipment inspection to ensure that only sound vehicles are utilized in transporting equipment Utilize competent and certified personnel 	L
	Road accidents, bad drivers, black spots, potholes on the roads, poor visibility, animals	Workers, Communities along utilized routes	H	H	H	<ul style="list-style-type: none"> Make use of Journey movement plan(JMP), use your seat belts, don't drive while under the influence of drugs, don't drive while 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	crossing, driving under the influence of drugs, Driving while talking on phone, poor journey management plan.	(Highway), machinery and Equipment				tacking on phone, use competent drivers, be vigilant while driving with other road users, follow road safety rules, signage and speed limits. <ul style="list-style-type: none"> • Provide for training in defensive driving for all project drivers and disciplinary measures for non-compliance • Non-authorized people should not be allowed at the work place during loading operations • Provide for barricades and appropriate supervision during critical operations 	
5. Overlapping risks	Poor human waste disposal could lead to disease outbreaks	Host communities, NITA-U and contractor	1	4	L	<ul style="list-style-type: none"> • Inductions and Toolbox talks should also focus on waste management practices as per the NITA-U waste management plan • Contractor should provide portable toilet facilities for stretches without toilet facilities and also discuss with facilities in areas that have to allow project staff to utilize their ablutions. 	L
	Poor management of general waste streams like treated transmission poles, communities reusing poles for cooking	Host communities, workers and environment	3	3	M	<ul style="list-style-type: none"> • Ensure adherence to the waste management plan • Only transport Waste using NEMA licensed waste handlers. • Conduct awareness sessions on hazard identification and utilization of MSDS for all project related materials • Awareness sessions on the potential impacts of treated poles used as firewood should be provided to workers and communities so that this doesn't occur 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						<ul style="list-style-type: none"> Waste management aspects should be provided for as part of the induction process. Provide for proper chain of custody for waste and records on waste collected. 	
	Poor E-waste management and disposal	Host communities	4	4	H	<ul style="list-style-type: none"> NITA-U is participating in the initiatives by NEMA on E-waste management. Compliance shall be in line with the draft e-waste management regulations under the proposed waste management regulations and the guidelines by the ministry of ICT & NG Provide awareness sessions and publications to the public on proper E-waste management and Provide collection centres for e-waste at various points throughout the country to ease waste collection. 	M
	Likely incidents of child labour or forced labour	Host communities	4	2	M	<ul style="list-style-type: none"> No children shall be engaged in the project particularly, those below 18 years and are in school Request for a letter from LC1 during employment to establish residence and contact persons 	L
	Likely presence of migrants or seasonal workers including risks associated with labour influx	Host communities	4	2	M	<ul style="list-style-type: none"> 60% of the casual jobs shall be reserved for project affected communities/local content 	L
	Gender based violence	Host Communities and female labourers	4	2	M	<ul style="list-style-type: none"> All workers shall be inducted to the project code of conduct before signing Sensitization on what constitutes GBV and the penalties 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						<ul style="list-style-type: none"> All criminal cases shall be documented and handed over to Police 	
	Non-nationals taking over many jobs	NITA-U staff and the contractor's pre-project launch team	4	2	M	<ul style="list-style-type: none"> 60% of the casual jobs shall be reserved for project affected communities/local content 	L
L: Likelihood, C: Consequence		L: Low, M: Moderate	H: High			Rating: Impact significance/consequence	

4.0 BRIEF OVERVIEW OF LABOR LEGISLATION, STANDARDS AND GOOD INTERNATIONAL AND INDUSTRY PRACTICES

4.1 The National Policy on HIV/AIDS and the world of Work 2007

It strives to ensure non-discrimination, confidentiality, HIV testing in workplaces among other aspects in the workplace. All workers are provided with information on HIV/ AIDS and it also forms part of the main induction packages for new joiners in the project. Routine awareness sessions are provided for staff in operation areas to deal with this aspect.

4.2 The National Community Development Policy 2015

Provides for project inclusiveness ensuring that aspects of active community involvement. The project ensures that over 60% of the casual labor taskforce is recruited from the local communities. A number of documents have been provided to guide in this including but not limited to the Grievance Redress Mechanism and the Stakeholder Engagement Plan.

4.3 The National policy on elimination of gender-based violence 2016

Strives for an environment free of Gender Based Violence and this is emphasized in the project toolbox talks, meetings and induction exercises to all staff. It also forms an integral part of the project interactions in host communities. Reminders on this should also be posted in various areas including but not limited to offices, district notice boards (if permitted) and accommodation facilities.

4.4 The Uganda Gender Policy of 2007

Provides for gender considerations and inclusion in all phases of projects. In NITA-U, there is a deliberate effort to ensure gender considerations in all operation areas including but not limited to understanding roles and responsibilities and the most practicable way regardless of gender.

4.5 The National Policy on Older Persons, 2009

This provides for inclusion of older persons in income generating projects as key social protection instruments. Where it is reasonably practicable, older persons are engaged in projects carried out in our operation areas.

4.6 Ministry of Works and Transport Occupational, Health and Safety [OHS] Policy, 2008

This policy also strives to improve on the lives of Ugandans in their transport and working sectors through promoting of better road safety practices and providing healthy working environments among others. With many project sites along roads, this is an important aspect to consider during planning, transportation of personnel and implementation of the project.

4.7 The Occupational Safety and Health Act, 2006

The Act provides for a written statement of policy with respect to the safety and health of employees while at work and duties of both the employer and the employee. Aspects of cautions like display of safety precautions to any person who may be affected in a manner in

which the employer conducts his or her undertaking, reasonable control measures etc. are also of interest therein.

4.8 Worker's Compensation Act Cap 225, 2000

The Act provides for the compensation of works for injuries suffered and diseases incurred in the course of their employment providing clear guidance on the employers' liability in case of injury during work execution.

4.9 The Labour disputes (arbitration and settlement Act) 2006

Also provides for arbitration in labour related grievances and is emphasized during project planning and implementation.

4.10 The Employment Act 2006

This act fights against forced labour, discrimination in employment and remuneration. It also strives to erase sexual harassment employment among others. The project has measures in place to prevent sexual harassment from occurring at the workplace and also coordinates with various agencies and officers in charge like Labour officers to check and track this performance. Close supervision is carried out and the aspect of sexual harassment as part of the induction process and

4.11 National Environmental Act 2019

Provides for a right to a clean and safe environment and adequate environmental standards that can be utilized in sustainable development.

4.12 The Children's Act Cap 59 of Uganda

Provides for care and protection of children and this is emphasized throughout the project cycle.

4.13 Persons with disabilities Act 2006

This Act fights discrimination and strives to provide equal opportunity in the workplace for persons with disability. It also promotes sound access to workplaces with clear consideration to persons with disabilities.

4.14 Equal opportunities Commission Act 2007

This makes room for the provision in relation to the Equal Opportunities Commission pursuant to articles 32 (3) and 32 (4) and other relevant provisions of the Constitution. Aspects in compliance with this throughout the project cycle include community engagements held, gender sensitivity in hiring of staff and project execution. It strives to eliminate discrimination and inequalities against any individual or group of persons on the ground of sex, age, race, color, ethnic origin, tribe, birth, creed or religion, health status, social or economic standing, political opinion or disability, and take affirmative action in favor of groups marginalized on the basis of gender, age, disability or any other reason created by history, tradition or custom for the purpose of redressing imbalances which exist against them.

4.15 Stockholm Convention on Persistent Organic Pollutants [POPs] 2001

Provides protection of the environment and human health from Persistent Organic Pollutants (POPs). In all pole treatments and utilization of chemicals, effort is directed towards having environmentally complaint suppliers who do not utilize POPs. Material Safety Data Sheets/ Safety Data Sheets are provided to guide teams in proper handling of treated poles during pole transportation, erection and handling of offcuts under Components 1 and 3.

4.16 Convention on Elimination of All Forms of Discrimination against Women, 1979

It looks at discrimination against women as any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

The project shall provide for equal opportunity in recruitment and treatment of all staff. There shall be deliberate effort in recruitment of women in appropriate roles and provision of appropriate PPE and safe work environment to enable execution of assigned roles and responsibilities.

4.17 The International Convention on Protection of Migrant Workers and members of their families, 1990

This is a United Nations multilateral treaty governing the protection of migrant workers and members of their families. This labor Management Procedure provides for protection of all workers on the project without discrimination.

4.18 The UN Conventions on the Rights of Persons with Disabilities, 2007

This is intended to protect the rights and dignity of persons with disabilities and ensure full enjoyment of their human rights and equality under the law. The project has special attention to Vulnerable Groups, the directed efforts in their inclusion and care in taken in project implementation to reduce or mitigate on the negative impacts associated with it. This is mainly in barricading off of areas under construction and timely backfilling of excavations among others.

4.19 World Bank Environmental and Social Standards relevant to the LMP

World Bank's Environmental and Social Framework relevant to this LMP include;

- a) ***ESS2 Labor and Working Conditions:*** This Standard obliges the Developer (NITA-U) to develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national laws.
- b) ***ESS4 Environment and Social Framework on Community Health and Safety:*** The Standard puts emphasis on community exposure to risks and impacts of project and includes road safety risks; risks associated with security personnel as well as addressing water-related, communicable and non-communicable diseases that can

result from projects activities and have impact on project labor as well as the community.

4.19.1 COMPARISON TO WORLD BANK ESS 2

There are gaps between Ugandan laws and regulations and requirements for labour and working conditions under Environmental and Social Standard 2 (ESS2). Table below highlights the differences between Ugandan laws and World Bank policies regarding resettlement and compensation.

4.19.2 Table 6-1: Gap Analysis of the National Legal Framework and ESS2 and World Bank Resettlement Requirements

No.	World Bank ESS2	Uganda Legislative Requirements	Gaps and how these will be addressed
1.	Promotes the implementation of a systematic approach to improving the management of risks and impacts related to labor and working conditions in projects.	Occupational Health and Safety Act of Uganda 2006 provides for general duties of employers, manufacturers, suppliers, transporters (Primary supply) and duties, rights and responsibilities of workers/employees. It also provides for health and welfare which entails workplace conditions, such as suitable lighting, sanitary facilities provision, provision of adequate wholesome drinking water among others	While the Act provides this guidance, implementation yet to be fully enforced for all development projects. Continuous improvement of the Environment Health, Safety and Social compliance culture through awareness sessions, stakeholder engagements, scheduled inspections and audits can go a long way in ensuring compliance and responsible investment. However, Ministry of Gender Labour and Social Development conducts campaigns to encourage safe work practices and requires compliance related assessments
2.	Also provides for arbitration in labor related grievances. It provides for engaging with project workers and their representatives on labor issues, including with representatives of workers' organizations helps inform the assessment of labor risks and impacts, by providing useful context and additional information.	The Labor disputes (arbitration and settlement Act) 2006 The Employment Act 2006	. In this project, grievance redress shall form part of the induction process and routine awareness sessions
3.	The environmental and social assessment identifies the ways in which national law and the requirements of ESS2 are applied to the project	National Environmental Act 2019	While the laws in place provide for ESIA's, follow-up on these with compliance monitoring of projects on a Country wide scale is still slow. Response to annual audits also often takes long which defeats the purpose of the audit.

No.	World Bank ESS2	Uganda Legislative Requirements	Gaps and how these will be addressed
			The project shall ensure that ESIA conditions of approval are not only considered but ESMPs are developed
4.	It considers risks relating to child labor and also expects the environmental and social assessment considers any inherent risks within the country and project context, The project's labor management procedures should specify the minimum age for employment or engagement in connection with the project as the age specified in law or the age of 14, whichever is higher, and include measures to prevent employing or engaging children under this age.	The Children's Act Cap 59 of Uganda The Employment Act 2006 The Labor disputes (arbitration and settlement Act) 2006	The project shall carry out a due diligence and verification of the age of workers at recruitment so as not utilize underage children and shall ensure continuous liaison with the Labor offices in all districts of interest.

5.0 DUTIES AND RESPONSIBILITIES

National Information Technology Authority (NITA)

***NITA-U Executive Director:** Overall responsibility of project delivery and showcases commitment to set compliance aspects of the project as a responsible developer*

***NITA-U Project Managers:** are the main contract focal points throughout the project life cycle and provide final guidance in project execution.*

***EHSS Specialists:** provide support to the project on compliance including but not limited to monitoring of workers' welfare, adherence to project related compliance aspects and advising on implementation of agreed or best practices in the operation. EHSS will:*

- a) As part of the OHS requirements, identify potential hazards to project workers and develop OHS plans to manage the identified risks;*
- b) occupational health and safety (OHS)*
- c) induction and training of contractors on OHS and labor management procedures ensure worker grievances are addressed*
- d) regularly monitoring and reporting on implementation of the labor management procedures and OHS requirements.*

***Contractor management:** Contractor management presents some of the greatest risks during project implementation given the fact that most activities are contracted out. These often come with own Environment Health Safety and Social compliance cultures. Prompt inductions and continuous monitoring is encouraged to ensure compliance. While responsibility is provided to contractors, the client (NITA-U) remains accountable for the project.*

For contract bidding and contracts for the Project, NITA U will use the World Bank's 2017 standard procurement documents, which include labor, and occupational health and safety requirements.

NITA U will incorporate a standard language, based on project requirements drawn from ESS2, ESS4 and other sections of the World Bank Environmental and Social Framework and supporting documentation, in the tender and contract documents to ensure potential bidders are aware of the environmental and social requirements to be met under the project.

Tender documentation should note that the contractor/subcontractor shall actively collaborate and consult with project workers in promoting understanding, and methods necessary for project implementation.

NITA U will require bidders for contracts for the Project to agree and to implement a workplace Code of Conduct (COC) that includes provisions prohibiting any form of sexual exploitation, assault or harassment of Project workers, as well as sexual exploitation or sexual assault of persons in local communities affected by the project, and any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage. The CoC will apply to all persons employed or engaged, including persons employed or engaged through

contractors and subcontractors, in relation to the project. The CoC shall form part of the induction process and the routine awareness sessions.

NITA U will require bidders for contracts for the project to submit a statement confirming their firm compliance with national labor and employment and occupational health and safety laws, and labor management procedures in accordance with Environmental and Social Standard 2 “Labor and Working Conditions” (ESS2) and the LMP for the project.

NITA-U will make reasonable efforts to ensure that parties awarded contracts for the project are reliable law-abiding entities that do not have a history of problems relating to disrespect for national labor law, unresolved labor disputes, or frequent work-related accidents.

As part of the selection process for contractors, NITA-U will request and review from prospective contractors the following information as a bare minimum:

- a) Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies*
- b) Business licenses, registrations, permits, and approvals.*
- c) Documents relating to a labor management system, including OHS records, for example, labor management procedures.*
- d) Identification of labor management, safety, and health personnel, their qualifications, and certifications.*
- e) Workers’ certifications/permits/training to perform required work for example Work at Height certification and Permit to Work training certification among others.*
- f) Records of safety and health violations, and responses.*
- g) Accident and fatality records and notifications to authorities.*
- h) Records of legally required worker benefits and proof of workers’ enrollment in the related programs.*
- i) Worker payroll records, including hours worked and pay received; and*
- j) Identification of safety committee members and records of meetings*

During the implementation of the contract, NITA-U will require that contractors to provide Weekly, Monthly and quarterly provided during project implementation shall have in aspects of the LMP especially around Personnel on Board (POB), Lost Time Incidents, Fatalities, inspections and audits, workplace inspections, grievances raised and resolved among others as dictated by field conditions and site specific risks. Some of the pertinent contractor roles are subsequently presented:

Contractor site supervisors: *Responsible for daily monitoring of activities to ensure compliance to set legislation and ensure close out of action points as provided in various scenarios. They hold the mantle to sound project implementation. Additionally, the contractor shall:*

- a) Implement the labour management procedures and OHS requirements in line with the ESMF.*

- b) *Supervise sub-contractors' implementation of labor management procedures and OHS requirements.*
- c) *Provide routine occupational health and safety training to all workers involved in works and maintains records of such trainings.*
- d) *Maintain records of recruitment and employment of contracted workers as provided in their contracts.*
- e) *Ensure that workers understand and sign the code of conduct, prior to commencement of works.*
- f) *Provide workers with the necessary PPE wear and enforce PPE usage.*
- g) *Ensure availability of first-aid kits, readily accessible by workers in case of injury.*
- h) *Ensure availability of food and adequate potable drinking water for all project teams*
- i) *Documentation and reporting of occupational accidents/incidents, maintain accident/incident logs. Major accidents/incidents such as fatalities etc., shall be reported to NITA-U and World Bank immediately and investigative action undertaken to determine root causes. Minor incidents shall be recorded in the monthly monitoring reports including corrective actions undertaken to prevent recurrence. As part of OHS requirements, develop and implement emergency preparedness and response measures to effectively respond to emergency situations.*

Contractor EHSS personnel: *Responsible for project compliance in line with workers' rights and obligations and advising management on proper systems of work. These carry out daily and routine monitoring of activities to ensure compliance with specified safety measures and records of any incidents.*

District focal persons: *these include the Chief Administrative Officers, Local Leadership and Labor Officers and Community Development Officers. They ensure that all grievances provided to them are directed to the client and appropriately closed out or forwarded to the next tier as and when situations demand.*

Local Council Chairpersons: *They also responsible for providing names of potential casual laborer's from their communities.*

6.0 AGE OF EMPLOYMENT

The project will employ workers aged 18 years and older. Age of participants will be verified during the employment process using tools like Voters Registration Card (VRC), National ID and letters from the resident LC 1 chairpersons.

In liaison with the District Labor officers and LC 1 chairpersons, awareness sessions on child and forced labor shall be conducted with clear consideration of host community cultural norms. In rare occurrences where there are child head of families, the Labor officer will advise on the type of work such a person can do in terms of exemptions often provided for children of 16 and 17 years of age. This is in line with the provision for in Section 32 (ii) on Prohibition of Child Labor of the employment Act 2006 that allows employment of a child to do light work under supervision of an adult aged over eighteen years, and which does not affect the child's education provided is not done between 7pm to 7am and is not injurious to her/his health, emancipated children above 14 years including those heading households may be allowed to continue in their employment provided it is done in compliance with this provision. If a minor working on the project without the exemption discovered, it shall necessitate the following steps prior to termination of contract:

- (a) Incident notification and investigation: to establish circumstances under which a child was recruited. The team set up for such an investigation shall be spear headed by the EHSS teams and other members coopted depending on the situation. These shall include the LC1 chairperson, Labor officer, Community Development Officer independent supervisor, project manager and a workers' representative.
- (b) In writing, NITA-U will communicate to the beneficiary and the contractor within five working days to terminate the services of the child(ren) involved and pay him/her off for the services provided up to that time, particularly
- (c) Where a child is terminated, the Sociologist involved upon receipt of the termination instructions
from the developer will counsel the child laborer explaining the legal reasons for his termination and encouraging him/her to go back to school.

7.0 CONTRACTOR MANAGEMENT

To ensure sound and time-bound project implementation, NITA-U utilizes a number of specialists. This call is for sound contractor management be realized through proper agreement signing, agreement on key performance indicators and ensuring that worker related aspects of the project are embedded in contract. Contractors will be selected through an open competitive bidding process. Management of labor issues including occupational health and safety as guided by ESS 2 and the approved LMP shall form part of the contract awarded to the best evaluated bidder. There should be:

1. Scrutiny of Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies.
2. Business licenses, registrations, permits, and approvals; Documents relating to a labor management system, including OHS issues, for example, labor management procedures.
3. Identification of labor management, safety, and health personnel, their qualifications, and certifications.
4. Workers' certifications/permits/training to perform required work.
5. Records of safety and health violations, and responses.
6. Accident and fatality records and notifications to authorities.
7. Records of legally required worker benefits and proof of workers' enrolment in the related programs.
8. Worker payroll records, including hours worked and pay received.
9. Identification of safety committee members and records of meetings; and
10. Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms

NITA-U shall have full access to all project information collected by the contractor and project focal persons. The project manager with support from the Independent Supervisor shall be tasked to monitor and ensure compliance by the Contractor to ESS 2.

All contractors shall have clear SOPs, closure dates and competent action parties. Continuous monitoring shall be carried out throughout the project life cycle including but not limited to anomaly sighting campaigns amongst staff, periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by third parties. While contractors shall have independent agreements or contracts signed with employees and sub-contractors, NITA-U shall ensure that all contractors and employees are employed as per National Legislation, Best industry practice and in compliance to the labor management procedures. The contractor is obliged to provide all copies of contracts or agreements from all employees and subcontractors or any other contract entered into as part of the project delivery to NITA-U.

8. REPORTING ON LABOUR PERFORMANCE AND WELLBEING

Monthly and quarterly Environment Health Safety and Social (EHSS) monitoring reports be provided by NITA-U to illustrate project performance in line with set EHSS indicators of the project including but not limited to:

Indicators		
Man-Hours	Fatalities (FTL)	Pre-Task Meetings
Personnel On Board (POB)	Immediate Incident Reports	EHS Inductions
Local Content	Incident/Accident Reports	Worksite Training Classes Held
National Content	Number of Days Since Last LTI	Total Training Hours
Female Content	Number of Days Since Last Recordable Incident	Drills (Fire, Stretcher, Man-Down)
Sound EHSS performance rewards	Number of Days Since Last Hurt	Motor Vehicle Inspections
Environmental Incidents (ENV)	Number of Days Since Last HIPO	Lifting Equipments Inspections (Self Loading Trucks)
First Aid Treatment (FAT)	Stand-Down Safety Briefs \geq 15Mins	PPE Inspections
Medical Treatment Only (MTO)	World Bank Visits	Weekly Camp Inspections and spot checks
Restricted Work Cases (RWC)	Audits	Government/ lead agency visits (includes Local government)
Cumulative Restricted Duty Days	Gov. licenses/ permits	Other External Audits
Lost Time Incidents (LTI)	JSAs Completed and Reviewed	Mileage (Km)-Contractor
Cumulative Lost Workdays From LTI	Permit To Work (PTW)	Mileage (Km)- UDAP
Other EHSS Meetings	Pre-Task Meetings	Kms excavated (trenched)
Grievances Recorded	Grievances Recorded	Kms backfilled

All the above elements provide guidance on how labour is performing and how safe the project stands during its implementation. Action points from these reports are tracked with action parties assigned to them to ensure completion.

8.1 Hiring

All work shall be carried out by personnel considered eligible to provide labour by law (above 18 years of age) upon presentation of a valid National Identification Card and recommendation letter from the resident Local Council chairpersons. For avoidance of doubt, this shall be under the guidance of the Ministry of Gender, Labour and Social Development. The minimum acceptable age of minors employed on the project will be sixteen (16) upon approval by the District labour officer and consideration will be given to young family heads. They shall be engaged in non-hazardous² that is not labour intensive for instance housekeeping and stock-taking.

All works shall be shared through a 40/60 ratio with the local community benefitting 60% of the employment like has been the case in RCIP. Community workers will be recruited and under direct supervision of contractor/ sub-contractors. The Contractor/ sub-contractors must ensure that all project workers sign employment contracts and Code of Conduct agreements.

Equitable employment aspects of the project shall be streamlined throughout the project cycle with deliberate effort to cater for VMGs as per ESS7 and also in compliance with ESS2. Aspects of salaries and wages shall be in line with:

- a) Number of hours worked
- b) Distances excavated or covered during pole erection
- c) Grading as follows:
 - i. Casual Labor
 - ii. Supervisors
 - iii. Managers
 - iv. NITA-U staff
 - v. NITA- U Consultants

Deliberate efforts shall be directed to providing gender balance with specific attention to women in the project's areas of operation. In all available job offers, females shall be encouraged to apply and some jobs specifically earmarked for female employs. These shall include but not be limited to flag personnel, stores management, and field supervision among others.

All workers including casual labourers employed by the project shall workers be documented have written contracts stipulating all the above and other aspects as per the laws governing

²² ESS2 specifies work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include: (a) work with exposure to physical, psychological or sexual abuse (b) working at heights or in confined spaces (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, temperatures, noise or vibration damaging to health etc.

Uganda and materially consistent with objective of ESS2 and in compliance of this LMP. All workers will be issued a code of conduct stipulating the acceptable work behavior and punitive measures provided to mitigate against SEA and GVB.

8.2 Staff welfare

Accommodation

Given the linear nature of the project, pre facility visits shall be carried out for selected accommodation units and an agreement reached between the contractor and landlords. All staff shall be expected to have and utilize personal beddings and the contractor shall be responsible for hauling these to the selected accommodation facilities. For avoidance of doubt the project shall only utilize existing facilities in project districts as a way of supporting local businesses and reducing on project environmental footprint. All facilities shall be inspected prior to occupation so as to ensure fit for purpose, adherence to COVID19 SOPs as issued by Ministry of Health. All residential facilities shall have clean running water and shall ensure that care is taken on:

- Malaria management
- Hygiene related aspects of the project including provision of hand washing soap and sanitizer where available and bathing facilities
- Proper human waste management including provision of adequate number of toilet facilities
- Appropriate lighting and ventilation
- Provision of proper muster points and
- Medical emergency points and readily accessible first aid kits maintained by health and safety representatives
- Gender considerations especially for separate accommodation and sanitation facilities
- Avoidance of locations that are hot spots for prostitution
- Social distancing and other standard operating procedures when/where relevant

Insurance

All project staff shall have insurance including but not limited to workman's compensation as stipulated in the employment contracts and provided by NITA-U. Best practice also calls for medical insurance or MOUs with credible medical service providers in the operation area to cater for illnesses during project implementation

Food and water

All project personnel shall be provided with meals in the following categories by their respective employers:

- Breakfast, lunch and dinner- teams staying in designated accommodation area
- Lunch- teams commuting from host communities

- Enough safe drinking water (≥ 3 litres of portable drinking water) - for all staff throughout the project cycle.

Security

All personnel shall be provided with appropriate security during project implementation and this shall be in collaboration with state security agencies like Uganda Police, the Uganda Peoples Defense Forces, the Uganda Wildlife Authority (if in Protected Areas) and private security firms where applicable. All these shall be sensitized on NITA-U's awareness on Voluntary Principles on Human Rights and Security and encouraged to showcase these values while executing their state duties.

8.3 Timing of Labor Requirements

All workers shall work for 8 hours a day during the day time starting at 8:00am with one hour lunch break and end at 4pm. Night time operations shall be conducted on a needs only basis after activity specific risk assessment, toolbox talks and appropriate Permit to Work approval for this as a non-routine operation. This shall enable proper hazard identification and provision of mitigation measures. This caters mainly for works in busy town setting where day-time works have a potential to distract routine activities in the area. Teams working at night will have rested during day time.

In scenarios where workers have to travel a distance longer than 1 km, transportation shall be provided from accommodation to site/sites and time utilized for movements to and from the site shall form part of the working hours in the day. A journey Management risk assessment template utilized for field activities is provided in Appendix 1 Man-hours attributed to the project have already been considered an integral part in the reporting of activities.

8.4 Incident management and investigation

To reduce the risk of incidents resulting from human error as an underlying factor, project teams shall be provided with awareness sessions on incident reporting, management and preventive actions provided in ESMF developed for UDAP. Emphasis shall be on emergencies like injury, accidents with a lot of emphasis on near misses and Lost Time Incidents among others as per incident management plan.

9.0 GRIEVANCE REDRESS MECHANISM

NITA-U has Grievance Redress Mechanism guidelines that shall be utilized throughout the project lifespan. These support all processes that are aimed at preventing, timely identification and resolving of project related grievances. The intention is to address workers' concerns, community concerns, reduce risks, and assist other processes to create sustainable positive impact through various tiers. Grievance Redress Mechanism is further discussed in section 6.1 and Annex 3 of the ESMF.

9.1 Workers Grievance Redress

A grievance is a concern or complaint raised by an individual or group affected by the project. Concerns and complaints can result from either real or perceived impacts and maybe logged and handled in a similar manner. The objective of the project GRM is to provide stakeholders processes for submission and raising grievances and grievance resolution. This mechanism will ensure all grievances are handled in a fair and transparent manner, in line with NITA-U internal policies, the Ugandan legal framework and the requirements under ESS2.

NITA's Social Scientist shall work with community leaders in the project sites and communities to establish and operationalize Grievance Redress Committees to address all grievances recorded. All measures shall be taken to settle all grievances amicably before resorting to courts of law.

All workers related grievances of contractual nature including among others, non-fulfillment of contracts, levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation shall be addressed to the workers' grievance committee. The procedure shall include:

Step One: All civil grievances shall be submitted in writing to the Secretary, site specific workers GRC that sits weekly to handle grievances and provides feedback in 7 days. This committee shall consist of the site Engineer, Workers Representative, NITA-U Grievance Officer (representative), Contractor EHS/Sociologist and the LC 1 Chairman (Traditional/Religious/Opinion leader). If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the project implementation team GRC.

At all times, the GRCs shall be gender responsive with deliberate efforts to have women represented so as to cater for specific needs and grievances of women. In scenarios where the grievance or complaint is on one of the main committee members, these shall step aside to allow fair investigation and replacements made.

For avoidance of doubt, suggestion boxes shall be utilized for scenarios where the complainant(s) prefer to stay anonymous.

Step Two: Project Implementation Team (PIT) GRC that sits every week and will provide feedback in 14 days. This committee shall consist of the UDAP Project Manager, Contractor

Project Manager, NITA-U Grievance Officer (representative), Contractor Engineer, Workers Representative, NITA-U Social Scientist and EHS and Contractor EHS/Sociologist. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

Step Three: NITA GRC. This will include a Grievance Officer, UDAP Legal officer and the Executive Committee members of NITA-U with capacity to handle any civil issue including those that are intricate and complex. This GRC will meet once a month and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to court for adjudication.

Mitigation measures against GBV and SEA shall be addressed through the existing legal procedures and process in place including Police, Courts and Prosecution, Labor Officers and Probation Officers. The procedure shall include:

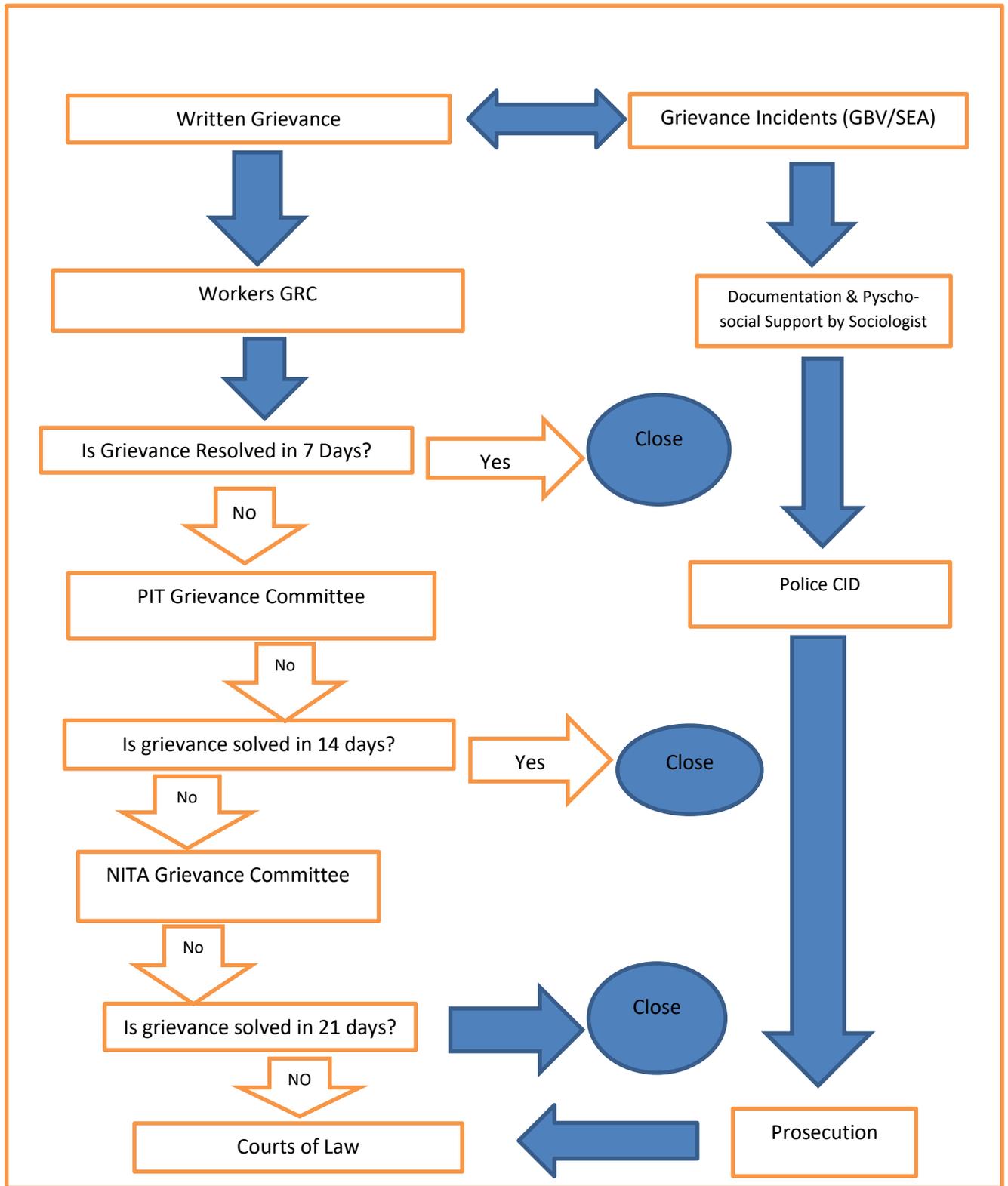
Step One: Documentation of the incident and provision of psychosocial support to the victim by the Sociologist/GBV incident or service providers

Step Two: Handling of the incident by Police and other criminal justice system authorities for redress

9.2 Grievance Redress Mechanism Guidelines

In addition to the grievance registration and closure forms in appendices 2 and 3, an extract from the GRM guidelines is subsequently presented:

Figure 7.2.1: Visual Illustration of Grievance Mechanism



Appendix 1: Journey Management Plan Risk Assessment

NITA-U JOURNEY MANAGEMENT PLAN RISK ASSESSMENT				
SECTION 1: TRAVEL DETAILS				 <small>- Driving the IT Revolution -</small>
Driver's Name:	Signature:	Purpose for the Journey:	Departure Date & Time:	
Vehicle Registration No:	Driver's Permit No:	Date & Time of Arrival:		
Passengers on the Vehicle:	Journey Description (From/To, Via):	Is the driver trained in defensive driving? Yes/No Has the driver rested for the past 11 hours? Yes/No		
SECTION 2: RISK ASSESSMENT (Strike Out Controls Which Are Not Applicable / Tick To Confirm Risk Rating, Or Amend As Appropriate)				
Hazard	Causes	Impact	Controls	Risk Rating
Loss of control of vehicle	Driver error Interaction with fauna Extreme weather conditions Variable standard of road surfaces Horseplay	Personal injury and/or damage to vehicle resulting from Collision with another vehicle, livestock or wildlife Single vehicle collision	Driver is licensed for the class of vehicle being driven and trained in defensive driving. Vehicle equipped with first aid kit Driver is well rested and free from the influence of alcohol and drugs (including prescription medication with drowsiness warnings). Driver modifies speed to cater for factors such as weather, traffic, fauna, and road conditions. Journey is scheduled conclude within 14 hours of start of work day. A pre-start inspection of the vehicle is carried out and all safety concerns addressed prior to departure.	<div style="display: flex; justify-content: space-around; width: 100%;"> <div style="width: 20px; height: 20px; background-color: #92d050;"></div> <div style="width: 20px; height: 20px; background-color: #ffff00;"></div> <div style="width: 20px; height: 20px; background-color: #ffcc00;"></div> <div style="width: 20px; height: 20px; background-color: #ff0000;"></div> </div>

			<p>Vehicle equipped with trauma/first aid kit.</p> <p>Travel commences after dawn and concludes before dusk.</p> <p>Other:</p>				
Hazard	Causes	Impact	Controls	Risk Rating			
Vehicle stranded	<p>Mechanical failure</p> <p>Collision, Boda bodas and pedestrians criss-crossing in the road</p> <p>Lack of fuel</p>	<p>Personal illness</p> <p>Personal harm</p>	<p>All controls as stated above (per “Loss of control of vehicle”)</p> <p>Minimum 1 litre of water for every 1 hour of journey per person on board.</p> <p>Fleet Care (roadside assist) contact details recorded in the vehicle.</p> <p>Mobile telephone on board (in case mobile reception available).</p> <p>All personnel remain with vehicle.</p> <p>Driver and/or passengers’ familiar with route, or maps on board.</p> <p>Other:</p>				
Inaccessible roads	<p>Bushfires, floods, motor vehicle incident, pot holes etc...</p>	<p>Modified route required</p> <p>Delayed arrival</p>	<p>Driver modifies speed to cater for factors such as weather, traffic, fauna, and road conditions.</p> <p>Driver follows the direction of emergency services personnel as applicable, tunes in to radio for emergency updates</p> <p>Deviations from planned route (as above) reported to Contact at destination however possible. Shared driving where driver reports experiencing signs of fatigue.</p> <p>Other:</p>				
SECTION 3: TRAVEL APPROVAL							
Approved by; Name and Position:			Signature:		Approved Date:		Approved Time:

Risk Matrix		CONSEQUENCE				
		INSIGNIFICANT	LOW	MODERATE	HIGH	CATASTROPHIC
Life/Health		First Aid Treatment	Medical treatment or occupational illness (recoverable).	Lost time injury or occupational injury (recoverable);Restricted Work Injury	Fatality or disabling injury or occupational illness (non-recoverable)	Multiple fatalities or disabling permanent injuries
	Almost Certain	Moderate	High	High	Extreme	Extreme
	Likely	Moderate	Moderate	High	High	Extreme
	Possible	Low	Moderate	High	High	High
	Unlikely	Low	Low	Moderate	Moderate	High
	Rare	Low	Low	Moderate	Moderate	High

RISK TOLERANCE LEVELS

GREEN LOW	Driver may approve and move unit to designated Journey manager for signature. Driver must review the JMP and verify that identified controls can be fully implemented, and that all personnel fully understand the task and their role. The journey may proceed with caution, but be prepared to reassess the risk.
YELLOW MODERATE	Supervisor input required. Supervisor must review the JMP, and discuss potential additional controls with the Driver. If controls cannot be implemented to reduce the risk rating to green, the Supervisor must sign the JMP as 'Approver'.
ORANGE HIGH	Project Manager input required. Project Manager must review the JMP, and discuss potential additional controls with the driver or their supervisor. If controls cannot be implemented to reduce the risk rating to yellow or green, the Project Manager must sign the JMP as 'Approver'.
RED EXTREME	Journey must not proceed. Input must be sought from the appropriate Manager for further advice. If controls cannot be implemented to reduce the risk rating to orange, yellow or green, the task must be reconsidered, alternative travel methods employed, or a full Risk Assessment conducted to establish suitable controls

Appendix 2: Grievance Registration Form

GRIEVANCE REGISTRATION FORM



Serial No: 1001
 Ref No:
 Date: .../.../.....

Name of Complainant: Gender: Male Female

Telephone Number: Age:.....

ID Type and No:

Description of Complaint;

.....

Name & Contact details of witness (If available):

Location of Receipt of Grievance	Location of occurrence of Grievance
District:	District:
County:	County:
Sub county/Town council:	Sub county/Town council:
Village/Cell:	Village/Cell:
LC Chairperson's Name:	Line Number:
Grievance No in village:	Name of execution contractor:
Other (Specify)	Other (Specify)

Description of Activity/Project/ line that Grievance is related to

.....

Signature or thumbprint:

FOR OFFICIAL USE ONLY: Received by:

Observation of receiving Officer: Issue Grievance Non Grievance

Method of receipt: Letter Email Face to face Telephone call

WhatsApp Etc...(Please specify)

Support documents provided by Complainant (if any)

Appendix 3: Grievance Resolution Form

GRIEVANCE RESOLUTION FORM



Closure Date: .../.../.....
Ref No (Should be in line
with registration form
number):
Receipt Date: .../.../.....

Name of Complainant: Gender: Male Female

Telephone Number: Age:

ID Type and No:

Grievance registration Form Details:

Serial No: System Ref No. Date of receipt

Response to Complaint (detailed-Utilize overleaf/ additional paper if required)

.....
.....
.....
.....

Name & Contact details of witness (If available).....

Iacknowledge that I agree to the
solution proposed in respect to the above grievance and that the solution has been implemented
to my satisfaction.

Complainant's Name & Signature:

Witness' Name & Signature:

Company representative Name & Signature:

Appendix 4: Incident management and investigation



INCIDENT RESPONSE SYSTEM

