



**Arab Republic of Egypt**

**Ministry of Supply and Internal Trade**

**Emergency Food Security and Resilience**

**Support Project**

**(P178926)**

**LABOR MANAGEMENT PROCEDURES (LMP)**

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<b>Prepared for</b>	Egyptian Holding Company for Silos and Storage (PMU Project management unit)
<b>Address</b>	1, El Sawah Square, Saray El Kobba, Cairo, Egypt – postal code: 11813
<b>Tel</b>	+2022850914
<b>Fax</b>	+2022850910
<b>Email</b>	Email: info@ehcss.com
<b>Website</b>	Www.ehcss.com

Prepared by	Technical review	Delivery date	First Revision	finaly Revision
Dr. Soliman El-Bakary	Dr. Atef Kamal	July 2023	Oct 2023	Jan 2024
DR. Walaa Safwat				
MR. Mohamed Elserafy				
Eng. Akram Okasha				

### Definition

1	<b>Project</b>	(Emergency Food Security and Resilience Support Project (P178926)
2	<b>Services</b>	Stakeholders Engagement Plan (SEP)
3	<b>Client</b>	Ministry of Supply and Internal Trade Egyptian Holding Company for Silos& Storage (PMU Project management unit)
4	<b>Consultant</b>	Bayan Environmental Services Co.
5	<b>Area of Project</b>	Arab Republic of Egypt

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## Acronyms

ARC	Agriculture Research Center
CAAES	Central Administration for Agricultural Extension Services
CAPMAS	Central Agency for Public Mobilization and Statistics
ESF	Environmental and Social Framework
ESCP	Environmental and Social commitment Plan
EEAA	Environmental Affairs Agency
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
FAO	Food and Agriculture Organization
FGD	Focus Group Discussions
GASC	General Authority for Supply Commodities
GBV	Gender Based Violence
GCSS	General Company for Silos and Storage
GM	Grievances Mechanism
GIIP	Good International Industry Practice
EHCSS	Egyptian Holding Company for Silos and Storage
FM	Financial Management
HIECS	Household Income, Expenditure and Consumption Survey
IFAD	International Fund for Agricultural Development
IFPRI	International Food Policy Research Institute
IU	Implementation units
LMP	Labor Management Procedures
MALR	Ministry for Agriculture and Land Reclamation
MOE	Ministry of Environment
MOF	Ministry of Finance
MOMI	Ministry of Manpower and Immigration
MOHP	Ministry of Health and Population
MOSIT	The Ministry of Supply and Internal Trade

MOT	The Ministry of Transport
MIS	Management Information System
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PMU	Project management unit
POM	Project Operational Manual
SEA/SH	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
WB	World Bank

## 1. Introduction

Under the World Bank Environmental and Social Standard 2 (ESS2: Labor and Working Conditions), The Government of Arab Republic of Egypt (the Borrower) (as the grant receiver, with the involvement of the Ministry of Supply and Internal Trade as the implementing agency (MOSIT) and the Ministry of Agriculture and Land Reclamation (MALR),) are required to develop Labor Management Procedures (LMP) as set out in the Loan Agreement. The World Bank has agreed to provide financing for the Project Emergency Food Security and Resilience Support Project (P178926), as set out in the referred agreement.

The Borrower will ensure that the Project will be carried out in accordance with the Environmental and Social Standards (ESSs) and Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank, in addition to laws, regulations and policies of Egypt pertaining to environmental protection and management (Law No ٤/١٩٩٤ amended by law 9/2009 and its executive regulations).

## 2. Project background

The Government of Egypt has received financing in the amount of US\$ 500 Million from the World Bank toward the cost of the Emergency Food Security and Resilience Support Project, and it intends to apply part of the proceeds to payments for goods, works, non-consulting services and consulting services to be procured under this project. This project will be jointly self-financed by the Ministry of International Cooperation.

## 3. Project components

### The project will include the following components:

#### **Component 1. Emergency Response Measures.**

Carrying out the procurement of eligible imported wheat.

#### **Component 2. Strengthening Preparedness and Response to Shocks.**

##### **Sub-Component 2.1. Improving the resilience of the wheat supply chain and reducing loss and waste.**

Implementing the following upgrades at 10 priority wheat silos serving Qena, Assiut, Aswan, Al Wadi Al Jadid, Minya and Giza governorates, strategically prioritized in poorer Governorates of Upper Egypt: (a) upgrading the storage capacity of 6 silos; (b) construction of 4 new silos; (c) supporting modernization of grain collection and storage infrastructure to ensure safe, wasteless and energy-efficient storage of grain.

##### **Sub-Component 2.2. Improving farm-level resilience and enabling sustainable domestic cereal production.**

Implementing the following improvements: (a) upgrading Ministry of Agriculture and Land Reclamation's 14 regional seed stations, including installation of equipment and rehabilitation of selected seed centers; (b) installation of automatic agrometeorological stations, and the /equipment and operationalization of the extension service units in at least 10 agricultural service centers in selected governorates of Upper Egypt; (c) supporting implementation of agricultural extension programming for farmers.

### **Component 3. Project Management and Knowledge Management.**

Implementing the following project management and knowledge management activities: (a) financing consultants if required for financial management (including audit), procurement, monitoring and evaluation and environmental and social compliance (including a citizen engagement mechanism); (b) financing studies, technical assistance and policy dialogue to contribute to overall food security policies and reforms.

The Project management unit (PMU) shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSS) and this Stakeholder Engagement Plan (ESCP), in a manner acceptable to the World Bank. This ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation

## **4. Environmental and Social Aspects**

This project addresses the environmental and social aspects through the World Bank's Environmental and Social Standards (ESS) approach/ framework. One of the Standard- ESS 2- relates to Labor and Working Conditions and expects the Borrowers to develop labor management procedures (LMP). The LMP enables identify main labor requirements and risks associated with the whole project. It helps the Borrower to determine the resources necessary to address labor issues. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project. Accordingly, this document details out the type of workers likely to be deployed by the project and the management thereof.

## Overview of labor use on the project

The World Bank's ESS2 (Labor and Working Conditions) and ESS4 (Community Safety and Health) were identified as applicable for the project. The purpose of the Labor Management Procedures (LMP)—developed in accordance with the requirements of ESS2—is to set out the ways in which workers under the different project components will be managed in relation to the associated risks and impacts. The objectives of the LMP are to:

- (a) Identify the different types of project workers who are likely to be involved in the project.
- (b) Identify and assess the labor related risks and impacts for project activities.
- (c) Set out procedures to meet the requirements of ESS2, ESS4 and of the applicable national legislation.

The LMP will be applied with due consideration of the requirements of national laws, the interrelatedness of ESS2 with other Environmental and Social Standards in general and ESS4 in particular

Under the World Bank Environmental and Social Standard 2 (ESS2: Labor and Working Conditions), the Borrower is required to develop labor management procedures (LMP).

ESS 2 categorizes the workers into: direct workers, contracted workers, community workers and primary supply workers. The following section describes categories involved in the project based on available information:

### Characteristics of Project Workers

All workers are expected to be local. Female workers are expected to constitute approximately 30% of the Direct Workers and less than 5% of the Contracted and Primary Supply Workers. It is not expected that the project will hire workers between the minimum age and 18.

### Timing and Description of Labor Requirements in the Project:

The following labor requirements are generic across various phases at each silo site but may vary from site to site. Refer to the table titled "Number of Project Workers" for comprehensive details encompassing all relevant categories of workers.

#### **1. Direct Workers**

The Project will employ Direct Workers for the Project Management Unit (PMU) to be formed at the Egyptian Holding Company for Silos and Storage (EHCSS); Two working groups under the Ministry of Supply and Internal Trade (MOSIT), and Ministry for Agriculture and Land Reclamation (MALR); and two Implementation Units (EHCSS; Agriculture Research Center (ARC) through its affiliates). The PMU and the IUs, will be established before effectiveness and will be maintained throughout the project's duration.



Other Direct Workers will include individual consultants who will be assigned throughout the Project implementation. It is estimated that the Project will hire 32 workers are hired by the Egyptian Holding Company for Silos and Storage, in addition to 20 workers During the local wheat supply season and 4-6 workers out of season, those will be hired as loading and aging contractor . The total number has been estimated, but will be clarified when project implementation begins. The total number will be updated when the plan is updated.

The direct workers at PMU will generally be required full time and around the year for the project duration. Other experts/consultants will be hired on demand basis throughout the project period. Timing for involvement of contracted workers will be known at later stages, however it is clear that they will be engaged depending on implementation of various sub-components on specific time slots.

Government civil servants will be involved in the project coordination and supervision including the Ministry of Supply and Internal Trade, Ministry of Environment, Ministry for Agriculture and Land Reclamation, Ministry of Health and Population, university hospitals waste management staff, and governorate management staff and workers (i.e., executive SWM units and heavy equipment drivers). The government civil servants will remain subject to the terms and conditions of the existing public sector employment agreement and ESS2 and these Labor Management Procedures (LMPs) will not apply to such government civil servants. However, conditions of OHS, and restriction on child labor and forced labor are three conditions that would still apply to the civil servants

## **2. Contracted Workers**

The Project will use the service of consulting firm(s) for the different Environmental and Social (E&S) documents and plans to be developed, technical design, feasibility study, construction supervision, training, and compliance audits during both construction and operation phases. Upon completion of design and feasibility studies, contractors for the different subprojects will be hired for the construction work. Besides the operation staff, the Project will also hire contractors for maintenance work; waste management; and consulting firms. It is estimated that the Project will hire a total of 1211 Contracted Workers.

Civil Works contracted workers will be required as per the need. So, it will be up to the contractor to mobilize labor force to coincide with the type of work and the season. The work hours should not exceed 8 hours a day, with the provision of at least 1 hour for the rest.

### 3. Community Workers

During the project preparations, consultations underscored the potential hiring of community workers by contractors during the construction phase at Silos. Citing World Bank's ESS2 Guidance Notes (GN), it emphasizes the importance of ensuring the safety of the working environment, verifying the age of community workers, and scrutinizing the terms under which labor is mobilized. The GN stresses that labor provided by community workers should be voluntary, with agreements documented comprehensively to reflect project design and community decision-making processes. Therefore, the bidding documents will mandate all contractors hired for expansion and construction works under sub-component 2.1 to develop safety protocols for community workers. Additionally, the project will develop Occupational Health and Safety (OHS) plans for all workers as part of the Environmental and Social Management Plan (ESMP) that will be developed for each Silo prior to construction. ECHSS commits to deploying Site Engineers supervisors for on-site monitoring and frequent check-ins to oversee implementation

### 4. Primary Supply workers:

Primary supply workers include suppliers who on an ongoing basis will be providing goods and materials that are essential for the core function of the different project components. Examples of preliminary suppliers include service providers of construction materials, waste collection services, etc. It is estimated that the Project will hire a total of 60 Primary Supply Workers.

**Number of Project Workers**

The table below gives an overview of indicative labor use in the project. The total number of workers is not yet firm, but the following estimate is provided:

Type of project workers	Characteristics of project workers	Timing of labor requirements	Indicative number of workers
<p><b>Direct workers PMU permanent staff/ consultants</b></p>	<ul style="list-style-type: none"> <li>● Government civil servants</li> <li>● experts and consultants</li> <li>● short term consultants</li> </ul>	<p>Throughout project implementation</p>	<p>PMU: 30 workers – Program Director; Project Officer; Accountants (2); Senior Procurement Specialist; Procurement Officer; Procurement Assistant; Senior Financial Management Specialist; Finance Officer; Environmental Specialist; Social Specialist; Gender Specialist; Monitoring &amp; Evaluation Specialist; MIS Specialist; Knowledge Management Specialist; and Data Assistant. 32 workers Silo functional structure workers</p>

<p><b>Contracted workers</b></p>	<ul style="list-style-type: none"> <li>● Renovation works under component 2 contracted workers are expected under civil work contracts</li> <li>● Short term consultants: experts specific thematic areas recruited for short term assignments</li> <li>● Support staff include administrative staff (procurement, financial management, human resources), drivers, guards, etc.</li> <li>● Skilled permanent staff of the primary contractor (implementing partners/NGOs consulting company, construction company): most likely national staff involved in community mobilization, agricultural practices and extension, seed production marketing and in construction work of small facilities.</li> <li>● Skilled workers engaged by subcontractors for construction work.</li> </ul>	<ul style="list-style-type: none"> <li>● International and national experts, field workers and support workers: throughout project implementation</li> <li>● Short term consultants on need basis (few weeks or few months)</li> <li>● Other IP / contractor staff: Duration of several months to several years specified by contract or letter of agreement signed with implementation partner / contractor.</li> </ul>	<p>927 workers for expand and construction of silos                  25 workers - Plant Production &amp; Protection Officer; Operations Officer; Social Risk Management Officer; Environmental Risk Management Officer; Gender Officer; Emergency Specialist; Fisheries Officer; Natural Resource Management Officers (2); Plant Protection Specialist; Engineering Officer; GIS Officer; Forestry Officer; Water Engineer; GIS Specialist; AAP Field Focal Points (5); Area Coordinators (5); Field Extension Facilitators (4); Monitoring &amp; Evaluation Officer; M&amp;E Associates (2); Emergency Reporting Officer; Admin &amp; Finance Officer; Strategy &amp; Resource Planning Officer; Procurement Officer; HR Consultant; Logistics Officer; Communications &amp; Visibility Officer; Radio Programming Officer; Admin/Finance/HR Assistant (3); Operations Associate; Logistics Assistant/ Warehouse/Storekeeper; Security Assistant (4); Drivers (5) The IP workers will be identified during the project implementation stage. - ICT Associate; Administration Senior Assistant; Field Team Leader; Field Finance Assistant; Field Environmental and Social Safeguards Assistant; Field M&amp;E Assistant; Field Community Mobilization Assistant; Field Community Mobilization Clerks, 180 Workers During the local</p>
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	<ul style="list-style-type: none"> <li>Unskilled community members engaged by contractors: Most likely local workers</li> </ul>		<p>wheat supply season and 54 Workers Outside the local wheat supply season</p>
<p><b>Primary supply Workers engaged by primary suppliers</b></p>	<p>Most likely local workers</p>	<p>Project implementation</p>	<p>The primary supply workers will be identified during the project implementation stage</p>

- Total number of each working category is listed in the table below: However when project implementation begins. The total number will be updated.

Category	Description	Estimated number
Direct workers PMU / consultants (Appointed in the structure of the silo of the Egyptian Holding Company for Silos and Storage)	Site manager	1
	Electrical Engineer	2
	mechanical engineer	2
	Electricity technician	3
	Mechanical Technician	3
	Receipt specialist	1
	receiving technician	1
	Storage specialist	1
	Storage technician	3
	weight custodian	2
	accountant	1
	Administrative affairs specialist	1
	Storekeeper	1
	Treasurer	1
	Factor driver	6
	Security representative	
	Total	
permanent staff (will be provided by the contractor for loading and aging)	during the local wheat supply season	20
	out of season	4: 6

Total Number		52 - 58

- Age of Employment: The minimum age of project workers eligible for any type of work (including construction work) is set at 18. The engagement of project workers between the age of 14 and 18 years (in particular, vulnerable individuals such as orphans) while legal for non-hazardous work will not be allowed under the project so as to mitigate above mentioned risks and not interfere with the child’s education and development.
- To prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor is required to maintain labor registry of all contracted workers with age verification.

**Working Hours**

The silo affiliated with the Egyptian Holding Company for Silos and Storage is operated in shift system as follow

**M The end date of the shift**

shift	Duration of the shift	The start time of the shift	The end tome of the shift
Primary	8 Hours	8:00 AM	4:00 PM
Second		4:00 PM	12:00 AM
3 <sup>rd</sup>		12:00 AM	8:00 AM

- The worker is assigned to work in the silo for one shift.
- The worker can be assigned to work a maximum of two shifts, according to the work need

## Assessment of key potential labor risks

Based on available information, the following section describe:

**1 Labor risks associated with contracted workers at subproject level.**

There is existence of construction activities under the proposed project component 2 some risks are envisaged. Only under sub-component 2.1. Expansion works will be implemented for 7 silos and construction of 2 new silos by local contractors and where possible contracted workers will be hired locally. All contractors will be required to have a written contract with their workers materially consistent with objective of ESS2, in particular about child and forced labor, following procedures as specified in the World Bank's Procurement Regulations.

**2 Labor risks including labor influx and associated Gender-Based Violence (GBV), and child labor** are considered Moderate given the PCU's ADHER Social Security Law No. 79/1975, as amended, and its executive regulations; Child Law No 12 of 1996; and Child Law No 126 of 2008), and Law 118/2003 concerning employment of children. Since civil works to be supported under the component 2. Will be large in scale and prioritized by PMU, the risk of forced labor is expected to be small. Nonetheless, the contractors will be required in the contract to commit against the use of forced labor, and PMU staff in charge of contractor supervision will monitor and report the absence of forced labor.

The GBV/SEA/SH risks will continue to be monitored during project implementation.

The project's labor related risks will be mitigated by the application of the project's OHS measures and national labor laws (e.g., on wages, working hours, insurance etc.). With regards to SEA/SH risk, the MDLF and municipalities will adopt and implement measures to assess and manage GBV/SEA/SH risks such as applying the Codes of Conduct (COC) for project workers, raising awareness and conducting trainings about these issues in the workplace (including construction sites), and ensuring access to grievance mechanisms (with special features to accept and address SEA/SH complaints) in case there is a need to file a complaint, without fear of reprisal and while maintaining the complainant's anonymity.

**3 Occupational Health and Safety (OHS) risks** will depend on the type of sub-components works to be implemented. All contractors hired for the different activities under the different project components will be required to develop and implement written labor management procedures, including procedures to establish and maintain a safe working environment as per requirements of ESS2. For the purpose of managing PHS during construction and operation phase, including for the



silos Environmental and Social Impacts Assessment (ESIA) and Environmental and Social Management Plan (ESMP) will identify the various types of OHS and will set forth the measures and practices that contractors and operators should abide to ensure the safety of workers.

#### 4 **Employment Risks:**

Workers will be hired by the PMU, either directly as project staff or indirectly as part of contracts with consultants or service providers. The practice shows that civil works subcontractors do practice a labor contract with a lump-sum payment for a certain type of service or scope of work. Where the duration of labor will be limited to several months.

#### 5. **Fair Treatment and Nondiscrimination**

Risks of unfair or discriminatory hiring practices could occur in hiring of direct project workers and in hiring of workers by contractors and primary. Engagement of community workers could also be unfair or discriminatory, particularly where community work is rewarded with payments in cash or in kind or with other benefits.

#### 6 **Spread of Covid-19 and communicable diseases:**

There is a risk of spread of Covid-19 among project workers (e.g., working in offices, during capacity building etc.) And construction activity during Covid-19 surges.

At such times, the contractor and his workers will be contractually obliged to:

- Review the country COVID-19 spread situation in the project area, and to abide by the restrictions put in place by the government to contain virus spread;
- Be sure that all project workers articulate and express their understandings on social behavior (by understanding, signing, and practicing the coc terms and requirements) and good hygiene practices.
- Contractors are requested to abide to MOH COVID-19 guidelines and provide awareness to their workers on COVID-19 mitigation requirements<sup>1</sup>.
- Develop protocols and procedures to detect COVID outbreaks through regular testing and isolation measures to reduce workers and community exposure to COVID and other communicable diseases.
- Provide Personal Protective Equipment's (masks, gloves, etc) to the project workers at no cost. - Maintain social distance, maintain wearing masks at gathering and in closed areas. Further details are included at the ESMF- ANNEX 16: COVID-19 Commitment Letter (should be signed and followed the contractor)

- 7 **Overtime work risks.** There is a risk that the current practice of unaccounted working hours and lack of compensation for overtime will continue. According to Labor Law - Law 12/2003 and its amendments and accompanying ministerial decisions with the employer concurrence, the direct workers will receive other rest hours in another day as compensation for overtime. The project will seek to address the risk through informing Direct Workers their rights and establishing a Grievance Redress Mechanisms for Direct Workers.

**8 Risk of labor unresolved complaints:**

This risk could be a result of the lack of the absence of a GM, or the presence of inefficient and not properly designed GM.

**Discrimination and exclusion of vulnerable/disadvantaged groups**

1. Vulnerable/ disadvantaged groups including women and persons with disabilities may be subject to increased risk of exclusion from employment opportunities under the Project/subprojects. Likely causes may be that both sides of employers and employees have not identified the employment relationships in this field. Currently, Vietnam has granted incentive policies to encourage employers to recruit or engaged female labors and labors with disabilities to enhance gender equality in the field of employment. For the project, employers especially contractors/subcontractors will be expected to apply such incentive policies of the nation to create employments suitable with women and people with disabilities, while coordinating with local authorities such as commune Women Unions to facilitate the vulnerable labor groups to find employments from the project.

**Brief overview of national labor legislation: terms and conditions**

Employment matters in Egypt are primarily regulated by the following legislative sources:

- Egyptian Constitution
- Social Security Law No. 79/1975, as amended, and its executive regulations ;
- Law No. 48 for the year 1978 governing public sector employees;
- Law No. 203 for the year 1991, addressing special requirements for employees working in the public commercial (business) sector of the State;
- Child Law No 12 of 1996 ;
- Law No. 12 for the year 2003 and its executive regulations, regulating relationship between employers and employees in private sector;
- Child Law No 126 of 2008

Egypt is a member of the International Labour Organisation (ILO) and has ratified 64 ILO conventions, including all 8 core conventions. Most of the core principles of ESS2 align with the different Egyptian legislation. However, there are some challenges in some cases related to enforcement and definitions (e.g. forced labour is not clearly defined in relevant laws although prohibited by the Constitution).

The different requirements relating to labor and working conditions are summarized below :

- **Minimum Working Age**

The minimum age for hazardous work is 18 years old.

– **Minimum Wage**

As of 2019 the minimum wage is 2,000 Egyptian pounds (EGP). The minimum obligatory annual increase is set at no less than 7% of the basic salary, which is the basis for calculation of social insurance. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

– **Working Hours and rest periods**

According to the Labor Law, the maximum working hours per day are 8 hours, or 48 hours per week in case of a six-day work week. Worker shall receive a weekly rest of not less than 24 hours every six working days.

However, an employee, occasionally may be required to work additional hours upon need. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at nighttime; 100% for work performed on days off and holidays.

The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly rest shall be paid.

– **Annual Leave**

Article 47 of the Labor Law stipulates that the duration of the employees' annual leave is 21 days per year provided they have worked one year for the employer. For employees who have worked for more than 10 years, serving one or more employers, annual leave is 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days.

For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service.

– **Sick Leave**

As stipulated in Article 54 of the Labor Law, in case of employee's sickness he/she is entitled to sick leave based on the report from concerned medical authority. According to Social Insurance Law, during the sick leave an employee is entitled to his/her salary. An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated ; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180

days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists.

#### – Maternity Leave

According to the 1996 Child Law, female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided they have been contributing to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees are entitled to up to two years of unpaid childbearing leave per child as stipulated in the Child Law.

Women are also entitled to two half-hour nursing breaks per day, or alternatively one combined an hour long break, for 24 months after the date of birth of each child.

A woman preserves all her rights and benefits upon return to workplace from maternity leave.

#### – Work Permit Requirements for Foreign Employees

Foreign employees are not permitted to work in Egypt unless Residency and Work Permits are obtained.

#### – Discrimination and Equal Opportunities

Egyptian labor law includes non-discrimination clauses and complies with the International Labor Organization (ILO) conventions regulating the employment and training of women and eligible children (Egypt ratified ILO Convention 182 on combating the Worst Forms of Child Labor in April 2002). There are legal provisions that are meant to protect women against sexual harassment in the workplace. However, there are some provisions that would not allow women to get engaged in certain types of jobs as men despite the fact that officially there is no discrimination based on gender. There is also no provision for equal pay for the same type of work that a man and a woman would do. In light of those legislative limitations, there need to be clear provisions in different contracts under various components to ensure that women are given equal labor opportunities including in jobs and pay. This is particularly valid the types of works under the project could be classified as jobs that are not appropriate for women.

### BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

#### The main national laws addressing labor and working conditions are listed below:

- **Labor Law No. 12/2003:** It is the primary source of labor law. It regulates employment, labor relations and OSH in the private sector.
- **Law No. 48 of 1978:** it regulates employment in the civil sector

- **Law No. 18 of 2015** concerning the Civil Service: It regulates public sector employment including working conditions for civil servants; setting the retirement age for the sector; and setting out the wage structure for civil servants. It is the most recent law on Egypt's civil service, and its scope is assumed to be similar to Law No. 48 of 1978.
- **Law No. 148 of 2019** on social insurance pension system. The new unified program covers 26 categories of workers, including public- and private-sector employees, civil servants, and self-employed persons
- **Child Law no. 12 of 1996**, amended by Law no. 126 of 2008 and its executive regulation issued by decree no. 2075 of 2010. The Child Law is a general law for the protection of the rights of the child, introduced a number of amendments increasing the minimum age for children employment.
- **Decree No. 118 of 2003** concerning the employment of children in hazardous work. It sets forth list of jobs for which children under the age of 18 shall not be employed. It does not exclude specific sectors as a whole or specific types of employment.
- **Decree No. 113 of 2003** regulates preparatory and complementary work which needs to be finished by workers before or after the end of work. Its scope is not specified in the law, however, since it is an executive decree of the Labor Law it is likely to have the same scope.
- **Decree 115 of 2003** determines the works that are intermittent by their nature and in which the worker may stay at the place of work more than 10 hours a day but maximum 12 hours a day. It covers work that is deemed intermittent by nature, including certain types of farming, transport (including land, air and water), port work and shipping.
- **Law No. 83 of 2002** on Economic Zones of a Special Nature regulates employment relations, organization, and management in Economic Zones of a Special Nature. It sets out that in these zones, foreign nationals may only account for 25% of a firm's workforce.
- **The Law on the Rights of Persons with Disabilities of 2018** regulates the social protection, training and the right to work of people with disabilities. Its specific scope is unclear.

**The main national laws addressing OHS are listed below:**

- **The 2003 Labor Law** devotes a specific section (Book V) to occupational safety and health and assurance of the adequacy of the working environment .
- **Decree No. 126 of 2003** defines procedures and forms for the notification of work-related accidents, injuries, fatalities and diseases. It replaced Decree No. 75 (1993). Sets forth that establishments must notify the authorities when accidents and diseases occur and provide statistics on workplace injuries, accidents and diseases. Its scope is unclear.

- **Decree No. 211 of 2003** specified conditions and precautions essential for the provision of OSH measures at the workplace. It replaced Decree No.55 (1983). Its specific contents and scope are unclear.
- **Decree No. 134 of 2003** defines the committees for vocational safety and health and related OSH training institutions. Its specific contents and scope are unclear, however, since it is an executive decree of the Labor Law it is likely to have the same scope.
- **Law 137/1981:** Labor and Workforce Safety.
- Minister of industry **Decree 91/1985** for implementing Law 2/1985.
- **Law 4/1994:** Articles 43 - 47 of its modified Executive Regulations by Decrees No. 1095/2011 and 710/2012 stipulate the provision of all necessary safety measures including protective equipment to work crew involved in construction activities. Annex 8 of the Regulations of Law no.4/1994 lists the maximum allowable limits for air contaminants within the working environment. Annex 7 of the Executive Regulations amended in 2012 of Law no.4/1994 stipulates the permissible limits for sound intensity and safe exposure times in workplaces. Article 44 of Law 4/1994 and Article 46 of its amended regulation 710/2012 stipulate conditions and requirements for temperature and humidity in the workplace. Annex 9 to the Regulations sets out the major and minor limits for temperature and humidity, exposure periods and safety precautions.

### Responsible staff

The PMU will be directly supervised by the Egyptian Holding Company for Silos & Storage will report to responsible staff within Ministry of Supply and Internal Trade appointed by the Minister. The PMU will be responsible for overseeing all day-to-day operations, including the implementation of social and environmental instruments including LMP. Within the PMU structure, the Environmental and Social Specialist will be collaborating with the different relevant teams assigned on different level including with MALR and on the level of the silos (e.g. the Silo Manager) assigned to track and monitor the execution of the LMP, with particular emphasis on the following:

- Implement this labor management procedure.
- Ensure that civil works contractors comply with these labor management procedures, and also prepare occupational health and safety plans before mobilizing to the field.
- Ensure the contracts with the contractors are developed in line with the provisions of this LMP, as detailed in the Project Operations Manual (POM).
- Monitor to verify that contractors are meeting labor and OHS obligations toward contracted
- Monitor contractors and subcontractors' implementation of labor management procedures.

- Monitor compliance with occupational health and safety standards at all workplaces in line with Arab Republic of Egypt occupational health and safety legislation.
- Monitor and implement training on LMP and OHS for project workers.
- Ensure that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it.
- Have a system for regular monitoring and reporting on labor and occupational safety and health performance.
- Monitor implementation of the Worker Code of Conduct.

POM will include standard templates of contracts which include LMP, OHS aspects, and the contractors (NGOs and Civil Works) commit to them. LMP and OHS responsibilities of the Contractors are the following:

- Follow the labor management procedures and occupational health and safety requirements in line with the ESMF provisions and stated in the contracts signed with PMU. If the number of workers (direct +contracted) is above 50, then Contractors will develop their own LMPs and OHS plans.
- Supervise the subcontractors' implementation of labor management procedures and occupational health and safety requirements.
- Maintain records of recruitment and employment of contracted workers as provided in their contracts.
- Communicate clearly job descriptions and employment conditions to all workers.
- Make sure every project worker hired by contractor/subcontractor is aware of the PMU dedicated phone number, email address, and web portal through which anyone can submit grievances.
- Provide induction (including social induction) and regular training to employees in labor protection requirements, including training on their rights on safe labor under Egyptian law, on the risks of their jobs, and on measures to reduce risks to acceptable levels
- In collaboration with PMU Safeguards Consultant conduct training on labor management procedures and occupational safety to manage subcontractor performance.
- Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct prior to the commencement of works, and supervise compliance with the Code.

## **POLICIES AND PROCEDURES**

The Project's identified risks and impacts will be mitigated a number of policies and procedures. These will address OHS risks, working conditions and management of worker relationships, labor working

conditions, non-discrimination and equal opportunities, terms and conditions of employment. The different policies and procedure which the Project will prepare, adopt and implement are listed below.

### **Occupational Health & Safety (OHS)**

All contractors, primary suppliers and private sector operators involved with the Project (Components 1 and 2 in specific) shall prepare, adopt and implement an OHS plan complying with national legal requirements, General World Bank Environmental, Health and Safety Guidelines (EHS GS) and, as appropriate the industry-specific EHS GS as well as other Good International Industry Practice (GIIP). This will be reflected in the design requirements for the different Project components, clear and specific clauses in the contracts as well as in all tools developed for the Project throughout the implementation period. The OHS plan shall be approved by the PMU prior to the start of the relevant activities. The OHS plan to be developed by the different parties shall cover the following:

- Identification of all potential hazards affecting the physical, mental and social well-being of project workers in all occupations, with focus on life threatening hazards.
- Provision of appropriate measures to prevent and protect against the potential hazards, including modifying, substituting, or eliminating the hazard sources. These include adequate personal protective equipment at no cost to project workers; adequate first aid facilities; hazard labelling in both Arabic and English languages.
- Developing and implementing an Emergency Prevention and Preparedness and Response arrangements to emergency situations.
- Provision of remedies for adverse impacts such as occupational injuries, deaths, disability and disease.
- Putting in place processes which enable project workers to report work situations that they believe are not safe or healthy.

All contractors and private operators shall hire a full-time accredited OHS professionals at each of the construction sites. Records shall be kept and shared with the PMU on OHS performance at all sites, and all work-related accidents, illnesses, and all other incidents will be formally reported and documented.

Contractors should also develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and it is clear what should be done if a worker gets sick. These measures include but are not limited to:

Assessing the characteristics of the workforce, including those with underlying health issues or who may be otherwise at risk

- Confirming workers are fit for work, to include temperature testing and refusing entry to sick workers



- Considering ways to minimize entry/exit to site or the workplace, and limiting contact between workers and the community/general public
- Training workers on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected workers
- Treatment of workers who are or should be self-isolating and/or are displaying symptoms
- Assessing risks to continuity of supplies of medicine, water, fuel, food and PPE, taking into account international, national and local supply chains
- Reduction, storage and disposal of medical waste
- Adjustments to work practices, to reduce the number of workers and increase social distancing
- Expanding health facilities on-site compared to usual levels, developing relationships with local health care facilities and organize for the treatment of sick workers
- Establishing a procedure to follow if a worker becomes sick (following WHO guidelines)
- Implementing a communication strategy with the community, community leaders and local government in relation to COVID-19 issues on the site.

### **Labor influx**

While a substantial number of jobs will be created during the project implementation, it is expected that the program area will experience substantial labor influx which will affect primarily the community of the project area. External workers, will be accommodated at existing housing in the area. If it is necessary there will be dedicated camps established for worker accommodation in the project. Specific requirements to manage risks associated with labor influx, related to the interaction between program workers and local communities, such as communicable diseases and gender-based violence, are managed through contractual requirements, code of conduct and training. These procedures are guided by national legislation and also follow the guidelines of Bank's ESS 2 and the World Bank's interim note on "COVID-19 Considerations in Construction/Civil Works Projects" and the Technical Note on "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings"

Impacts of labor influx can be summarized as follow:

- Increased pressure on accommodation and rents
- Increased risk of communicable diseases and burden on local health services
- Increased risk of illicit behavior and crime
- Potential Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA). As per the WB 2016 Labor Influx Guidance Note, the scale of labor influx and the absorptive capacity of the local

community indicate the significance of the anticipated risk of GBV. The project can lead to an increased risk of Gender Based Violence, as women are particularly vulnerable within the context of construction projects. Gender based violence can be manifested through multiple behavior's including: Sexual harassment of women and girls or Exploitative sexual relations and unpaid work, or low wages.

The project will adopt mitigation measures including requirements for the contractors to develop and sign a code of conduct. It will include prevention of sexual exploitation and abuse and sexual harassment (SEA/SH) at workplace, and accommodation of workers in the case of presence with local communities. In addition to that, the following will be thoroughly implemented:

- The ESMPs to be developed for each silo will engage locals before project start to understand labor dynamics and prevent sudden influxes
- Encourage contractors, through stating in the bidding documents, to prioritize the hire from local communities.
- Apply the full requirements related to operating the project grievance mechanism including anonymous channels and safe reporting to official national referral pathways (e.g. National Council for Women)
- Conduct sensitization to the local community about the project commitment towards communities' and the measures taken for that through public consultation and focus group discussions
- Conduct random drug and alcohol tests.
- Codes of conduct to be developed, signed by all workers, and penalty system to be put in place for all noncompliance including cases where workers will be staying in rented apartments by the contractor or sub-contractor.

## **Terms and conditions of employment**

### **Wages and working hours**

All Direct Workers will be provided with clear and understandable terms and conditions of employment. For the Contracted and Primary Supply workers, clauses will be included in the all-project procurement documents to ensure that terms and conditions of employment are being provided according to the requirements of ESS2 and/or national law. This includes providing them with signed contracts stating clearly the duration of the contract, leave entitlements, conditions of contract termination including receiving written notices of termination, disciplinary procedures that are applicable, housing and accommodation provisions and allowance where applicable, food and payment, their rights related to hours of work, fair wages, overtime, compensation, benefits as stated in the national law as well as those arising from the requirements of ESS2.

Monitoring systems will be put in place to ensure that all types of Project workers will be properly paid on a regular basis and compensated for longer working hours and certain shifts which may need to be paid at a higher hourly rate as per applicable legislation (e.g. Night shifts). Workers will be presented with details of grievance procedures, including the person to whom grievances should be addressed (refer to section 9 for details about the workers' grievance, and mechanisms which will be adopted)

The Project is expected to deal with contracted and supplied workers who may not be capable of reading and/or may have difficulties understanding the employment documentation. The project will therefore ensure that working conditions and terms of employment are orally communicated and explained. For the migrant domestic workers, which are also expected as part of the Contracted and Primary Supply workers, the project will ensure that the working conditions and terms of employment are the same or substantially equivalent to those of non-migrant workers (when performing the same type of work).

Forced labor, refers to any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. These practices will be prohibited and will not be used in connection with the project. This prohibition covers any kind of involuntary or compulsory labor. If forced labor is discovered in the project's workforce, prompt action will be taken to address the practice that has coerced the worker and not recreate conditions of coercion. Any cases of forced labor discovered in the project's workforce are referred to relevant government authorities and support services, as appropriate, to be addressed in accordance with national law. These may include bonded labor (work in satisfaction of a debt of an amount that would be difficult or impossible to pay off), excessive limitations on freedom of movement, excessive notice periods, retaining the worker's identity and other government-issued documents (such as passports) or personal belongings, imposition of recruitment or employment fees payable by the worker at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

### **Freedom of Association and Collective Bargaining**

Article (13) of the Constitution stipulates that "The State shall protect workers' rights and strive to build balanced work relationships between both parties to the production process. It shall ensure means for collective negotiations, protect workers against work risks, guarantee the fulfillment of the requirements of security, safety and occupational health, and prohibit unfair dismissal, all as regulated by Law". The project should ensure that the rights of workers and the role of unions will be respected and the right to enter free and voluntary collective bargaining arrangements with management is respected.

## Equal Opportunity and Non-Discrimination

As previously mentioned, the project will implement GIIP relating to labor standards and working conditions (in line with ILO Core Conventions) and national law. This particularly applies to equal opportunities and non-discrimination. The employment of Project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship including but not limited to: recruitment requirements; training opportunities; termination of employment; inappropriate treatment or harassment including sexual harassment. Where disabled persons are hired (higher probability will be among Direct Workers), accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication, etc.).

Men and women will be given equal opportunities relating to all recruitment opportunities under the project. This will apply to hiring of all project workers. The workforce grievance mechanism (GM) will be communicated to all workers as detailed in section 9 and will be used for noncompliance monitoring.

The project will also provide all measures necessary for protecting vulnerable groups of workers such as the disabled, women and migrant workers. As mentioned above, the code of conduct will be developed which should also include provisions on Sexual and gender-based violence (SGBV) and safety. Induction trainings and refresher training will be provided for all workers as detailed below.

## Training and Capacity Building

Training will be provided to all workers on general (and specific) OHS during induction and on a regular basis to ensure all workers are well capacitated with the project's OHS requirements. The PMUs Health and Safety Officers will provide training to Direct Workers, while training will be provided to Contracted and Primary Supply Workers through Third Parties. Training will include but will not be limited to: work at heights; electrical and vehicular safety; handling of hazardous materials, use of PPE, hazard avoidance and reduction measures, use of first aid and rescue techniques, emergency prevention and preparedness and response arrangements to emergency situations, and firefighting

Additional training sessions for different targeted workers will include the following:

- Awareness of the requirements of this LMP and associated plans/procedures;
- Code of conduct, Gender-based violence and SEA;
- Grievance mechanism, including roles, responsibilities and accountabilities, and contact persons /communication channels.
- E&S instruments as relevant including the implementation of the different esmps and waste management plans.

Training shall be delivered by experienced trainers, based on the competency requirements. Records of the training will be kept including training evaluation.

## Age of employment

- The minimum age for employment on the project is 18 due to the hazardous nature of the work in particular under components 2 and 3.
- All workers will have written contracts compliant with the national labor law and receive pre job briefing of their rights under the national law, including wages, pay, overtime etc.

In accordance with ESS2 requirements, a child under the age of 18 will not be employed or engaged in connection with the Project. Moreover, **according to ESS2 (paragraphs 18 and 19) a child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions:**

- a. The work does not fall within paragraph 19 of ESS24;
- b. An appropriate risk assessment is conducted prior to the work commencement
- c. The Implementing Municipalities conduct regular monitoring of health, working conditions, hours of work and the other requirements of ESS2.

- d. The PMU and municipalities will be required to verify and identify the age of all workers. This will require workers to provide official documentation, which could include a birth certificate or ids. The municipalities shall keep the records/documents which will be checked on their website.
- e. If underage workers are found working on the Project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner.

A regular review and checkup will be conducted by PMU to make sure no underage workers are still working on the Project.

### **Process of age verification**

In order to prevent engagement of under-aged labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor is required to maintain labor registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented.

Below is indicative age verification means that could be used in the context where official ID system is unavailable:

- Check the birthday on official documents such as birth certificate, national ID or other credible records, where available;
- Obtain written confirmation from the medical practitioner;
- Obtain written and signed declaration from the worker and his/her parents or guardian; or
- Inquire with the local community leader, community action group or with other credible community sources.

### **Terms and conditions**

The project will have Direct, Contracted and Primary Supply Workers. The Terms and Conditions for each of them are described below.

#### **Terms and Conditions for Direct Workers**

- **Maximum number of hours that can be worked on the project**

The project will commit to the provisions of the Labor Law and accordingly allow a maximum working hours per day that are 8 hours, or 48 hours per week. The minimum premiums are set at 35% of the normal

pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays

- **Provisions on termination**

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

- **Annual leave**

The duration of the employees' annual leave will be 21 days per year, provided they have worked one year for the employer. For employees who have worked for more than 10 years, serving one or more employers, annual leave will be 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days. For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service

- **Maternity leave**

Female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided they have been contributing to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees will be entitled to up to two years of unpaid childbearing leave per child. Women will be also entitled to two half-hour nursing breaks per day, or alternatively one combined an hour-long break, for 24 months after the date of birth of each child. Women will preserve their rights and benefits upon return to workplace from maternity leave.

- **Rest per week**

Workers shall receive a weekly rest of not less than 24 hours every six working days. The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly and daily rests are paid.

- **Sick leave, injuries and death**

The employee is entitled to a sick leave based on a report from concerned medical authority. During the sick leave an employee is entitled to his/her salary. An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180 days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists.

Pregnant women will be re-assigned and allowed to work in non-hazardous, non-arduous work as per medical advice without pay severance or penalty. It is the contractor's responsibility that all workers, including temporary and daily laborer's, shall be appropriately insured against injuries and death

### Terms and Conditions for Contracted Workers

- **Specific wages, hours and other provisions that apply to the project**

The provisions of the labor law will be implemented as a minimum reference. Accordingly, the minimum wage will be 2,000 Egyptian pounds (EGP).

- **Maximum number of hours that can be worked on the project**

The project will commit to the provisions of the Labor Law and accordingly allow a maximum working hours per day that are 8 hours, or 48 hours per week. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

- **Provisions on termination**



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

- **Annual leave**

The duration of the employees' annual leave will be 21 days per year, provided they have worked one year for the employer. For employees who have worked for more than 10 years, serving one or more employers, annual leave will be 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days. For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service

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The employee is entitled to a sick leave based on a report from concerned medical authority. During the sick leave an employee is entitled to his/her salary. Pregnant women will be reassigned and allowed to work in non-hazardous, non-arduous work as per medical advice without pay severance or penalty.

An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180 days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists.

### **Grievance mechanism**

A well-communicated and easily accessible grievance mechanism will be provided for all direct and contracted project workers, as well as community workers to raise workplace concerns related to recruitment process and/or workplace conditions. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. The PMU is responsible for managing direct workers' grievances, while the contractor for contracted workers.

The workplace grievance mechanism will be designed to be easily understandable, clear, and transparent and to provide timely feedback. The policy of confidentiality and non-retribution will be reinforced, along with ability to raise anonymous grievances.

The mechanism will include multiple communication channels dedicated for workplace complaints only, including but not limited to an email address/website link; phone number; and a physical address for handing the complaints and grievances in person. Workers will have the freedom to pick the one they are comfortable using.

The workplace grievance mechanism will not impede access to other judicial or administrative remedies that are available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

### **GM Procedures**

Workers will be encouraged to discuss their grievance and complaint informally with their direct managers. In cases where the direct manager is related to the subject of the complaint, the employee would most probably choose to directly submit a formal grievance. For all cases where the employees decide to submit a formal grievance, the following provides details about the step-step procedure they will be using:

#### **1- Receipt, acknowledgment and registration**

- The worker will submit the grievance through one of the dedicated channels indicated above.
- The worker will be requested to use to the extent possible a grievance template which will be shared with all workers in hard/soft copies /available to download from the website.
- If the worker wishes to submit the grievance orally via phone or in person, the project staff will lodge the complaint on their behalf, and it will be processed through the same channels.
- Under request of the plaintiff, grievances can be lodged anonymously. This option shall be made clear to the complainant in the Grievance template and/or in cases of oral submissions.
- In case of anonymity opt-out, the worker will provide contact details or any other suitable means for him/her to be updated on the status of their complaints/grievances.
- All received grievances shall be logged into the workplace grievance log.
- In all cases, the staff in charge should provide a timely communication back to the complainant(s) that their grievance has been received, will be logged and reviewed for eligibility and provide them with the registration number. Clear and announced standards for the time frame of the response should be established, announced and adhered to.

#### **Current and proposed future communication channels for the Ministry of Agriculture and Land Reclamation (MOLR)**

Inquiries and services related to ministers are communicated via email on the website:

[.https://www.facebook.com/min.agriculture/](https://www.facebook.com/min.agriculture/) or through the official website of the Ministry

[http://www.agr-egypt.gov.eg/?page\\_id=56](http://www.agr-egypt.gov.eg/?page_id=56) While to submit complaints requests, send them and follow them up through the unified government complaints portal ([www.shakwa.eg](http://www.shakwa.eg)), hotline: 16528. In addition to the Ministry's hotline: 15500\_19561

Current and proposed future communication channels for the Egyptian Holding Company for Silos and Storage (EHCSS)

- Current communication channels are- :
- Silo manager's office at each site.
- Customer service managed by the company.
- The company's official website: [www.ehcss.com](http://www.ehcss.com)
- The unified government complaints system in the Council of Ministers.
- Grievances Committee at the company's management. (For company employees only).
- The proposed communication channels in the future are- :
- Create a group on WhatsApp to receive complain

## 2- Grievance verification and assessment

- In order to verify the grievance, it should be discussed with the worker, investigated and evidence gathered to the extent possible. This should include field inspections if needed in order to conduct interviews and gather information about the incident or the case.
- The GM staff will need to make a decision with regards to the eligibility of the grievance or whether it should be directed to other mechanisms such as the project GRM. The following represents the proposed eligibility criteria:
  - Is the complainant one of the project's workers: direct; contracted or primary supply workers?
  - Is the complaint related to one of the following OHS and/or worker and labor conditions: 1- OHS; 2- Forced labor; 3- Child Labor; 4- Social insurance; 5- wages and working hours; 6- discrimination and unequal opportunities; 7- Freedom of association and collective bargaining?
  - Is the complaint not related to any of the above categories but still related to labor and working conditions?

## 3- Response and Feedback

- **As an initial response**, the complainant will be informed with the eligibility results as well as all the steps being taken to address his concerns. This initial response shall be provided via a formal letter; an email; or a phone call within 5 working days from the date of receipt of the grievance.

- **For eligible and straightforward grievances**, GM staff will provide a response without further investigation within 10 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- **For eligible grievances that require further assessment**, GM staff will further engage with the complainant via a phone call or a formal meeting in order to collect further information. Based on this, they will provide within 14 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- **Imminent and serious safety risks reported** by the worker will be addressed immediately and will not follow the normal timeline.

In all the above-mentioned scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial or non-judicial possibilities.

In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance log with the date of grievance resolution.

In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal within 5 working days. In such case, a second tier should be initiated where the GRM staff will attempt to propose alternative options and carry out additional investigation in order to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. It will be preferred that a more senior staff attend/discuss the appeal with the employee. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint, in addition to worker representative(s) (upon the complainant consent) in order to help achieve a transparent process. The GRM staff should send their response within 7 days from the date of the appeal. The second-tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

#### **4- Agreement and implementation of the response**

- If the grievance has been resolved, the GM staff will document the actions taken, time it took to resolve the grievance and satisfactory resolution.

- If the grievance has not been resolved, GM staff should document additional information including actions taken, communication with the complainant, and the final decisions made by the complainant and the organization with regards to any other alternatives.
- In general, confidentiality should be maintained in GRM documentation, if the complainant has requested so.
- In all cases, the total number of grievances should be recorded including time it took to resolve them, as well as the number of unresolved cases.

### **Complaints Related to GBV, SEA and SH**

In line with the World Bank Good Practice Note at "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works", published in 2020.<sup>6</sup> The World Bank has developed the Good Practice Note (GPN) to assist in identifying risks of SEA/SH – as opposed to all forms of GBV that can emerge in Investment Project Financing (IPV) involving major civil works contracts – and to advise Borrowers on how to best manage such risks. The GPN builds on World Bank experience, relevant international instruments, and good international industry practices, including those of other development partners. The GPN also aims to contribute to a growing knowledge base on the subject. PMU had adopted some actions to assess and address or respond on the complaints related to GBV, SEA and SH, which are

- Assessing Risks During the preparation for this ESMF document
- Establishment of mitigation, reporting and monitoring measures such as:
  - Restrict the communication between workers and the surrounding local community.
  - No camping for workers. Hence, there will be no Workers' influx
  - A code of conduct (annex 2) will be signed by all workers in the construction site.
- In case of receiving any complaint related to the GBV, SEA and SH, either using the GM channels or reported to the project staff during monitoring up activities, immediately this complaint is transferred to the responsible social expert at the PMU, who deal with this complaint confidently and secretly, without reporting to the public. The complaint will be investigated only by the Social Specialist and it will not be recorded at the official database of the municipality with the details, it will be mentioned as number and type of complaint, to keep on the privacy of this complaint.

### **Current and proposed GBV complaints mechanism as a separate mechanism of the Ministry of Women's Complaints Office at the National Council for Women Agriculture:**

- Hotline: 15115

- Email: complain.office.2001@gmail.com
- Fax: 68-23490066 (02) WhatsApp: 01007525600
- Facebook: <https://www.facebook.com/ncwegyptpage>

**Applied mechanism:**

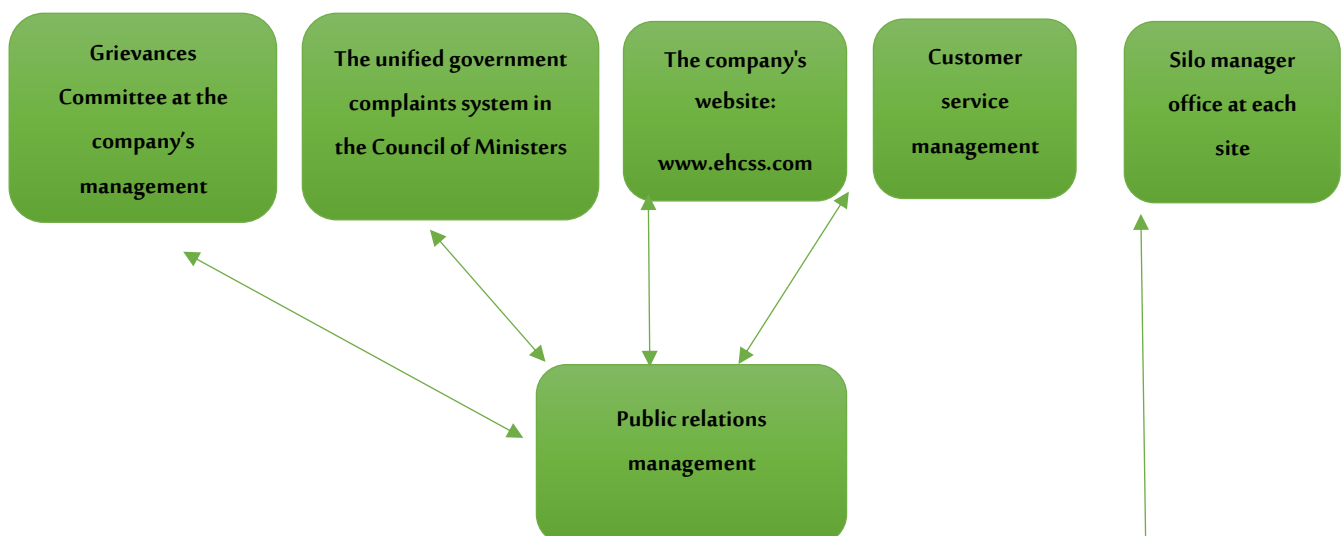
Limits of the jurisdiction of the Women’s Complaints Office

- The person concerned with the complaint must be an Egyptian female.
- The age of the person filing the complaint must exceed 18 years.
- The complaint must fall within the scope of the Complaints Office’s jurisdiction.

- The complaint must be submitted by the interested party in person or by her representative using an official power of attorney and the original of her ID card. The complaint form must be completed and signed by the complainant or agent, including all documents that support the content of the complaint and her acknowledgment of accepting the office’s intervention.

**Current and proposed GBV complaints mechanism as a separate mechanism of the General Company for Silos and Storage**

- Complaints are transferred to the Public Relations Department for processing and the result of studying the complaint is transferred directly to the Major General/CEO of the company.
- If complaints are not resolved, they are referred to the National Council for Women to help resolve the complaint



**Figure 4: Organizational structure of gender-based violence cases.**

### **Classification of complaints according to project work**

- Social complaints.
- Environmental complaints.
- Complaints related to purchases.
- Special complaints entitlements.

### **Complaints expected to re-occur during the project period**

- Environmental complaints.
- Complaints related to purchases.
- Special complaints entitlements

The grievance mechanism will be gender and age inclusive and will respond and address potential access barriers for women, older persons, persons with disabilities, youth and other potentially marginalized groups as appropriate for the project.

The grievance mechanism won't impede access to judicial or administrative remedies that may be relevant or applicable and would be readily available to all stakeholders at no cost and without penalty

### **Code of Conduct and SEA/SH Measures**

The safety measures, complaints, and SEA/SH measures is detailed in the Code of Conduct (Annex 2). The Code of Conduct (COC) will be incorporated into the bidding documents in local language (Arabic) including provisions related to SEA/SH and sanctions. PMU will be ensured that the COC is included in the



bidding documents. The contractor will sign the coc (see Annex 2) and will be made accountable for complying with it. An orientation for all workers will be required. The Project workers shall be informed within the training to be provided to them by the PMU, about the workers' GM, and how and to whom they can address their complaints, in case they didn't get responses on their complaints from the contractors

## Contractor management

The contractors will be selected based on both minimum technical specifications and financial offers. The technical specifications will ensure that they shall have in place labor management procedures including OHS issues applicable to the project that will allow them to operate in accordance with the requirements of ESS2.

Requirements of ESS2 will be incorporated into contractual agreements with all contractors and sub-contractors and procedures will be put in place to manage and monitor the performance of contractors. The contractual agreements will include non-compliance remedies (i.e., sanction clause) for possible noncompliance with E&S provisions by the contractor. The EES2 requirements will include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by third parties. Third parties' labor management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of non-compliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS for the project. COVID-19 specific measures shall also be incorporated into contractual agreements, including but are not limited to:

Provision of medical insurance covering treatment for COVID-19, sick pay leave for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death

- Specific procedures relating to the workplace and the conduct of the work (e.g. Creating at least 6 feet between workers by staging/staggering work, limiting the number of workers present)
- Specific procedures and measures dealing with specific risks. For example, for health care contractors: infection prevention and control (IPC) strategies, health Workers exposure risk assessment and management, developing an emergency response plan, per WHO Guidelines
- Appointing a COVID-19 focal point with responsibility for monitoring and reporting on COVID-19 issues, and liaising with other relevant parties

- Including contractual provisions and procedures for managing and monitoring the performance of contractors, in light of changes in circumstances prompted by COVID-19

Contractors' labor management records and reports that may be reviewed would include: representative samples of employment contracts or arrangements between third parties and contracted workers, records relating to grievances received and their resolution, reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions, records relating to incidents of non-compliance with national law, and records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

### **Terms and conditions for primary supply workers**

The requirements under ESS2 for primary suppliers are related to risks of child labor, forced labor and serious safety risks. When sourcing [construction materials] from primary suppliers, the contractor will require such suppliers to identify the risk of child labor/forced labor and serious safety risks in producing the [construction materials]. The PMU and the engineering and supervision consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers.

If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers under the project, the PMU and the engineering and supervision consultant will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness.

## **ANNEXES**

### **Annex (1): Outline of Contractor's LMP**

<p><b>Workforce Management</b></p>	<ul style="list-style-type: none"> <li>● Profile of workforce – work activities, schedule, contract duration, workforce rotation plan, workers place of stay, workers with underlying health issues</li> <li>● Measures to mitigate risks on account of COVID 19</li> <li>● Contingency plan covering – pre-health check-up, access restrictions, hygiene, waste management, accommodation arrangements, PPE provision and usage</li> <li>● Reporting and handling of Instances of COVID 19 cases, training and communication with workers, training and sops on communicating and contact with community</li> </ul>
<p><b>Occupation Health &amp; Safety and Emergency Management</b></p>	<ul style="list-style-type: none"> <li>● List of work locations, hazards/risks with PPE requirement and numbers</li> <li>● Lists of tasks and work zone critical for hazard prevention</li> <li>● Location of warning signage for hazard prevention</li> <li>● Requirement of first aid boxes and fire extinguishers – task and location wise</li> <li>● Key person(s) to be contacted during emergency</li> <li>● Protocol for deciding the level of emergency – need for hospitalization, information to authorities, etc.</li> <li>● Process of accident analysis, corrective and preventive measures and need for reporting</li> </ul>
<p><b>Addressing GBV/SEA/SH Risks</b></p>	<ul style="list-style-type: none"> <li>● Preventive measures – provision of lighting, separate toilet areas for men and women, increased vigil and security arrangement for community sensitive GBV/SEA/SH hotspots, if identified by dam authorities.</li> <li>● Sensitizing and awareness of labor on GBV/SEA/SH issues including penalties and legal action against offenders</li> <li>● Awareness about GRM</li> </ul>

<b>Workers Code of Conduct</b>	<ul style="list-style-type: none"> <li>● Preparation of Code of Conduct</li> <li>● Making labor aware of conduct with all the provisions, does and don'ts, penalties for non-compliances, etc.</li> <li>● Displaying COC at prominent locations</li> <li>● Signing of COC by workers</li> </ul>
<b>Awareness and Training</b>	<ul style="list-style-type: none"> <li>● Plan for training and awareness covering pollution prevention, OHS, use OF PPES, accident reporting and emergency management, COC, GBV/SEA/SH, GRM, etc.</li> <li>– Training schedule</li> <li>– Training records</li> </ul>
<b>Workers Grievance Mechanism</b>	<ul style="list-style-type: none"> <li>● Details of GRM including contacts</li> <li>● Process of receiving, redressing, escalation, reporting back</li> <li>● Consolidated statement on Grievances (segregated by non-COVID related &amp; COVID related)</li> <li>● Contacts of nearest labor offices of the Department of Labor in the Ministry of Labor and Employment</li> </ul>

## Annex (2): Code of Conduct

### Introduction:

The Code of Conduct is prepared by PMU for workers to indicate that they have:

- Received a copy of the code;
- Had the code explained/oriented to them;
- Acknowledged that adherence to this Code of Conduct is a condition of employment; and
- Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities

### Individual Code of Conduct templet in Case of Works Contractor

Code of Conduct and Work Ethics (for employees)			
Name		ID Number	
Gender		Age	
Project name		Project duration	

### Introduction

Paying attention to work and employment codes of conduct and ethics comes as one of the entrances to developing the performance of workers and employers. Preparing a code of conduct and work ethics that promotes positive values and practices at work, and a code of conduct is a general framework that must be adhered to and acted upon by project workers. They are rules that will contribute effectively to upgrading and improving the quality of performance. This code forms part of the project work requirements, focusing on prevention, safety and public health measures related to Covid-19, and must be applied in all areas. All working hours and throughout the operating period, and every worker will be provided with a copy of it, to read and act according to it.

### Basic principles Code of Conduct and Business Ethics

The quality of performance and the success of work depends on adhering to the general rules of behavior and work ethics, and acting in a fair and honest manner as socially responsible individuals, based on our firm belief in our social responsibility, which has a significant positive impact on the projects in which we work. To achieve this, we must respect these basic principles:

**Integrity and Honesty:** Act honestly in all relationships while strictly adhering to all applicable laws, respecting the dignity of every person and maintaining their integrity

**Transparency:** Mutual respect, dialogue and transparency are the basis of the relationship with employers and relevant authorities, which are compatible with the principles of cooperation, honesty and openness.

**Objectivity and Independence:** Work objectively and independently and avoid any kind of corruption or conflict of interest that may affect work-related decision-making.

**Responsibility:** Providing a safe and healthy work environment for workers, respecting rights and complying with duties as required by responsibility, and respecting the communities in which we work.

### Code of conduct and work ethics

#### Section 1: Public rights

1. The worker is obligated to perform his work sincerely and honestly and to preserve the secrets of work and his tools, and he is considered responsible for the tools in his custody and he must preserve them, and in the event of a circumstance beyond his control or force majeure, the worker is not considered responsible for the defect in the tools or their loss.
2. The worker must adhere to work ethics and maintain the privacy of residents and workers in the work area, without clashing with them or causing any harm to them in any way. You must refrain from participating in any physical or verbal violence against any staff or residents.
3. The worker must abide by the required working hours, as well as abide by and comply with the tasks assigned to him by the administration.
4. The worker must adhere to the occupational safety procedures used at the site, especially when using machines Hazardous materials or working in dangerous places, and any additional procedures requested by the project tool or the project supervision and control authorities.
5. The worker must immediately report any chronic diseases he suffers from or when he feels unwell, and any drugs the worker receives.
6. Refrain from causing any kind of harassment, whether verbal, direct or indirect, to any person during the work period, especially to women, children and people with special needs.
7. The worker has the right to sign an employment contract with the employer in order to preserve the rights of the worker, noting the work, its location and duration, working hours and times, and the contract must also include health procedures and precautionary conditions related to Covid 19, which were approved by the Egyptian Ministry of Health, and he must sign the contract By the employer and the worker so that the worker keeps an original copy of the contract.

8. The employer must undertake to insure all his workers for work-related injuries with the licensed authorities in Egypt.
9. The daily working hours must include one or more periods for the worker's rest, the total of which shall not exceed an hour, taking into consideration that the worker does not work for more than five consecutive hours without allocating time for rest.
10. Adhering to working hours and devoting working hours to carry out tasks and duties related to the nature of the contract, as stipulated in the work contract.
11. Ensure the worker's right to complain or complain about any violation of his right or wrong decision taken against him.

### **Section 2: Protecting Women's Rights**

1. Treating employees, especially women, with respect, regardless of race, color, language, religion, political or other opinion, origin, disability or any other status.
2. Woman has concerns, suspicions or incidents regarding acts of gender-based violence by the owners of any work -related party, she must report these concerns in accordance with the provisions of the law. L Complaints procedures adopted in the project. Provided that these complaints are dealt with great privacy in order to preserve the complainant's dignity.
3. Women must be provided with protection, safe workplaces must be created for women, especially pregnant women, ensuring that no pregnant woman is improperly transported, and working to remove or prevent exposure of pregnant women to risks.
4. Places for personal hygiene should be provided for use by workers and working women after work is completed. And also providing sanitary facilities (toilets) for women in the workplace, and these places must be sterilized on a daily basis.
5. Orientation meetings should be carried out prior to commencing work on site to ensure that everyone is aware of the GBV Code of Conduct

### **Section 3: Protecting the rights of people with disabilities**

1. Employers are obligated to create a suitable environment for people with disabilities and to provide facilities for movement in the workplace.
2. Non-discrimination of the right of male and female persons with disabilities to work, and respecting their right to choose the type of work that suits their abilities, interests and needs.
3. Commitment to provide health services and facilities that are suitable for the use of people with mobility disabilities in the workplace.

**Section 4: Occupational Health and Safety**

1. The worker must comply with the application of health and public safety conditions and procedures issued by the Ministry of Supply and Internal Trade
2. And adherence to occupational health and safety rules at work. The employer shall provide all necessary occupational safety tools to perform works at the work site, adhere to them, and oblige workers to comply with them.
3. The worker must report any work injuries, and the employer must provide first aid primary necessary for the worker in the event of injury and transporting him to the nearest treatment center, and the employer must provide the first aid box primary on the job site.
4. Adhere to public health and safety procedures and requirements related to COVID-19, including physical distancing, protective clothing, and everything stipulated in the health protocol.

The signature of the worker

Project management unit seal

\_\_\_\_\_

\_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**Annex (3): Health and Safety Incidents Tracker**

**Class of incidents**

Class 1	Class 2	Class 3
Minor: no one was injured or contaminated	Moderate consequences: minor injury with short term impairment	Major/critical: life at stake, severe injuries with long term or permanent



Reference number	Class of incident	Brief description	Cause of the incident	Date	Action to be taken	Due date	Responsible	Progress	Status
INC001									Open
INC002									Closed

#### **Annex (4): Employment, Health and Safety conditions Monitoring Form (Checklist)**

Contractor's name: ..... Site name:..... Date: ..... Instructions; Tick (✓) if available, put a cross(X) if unavailable. Tick (✓) if there's evidence, put a cross(X) if there's no evidence.

N0	Monthly Checklist: EHS items	Available	Unavailable	Type of evidence	Comment
1	Current Employee List				
2	Valid Working Contract				
3	Appointment letters				
4	Inductions – all contractor staff				
5	Routine OHS talk – all staff				
6	Reporting: Incidents accidents tracker/register.				
7	Grievance redress mechanism				
8	Health and Safety Committee				
9	PPE (boots, gloves, helmets, masks, and additional equipment as required for specific tasks): branded & properly worn at all times.				
10	Awareness on SGBV and STD				
11	Valid First Aid Kit				
12	Valid Fire extinguisher				
13	The incident register				

**Annex (5) Grievance Disclosure Sheet****Complaint Form**

Reference No.	
Full Name:	
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify)
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or grievance	
<input type="checkbox"/> One-time incident/grievance (date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?	
Signature	
Date:	

Annex (6) Grievance Log Sheet

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Ate of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

### Annex (7) Grievance Resolution Form

<b>How was grievance received</b>	
<b>Reference No:</b>	
<b>Fill Out Either Section 1 OR Section 2 below</b>	
<b>Description of Concern, Incident or Grievance: What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem</b>	
<b>Date of Grievance</b>	
<b>Fill Out Either Section 1 OR Section 2 below</b>	
<b>Has the Grievance been Resolved?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No; If not provide a justification below
<b>Section 1</b>	
<b>Summary of Actions Undertaken to Resolve Grievance</b>	
<b>Date of Implementation</b>	
<b>Section 2</b>	
<b>Summary of Proposed Actions to be Implemented to Resolve Grievance</b>	
<b>Timeline for Implementation</b>	

**Complaint review officer Signature:**

**Date**