

REPUBLIC OF THE GAMBIA



**Sub-Saharan Africa Women's Empowerment and
Demographic Dividend Project Plus (SWEDD+)
(P176693) – The Gambia**

Labor Management Procedure (LMP)

June 2023

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Abbreviations/Acronyms

Civil society organizations	CSOs
Demographic Dividend	DD
Demographic Dividend Monitoring Index	DDMI
Electronic civil registration and vital statistics	eCRVS
Gender Demographic Dividend Monitoring Index	GDDI
Gender-based Violence	GBV
Grievance Mechanism	GM
Grievance Management Committee	GMC
Implementing partners	IP
Labor Management Procedure	LMP
Local Government Areas	LGAs
Ministry of Basic and Secondary Education	MoBSE
Ministry of Gender, Children and Social Welfare	MoGCSW
Ministry of Health	MoH
National Population Commission Secretariat	NPCS
National Transfer Accounts (NTA) and National Time Transfer Accounts. (NTTA)	NTA / NTTA
Non-governmental organizations	NGOs
Occupational Health and Safety	OHS
Project Development Objectives	PDO
Project Coordination Unit	PCU
Reproductive, Maternal, Newborn, Child and Adolescent Health and Nutrition	RMNCAHN
Sexual Exploitation and Abuse	SEA
Sexual Harassment	SH
Social and Behavior Change Communication	SBCC
Stakeholder Engagement Plan	SEP
Sub-Saharan Africa Women’s Empowerment and Demographic Dividend Plus Project	SWEDD+
Village support groups	VSGs
Worker Grievance Mechanism	WGM

1. Project background and description

The population of The Gambia is estimated at 2.4 million, with an estimated growth rate of 3.1 percent per year (GBoS 2023). Sixty-four percent of the country's population is under the age of 25 and 42 percent is under the age of 15. These figures are expected to double in two decades due to the high fertility rate in the country (Total Fertility Rate 4.4). In addition, 43 percent of women aged 25-49 gave birth before the age of 20, and the adolescent birth rate is high (67 births/1000 women aged 15-19 years), with a higher percentage (20 percent) in rural areas than in urban areas (11 percent). Low contraceptive prevalence rate (19 percent) and high child marriage (26 percent) are key determinant factors of high fertility rate. The age dependency ratio remains one of the highest in the world (84.98 percent in 2021).

The changing socioeconomic situation and socio-demographic indicators in recent years pose a real challenge for harnessing the demographic dividend and achieving the sustainable development goals (SDGs) in The Gambia.

Although the maternal mortality ratio has decreased from 433 per 100,000 live births in 2013 to 289/100,000 in 2019 (DHS 2019), this is still high and remains a concern. In addition, gender inequality remains a real issue. The prevalence of female genital cutting (FGM) is high with (73 percent), domestic violence has increased from 26percent to 39percent (DHS 2013; DHS 2019) and 48percent of women aged 15-49 have experienced physical or sexual violence. Although the government has enacted a series of laws and policies to address Gender-Based Violence (GBV), child marriage, FGM, among other issues. However, inadequate enforcement of laws remains a challenge. Furthermore, significant disparities remain between girls and boys in education.

Youth unemployment rate is 41.5 percent and 54.7percent are from the urban areas while 45.3 percent from the rural areas. The proportion of male youth who are employed is more than their female counterparts in all statuses of employment. The data also shows that 30.6 percent of youth in the urban areas are unemployed, and 69.4 percent are unemployed in the rural areas. Basse (24.6 percent), Brikama (21.7 percent), and Kerewan (16.3 percent) had the highest proportions of unemployed youth. There are 54 percent of youth in the urban areas and 45.9 percent in the rural areas that were to in employment, education, and training (GLFS, 2018).

In view of the concerns mentioned above, this situation can have negative consequences on adolescent girls' and young women in various aspects of human development.

The World Bank is financing the Sub-Saharan Africa Women's Empowerment and Demographic Dividend Plus Project (SWEDD+) (P176693), to be implemented by multiple ministries including the Ministry of Health (MoH), the Ministry of Basic and Secondary Education (MoBSE), the Ministry of Youths and Sports (MoYS), the Ministry of Gender, Children and Social Welfare (MoGCSW), as well as the National Population Commission Secretariat (NPCS) and other central government bodies.

The project is part of the third phase of the World Bank-financed SWEDD program, which is being implemented by the Gambia. The project includes interventions in women and girls' health and

empowerment in countries of Sub-Saharan West Africa over the past decade.¹ This new phase includes Burkina Faso, Chad, Togo, The Gambia, Republic of Congo and Senegal, with the involvement of two regional institutions, the Economic Community of West African States (ECOWAS) and the Economic Community of Central African States (ECCAS). The program receives technical support from the UNFPA and WAHO.

Accordingly, the SWEDD+ Project will contribute to women and adolescent girls' empowerment and their access to quality services in sexual and reproductive health, education, economic empowerment, strengthening legal frameworks and capacity building to reduce their dependency, vulnerability and improve the demographic dividend.

1.1. Project Components and Sub-components

The project is structured around the following three components and subcomponents:

- Component 1: Design and implement gender transformative interventions that promote girls' and women's social and economic autonomy
 - Sub-Component 1.1: Social and Behavior Change Communication (SBCC) Campaign
 - Sub-component 1.2 Community-level interventions that increase the educational and economic opportunities of adolescent girls and young women, based on evidence and learning across ongoing SWEDD+ and SWEDD+ countries
- Component 2: Increased utilization of quality reproductive, maternal, newborn, child and adolescent health and nutrition services and qualified health workers at the community level: US\$8 million
 - Sub-component 2.1. Enhanced utilization of contraceptives at the community level (US\$2,500,000)
 - Sub-component 2.2. Enhancing the performance of pharmaceutical supply chain, last mile delivery (US\$1,500,000)
 - Sub-component 2.3 Improved availability and capacity of health workers providing RMNCAHN services in rural/isolated areas (US\$2 million)
 - Subcomponent 2.4: Strengthen Improve adolescent nutrition services (US\$2 million)
- Component 3. Foster National and Regional Commitment and Capacity for Policy Making and Project Implementation Budget: US\$7 million
 - Sub-component 3.1 Strengthen advocacy, legal frameworks, and political commitment on RMNCAHN at continental, regional and national levels (US\$2 million)
 - Sub-component 3.2 Strengthen capacity for policymaking, M&E related to demographic dividend and gender issues and strengthening marriage registration using birth certificates for child marriage prevention (US\$ 3 million)
 - Sub-component 3.3. Strengthen project implementation capacity (US\$2 million)

The Project's development objectives are presented in Annex 2.

¹ Interventions under the initial SWEDD program took place in Burkina-Faso, Benin, Chad, Cote d'Ivoire, Mali, Mauritania and Niger from 2015 onwards. In 2020, the program was extended to Cameroon and Guinea. Further extension to the Republic of Congo, Senegal, Togo and the Gambia was decided during the SWEDD Regional Steering Committee meeting in 2022.

2. Overview of labor use on the project

This section provides an overview of the types of labor considered under the World Bank Environmental and Social Standard 2 on Labor and Working Conditions (ESS2) and describes the type and characteristics of workers who will be engaged in the implementation of the SWEDD+ Project in The Gambia. With national legislation and the World Bank guidance documents as a basis, a Labor Management Procedure (LMP) is outlined below to promote sound worker-management relationships and enhance the development benefits of the project by treating workers fairly and providing safe and healthy working conditions. The LMP establishes how working conditions will be managed from a legal and operational standpoint within the Gambia SWEDD+ Project. The LMP was informed by the main labor risks triggered under ESS2 during project implementation. It includes strategies and recommendations to address potential labor issues connected to the Project, as well as a mechanism for worker grievance resolution.

2.1. Labor Management Procedure Objectives

The Labor Management Procedure (LMP) is a critical component of the project management framework. The objective of the LMP presented below is to support the planning and implementation of the SWEDD+ Project effectively by identifying and addressing the main labor requirements and any associated risks. By doing so, the LMP can help facilitate the implementation of a systematic approach to managing labor-related risks and requirements effectively, ensure a safe and productive working environment, and ultimately deliver successful project outcomes. According to ESS2, the objectives of the LMP are as follows:

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

As a living document, the LMP is initiated early in project preparation and is continually reviewed and updated throughout the development and implementation phases of the project. This ensures that the labor-related risks and issues are monitored and addressed promptly, and that the project stays on track to meet its objectives.

2.2. World Bank requirements for employment and working conditions

The World Bank Group has several requirements for employment and working conditions that are designed to promote safe and healthy working environments and ensure fair and decent work for all workers, including those working on projects financed by the World Bank. One of the key requirements is the application of the World Bank's Environmental and Social Standards, which include ESS2 on Labor and Working Conditions. This standard requires that projects financed by the World Bank should comply with national and international labor laws and standards, and provide

workers with fair wages, safe and healthy working conditions, and freedom of association and collective bargaining. The standard also requires that workers are not subjected to forced labor, child labor, or any form of discrimination.

ESS2 applies to all project actors, which comprise two categories:

- Project workers (as defined in detail below)
- Government civil servants working in connection with the project, for example, those who are responsible for carrying out project activities but whose employment is not legally transferred to the project

For those civil servants who have had an effective legal transfer of their employment/engagement to the project, all provisions of ESS2 will apply. For those who have not had such a transfer of employment, but who are working in connection with the project, they remain subject to the terms and conditions of their existing public sector employment agreement and arrangement, and only those ESS2 requirements relating to child labor and minimum age and OHS apply. Civil servants working on the project are also submitted to this LMP's accountability framework, including the Code of Conduct on the prohibition of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)² (see Annex 1) and the Workers' Grievance Mechanism (WGM) (see Section 4.5). **Uptake forms for submitting grievances by workers are in the process of being developed and will be appended to this LMP once they are available.**

In addition to ESS2, the World Bank has developed a Good Practice Note on the Management of Labor Influx, which provides guidance on how to manage labor risks associated with project-related labor influx. The note emphasizes the importance of assessing and managing risks to workers' health and safety, including risks related to occupational health and safety, exposure to hazardous substances, and gender-based violence, as well as risks related to labor influx, such as forced labor and child labor.

2.3. Types of Project Workers

According to the World Bank ESS2, project workers can be separated into four separate categories (direct workers, contracted workers, community workers, and primary supply workers):

Direct workers are defined as 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.

Contracted workers are people employed or engaged through third parties to perform work related to core functions of the project. Third parties may include contractors, subcontractors, brokers, agents, or intermediaries. Core functions of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue.

Primary supply workers are people employed or engaged by the Borrower's primary suppliers.

Community workers are people employed or engaged in providing community labor (generally on a volunteer basis). Work is considered on a voluntary basis when it is done with the free and informed consent of a worker with the possibility to revoke freely given consent at any time. In this project,

² When civil servants have already signed standard behavioral norms that prohibit SEA/SH, they are not required to sign the project's Code of Conduct.

workers already engaged at community level on a voluntary basis, such as village health workers, could take part in project implementation activities in areas such as community sensitization and information, as a complement to the work of direct and contracted workers who cannot be constantly present within communities.

2.4. Characteristic of SWEDD+ Project Workers

Under ESS2 and based on the present design of the Project, it is envisaged that three types of workers will be involved in the implementation of the Project including direct workers, contracted workers, and community workers. It is not anticipated that the project will engage primary supply workers. For the purposes of this LMP, project workers can be understood as any person employed directly by the Project Coordination Unit (PCU) and/or the Project implementing agencies to perform tasks or project activities and thus shall include:

- Contract agents directly recruited by the project or the implementing agencies on behalf of the project (subject to The Gambia's employment regulations)
- Agents of partner companies of the project with or without their own human resources management tools; consultants or independent experts
- Agents of subcontracted companies (local or migrant)

Direct workers may include staff of the Project Coordination Unit (PCU) and other staff from the Ministry of Health (MoH), the Ministry of Basic and Secondary Education (MoBSE), the Ministry of Youths and Sports (MoYS), the Ministry of Gender, Children and Social Welfare (MoGCSW), National Population Commission Secretariat (NPCS) and other central government bodies, who will implement the Project. Direct workers may also include persons employed or engaged by the PCU to carry out project design, supervision, monitoring and evaluation, or manage/coordinate community engagement in relation to the Project.

Contracted workers will include workers which will be employed or engaged through third parties (e.g. contractors, sub-contractors, brokers, agents, or intermediaries) to perform work on the project. Two broad categories of contracted workers are expected to be involved in the SWEDD+ Project:

- a) Those who will be carrying out the studies (technical, safeguard experts, procurement, finance); and
- b) Those who will carry out the works during project implementation

Community workers may be engaged through the existing health system or community structures (e.g., mothers clubs, community health workers, etc.) to carry out project implementation activities. Community workers live in the community and work on a voluntary basis within existing health structures, for the purposes of community-driven development and to ensure that health care services and/or support are available to vulnerable populations and those hard-to-reach within the community. Within the project, community workers will only be employed to complement the work of direct and contracted workers in areas such as community sensitization and provision of information, for instance by following up with community members to address any remaining question in the wake of a project intervention. While the Project's community workers will generally be members of the local community who are already working within existing health structures on a voluntary basis, they will be informed that they have the right to be remunerated for the work they will carry out as part of project activities.

The SWEDD+ Project is therefore expected to engage a variety of staff and workers which are outlined in Table 1.

2.4.1. Number of Project Workers

Based on the present design of the Project, it is anticipated that the Project will require direct workers, contracted workers, and community workers. The SWEDD+ Project is therefore expected to engage a variety of staff and workers which are outlined in Table 1.

Table 1. Overview view of SWEDD+ Project Staff as of May 2023

Staff function	# of staff recruited	# of staff to be recruited/appointed
Operations Officer	1	
Senior Accountant	1	
Accountant	1	
Senior Procurement Officer	1	
Procurement Officer	1	
Monitoring and Evaluation Officer	1	
Social Risk Management Specialist		1
Environment Risk Management Specialist		1 (as needed basis)
GBV Specialist		1
Drivers		3
Administration and support staff		3

The number of Project workers will be susceptible to change and will be monitored by project activity (see Table 2 below). The provisions of the LMP will apply to all Project workers regardless of duration of their contract.

3. Assessment of key potential labor risks

This section presents an overview of project activities that project workers will carry out during implementation and identifies key labor risks which may be associated with the project.

3.1. Worker characteristics by project activity

The project will be implemented country-wide but given the poor indicator performance for girls and women in five out of the eight Local Government Areas (LGAs), the project will be piloted in these areas and gradually be expanded nationwide. These LGAs are Mansakonko, Kerewan, Kuntaur, Janjanbureh and Basse. Table 2 presents the types and characteristics of project workers by project activity. The estimated and actual numbers of workers will be completed before workers are hired and as staffing requirements become clearer.

Worker characteristics

Staff function	# of staff recruited	# of staff to be recruited/appointed
Operations Officer	1	
Senior Accountant	1	
Accountant	1	
Senior Procurement Officer	1	
Procurement Officer	1	
Monitoring and Evaluation Officer	1	
Social Risk Management Specialist		1
Environment Risk Management Specialist		1 (as needed basis)
GBV specialist		1
Drivers		3
Administration and support staff		3
GBV focal points		20 per region
GM Committees		7 members per region
Health workers		300 Nationwide
Volunteers		300

Table 2. Overview of project activities and corresponding project worker categories (to be completed during implementation before workers are hired and as staffing requirements become clearer)

Component	Project Activity	Project Category	Number of Project Workers		Worker Category	Characteristics of Project Workers	Timing of Labor Requirements
			Estimated	Actual			
1	Target audience analysis	Project development, management and monitoring	350	TBD	Contracted workers non-governmental organizations (NGOs)/ Direct workers (MoH)	Consulting firm	Project preparation phase and throughout implementation
	Multi-media and community engagement SBCC campaign	Community outreach, training, and capacity-building and the implementation of community-level interventions	200	TBD	Direct workers/ Contracted workers	PCU and Implementing Partners (IPs)	Project preparation phase and throughout implementation
	Design and implementation of a grievance redress system for the MoGCSW by upgrading the existing MoGCSW toll free call center	Project development, management and monitoring	200	TBD	Direct workers/ Contracted workers	Workers employed by the MoGCSW and PCU	Project preparation phase and throughout implementation
	Establishing a functional electronic civil registration and vital statistics (eCRVS) system to improve the coverage of civil registration of vital events (births, deaths, marriages, and divorces)	Project development, management and monitoring	250	TBD	Direct workers (MoH)/ Contract workers	Workers employed by the MoH	Project preparation phase and throughout implementation
	Training to promote the minimum age of marriage of 18	Community outreach, training, and capacity-building and the implementation of	350	TBD	Direct workers/ Contracted workers/ Community workers	Workers employed by the MoH and PCU	At effectiveness date and throughout the project

	years for all marriages	community-level interventions					implementation phase
	Community level interventions that empower girls and young women	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	TBD	Contracted workers/ Direct workers/ Community workers	Contracted NGOs, Workers employed by the ministries, PCU and Community workers	At effectiveness date and throughout the project implementation phase
	Procurement of contraceptives, and community-based distribution of contraceptive commodities	Transportation of medical supplies, equipment and waste	250	TBD	Direct workers MoH/ Contracted workers (NGOs)	Workers employed by the MoH (RMNCAHN unit) and national workers who drive trucks and deliver medical supplies and equipment	Project preparation phase and throughout implementation
	Project Coordination and Management	Project management, development, and monitoring	150	TBD	Direct workers	Directly recruited PCU employees and other workers employed by the Ministries	Project preparation phase and throughout implementation
	Providing information to beneficiaries at the community level on the appropriate use of contraception methods	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	TBD	Direct workers (MoH)/ Community workers/ Contracted workers (NGOs)	Directly recruited PCU employees, RMNCAH Unit staff and other community workers volunteering for the regional health directorates (Community Health Nurses/Village Health Workers), Civil society organizations (CSOs)/IPs	At effectiveness date and throughout the project implementation phase
2	Community agents/peer educators will be trained, equipped, and deployed to promote and distribute family planning commodities in the community	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	TBD	Direct workers/ Community workers/ Contracted workers (NGOs)	Directly recruited PCU employees and other community workers volunteering for the regional health directorates (Community Health Nurses, Village Health Workers and Community Birth Companions), CSOs/IPs	At effectiveness date and throughout the project implementation phase
	Sensitization of community influential leaders, women groups, village	Community outreach, training, and capacity-building and the implementation of	350	TBD	Direct workers/ Community workers	Directly recruited PCU employees, RMNCAH Unit staff and other community workers volunteering for the regional health directorates	At effectiveness date and throughout the project

support groups (VSGs) on family planning and reproductive health	community-level interventions				(Community Health Nurses, Village Health Workers and Community Birth Companions)	implementation phase
Training of service providers (Community Health Nurses, Village Health Workers and Community Birth Companions) on contraceptive supply, monitoring and records keeping	Community outreach, training, and capacity-building and the implementation of community-level interventions	250	TBD	Direct workers	Directly recruited PCU employees and other workers employed by the MoH	At effectiveness date and throughout the project implementation phase
Mobility support to Village Health Workers to support sensitization efforts.	Transportation of medical supplies, equipment and waste	250	TBD	Direct workers/ Contracted workers	Directly recruited PCU employees and other workers employed by the MoH	At effectiveness date and throughout the project implementation phase
Printing of recording tools for Community Health Workers	Community outreach, training, and capacity-building and the implementation of community-level interventions	100	TBD	Contracted workers	Local contracted workers that specialize in printing	Project preparation phase and throughout implementation
Organization of open field days in each implementing health facility every quarter on family planning	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	TBD	Direct workers/ Community workers	Directly recruited PCU employees, workers employed by the MoH/Regional Health Directorate, and other community workers volunteering for the Regional Health Directorates	At effectiveness date and throughout the project implementation phase
Identify and strengthen community-based human resources to deliver services adapted to adolescents in	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	TBD	Direct workers/ Community workers/ Contracted workers	Directly recruited PCU employees, Workers employed by the MoH (RMNCAHN unit), other community workers volunteering for the regional health directorates, and	At effectiveness date and throughout the project implementation phase

rural areas by supporting the training of 100 midwives and their deployment especially in the rural regions					other contracted implementing organizations	
Establishment of a Centre of Excellence in The Gambia to provide long term trainings for health workers in midwifery	Community outreach, training, and capacity-building and the implementation of community-level interventions	250	TBD	Direct workers/ Contracted workers	Directly recruited PCU employees and workers employed by the MoH (RMNCAHN unit) subject matter specialist	At effectiveness date and throughout the project implementation phase
Counselling on life education (to include nutrition education), training in life and job skills, deworming, and periodic micronutrient distribution (to improve iron and folic acid status), and contraceptive services	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	TBD	Community workers/ Contracted workers	NaNA, Community workers volunteering for the regional health directorates and departments of education and other contracted implementing organizations	At effectiveness date and throughout the project implementation phase
Advocate for and support the promulgation, enactment, enforcement, review or improvement of existing or new laws and policies that will improve the status of girls and women in The Gambia	Project management, development, and monitoring	200	X	Direct workers/ Contracted workers/ Community workers	Implementing Partners/ partner organizations	Project preparation phase and throughout implementation
Capacity building of actors on legal	Community outreach, training, and capacity-	150	X	Direct workers	Implementing Partners	Project preparation

	matters relating to rights of girls/women	building and the implementation of community-level interventions				phase and throughout implementation	
	Project Coordination and Management	Project management, development, and monitoring	150	X	Direct workers	Directly recruited PCU employees and other workers employed by the Ministries	Project preparation phase and throughout implementation
	Raising awareness of communities on rights of girls/women and religious leaders engaged to amplify the messages around the conflicts between state law and religious especially as it relates to harmful traditional practices	Community outreach, training, and capacity-building and the implementation of community-level interventions	350	X	Direct workers/ Community workers/ Contracted workers	Implementing Partners, Community workers volunteering for the regional health directorates and other contracted implementing organizations/CSOs	At effectiveness date and throughout the project implementation phase
3	Establishment and capacity strengthening of the Demographic Dividend Observatory in The Gambia to conduct research on and advocate with policymakers to incorporate gender and the demographic dividend in national and regional development planning and budgeting	Community outreach, training, and capacity-building and the implementation of community-level interventions	200	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation

Update The Gambia's demographic dividend profiling using National Transfer Accounts (NTA) and National Time Transfer Accounts (NTTA)	Project management, development, and monitoring	250	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation
Develop a Demographic Dividend Monitoring Index (DDMI) and Gender Demographic Dividend Monitoring Index (GDDI) for monitoring and tracking Demographic Dividend (DD) in The Gambia	Project management, development, and monitoring	250	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation
Undertaking studies and research on the demographic dividend.	Project management, development, and monitoring	200	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	6 months after effectiveness date and throughout the project implementation phase
Develop and implement a national capacity building program to take into account the demographic dividend in economic, social and cultural	Community outreach, training, and capacity-building and the implementation of community-level interventions	150	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation

development policies.						
Setting up a database to allow the periodic monitoring of the trajectory of the demographic dividend and to facilitate access to it for users.	Project management, development, and monitoring	100	X	Direct workers/ Contracted worker (database specialist)	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation
Participate in the development of the sub-regional network of national observatories of the demographic dividend.	Project management, development, and monitoring	250	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	6 months after effectiveness date and throughout the project implementation phase
Contribute to the development, monitoring, and implementation of the national roadmap “invest massively in young people to take full advantage of the demographic dividend” and the recommendations of sub-regional and international instruments in relation to the achievement of	Project management, development, and monitoring	250	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation

the demographic dividend.						
Produce the annual national report on the profile of the demographic dividend in The Gambia to assess the evolution of the composite dividend monitoring index demographic.	Project management, development, and monitoring	250	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	6 months after effectiveness date and throughout the project implementation phase
Conduct advocacy actions aimed at implementing economic and social policy recommendations resulting from studies and research on the demographic dividend	Project management, development, and monitoring	250	X	Direct workers	Workers employed by the MoH/ MoGCSW/ National Population Commission Secretariat	Project preparation phase and throughout implementation
Project Coordination and Management	Project management, development, and monitoring	200	X	Direct workers	Directly recruited PCU employees and other workers employed by the Ministries	Project preparation phase and throughout implementation
Regional related activities	Project management, development, and monitoring	200	X	Direct workers	Directly recruited PCU employees and other workers employed by the ministries	Project preparation phase and throughout implementation

3.2. Key potential labor risks

In the context of the World Bank's ESS2, the Good Practice Guidance Note on *Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx*, and the World Bank Good Practice Note, *Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations*³, the following key labor risks have been identified for the project.

3.2.1. Key Labor Risks associated with Occupational Health and Safety (OHS), accidents, and/or hazardous work

During their work, project workers may encounter accidents, such as traffic accidents and road safety hazards can pose various labor risks, including personal injury or physical harm to workers, including injuries or fatalities (noting that project workers who are required to travel long distances as part of their job may be at higher risk of experiencing accidents). These risks can be further exacerbated by factors such as non-compliance with traffic regulations, defective vehicles, or driver misconduct.

Furthermore, non-compliance with occupation, health, and other safety regulations may lead to accidents, injuries, and fatalities. Occupational safety hazards refer to various hazards that can cause physical harm to project workers in the workplace, such as falls, minor injuries, exposure to chemicals or toxins, and accidents involving machinery or equipment. In addition to hazards relating to poor working conditions, such as physical labor in extreme temperatures, long working hours which can increase the risk of accidents.

This is especially relevant to labor risks associated with accidents and/or hazardous work, for example involving risks relating to the exposure to hazardous substances (e.g., medical waste, contaminants, etc.) and other bodily injuries. Workers who are exposed to hazardous substances, such as medical waste or contaminants, may be at risk of developing occupational illnesses, including infectious diseases (Hepatitis B/C, HIV/AIDS, Tuberculosis etc.), other respiratory and skin allergies, which can be caused by exposure to chemical or biological agents present in medical waste. Therefore, proper handling and disposal of medical waste to prevent the spread of these diseases and protect the health and well-being of workers and the surrounding communities is essential. Furthermore, there are other risks relating to the management of medical waste (adverse health and environmental impacts such as the unintended release of chemical or biological hazards) especially hazardous materials that are infectious, toxic, or radioactive. For example, improper management of medical waste, including the unintended release of chemical or biological hazards, can pose environmental risks, such as soil or water contamination, that may affect the health and well-being of workers and the surrounding communities. Moreover, risks of other accidents may occur that lead to bodily injuries resulting from carrying medical supplies/waste or the installation of equipment such as minor sprains, pain from lifting/physical labor are applicable to project workers.

To mitigate these risks, it is essential to implement measures that promote road safety, such as providing adequate training for all project workers on traffic regulation compliance, providing routine vehicle maintenance/keeping a record of monitoring and maintenance, enforcing strict rules on driver behavior (e.g., prohibit alcohol consumption during working hours and adhere to other occupational health and safety measures), and ensuring up-to-date insurance coverage. Additionally, it is important

³ <https://thedocs.worldbank.org/en/doc/0e0825d39c28f61080380c6be9c40811-0290032022/original/SEA-SH-GPN-for-HD-Operations-CESSO-Issue-Version-September-26-2022.pdf>

to ensure that workers are aware of the risks associated with road travel and are provided with the necessary protective equipment and support to reduce the likelihood of accidents.

Mitigation strategies to prevent accidents and/or exposure to hazardous substances and ensure proper management of medical waste may include providing workers with appropriate personal protective equipment, implementing standard operating procedures for handling hazardous substances, providing training on safe handling and disposal of medical waste, and conducting regular inspections and monitoring to ensure compliance with environmental and health regulations. Additionally, workers will be required to sign a Code of Conduct upon recruitment and receive training/awareness of the implications of the Codes of Conduct (including sanctions, prohibitions) wherein each worker agrees to abide by occupational health and safety measures, as well as expected behaviors to prevent accidents and maintain respectful community relations with regards to management of medical waste.

Additionally, it will be essential for any contracted workers to implement the LMP in order to ensure a safe working environment as stipulated in the requirements of ESS2. All contracted workers will also be obligated to ensure that workers use essential safety equipment, receive basic safety training, and implement the Project's Environmental and Social Management Framework (ESMF) and the World Bank's Environmental, Health, and Safety (EHS) Guidelines.

3.2.2. Key Labor Risks associated with SEA/SH

Key labor risks associated with SEA/SH include the actual or attempted abuse of someone's position of vulnerability, differential power or trust, to obtain sexual favors in the workplace, the actual or threatened physical intrusion of a sexual nature, and unwelcome sexual advances or requests for sexual favor in the workplace (see Annex 1 for a definition of SEA/SH), whether these occur among workers or between workers and community members. For example, project workers who experience SEA/SH may be at risk of physical harm, including assault, rape, or other forms of violence. This can cause physical injuries and other psychological harms (e.g., depression, anxiety, and post-traumatic stress disorder) and cause long-term affects to their mental health and overall wellbeing including other adverse health consequences. Moreover, project workers who experience SEA/SH may need to a leave of absence to seek proper medical care, counseling, or legal assistance which may result in loss of income as well as other career setbacks. These risks are also applicable to community members (particularly from vulnerable groups or key populations) which may be targeted by staff on account of their vulnerability.

To mitigate such risks, it is essential measures to prevent SEA/SH in the workplace are implemented according to the SEA/SH Prevention and Response Action Plan and as per the Code of Conduct. The planned measures include:

- Conducting a mapping of GBV service providers in respective regions and link to the Project grievance mechanisms (including the Workers Grievance Mechanism described in Section 4.5).
- Carrying out a continuous awareness creation of Project team members and implementing partners on the mitigation and response measures considered by the SWEDD GAM Project on SEA and further including SEA/SH sessions in all environmental- and social-related training and other regular meetings with project team members.
- Based on the Project SEP, sensitizing Project stakeholders including focal persons at the community level on the reporting channels for SEA/SH cases and procedure for seeking redress, and ensuring that those channels are confirmed as accessible and safe by the Project

workers and communities (and specifically by women). These consultations will be done in sex-segregated groups with facilitator of the same sex.

- Clearly defining SEA/SH requirements and expectations in contract documents with grant partners.
- Requiring Project workers to sign the Code of Conduct on the Prohibition of SEA/SH upon recruitment. The Code of Conduct for project workers explicitly prohibits SEA/SH (by both project workers themselves and/or contractors or subcontractors) (see Annex 1) and outlines applicable sanctions for infractions. Project workers will receive training/awareness of the implications of the Codes of Conduct (including sanctions and prohibitions). Contracted Project workers will be required to have a written contract that is compliant with the LMP.
- Ensuring that separate toilet and hygiene facilities are available, functional and lockable from the inside for men and women at all venues where Project activities are being carried out.
- Instituting biannual reporting and feedback between Project implementing partners and regional committees.
- Conducting regular monitoring on partners' compliance to SEA/SH requirements and provide feedback for improvement.
- Preparing and submitting biannual reports to the World Bank including data on SEA/SH cases and progress made to resolve these cases to the satisfaction of survivors.

3.2.3. Key labor risks associated with lack of equal opportunity, transparency, and discrimination especially for vulnerable groups

Labor risks associated with the lack of equal opportunity, transparency, and discrimination can manifest in various ways. One significant risk is the exclusion of individuals from marginalized or disadvantaged groups from employment opportunities, often due to discriminatory practices in recruitment and selection processes. Unequal pay is another concern, with discrimination in hiring processes leading to the same work being compensated differently for project workers. This can result in individuals from marginalized or disadvantaged groups being paid less than their counterparts for doing the same job. Inadequate working conditions, including poor health and safety measures, long working hours, and a lack of access to benefits and social protections, can also affect vulnerable groups. Project workers with disabilities may face additional challenges related to accessibility, such as the need for wheelchairs, ramps, or alternative communication formats. Discrimination can also lead to harassment and violence in the workplace, limited job security, and physical and psychological impacts on workers, increasing the likelihood of further exploitation and abuse of vulnerable groups. It is essential to prioritize the principles of equal opportunity, transparency, and nondiscrimination to avoid these labor risks and create a safe and inclusive work environment.

Employment decisions such as hiring, promotion, and access to job opportunities should be based on the principles of equality, non-discrimination, and transparency. These principles require that personal characteristics unrelated to the inherent work requirements should not be taken into consideration. National laws governing employment matters typically reflect these principles, which are also aligned with the requirements of ESS2. Additionally, measures should be implemented to ensure that workers with disabilities have equal access to project sites and that information can be readily available in different formats, such as large print, Braille, accessible digital formats, or audio tape. This information should be provided to workers with disabilities at the time of recruitment. Addressing these risks requires promoting equal opportunity, transparency, and non-discrimination in all aspects of the employment cycle, including recruitment and selection, compensation and benefits, training and development, performance management, and promotion. It also involves creating a safe and inclusive

work environment, establishing grievance mechanisms, and ensuring compliance with relevant labor laws and international labor standards.

3.2.4. Key labor risks associated with the likely presence of subcontractors and volunteers

The involvement of subcontractors and volunteers in project implementation can pose additional labor risks that need to be carefully managed by the PCU. For volunteers, there is a risk of limited rights and inadequate working conditions, especially when they are engaged in delivering project activities in communities. In such cases, it is essential to ensure that volunteers are not exploited or exposed to hazardous working conditions. When it comes to subcontractors, the risk lies in a lack of control over work contracts and conditions, which can result in poor working conditions and labor violations. To mitigate these risks, the project should have measures in place to ensure that subcontracted workers are aware of and abide by the LMP. This may require a due diligence process to be implemented to ensure that the subcontractors have appropriate policies and procedures in place to manage their workforce in compliance with the LMP and national labor laws. Moreover, subcontractors may also pose risks related to forced labor and child labor if they engage in such practices, which could be difficult to monitor in rural areas where poverty rates are high. Thus, it is essential to have robust monitoring mechanisms in place to identify and address any labor risks associated with the presence of subcontractors.

Overall, it is important to ensure that subcontracted workers and volunteers are treated fairly and have access to safe and healthy working conditions. This requires careful planning, monitoring, and evaluation of labor practices throughout the project implementation process, including the selection and management of subcontractors and volunteers.

3.2.5. Key labor risks associated with child labor and labor influx

Additionally, the project may face labor risks related to forced labor and child labor due to minor rehabilitation work in rural areas with high poverty rates, which may be challenging to monitor. However, as the SWEDD+ project only involves minor rehabilitation of existing infrastructure and no civil works, the risk of labor influx is very low. Nonetheless, it is crucial to acknowledge that project activities may lead to other types of labor influx that could increase risks of SEA/SH (such as when workers have contact with vulnerable populations) and community health and safety risks (such as the transmission of communicable diseases like COVID-19). Any SEA/SH risks associated with these activities will be addressed through the Project Prevention and Response SEA/SH Action Plan and its Accountability and Response Framework including the Grievance Mechanism and Codes of Conduct, which will be implemented before project activities commence. Moreover, the project must fully comply with relevant national laws on forced and child labor.

Table 3 provides an overview of key potential labor risks organized by project activity grouping.

Table 3. Overview of key labor risks organized by project activity

Project Category	Key Labor Risks
Transportation of medical supplies, equipment and waste	<ul style="list-style-type: none"> ▪ Traffic accidents and road safety hazards and risks (e.g. road traffic accidents involving personal injury or driver indiscipline) ▪ Risks relating to the exposure to hazardous substances (e.g. medical waste, contaminants, etc.) ▪ Risks relating to the management of medical waste (adverse health and environmental impacts such as the unintended release of chemical or biological hazards) especially hazardous materials that are infectious, toxic, or radioactive ▪ Risk of labor influx which increases SEA/SH risks (e.g. when workers have an opportunity to identify or potentially interact with vulnerable populations in the local communities) and community health and safety risks (i.e., transmission of communicable diseases such as COVID-19)

	<ul style="list-style-type: none"> ▪ Risk that some accidents may occur that lead to bodily injuries resulting from carrying medical supplies/waste or the installation of equipment such as minor sprains, pain from lifting/physical labor
<p>Community outreach, training, and capacity-building and the implementation of community-level interventions</p>	<ul style="list-style-type: none"> ▪ Risk for lack of control of government over work contracts and conditions among subcontracted project implementers – requires due diligence process ▪ Risk of limited rights and inadequate working conditions for volunteers delivering project activities in communities ▪ Traffic accidents and road safety hazards and risks (e.g., traffic accidents involving personal injury) ▪ Risk of workplace violence and harassment (e.g., unwelcome conduct, bullying, domestic abuse), retaliation, sexual exploitation and sexual abuse and sexual harassment (SEA/SH) among workers against each other, community members against workers, and workers against community members ▪ Labor risks associated with lack of equal opportunity, transparency, and discrimination especially for vulnerable groups ▪ Risk that some accidents may occur that lead to bodily injuries resulting from physical engagement in project activities such as minor sprains, pain from lifting/physical labor
<p>Project management and monitoring</p>	<ul style="list-style-type: none"> ▪ Traffic accidents and road safety hazards and risks (e.g., traffic accidents involving personal injury) ▪ Risk of workplace violence and harassment (e.g., unwelcome conduct, bullying, domestic abuse), retaliation, sexual exploitation and sexual abuse (SEA/SH) among workers against each other, community members against workers, and workers against community members (e.g., SEA/SH and harassment in the workplace and PCU) ▪ Labor risks associated with lack of equal opportunity, transparency, and discrimination especially for vulnerable groups

4. Policies and procedures

This section outlines main policies and procedures to be followed during the implementation of the Project. The section will be updated and amended as and when needed.

The PCU will inform the Bank about any significant event (labor issues) as soon as reasonably practicable, but no later than five calendar days after the occurrence of the event. Such events include strikes or other labor protests. The PCU will prepare a report on the event and the corrective action and submit to the Bank within 30 calendar days of the event.

4.1. Brief overview of labor legislation

4.1.1. Terms and conditions

The Gambia's primary labor legislation is the Labor Act 2007. The Act does not include specific provisions on working hours for either employed or contracted workers. The LMP requires the duration of work not to exceed 40 hours per weeks (8 hours per day). The 8 hours are not inclusive of time for meal breaks. The employees will have a meal break of 1 hour each workday. The duration of rest between working days shall not be less than 12 hours.

A review of the Labor Act 2007 was completed in 2020 by the Ministry of Trade, Industry, Regional Integration and Employment, and a draft bill for revision of the Labor Act is currently before the Parliament. However, the content and ratification timetable for a new law are not confirmed. New legislation, therefore, may come into effect while the project is under implementation. Any revisions to the Act 2007 may require that SWEDD+ reassess applicable terms and conditions.

The **Public Service Act** (1991) is also relevant for the Project, as SWEDD+ activities will be performed by staff from different ministries at central and regional level. The act includes provisions for the appointment of public servants, and the terms and conditions of their employment.

Should the final project include procurement and/or the contracting for civil works, additional labor legislation includes:

The **Equality of Opportunity Act** (2010), with provision for the Prohibition of Discrimination Against Women in Employment (Part V)

The **Persons with Disabilities Bill**, with provision for the social integration of disabled persons, and non-discrimination in the work force

The **Trafficking in Persons Act** (Act No. 11 of 2007), including provision for the elimination of forced labor

The **Children's Act** (2005), which prohibits engaging a child in exploitative labor and hazardous work, or labor that deprives the child of health, education or holistic development.

4.1.2. Occupational Health and Safety

The Labour Act 2007 includes Occupational Health and Safety measures to ensure the health and safety of workers. Article 72 of the Labour Act 2007 defines basic requirements and general principles of occupational safety for jobs that are dangerous, hard, harmful, and/or hazardous. These obligate the employer to provide safe working conditions and adequate safety equipment for employees.

4.2. Responsible staff

For the purpose of the SWEDD+ project, “Project Workers” mean direct workers; contracted workers whether from companies, NGOs or CSOs; and community workers.

The Project Implementation Unit will be responsible for the following:

- Implementation of the agreed Labor Management Procedure for direct workers
- Monitoring the training and activities of the Project Workers
- Ensuring that the grievance mechanism for Project Workers is established and monitored

This section identifies the function and/or individuals/agencies responsible for oversight mechanisms within the Project.

4.2.1. Engagement and Management of Direct Workers

The PCU is responsible for engagement of direct workers, contractors and ensuring compliance with contract conditions.

The Gambia SWEDD+ will address all LMP aspects as part of procurement for works, such as equipment purchase.

4.2.2. Engagement and Management of Contracted Workers

The Contractor is responsible for the management of its workers or subcontracted workers in accordance with the LMP. This includes ensuring compliance with the LMP’s provisions.

4.2.3. Addressing Workers Grievances

The SWEDD+ implementing partners will be required to implement the Worker Grievance Mechanism (WGM) outlined below. They will review the records monthly and inform the PCU of WGM complaints and resolutions, which will be reflected in the quarterly reports to the World Bank.

4.3. Age of Employment

Gambian law, especially the Children’s Act of 2005, prohibits anyone under 18 from performing hazardous work at public or private agricultural, industrial or non-industrial undertaking or in any of their branches. The SWEDD+ project will not have activities that fall into these categories. Furthermore, SWEDD+ will not hire any Project Worker under the age of 18 years.

4.4. Terms and Conditions

The employment of Project Workers will be based on the principles of non-discrimination and equal opportunity, and respect for human rights as required in the Labour Act of The Gambia (2007), the Public Service Act (1991) and the Equality of Opportunity Act (2010). There will be no discrimination with respect to any aspect of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment.

The terms and conditions applying to PCU and other direct employees are set out in the contracts that provide for the rights of employees, in line with the national Labour Act. Terms and conditions of contracted workers are determined by their individual contracts. The work hours are 40 hour per week for direct workers.

As a core contractual requirement, contractors are required to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the PCU. The contractual arrangements with each project worker must be clearly defined. All environmental and social requirements will be included in the bidding documents and contracts. In addition, MoH will be responsible to ensure that safe messaging around Occupational Health and Safety measures are distributed and available to all direct workers, as per provisions in this LMP.

4.5. Worker Grievance Mechanism

The SWEDD+ project includes a specific procedure to manage the complaints of project workers (direct and contracted workers) through a Worker Grievance Management Mechanism (WGM).

The WGM handles grievances in a way that is objective, prompt and responsive to the needs and concerns of the aggrieved workers. It allows for anonymous complaints to be raised and addressed and will keep the name of complainants confidential when they require such confidentiality. It ensures that complainants are protected from reprisals and discrimination in the workplace. It provides complainants support in submitting and documenting their grievance and respects their right to be accompanied by a colleague, friend, or union representative at any meeting or hearing.

The WGM does not replace or override the requirement that the PCU and all entities involved in project implementation provide processes for workers to report situations in the workplace that they believe are not safe or healthy, such as reporting requirements regarding workplace injuries and accidents (see section on Occupational Health and Safety). In addition, the WGM does not prevent workers from seeking recourse from the Industrial Tribunal, established under the Labour Act, or from the Ombudsman (Act of 1997). Both offer alternative forms of dispute settlement for complaints regarding injustice, corruption, abuse of power, labor issues, maladministration and unfair treatment. Finally, the WGM does not preclude any project worker's ability to access any other judicial or administrative remedies that might be available under national law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

4.5.1. WGM principles and organization

The WGM will be placed under the responsibility of the Grievance Management Committee (GMC) also in charge of the project level GM. The GMC will comprise representatives of ministries and agencies directly involved in project implementation (including MoH, MoGCSW, MoBSE and MoYS), representatives of key stakeholders (including women's and children's rights NGOs), as well as the PCU coordinator. The Director of Gender Equality and Women Empowerment (MoGCSW) will serve as the focal point within the GMC. The committee will work under the supervision of the Permanent Secretary, MoGCSW.

The GMC will define the following elements of the WGM in accordance with the provisions of the LMP:

- A procedure to receive, record, refer, resolve and track grievances, including a separate and strictly confidential procedure to deal with cases of alleged SEA/SH.
- In responding to SEA/SH grievances, the procedure will apply a survivor-centered approach placing the survivor's needs, wishes, and rights at the centre of the resolution process. The survivor-centered approach is based on a set of principles and skills designed to guide professionals – regardless of their role – in their engagement with survivors (predominantly

women and girls but also men and boys, and transgender and nonbinary people) who have experienced sexual or other forms of violence. The procedure will ensure that survivors are treated with dignity and respect, and their needs, rights and choices are taken into consideration at all times through all processes and decisions. Assistance will not be imposed on a survivor if they are not ready to proceed with a matter.

- Multiple uptake channels such as comment/complaint form, workplace suggestion boxes, a dedicated email address, a hotline for telephone calls and What'sApp messages managed by the MoH call center, complaint and suggestion boxes at the MoH call center and one stop shop centers.
- A Confidential Grievances Desk Officer receiving anonymous worker grievances, including through the GM telephone hotline; the Officer in charge of anonymous complaints will be provided specific training to receive and handle cases relating to SEA/SH.
- The Confidential Grievances Desk Officer will also receive worker complaints related to SEA/SH incidents involving workers/managers in situation of power/hierarchy, including through the GM telephone hotline. The intake process for these cases will be highly confidential and will protect survivors against any risk of retribution or retaliation.
- Furthermore, workers will be able to consult the Project's Social Safeguards Specialist and/or the GBV focal point in highly sensitive cases.
- Stipulated timeframes to respond to grievances, with time limits set for each stage of the procedure (e.g., a maximum period between the time a complaint is communicated and the holding of a meeting to consider it).
- A registry to record and document all stages of the management of a complaint, including a copy of the initial complaint, the employer's response, recorded notes of any meeting, conclusions, and reasons for such findings; the registry will be managed by the GMC and placed under the responsibility of the GMC focal point.

The PCU ensures that all government agencies and contractors involved in the project implement the WGM. This entails that all workers be informed about the WGM at the time of hiring, and details of how it works must be readily available. Workers need to know who they can turn to in the event of a grievance and be informed of the support and sources of advice available to them. Where consultants/contractors have an existing grievance system, their direct workers should use the mechanism in first instance, but they have the possibility to submit or escalate their grievance to the WGM if they wish to do so. All line and senior managers should be familiar with their organization's grievance management mechanism and with the WGM.

The PCU also ensures that the GMC has adequate resources and authority to manage the WGM in accordance with the provisions of the LMP, including to conduct investigations.

4.5.2. Management of individual and collective complaints

The SWEDD+ WGM includes the following steps:

Step 1: Workers submit their grievance through one or more of the uptake channels.

Step 2: The GMC focal point records the grievance and provides an initial response informing the complainant about the handling of the case. In case of an anonymous or confidential complaint, the GMC conducts a specific procedure for such grievances.

Step 3: The GMC investigates the grievance and determines a response that is proportionate to the nature and scale of the issue.

Step 4: The GMC communicates its response to the complainant and receives the complainant's response.

Step 6: The GMC closes the grievance if the complainant is satisfied or, if not, explores other resolution options with the complainant. Once all possible options have been proposed and if the complainant is still not satisfied, the GMC advises them on their right to legal recourse.

Each government unit and contractor engaged in project implementation should hold periodic team meetings to discuss any workplace concerns. The grievances raised by workers should be recorded with the actions taken by each unit. The records of individual and collective complaints made through team meetings should be integrated in the WGM registry.

The GMC provides a periodic summary of new grievance cases recorded in the registry and the PCU includes the summary in its periodic reports on project implementation.

4.6. Contractor Management

The PCU will use the Bank's 2018 Standard Procurement Documents for solicitations and contracts, and these include labor and occupational, health and safety requirements. The tendering process for contractors will require that contractors can demonstrate their labor management and OHS standards, which will be a factor in the assessment processes.

Contractual provisions will require that contractors:

- Provide induction training to employees and sub-contractors on Gender Based Violence (GBV) Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) issues, according to project conditions. The contractor Code of Conduct shall include specific terms for the prevention, definition, prohibition and sanctions related to acts of SEA/SH in all SWEDD+ project activities.
- Monitor, keep records and report on terms and conditions related to labor management;
- Provide workers with evidence of all payments made, including benefits and any valid deductions;
- Ensure that there is a health and safety focal point, responsible for monitoring OHS issues;
- Keep records regarding labor conditions and workers engaged under the Project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime). Specifically, records will document SEA SH-related incidents and complaints.
- Record safety incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.);
- Report evidence that no child labor is involved;
- Provide information on training and induction, including dates, number of trainees, and topics;
- Provide insurance against occupational hazards for workers, including ability to access medical care;
- Provide detailed reports on worker grievances including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be

taken. Grievances listed should include those received since the preceding report and those that were unresolved at the time of that report;

- Sign the Manager's Code of Conduct and/or the Individual Code of Conduct, as applicable.

Monitoring and performance management of contractors will be the responsibility of the PCU. The PCU will be responsible for oversight of the labor management provisions as well as contract supervision. The PCU Focal Point will have overall responsibility for data collection, monitoring, and analysis of the LMP as part of the Project's M&E efforts. The PCU Focal Point will monitor the implementation of, and compliance with, this LMP, including management of worker-related grievances. Monitoring reports should be reviewed and submitted regularly to the Manager of the PCU, who will submit with other monitoring reports to the World Bank.

Contractors will keep records in accordance with specifications set out in this LMP. PCU may at any time require records to ensure that labor conditions are met and that prevention mechanisms and other health and safety issues are being followed. The PCU will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

4.7. SWEDD+ Occupational Health and Safety

All project workers should receive training on OHS and relations with local community. Training programs should also focus, as needed, on SEA/SH prevention and personal safety.

OHS measures include the following provisions:

- Ensuring workplace health and safety standards are in full compliance with Gambian law,
- Comply with national legislation, WB's ESS2 requirements, requirements set forth in Section 2 of the WB Environmental Health and Safety Guidelines⁴, and other applicable requirements which relate to OHS hazards
- All workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken, which should be reported to the PCU and the World Bank immediately
- All workers (irrespective of contracts being full-time, part-time, temporary or casual) to be covered by insurance against occupational hazards and other safety issues, including ability to access medical care and take paid leave if they need to
- All work sites to identify potential hazards and safety issues and actions to be taken in case of emergency
- Any on-site accommodation to be safe and hygienic, and with distancing guidelines in place, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation and cooking facilities
- Workers residing at site accommodation to receive training in preventing infection through contaminated food and / or water and avoidance of sexually transmitted diseases
- Provide PPEs as suitable to the task and hazards of each worker, without cost to the worker;
- Construction materials manufactured in The Gambia be procured only from suppliers able to certify that no forced labor (including debt bondage labor) or child labor (except as permitted by the Labour Law) has been used in production of the material

⁴ <https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

- Protocols on auto travel and provisions pertaining to road safety/traffic accidents.

4.8. Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

The SWEDD+ project will take measure to prevent and respond to acts of discrimination, Gender Based Violence, Sexual Exploitation and Abuse and Sexual Harassment from project activities. Such will include measures not to engage in:

- Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
- Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
- Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions; any form of sexual activity with individuals under the age of 18.

Annexes

Annex 1: Code of Conduct on the Prohibition of SEA/SH

The SWEDD+ mandatory Code of Conduct (CoC) includes specific provisions on SEA/SH for all project workers. The CoC is aligned with the Gambian labor code and existing standard behavioral norms for civil servants. The CoC is based on the following definitions.

- Sexual exploitation is the actual or attempted abuse of someone’s position of vulnerability, differential power or trust, to obtain sexual favors, including, but not only, by offering money or other social, economic or political advantages. It includes trafficking and prostitution.
- Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual slavery, pornography, child abuse and sexual assault.
- Harassment, a form of discrimination, is any unwanted, unwelcome, or uninvited physical, verbal, or non-verbal behavior that makes a person feel humiliated, intimidated, or offended, and that interferes with work or creates an intimidating, hostile, or offensive work environment. Harassment may consist of a single or repeated incident. A single incident is considered harassment if it has a negative impact on an individual or the work environment. Although harassment may not always be intended, the impact – not intent – is a key factor.
- Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.
- Prohibited conduct in association with harassment includes, but is not limited to slurs, negative stereotyping, racial, ethnic, or religious epithets, written or graphic material, offensive jokes, bullying, nonviolent threats or insult, belittling, aggression, abuse, or molestation whether emotional, verbal, or physical.

Individual Code of Conduct (SWEDD+ GAM)

I, _____, acknowledge that it is important adhering to SWEDD+ GAM Project environmental, social, health and safety (ESHS) standards, requirements, and preventing sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC).

SWEDD+ GAM considers that failure to follow ESHS standards, or to commit acts of SEA/SH or VAC —be it on the workplace, the work surroundings areas, or the surrounding communities— constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA/SH or VAC by law enforcement authorities may be pursued if appropriate, and only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

I agree that while working on the project I will:

- Attend and actively partake in training courses related to ESHS, HIV/AIDS, SEA/SH and VAC as requested by the project.

- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not engage in sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.
- Not participate in sexual contact or activity with children (persons under the age of 18), — including grooming or contact through digital media (community members married to minors, even if legally done, will not be hired). Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not have sexual interactions with members of the host communities (NB: an exception applies to a locally hired worker already married to an adult member of the community). This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the Grievance Mechanism or to my manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

Regarding children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
- Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labor below the minimum age of 16 unless national law specifies a higher age or which places them at significant risk of injury.
- Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s E&S standards on child labor and minimum age.
- Take appropriate caution when photographing or filming children (see details below).

Use of children's images for work related purposes. When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.
- Parents or guardians must sign a consent form

Sanctions

I understand that if I breach this Individual Code of Conduct, the project partner will take Disciplinary action which could include:

- Informal warning.
- Formal warning.
- Additional Training.
- Loss of up to one week’s salary.
- Suspension of employment (without payment of salary/contract fees), for a minimum period of 1 month up to a maximum of 6 months.
- Termination of employment.
- Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management requirements. That I will avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex 2: Summary of key project development objectives

The proposed Project Development Objectives (PDO) is to increase women and adolescent girls' empowerment and their access to quality services through a multisectoral “4E” approach, and the interventions will contribute to the following:

- a) Enhance - sexual and reproductive health among adolescents (girls and boys);
- b) Educate - keep girls in school through secondary education
- c) Employ - expand economic opportunity for adolescents and young women; and
- d) Empower - address social norms, combatting harmful practices, strengthening legal frameworks and building capacity to inform national and regional policy, programming and budgeting, and considering aspects of population and gender

The following indicators will be used to measure the PDO:

Component 1

- Retention rate of adolescent girls enrolled in secondary schools in the project intervention areas.
- Percentage of adolescent girls and women benefiting from safe space interventions who understand the harmful consequences of child marriage and early pregnancy and the benefits of birth spacing.
- Number of young women engaged in an income-generating activity at least six months after receiving economic support interventions from the project.

Component 2

- Number of women using a modern contraceptive method in the project's intervention areas.
 - < 24 years
 - ≥ 24 years

Component 3:

- Number of countries that have conducted Budgeting sensitive to gender and Demographic Dividend process and presented to parliament or government.
- Number of regional initiatives developed and implemented with the support of the SWEDD+ project.

Annex 3: Uptake forms for worker grievances