



Sint Maarten

**Civil Society Partnership Facility for Resilience Project (CSPFRP)
(P172339)**

**Labor Management Procedures
(LMP)**

**14th of January 2021
- Final version -**

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GLOSSARY

CSO	Civil Society Organization
CSPFRP	Civil Society Partnership Facility for Resilience Project
DTL	Deputy Team Leader
ESCP	Environmental and Social Commitment Plan
ESHS	Environmental Social Health and Safety
ESMP	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
E&S	Environmental and Social
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
GoSM	Government of Sint Maarten
LBT	Learning Benchmark Training
LGRM	Labor Grievance Redress Mechanism
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
NRPB	National Recovery Program Bureau
NRRP	National Recovery and Resilience Plan
OHS	Occupational Health and Safety
OM	Operations Manual
PDT	Pre-Disbursement Training
PIU	Project Implementation Unit
PTC	Project technical Committee
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
TL	Team Leader
VNGI	International Cooperation Agency of the Association of Netherlands Municipalities
VSA	Ministry of Health, Social Development and Labor
WB	World Bank

1. OVERVIEW OF LABOR USE ON THE PROJECT

- 1.1 The CSPFR Project¹ is in charge for managing and monitoring sub-project activities, implemented by local CSOs, which focus on the reconstruction of physical facilities and improving services as well as strengthening resilience in the aftermath of hurricane Irma. These Labor Management Procedures apply to CSO's, their contractors, and to the Project Implementing Unit (PIU).
- 1.2 The Project will be implemented by VNG International (VNGI), they are the PIU for the project, and consists of three components, (i) grants for reconstruction, service delivery and resilience, (ii) capacity building and technical assistance and (iii) project management, communication and coordination. The size of the grants during Project implementation will be different. During the first two 'Quick Win' rounds, scheduled for late 2020 and early 2021, the maximum amounts will be lower than the amounts planned for the regular application rounds planned for later 2021 and onwards. The exact maximum amount for a sub-project submitted under the first 'Quick Win' has been set at US\$ 50,000. Maximum amounts for the other application rounds will be determined following evaluation of the previous application process. Grants will be implemented by local CSOs already operating on the island. Given the scale of the project, importing labor is not expected, and most CSOs will be performing the work with existing staff, community workers and/or contracted workers (see section 11 and 12 below).
- 1.3 The management, communication and coordination of the Project is on a day-to-day basis the responsibility of the PIU. The PIU, which will be based in Sint Maarten, will consist of the following six positions:
- Team Leader (TL)
 - Deputy Team Leader (DTL)
 - Grants Manager
 - Capacity Building and Training Manager
 - Local Financial and Control Specialist
 - Social and Environmental Specialist

The local team will receive distant support from VNGI, more in particular through the following three positions:

- VNGI Senior Project Manager
- VNGI Junior Project Manager
- VNG Financial Administrator

The PIU will call in the services of external short-term consultants and an independent counsellor in charge for handling Gender Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) incidents when the need arises.

¹ Hereafter called the Project.

Annex 1 to this LMP visualizes the Project staff directly involved in managing and monitoring the Project. All PIU staff will be employed on a part-time basis except for the TL who will be permanently based on Sint Maarten for the first two years of the Project. After two years, the TL will only be involved on a part-time basis from a distance. The local DTL will take over responsibilities from the TL in year 3 and 4 of Project implementation. Main reason for this change half-way the Project is to make sure that the Project is locally managed and is supported locally with a view to sustainability.

- 1.4 The Project will finance small grants provided to local CSOs that will work with communities to generate sub-project proposals to implement activities focused on reconstruction, resilience and service delivery. Sub-projects to be financed will constitute those requiring rehabilitation and be of small magnitude. The Project will not include any land acquisition nor displacement of populations. Sub-project applications will be submitted and grants awarded.
- 1.5 CSOs implementing sub-project activities are active in a wide range of community areas varying from cultural and environmental activities to social care and after school facilities and services. Also the size and professional status of organizations applying for a grant is far from being homogeneous. It is expected that the majority of the applicants will belong to small organizations, both size-wise as well as experience-wise. The exact number of staff involved is at this stage of the process unknown as no sub-projects have been selected yet. However small CSOs typically have 1-3 staff. Moreover most of the small CSOs have staff that work in a voluntary way, this is discussed more in section 12 on Community Workers.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

- 2.1 The Project will not finance major civil works or new constructions. In addition, the project will not include any land acquisition or displacement of populations. The Project, being diverse in scope, may include some minor works activities such as rehabilitation, installation and clean-up operations. Activities will be on-site and implemented by CSO staff, community workers or contracted workers hired by CSOs. Potential risks attached to the minor works planned vary from working without protective equipment to working with hazardous material. Actions to prevent activities from causing damage are included in the ESMF for this project.
- 2.2 There is a risk that there is a dispute over wages from community workers (primarily CSO staff). The non-volunteer staff will be paid on a regular basis by the respective CSO implementing a project from the budget which has been approved by the PIU. Workers will receive information and documentation concerning the terms and conditions of their employment through the CSO. The labor GRM (Annex 2) in this LMP is available to any project worker if they have a complaint.
- 2.3 Harassment at the work site is a potential labor risk that must be counteracted. The prime responsibility to monitor and respond is with the CSO, in particular the project coordinator to provide necessary oversight and protect workers on the site. CSOs will also be required to adopt a

Code of Conduct (CoC) for its workers (Annex 5). The PIU has established an ‘on call’ councilor to help handle GBV/SEAH complaints which is described more in section 9 below.

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

- 3.1 The Department of Labor within the Ministry of Health, Social Development and Labor (VSA) is charged with the tasks concerning labor and has the following responsibilities²:
- Formulating policy memorandums and recommendations and making proposals for the development, adjustment, monitoring and implementation of national policy concerning labor and the policy regarding safety and labor inspection;
 - Preparing, implementing and monitoring the national legislation concerning labor and monitoring compliance with this legislation;
 - Promoting international, social and labor affairs, such as the relationship with the International Labor Organization (ILO).
- 3.2 The Labor Affairs Agency is the executing division of the Department of Labor and they are tasked with monitoring compliance with the labor legislation and settling complaints resulting from the labor relations between employers and employees.
- 3.3 All employees of CSOs will operate in line with the CoC attached to this LMP as Annex 5. All CSO staff active under the Project will become acquainted with the CoC during the Pre-Disbursement Training (PDT) session which precedes the start of CSO sub-project activities. All CSO staff will be required to adopt the CoC as a condition of the grant award.
- 3.4 Direct workers (PIU staff) are familiar with the VNGI CoC (Annex 6) which is part of their contract documents. The CoC is reinforced on a regular basis through the TL and the VNGI Senior Project Manager through regular PIU-VNGI team meetings.
- 3.5 CSOs which do not operate in line with the CoC (Annex 5) or ignore security and/or safety measures will receive an official warning in writing. Repeatedly ignoring security and/or safety instructions could ultimately result in termination of the grant agreement.
- 3.6 In case a Gender Based Violence (GBV) or a Sexual Exploitation, Abuse and Harassment (SEAH) incident or complaint occurs during sub-project implementation, the management of the respective CSO in charge for implementation of the sub-project is expected to take action according to the timelines in the GRM (see section 9 below). They will be supported to do this with the PIU and the independent councilor who is ‘on call’ for handling GBV/SEAH issues. Failing to take action following such a complaint could result in putting the project temporarily on halt until the complaint is

² Source: <http://www.sintmaartengov.org/government/VSA/labour/Pages/Labour-Legislation.aspx> - information on Department for Labor.

handled to the satisfaction of all parties. In case no satisfactory result will be achieved this will ultimately result in termination of the sub-project grant agreement.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

- 4.3 The National Ordinance on Occupational Safety AB 2013 GT. No.438 is relevant to the Project³. The main aim is to enhance the safety and health of laborers active under sub-project activities through the prevention of accidents and fire on the work floor and the promotion of a healthy and secure working environment (e.g. temperature, light, sound, furniture, ambient air, provision of drinking water). The employer is obliged to properly implement and maintain adherence to all regulations and directives. In case of violations, work may be stopped until problems are properly resolved. Any accident on the work floor must be reported immediately to the labor inspectorate.
- 4.4 The labor inspectorate within VSA is enforcing the stance of the International Labor Organization (ILO) in supporting the need for safe work for all. Occupational Health and Safety (OHS) involves the health and safety of everyone involved, not only the employees and the employers of a workplace but also the wider community and indirect stakeholders.
- 4.5 Every CSO implementing sub-project activities under the grant scheme has a legal obligation and responsibility with regards to OHS (National Ordinance on Occupational Safety AB 2013 GT. No.438), namely:
- By keeping the workplace safe and healthy;
 - By preventing danger to happen;
 - By taking reasonable precautions to ensure the safety and health of every person at the work site;
 - By ensuring that all employees with special needs are given directions, notices, information and instructions by any method of communication.
- 4.6 Every CSO implementing sub-project activities under the grant scheme will conduct a risk assessment at the work site through the following steps:
- Identify at the work site possible hazards to safety and health for employees and visitors;
 - Identify who could be harmed and what type of injury might occur;
 - Assess the risk and identify and decide on OHS control measures;
 - Nominate who within the operational team is responsible for taking control measures and indicate a timeframe;
 - Develop an action plan to deal with the most important things first;
 - Record and display the above findings and circulate among sub-project staff and employees implementing activities.

³ Source: <http://www.sintmaartengov.org/government/VSA/labour/Pages/Labour-Legislation.aspx> - [what to do in case of occupational injury](#).

- Review systematically whether the risk assessment is still valid which helps to make sure that OHS standards are still practised.

4.7 CSO staff involved in sub-project implementation is obliged to participate in a PDT which precedes sub-project implementation. At the PDT, CSO staff will be made familiar with all technical, social and financial requirements of the grant scheme. Part of the requirements is that CSO staff is fully aware of all Environmental and Social (E&S) risk management instruments relevant under the scheme and commit themselves to act in accordance with these instruments in order to mitigate the environmental, social, health and safety risks to an absolute minimum. Each PDT participant will, by signing a statement at the end of the training session, commit him/herself to act in accordance with the WB E&S risk management instruments.

5. RESPONSIBLE STAFF

5.1 PIU staff are responsible for training and guiding CSO staff and making them familiar with these labor procedures before the start of sub-projects during the obligatory PDT⁴.

5.2 The CSO management is responsible for labor measures taken at sites where sub-project activities are implemented. The CSO management will ensure that any labor hired for their project are within the legal age and will request that contractors adhere to safety and security procedures, and they will be required to monitor the same.

5.3 The Project TL will also monitor the labor management of all sub-projects through review of regular reporting and on-site visits held with the E&S specialist.

6. POLICIES AND PROCEDURES

6.1 All sub-project grant applications will be reviewed and screened on OHS measures by PIU staff and the E&S specialist. During the PDT preceding the actual sub-project implementation, CSO staff involved will be made familiar with the minimum regulations and guidelines that must be taken in order to guarantee a secure environment for project workers.

6.2 Once implementation of sub-project activities has started, the PIU will check at random the status of OHS measures taken (protective equipment), more in particular where this is related to minor works activities, by making site visits to places where actual sub-project activities are under implementation.

6.3 The ESMF has practical guidance for sub-project implementation and includes all necessary steps to be taken to mitigate OHS hazards during implementation of sub-project activities. Reference is

⁴ The PIU may invite Ministerial experts to make CSO staff familiar with the labor procedures mostly relevant for this Project.

made to table 5.2 of the ESMF, 'Standard ESHS Mitigation Measures for Minor Works/Minor Repairs' (page 18-19).

- 6.4 During the LBT, organized once a year for CSO staff involved in sub-project implementation, participants exchange experiences and lessons learned during sub-project implementation aiming to avoid duplication of incidents.
- 6.5 A complaint system for labor related complaints, the Labor Grievance Redress Mechanism (LGRM), will be used during the entire duration of the CSPFRP implementation period to ensure that labor complaints in relation to the Project, operations of the PIU and the CSOs, are registered and addressed in the appropriate manner. The process of the LGRM is outlined in Section 9 of this document.
- 6.6 The Project has a low risk where it concerns GBV and SEAH. In situations where a GBV or SEAH complaint is submitted to either the CSO or the PIU, the PIU will instantly engage an independent counsellor who will, in the most discrete manner, assist and/or treat the specific complaint. The counsellor has been appointed on an 'on-call' basis.
- 6.7 The PIU and CSOs will immediately put sub-project activities on halt should there be an official announcement for natural disasters or other calamities.
- 6.8 The PIU will collect every incident reported and labor complaints in a database which is separate to the main project GRM and include a summary of these in the progress reports.
- 6.9 The COVID-19 outbreak has resulted in drafting a set of procedures to make sure that the OHS of direct and indirect Project staff will be guaranteed. The following safety measures will be taken to stop the COVID-19 spreading from work:
 - PIU staff will learn about the signs and symptoms of COVID-19 and follow instructions provided by the local authorities on Sint Maarten. The Sint Maarten Government Website continuously updates information on COVID-19 that will be strictly followed by PIU staff. The general health and safety guidelines formulated by the Government (social distancing and general hygiene measures) will be practiced by PIU staff. Furthermore, the PIU will act in accordance with measures described on the following Website:
<https://www.who.int/emergencies/diseases/novelcoronavirus-2019/advice-for-public> .
 - Any PIU staff member who feels ill will stay home to prevent spreading germs in the office. Watch for fever, cough, shortness of breath. In case one of these symptoms appear, a general practitioner will be contacted immediately, who will oblige a mandatory 14-day quarantine at home or at a special isolated place.

- Avoiding close contact is essential meaning that hand-shaking is out of the question. Social distancing is the new common standard⁵.
- Minimum hygienic measures will be taken. For entering the local office of the PIU this means that hand cleaning with sanitizer is obligatory for everybody entering the building. Cleaning and disinfection of frequently touched surfaces (doorknobs, desks/tables, handrails) will be applied. Costs for providing COVID-19 supplies will be covered through the regular office running budget.
- PIU staff will work remotely from home. Until further notice physical group gatherings will be avoided. Essential meetings will be organized on-line.
- In case a physical group gathering with a limited number of persons⁶ is needed, every participant will be requested to wear a cloth face cover or mask, and to maintain social distancing, to avoid spreading COVID-19 to others.
- All outreach activities to be organized under the Project will, for the time being, be organized on-line.

7. AGE OF EMPLOYMENT

- 7.1 The minimum age of employment under sub-project activities is eighteen (18) years, with the exception of skill development (work/learn) internships⁷. According to the Sint Maarten labor law, minors are not allowed to enter into agreements. Minors are those persons who have not yet reached the age of eighteen and are not married or were never married or have not been declared of age. The minor may enter into a labor agreement only with the authorization of his legal representative. Furthermore, the rule is that it is prohibited to allow persons under the age of fifteen (children) to work.
- 7.2 Interns and trainees below the age of eighteen and over the age of 15 can participate in sub-project activities either as volunteers or as part of a training, instruction or education. Interns and trainees always operate under a senior CSO staff member, who will be in charge as supervisor. The project coordinator of the CSO will provide oversight and make sure that interns and trainees in all circumstances will operate with the same safety measures as other employees under the sub-project. The CSO will monitor on a regular basis health conditions at the work site, hours of work and other requirement of ESS2 with special emphasis on the involvement of volunteers and interns if any.
- 7.3 Sub-project activities will be implemented by local CSOs, sometimes supported by contractors hired by these CSOs. During the PDT, which is obligatory for CSO staff and precedes the actual start of sub-project activities, CSO staff will have been made familiar with this regulation.

⁵ A distance of 1,5 meters between two individuals is officially recommended.

⁶ Following the GoSM instructions on social distancing.

⁷ Reference is made to the Sint Maarten labor legislation, section 8, prohibition of child labor, night work-hazardous work for youthful persons and women (<http://www.sintmaartengov.org/government/VSA/labour/Pages/Labour-Legislation.aspx>).

8. TERMS AND CONDITIONS

- 8.1 By operating under the Project, both PIU and CSO staff automatically endorse and accept the values and policies explained in the Code of Conduct (CoC) attached separately to this LMP as Annex 5. The CoC will be explained in detail during the PDT and again during the Learning Benchmark Training (LBT) sessions. Not adhering to the CoC will result in an official warning. Repeatedly ignoring the CoC can ultimately result in termination of the grant agreement.
- 8.2 A staff employee who has a formal labor agreement with a CSO and who is actively involved in sub-project implementation, is covered by a social health insurance. Persons who do not have a formal work relation with the CSO but are involved in sub-project implementation as volunteer must prove that they have a social health insurance. In case they are not able to prove this, the respective CSO will be obliged to take out an accident insurance for these persons for the specific time period the person is involved in sub-project implementation.
- 8.3 In case minor works activities are outsourced to an external contractor, this contractor will guarantee that the workers he/she hires are insured by a health insurance and covered by a third party liability.

9. LABOR GRIEVANCE REDRESS MECHANISM FOR THE PIU AND CSOs

- 9.1 In situations where PIU staff employees want to submit a labor complaint, they can file their complaint through the LGRM. Labor complaints and appeals will be logged by the VGNI Senior Project Manager (based in the Netherlands) in a database, and labeled according to complaint type. The Senior Project Manager will be responsible for ensuring that labor complaints are responded to and followed up on by the most appropriate party. Contact details for filing labor complaints are shared with the PIU staff through posting of contact details in the office area.
- 9.2 In case a sub-project worker feels aggrieved by any action related to the behavior of staff (misconduct or harassment) or any other workplace concerns, he/she is encouraged to report such an incident immediately to the direct supervisor of the responsible CSO. He/she is also encouraged to submit an official complaint by completing the LGRM complaint form in Annex 2. The supervisor, in most cases the CSO project coordinator, will have consultations within five (5) working days with both parties to try to settle the incident in an amicable way if possible. In case the aggrieved party

Contact details for labor complaints for PIU staff:
Mr. Elger Vermeer (VGNI Senior Project Manager)
elger.vermeer@vng.nl
+31 70 3738401

cannot accept the settlement, the PIU TL will assist with the complaint when referred by the CSO. The PIU TL will not be responsible for labor complaints from the PIU.

- 9.3 Annex 2 to this LMP includes the Labor Grievance Redress Mechanism Complaint Form for CSO Workers under CSPFRP to be used by CSO staff and workers, and PIU staff, to submit labor grievances. A completed LGRM tracking form (Annex 3) will be submitted by CSOs to the PIU for further treatment on a regular basis as part of the technical reporting.
- 9.4 The PIU will within 10 working days work to resolve the issue and report back to the complainant. If the PIU cannot resolve the issue, the PIU will forward the complaint to the PTC where it will be discussed after having organized hearing sessions with both the complainant as well as the respective CSO. The timeframe for organizing the hearing is within 15 working days of the PTC receiving the complaint. The PIU aims to establish an agreement with the NRPB to consider complaints not resolved by the PTC. At any point in the complaints process the complainant will be able to access the Sint Maarten judicial system without this effecting the handling of the complaint.
- 9.5 Extensive information on the use of the LGRM complaint form for CSO Workers under CSPFRP (Annex 2), including the way to submit the complaint will be explained during the PDT and repeated multiple times during the LBT sessions. A visualization of labor complaint handling is presented in Annex 4.
- 9.6 Any direct worker and community worker can also make use of the WB Grievance Redress Service (GRS)⁸ if they are not satisfied with the LGRM outcome or process. The GRS is an independent complaints mechanism for people and communities who believe that they have been, or are likely to be, adversely affected by a WB financed project.

10. DIRECT WORKERS

- 10.1 Employees who are on the payroll of VNGI or the respective CSO involved are considered direct workers under the Project. Examples: staff required to carry out design and supervision, monitoring and evaluation, or community engagement in relation to the Project. Also, external short-term experts envisaged to cover capacity strengthening training activities are considered direct workers under the Project. Direct workers will operate in accordance with an official contract. Labor management procedures for direct workers are in line with ESS2 and included in the Project Operations Manual (POM) of the Project and separately in the contract of each direct worker.

Following the POM, it is fundamental that both the PIU and the CSO create proper labor and working conditions for their direct workers during Project implementation. The PIU and the CSO will take necessary standard labor measures to guarantee the safety of their workers at project sites. Any incident or accident at a CSO work site will be reported immediately to the PIU who will

⁸ <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

inform the labor inspectorate within the Ministry of Health, Social Development and Labor (VSA). Any incident that takes place at the level of the PIU will be reported directly to the VNGI Senior Project Manager.

Procedures for direct workers of PIU and CSOs include information on child labor, the submission of grievances and OHS measures taken, as follows:

- The minimum age for workers to be actively employed under the CSPFRP is eighteen to prevent child labor. Any CSO and PIU staff employee must be able to show a valid proof of identification (ID), along with proof of residence and work permit, as issued by the GoSM.
- Direct workers of CSOs and PIU have the right to submit grievances, the procedure of which is explained in section 6.5 and section 9 above.
- Where small works/activities are concerned, CSOs and the PIU must ensure that direct workers operate in a safe environment and in a secure manner. Protective clothing (helmets, gloves, proper footwear etc.) and precautionary measures being in place, to create a safe environment, will be mandatory. The PIU will, with and without prior notification, inspect CSP sub-project sites and insist on corrective measures if needed. The costs for such corrective measures will have to be carried by the CSO.
- A zero-tolerance policy against Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) is in place under the Project. Any direct worker exposed to GBV and/or SEAH will be offered the possibility to consult the independent counsellor appointed under the Project. The counsellor will treat any consult with absolute confidentiality. A final report with recommendations could have repercussions for the continuation of sub-project activities. A referral of victims to GBV specialized institutions on Sint Maarten is among the possibilities.
- CSO employees operate in line with the CSO Code of Conduct (Annex 5).
- PIU employees operate in line with the VNGI Code of Conduct (Annex 6).
- Both, direct workers of CSOs and the PIU will operate in line with the current COVID-19 precautionary measures promulgated by the GoSM.

The current and foreseen VNGI direct workers under the Project:

- Team leader (PIU), international
- Deputy Team Leader (PIU), local
- Grants Manager (PIU), local
- Capacity Building and Training Manager (PIU), local
- Local Financial and Control Specialist (PIU), local
- Social-Environmental Specialist (PIU), local
- VNGI Senior Project Manager, international
- VNGI Junior Project Manager, international
- VNGI Administrator, international

Project staff not on the regular payroll of VNGI but contracted under the current Project have been selected following a standard set of Project Terms of Reference (ToR) and the collection of at least three CVs per position. Comparison of CVs and follow-up interviews made, VNGI selecting Project staff for a fixed period under the present Project. The risk of labor influx is extremely low because given the available fixed Project budget, the team of direct workers, who signed an agreement with VNGI for the period of CSPFRP implementation, was selected.

11. CONTRACTED WORKERS

- 11.1 CSO sub-project activities may be implemented with the services of external contractors for specific activities which cannot be covered by CSO staff (contracted workers). Labor management procedures (LMP) for contracted workers are required to be in line with ESS2 and will be directly communicated to the external contractors through the respective CSO. This includes information on child labor, the submission of grievances and OHS measures taken. The likelihood of labor influx for any of the sub-projects is extremely low because the PIU will screen sub-projects carefully up-front and contractors have to be compliant with the local labor legislation regarding work permits. The respective CSO is responsible to ascertain that external organizations who engage contracted workers are legitimate and have solid working conditions in line with the overall CSPFRP Project. The CSO management will be the prime communication channel to contracted workers and monitor this during the lifetime of the sub-project.

12. COMMUNITY WORKERS

- 12.1 Based on the Guidance Note for ESS2, Art.32, community work comprises labor that is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in fragile and conflict-affected situations.

In the specific context of the CSPFRP Project, Community Workers include CSO staff (paid, or voluntary, with a specific CSO function), and CSO volunteers (voluntary and temporary, project-based). Due to financial and structural constraints after Irma, many professionals dedicate their time and expertise to the CSOs on a voluntary basis. Many CSOs can only perform their mission with the support of volunteers who are unpaid

CSOs may engage community workers for work implemented under a sub-project. CSO staff will be in charge of the mobilization of community workers and monitor that their operations are in accordance with ESS2. Community workers will not be used in minor works activities to prevent them from any OHS hazards. Community workers (including volunteers), engaged by CSOs for the implementation of sub-project activities, are obliged to follow the PDT session preceding the start of sub-project implementation in order to become fully familiar with all E&S safety procedures and regulations applicable under the Project. It will be during the PDT session that VNGI will communicate CSO participants on the nature of volunteering under the sub-project and to ascertain

if workers are in agreement to work on a voluntary basis. The PIU will register all participants who attend the PDT session.

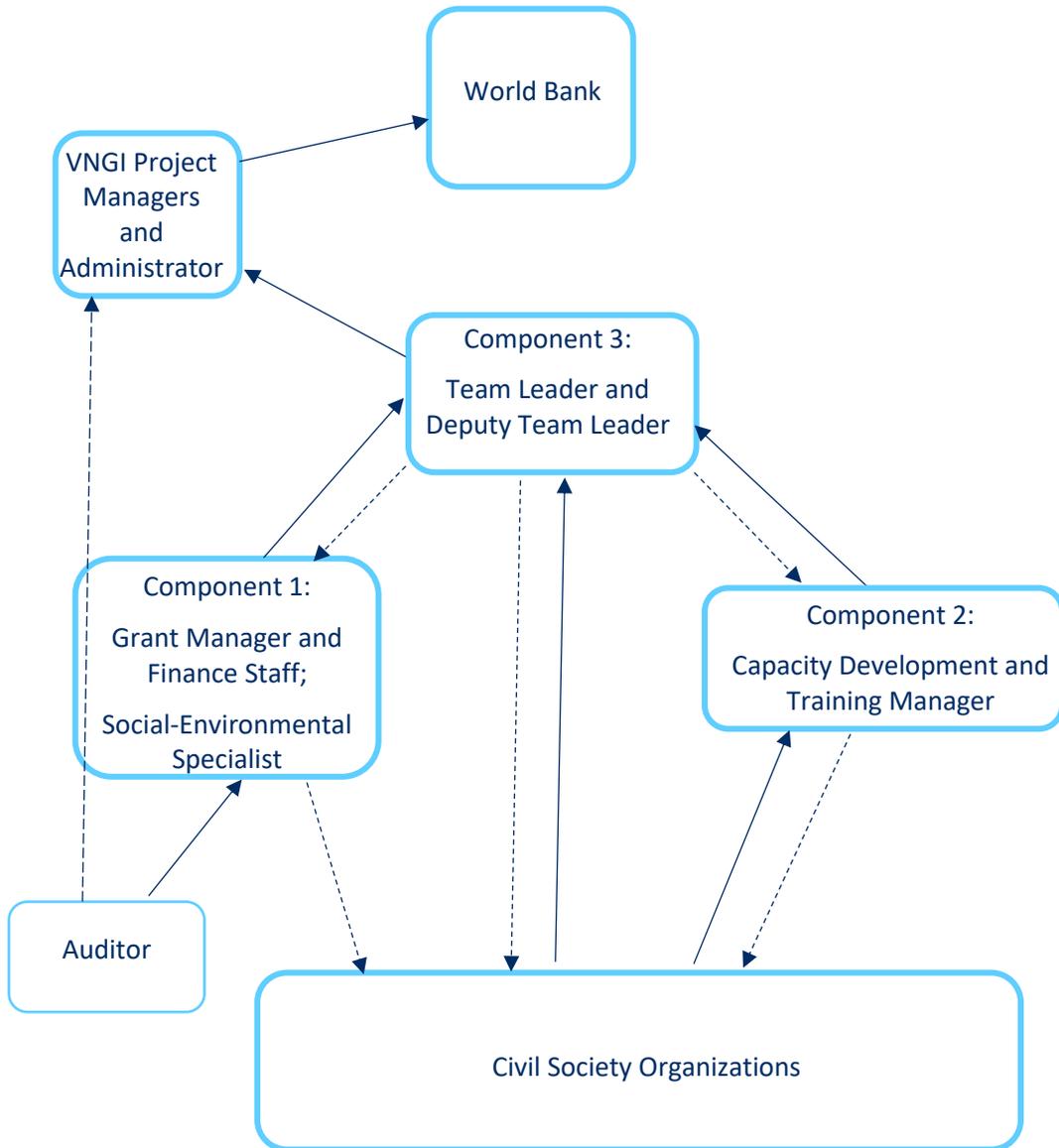
13. PRIMARY SUPPLY WORKERS

- 13.1 Based on the Guidance Note for ESS2, Art.39.1, primary supply work is in place if types of goods and materials are to be obtained from primary suppliers.

Based on the current scope of participating CSOs and foreseen needs within the CSPFRP Project, the category of “primary supply workers” will not be relevant under the CSPFRP Project. For construction or renovation work it is planned that the work will be coordinated through the CSO staff, together with the sub-contractor, and overseen by the PIU.

In case there are primary supply workers, all relevant safeguards of ESS2, and the Guidance Note will be applied in the same manner as all other project workers. The PIU will monitor sub-contracting contracts and potential primary supply work through the standard WB procurement process.

Annex 1 Project Organization Civil Society Partnership Facility for Resilience Project (CSPFRP)



Annex 2 Grievance Redress Mechanism Complaint Form for CSO Workers under CSPFRP, and for workers in the PIU

INFORMATION ABOUT WORKER SUBMITTING A GRIEVANCE	
Name of the Worker	Date of Submission
Job Function	Worker ID number
Full address of the worker	Address of the work site
Mobile tel. number of worker (if any)	E-mail address of worker (if applicable)
Relevant additional administrative information (if any)	

Annex 2cont'd

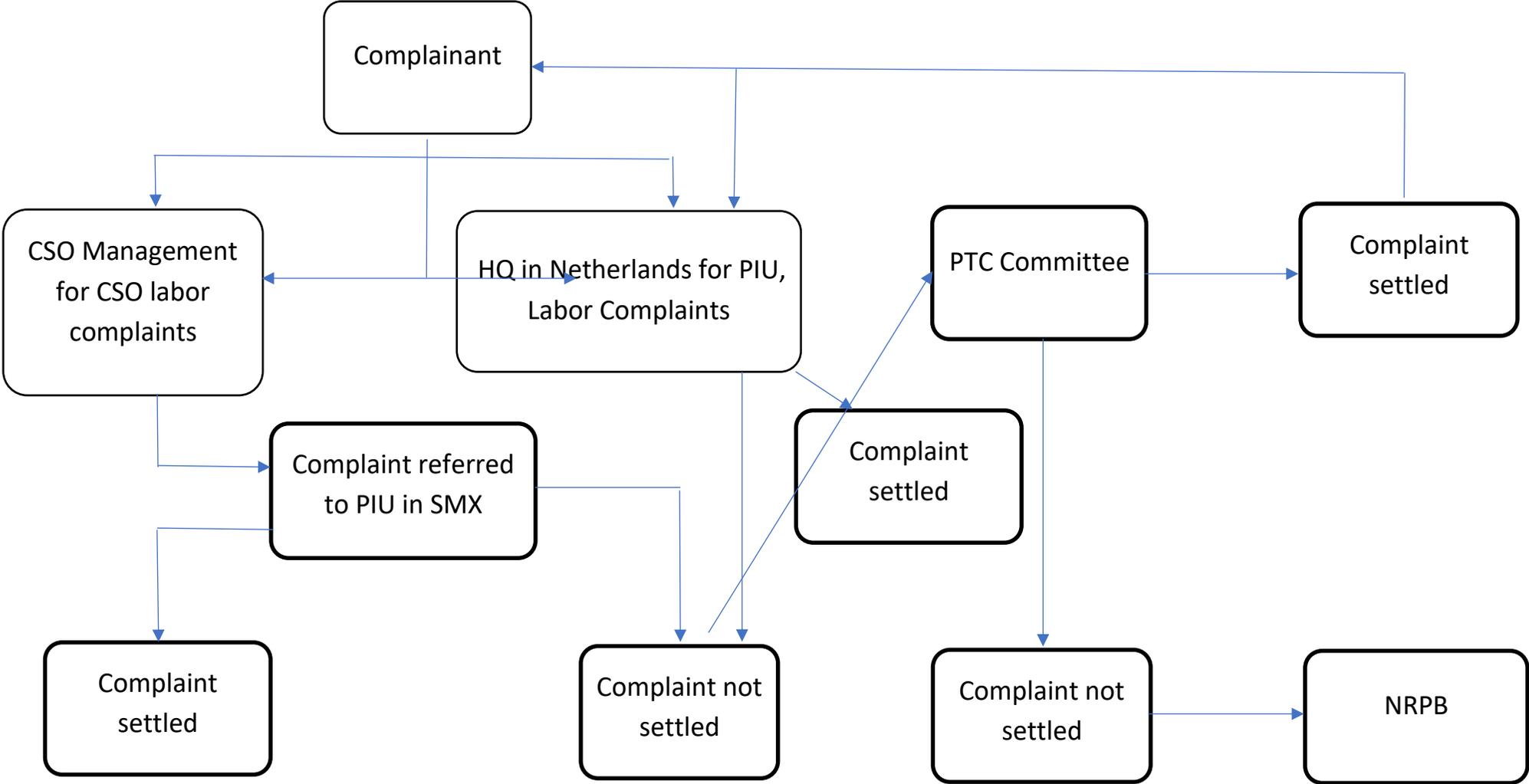
DETAILS OF EVENT LEADING TO A GRIEVANCE	
Date, Time and Location of Event	Any witnesses (if applicable)
Account of Event	Violations
Provide a detailed description of what happened. Include the names of any additional persons involved	Provide a list of any policies, instructions, procedures or guidelines you believe have been violated in the event described
Proposed Solution	
Signatures	
Worker signature	Date
Signature of the organization's manager	Date

Please make a copy of this form for your own administration.

Annex 3 Grievance Redress Mechanism (GRM) tracking form – To be completed by a CSO in line with their reporting requirements

Claim Number	Date Complaint Received	Name & Contact Person Making Complaint, unless anonymous	Description of Complaint	Actions Taken to Resolve Complaint	How was Complaint Resolved	Date Complaint Resolved	Outcome accepted/not accepted	Further information

Annex 4 Visualization of Labor Complaint Handling under CSPFRP for PIU and CSOs



Annex 5 Workers operating under CSOs Code of Conduct

The objective of the worker's Code of Conduct (CoC) is to avoid or minimize as much as possible, any negative impact that could be produced because of interrelations between the workers inside the local areas of influence. The CSO shall implement a workers' CoC to assist all employees to:

- Understand expected standards of conduct and behavior;
- Comply with relevant laws and policies;
- Demonstrate and promote good ethical work practice;
- Respect colleagues, supervisors and community members.

CSOs shall ensure that each worker receives a written copy of the CoC as part of the induction process and as part of the contract. As a requirement to be hired, all workers must sign a copy of the CoC, where they acknowledge it and certify they have read it and accepted its terms, promising to comply with its terms thoroughly and at all times. Additionally, copies of the CoC shall be made available at a visible location at the project site.

Under the CoC all workers shall:

- Consider people equally without prejudice or favor;
- Act professionally with honesty, consistency and impartiality;
- Take responsibility for situations, showing leadership and courage; and
- Observe standards for safety.

The workers are obliged to comply with the rules and procedures indicated in the CoC, so as to maintain good relations with the local community in the direct area of influence of the project. Any worker may be subject to disciplinary actions and/or may be fired if their behavior while he/she is employed on the project goes against the rules stated in the CoC. However, workers shall have access to the Grievance Redress Mechanism (GRM) for the project.

Under the workers' CoC, as a minimum, a worker shall comply with the following rules:

Rules Regarding the Local Population

- The local population is defined as all people that live within the direct area of influence of the project, or in the areas used for the transportation of equipment and materials required for the activities of the project.
- All workers are expected to behave adequately at all times and must avoid improper relations with the local population. The CSO will not tolerate any form of harassment or discrimination, including behavior, comment, jokes, slurs, email messages or any other social media, pictures, photographs, or other conduct that contributes to an intimidating, disrespectful or offensive

environment.

- All workers shall avoid any discriminatory conduct based on gender, age, disability, race, language, culture, political affiliations, philosophy, religion, or any other basis.
- All workers must comply, at all times, with all applicable environmental and health and safety rules and regulations.
- Should the worker fail to comply with the CoC or behave in such a way that he/she creates a problem with the local population, the corresponding action must be communicated to the CSO, detailing what happened, so that the CSO can carry out an investigation.

Rules regarding Construction

- All workers are required to show at all times a transparent and honest behavior, and a high level of personal responsibility and professionalism, either in or out of the project area.
- All workers shall comply with all applicable laws, rules and regulations.
- Workers shall immediately inform the CSO management about any kind of sickness or symptom that may affect their ability to carry out their work-related obligations properly.
- Workers shall use adequate personal protection equipment for safety and for the prevention of COVID -19 transmission, during their activities within the project area, including the use of vehicles.
- Workers are not allowed to smoke or make an open fire within or in the surroundings of the project area or near any project property, including vehicles.
- Workers are not allowed to engage in gambling while at work and using company assets for gambling are prohibited, including during breaks. For purposes of this standard, “gambling” is defined as playing a game for money or property or betting on an uncertain outcome. Prohibited gambling activities include, but are not limited to: Games (e.g., cards, dice, and dominoes) played for money or property, including electronic games (online poker, roulette, etc.); betting on sporting events, bingo, etc.
- Workers are forbidden to possess, use or carry any kind of illegal drugs, medical paraphernalia, narcotics or alcoholic beverages within the project area or any project property, including vehicles.
- Workers are not allowed to possess or carry weapons, such as firearms, explosives, ammunitions, knives, clubs, etc., within the project area or any project property, including vehicles.
- All workers shall not receive or hand over money, goods or other objects of value in order to obtain benefits, receive favors or influence decisions, third parties, or themselves.
- Workers shall not use project funds or equipment, or other articles provided for the project for their personal benefit or any other unauthorized use.

Annex 6 Values and Policies of VNG International

VNG International is committed to strengthening democratic local government worldwide. With this mission in mind VNG International has formulated values and policies that determine the operation of our organization.

I – Code of Conduct

Wherever we operate we aim for the highest standards of performance and behavior in everything we do, according to certain principles that shall govern the conduct of every employee and expert of VNG International. See our 'Code of Conduct'. We are aware that statements on paper are not sufficient to avoid condemnable behavior so we see the Code of Conduct as an instrument which is only useful if we discuss the mentioned values when we are confronted with dilemma's in the daily practice of our work. The management will review annually our attention for the values expressed in the Code of Conduct.

II – Human Resources

Our employees and experts are central to everything we do. VNG International will invest in skills and talents of their employees through ongoing training and development.

III – Security and Safety

We take security and safety very seriously. That is why we have a well elaborated security and safety policy to protect our employees and experts around the world. See our 'Security and Safety Policy'.

IV – Sustainable Entrepreneurship

We want to contribute to sustainable growth. That is why we operate in a way that minimizes negative environmental impact and maximizes positive social impact.

Code of Conduct VNG International

1. We are dedicated to the concepts of effective and democratic local government as formulated in the "European Charter for Local Self-Government".
2. We affirm the relevance of the services rendered by democratic government and maintain a constructive, creative, and practical attitude to local government affairs and a deep sense of social responsibility.
3. We know that we are the ambassadors of VNG International. We are dedicated to the highest ideals of honour, integrity and trustworthiness in all public and personal relationships, which means amongst other things that the use of illegal drugs, excessive consumption of alcohol, sexual harassment and bribery are prohibited in all circumstances. We are fair and do not discriminate. In case we have indications of fraud or corruption by a partner or beneficiary organisation, we will report this to the VNG International project manager or line manager, in order to define the most appropriate response.
4. We strive to achieve the highest quality, effectiveness and integrity in both the process and the products of our professional work. We only accept an assignment if we are able to offer the know-how and qualifications to fulfil it. We are straight and clear in our accountability for the results and failures of our work. We are open for criticism and see that as a stimulus for improving the quality of work.

5. We acquire and maintain professional competence, share information with our colleagues, and accept and provide appropriate professional review.
6. We listen carefully to our clients, partners and contracting agents in order to be able to understand and address their real needs.
7. We know that we are doing our work on the request of our clients and for the benefit of the beneficiaries. We respect cultural values, sensitivities and national laws of the country in which we work. We stick to contracts, agreements, and assigned responsibilities.
8. We honour property rights including copyrights and patent and give proper credit for intellectual property. We honour confidentiality and we respect the privacy of others, also as required by the General Data Protection Regulation (GDPR) of the EU.
9. We are aware that we sometimes work under difficult or dangerous circumstances and we fully comply with the 'Security and Safety Policy' of VNG International.
10. We uphold and promote the principles of this Code.

When becoming aware of a possible violation of the VNG International Code of Conduct by staff or experts of the organization, people are strongly requested to report the matter to VNG International. Appropriate action will be taken. This may include involving a third party, as well as reporting to the authorities concerned and to the client of the project. In reporting the matter to VNG International people may choose to go on record as the complainant or report the matter on a confidential basis. Reports of violation can be sent to our **HR Business Partner, Ms. Anouk de Boer**: anouk.deboer@vng.nl, or tel. +31622961472.