



Republic of Kenya

**Second Kenya Social and Economic Inclusion Project
(P504218)**

**Labor Management Procedures
(LMP)**

Revised April 2025

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Abbreviations

ASAL	Arid and Semi-Arid Lands
BWCs	Beneficiary Welfare Committees
CCTP	Consolidated Cash Transfer Program
CDFSCs	Community Drought and Food security Committees
CHPs	Community Health Promoters
CIFF	Children Investment Fund Foundation
CoG	Council of Governors
CoK	Constitution of Kenya
CPVs	Child Protection Volunteers
CT-OVC	Cash Transfer for Orphans and Vulnerable Children
DFID	Department for International Development
DRM	Disaster Response Management
DSA	Directorate of Social Assistance (DSA)
E&S	Environmental and Social
EIP	Economic Inclusion Program
ESF	Environmental and Social Framework
ESR	Enhanced Single Registry
FCDO	United Kingdoms' Foreign and Commonwealth Development Office (FCDO)
FGD	Focus Group Discussion
GM	Grievance Mechanism
GoK	Government of Kenya
GSFF	Global Shield Financing Facility
HSNP	Hunger Safety Net Program
HUTLCs	Historically Underserved Traditional Local Communities
IAs	Implementing Agencies
IGA	income-generating activity
ILO	International Labor Organization
IP	Indigenous Peoples
KNCIC	KSEIP National Coordination and Implementation Committee
KSEIP2	Second Kenya Social Economic Inclusion Project
LVCs	Lay Volunteer Counselors
MEACARD	Ministry of East African Community, ASALs & Regional Development
MIS (s)	Management Information System (s)
MLSP	Ministry of Labor and Social Protection
MOE	Ministry of Education
MOH	Ministry of Health
NCPWD	National Council People with Disability
NDMA	National Drought Management Authority
NEDI	North Eastern development Initiative (NEDI)
NEMA	National Environment Management Authority
NGEC	National Gender Equality Commission
NGOs	Non-Governmental Organizations
NHIF	National Health Insurance Fund
NICHE	Nutritional Improvements through Cash and Health Education
NSNP	National Safety Net Program
NSSF	National Social Security Fund
NT	National Treasury
OPCT	Older Persons Cash Transfer
OSHA	Occupational Safety and Health Act
PCU	Project Coordination Unit
PDO	Project Development Objective
PWD	Persons with Disability
PwsD-CT	Persons with Severe Disabilities Cash Transfer
SCCO	Sub County Children Officers

SDSP	State Department of Social Protection and Senior Citizens Affairs
SEA	Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation and Abuse/Sexual and Harassment
SEP	Stakeholder Engagement Plan
SIDA	Swedish International Development Cooperation
SLVC	Sub Location Validation Committee
SP	Social Protection
USAID	United States Agency for International Development
VMG	Vulnerable and Marginalized Group
WB	World Bank
WFP	World Food Program
WIBA	Workers Injury and Benefits Act

1. INTRODUCTION/PROJECT DESCRIPTION

1. Over the last decades, Kenya has made significant improvements in economic growth resulting in the reduction of both poverty (from 47 percent in 2005 to 39 percent in 2023) and inequality from a Gini coefficient of 45 in 2005/06 to 39 in 2023. Despite the outstanding performance, almost as many Kenyans (36 percent) live below the international poverty line of US\$2.15 a day (2017 Purchasing Power Parity)¹ with five counties in the Arid and Semi-Arid Lands (ASAL) having the highest poverty rates.² These arid north/north-eastern counties, largely populated by refugees and pastoralists bear the largest social, economic, and environmental costs of droughts and floods. Kenya is also highly vulnerable to climate change, particularly extreme floods and droughts, which has affected food security for millions of people.

2. The national context is further amplified by the existing social and geographic inequalities whereby the poverty rate is higher amongst female-headed households compared to male-headed ones (41 percent compared with 38 percent).⁵ Unemployment among the growing youth population, aged 15 to 24, is more than double that of the total population.³ Moreover, female youth unemployment (17.2 percent) is more than double that of male youth (8.2 percent). In poorer regions (the ASAL north/north-eastern counties), harmful practices such as child marriage and limited access to basic services contribute to gender inequalities in employment. Child stunting remains high (above 20 percent) in 15 counties, with the highest rates in poorer households, rural regions, and among children whose mothers lack formal education.⁴

3. To overcome these challenges, Kenya has in place a Social Protection (SP) system that includes a draft SP Bill, approved by the Cabinet in January 2024 for submission to Parliament. When passed, the bill will provide the legal framework for SP and other pro-poor programs, building on the 2024 National SP Policy. Additionally, an upcoming Disaster Response Management (DRM) Bill will restructure and clarify roles and responsibilities within the institutional architecture for DRM in Kenya. Further, the Kenya's flagship National Safety Net Program (NSNP), also called *Inua Jamii*, comprises the four largest cash transfer programs in the country, serving a total of 1.2 million households. These include (i) Hunger Safety Net Program (HSNP, 130,000 households), (ii) Older Persons Cash Transfer (OPCT, 730,000 households)⁵, (iii) Cash Transfer for Orphans and Vulnerable Children (CT-OVC, 265,000 households), and (iv) Persons with Severe Disabilities Cash Transfer (PwSD-CT, 44,000 households).

4. HSNP is implemented by the National Drought Management Authority (NDMA) under the Ministry of East African Community, ASALs & Regional Development (MEACARD) and provides routine cash transfers of 2,700 Kenyan Shillings (KES) per month (~US\$18) to poor households in eight northern counties. The HSNP also has a shock-responsive component which provides 2700 KES per month to poverty-targeted households when their sub-counties are affected by severe or extreme drought.⁶ Over 750,000 households are enrolled in the shock-responsive component and are eligible to receive this emergency assistance. The other three cash transfer programs make up the nationwide Consolidated Cash Transfer Program (CCTP), led by the Directorate of Social Assistance (DSA) within the State Department of Social Protection and Senior Citizens Affairs (SDSP). The CCTP provides 2000 KES per month to all beneficiary households. In April 2023, a Presidential directive called for an expansion of coverage of *Inua Jamii* to 2.5 million households in the next three years, the first phase of which is underway.

5. **The building blocks of Kenya's SP system are in place** as all NSNP programs utilize the GoK's Enhanced Single Registry (ESR) for: i) poverty targeting of beneficiaries (except OPCT, which is not poverty-targeted); ii) electronic transfers to bank accounts, iii) secure management information systems (MIS), and iv) multi-channel grievance and redress mechanisms. The ESR is a national targeting system

¹ http://macro-povertyoutlook.worldbank.org/mpo_files/mpo/mpo-sm24-ken-scope.pdf

² The five counties are: Turkana, Mandera, West Pokot, Tana River, and Samburu. KNBS and ICF. 2023. *Kenya Demographic and Health Survey 2022*. And World Bank Group. 2023. *Kenya Poverty and Equity Assessment 2023: From Poverty to Prosperity: Making Growth More Inclusive in Kenya*.

³ The World Bank. (2023). World Bank Open Data. <https://data.worldbank.org/>

⁴ KNBS and ICF. 2023. *Kenya Demographic and Health Survey 2022*.

⁵ The OPCT is an individual entitlement, not household. 730,000 is the approximate number of households in which OPCT beneficiaries reside.

⁶ HSNP emergency cash transfers are triggered by external monitoring of a Vegetation Cover Index (VCI) through satellite data.

for pro-poor programs with household welfare data collection completed in half of the counties and the remaining half to be completed in 2024.

6. These efforts notwithstanding, **gaps in Kenya’s SP system remain, and these include low coverage of SP programs, with only about 10 percent of Kenyan households receiving any social assistance despite 35 percent of households living in poverty.** Further, only 20 percent of the adult workers are covered by any social insurance while children, adolescents (ages 10-19), and youth (ages 16-29) receive little or no support through Kenya’s social protection system. Demographic projections indicate that the years 2020 to 2060 represent the optimal period for Kenya to harness the demographic dividend and achieve significant economic growth if effective investments are made in human capital and job creation. Otherwise, the current generation of children and youth will continue to experience high rates of poverty and require assistance into adulthood.

7. Against this backdrop, the Government of Kenya (GoK) in partnership with the World Bank (WB) is preparing the Second Kenya Social and Economic Inclusion Project (KSEIP2) with the objective of providing social and economic inclusion services to poor and vulnerable households and strengthen adaptive social protection in Kenya. The KSEIP2 is being prepared under the World Bank’s Environment and Social Framework (ESF).

1.1 Project Development Objective and Structure

8. The project’s Development objective (PDO) is to promote social and economic resilience of poor and vulnerable households and strengthen the adaptive social protection system in Kenya. The project is organized into four components as outlined in Table 1 below:

Table 1: Description of the project components and areas of focus

Component	Sub-Components	Area of Focus
Component 1: Building human capital of children and adolescents	1a: Nutrition-sensitive cash-plus program for children under three and pregnant or lactating women (PLW)	Expanding the coverage of NICHE to twenty-five counties to provide monthly cash top-up of 1000 KES and nutrition counseling to support the growth and development of young children. Nutrition counseling is delivered by Community Health Promoters (CHPs) of the Ministry of Health (MoH) and includes mother-to-mother support groups and community-wide counseling on optimal health and nutrition practices for both PLW and young children Testing NICHE-plus, which includes a positive parenting package and anticipatory shock responsive support, in five counties
	1b: Cash-plus program to support adolescent education and prevent teen pregnancy	Addressing the coverage gap of adolescents in Kenya’s existing social protection system, this subcomponent will test a cash-plus program that supports poor and vulnerable adolescents to remain in or re-enter school and prevent teen pregnancy Providing a comprehensive package of support to adolescents and their families depending on the presence/severity of risk factors among adolescents and their willingness to remain in or re-enter education. Cash top-ups will be provided to support enrolment and attendance in basic primary or secondary school among adolescent boys and girls in poor and vulnerable households. Supplemental services to some or all beneficiaries include: (i) skills training for adolescents who do not wish to return to school (in lieu of cash support); (ii) social and behavioral change activities for all parents and

		communities; (iii) case management, psychosocial support, and childcare support for teenage mothers seeking to re-enter school; (iv) life skills training, mentorship, and peer support for all adolescents; and (v) linkages to relevant social services.
Component 2: Climate Resilient Economic Inclusion	2a: Economic Inclusion Program (EIP)	<p>Improve economic lives of adults in poor households by supporting livelihood diversification and investments in more productive household enterprises.</p> <p>To strengthen households' climate resilience by promoting climate-resilient livelihoods and encouraging diversification from those vulnerable to climate change. Climate-resilient livelihoods are income-generating activities designed to withstand climate shocks and reduce vulnerability by integrating adaptation strategies. The program aims to promote livelihood diversification through different value-chains in bee keeping, shoats rearing, fodder production, milk, livestock production, fishing and root crops production.</p> <p>To address systemic barriers such as limited access to resources and discriminatory social norms preventing women from fully participating in the economy by training offered in EIP and expand their economic opportunities.</p>
	2b: Linkages and co-investments in green livelihoods in selected communities	Finance a climate-focused EIP-PLUS intervention that will be piloted in a subset of 8 North Eastern Development Initiative (NEDI) counties with high climate vulnerability, limited transportation and access to markets, and high rates of poverty.
	2c: Linking EIP beneficiaries to social insurance schemes	<p>To provide social insurance in the form of savings opportunities and incentives to EIP beneficiaries. Key design features have been informed by learning accrued through the Kenya National Youth Opportunities Towards Advancement Project (P179414) and will include:</p> <p>(a) Auto-enrollment: All EIP beneficiaries will be registered in the social insurance scheme with a flat benefit under this sub-component. Intensive behavior change communication will be carried out by mentors engaged under Component 2a.</p> <p>(b) Matching contributions to inculcate a savings habit: During the first six months, beneficiaries will receive a 100 percent matching grant, subject to a cap of US\$2 per month per beneficiary, if they contribute to the scheme. This nudge is intended to reinforce the behavior change communication and promote a long-term saving habit.</p>
Component 3: Systems Strengthening and Adaptive Social Protection	3a: Enhanced Single Registry (ESR)	<p>Improve the coverage, accuracy, and effectiveness of the ESR to bolster its legitimacy and capacity as a targeting platform for pro-poor programs.</p> <p>Make key investments in the Management Information System (MIS) and human resource capacity of the ESR.</p>

	3b: Consolidated Cash Transfer Program (CCTP) Enhancements	<p>Support critical reforms and enhancements to CCTP to improve its efficiency and poverty impact.</p> <p>Other key reforms to CCTP that will be supported under this sub-component include: (i) updating payment systems to maximize beneficiary choice, automation, and financial inclusion, (ii) upgrading program MISs to enhance interoperability, functionality, and flexibility, and (iii) developing and strengthening CCTP M&E functions and capacities, with a focus on devolving responsibilities to county-level staff.</p> <p>Support innovations to improve two-way citizen engagement.</p>
	3c: Enhancing Shock-Responsive Social Protection	<p>Support the expansion of HSNP and enhancements to its shock-responsive capacity by introducing anticipatory actions and enabling a risk-based, multi-hazard and multi-layered response mechanism under a renewed Disaster Risk Financing Strategy (DRFS).</p> <p>Expansion of HSNP to almost all ASAL counties will be supported by investments in its delivery systems. The project will finance third-party, census-style data collection in the new sub-counties using the ESR registration tool to identify and enroll new beneficiaries. Additional investment areas will include: i) implementation of ODR in all HSNP counties to allow dynamic data updates, ii) upgrades to the MIS data center for improved functionalities, iii) establishment of a modern call center to enhance two-way citizen engagement, iv) the remodeling of payment systems to enable beneficiary choice of payment service providers and withdrawals tools, and v) linking with existing or new early warning triggers/systems for droughts and floods.</p>
Component 4: Project Management, Monitoring and Evaluation, and Policy and Legislation		<p>Will finance project management, including capacity building, monitoring and evaluation, and environmental and social (E&S) risk management for the implementing agencies.</p> <p>Will also finance activities related to development of critical policy and legislation in the SP sector and coordination between national and county governments on policy development for devolved functions such as childcare.</p>

1.2 Key Results

9. Progress toward achievement of the PDO will be specifically measured by the following outcome indicators:

- (a) Households participating in NICHE that report following MIYCN best practices⁷ (Percentage).

⁷ Maternal, infant and young child nutrition practices (MIYCN), such as breastfeeding, complementary feeding, and other key nutritional behaviors.

- (b) Participating households that graduate from the Economic Inclusion Program (EIP)⁸ (Percentage).
- (c) Participating adolescent girls (ages 10 to 18) with improved educational attainment⁹ (Percentage).
- (d) Eligible households who have received emergency cash transfers within nine months of a qualifying climate or weather event (Percentage).
- (e) Coverage and accuracy of ESR increased through On-Demand Registration (Number).

1.3 Project Beneficiaries

10. The project targets to benefit all 1.8 million existing NSNP households with improved delivery systems for GoK-financed cash transfers, 150,000 households will be supported under the NICHE program, 20,000 households will be supported under the adolescents' program and 50,000 households will be supported under EIP. There can be overlap between households that participate in various programs given there will be (intentional) geographic overlap across some counties, and households may be eligible and interested to participate in multiple programs. Beneficiary households of all programs must be poor but do not necessarily need to already be enrolled in NSNP to be eligible. Beneficiary households will be selected using ESR data to assess their poverty status along with other relevant eligibility criteria for each respective program. Beneficiaries of HSNP's shock responsive program will be pre-registered using ESR data to assess poverty status and residence in qualifying HSNP areas in ASAL counties.

2. OBJECTIVE OF THE LMP

11. Under the World Bank's Environmental and Social Standard 2 (ESS2: Labor and Working Conditions), the Borrower is required to develop labor management procedures (LMP). The purpose of the LMP is to identify the main labor requirements and risks associated with the project and help the Borrower to determine the resources necessary to address project-related labor issues. Specifically, Borrowers are required to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. In this context borrowers are required to adhere to key provision of ESS2 including to:

- a. Promote safety and health at work.
- b. Promote fair treatment, non-discrimination and equal opportunity of project workers.
- c. Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS2) and direct workers, contracted workers, community workers and primary supply workers, as appropriate.
- d. Prevent the use of all forms of forced labor and child labor.
- e. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- f. To provide project workers with accessible means to raise workplace concerns.

12. The purpose of this LMP is to (a) identify the different types of project workers that are likely to be involved in the project, (b) set out the ways of meeting the requirements of ESS2 that apply to the different types of workers and (c) identify the resources necessary to address the labor issues associated with the project. The LMP is a living document and needs to be reviewed and updated throughout development and implementation of the project.

3. OVERVIEW OF LABOR USE ON THE PROJECT

3.1 Institutional Arrangements

Consistent with the ongoing KSEIP, the proposed project will retain two main IAs—the Ministry of Labor and Social Protection (MLSP) and NDMA within the MEACARD. Within MLSP, SDSP will have overall

⁸ The criteria for graduation from the program include achieving all of the following: improved food security, establishing a sustainable and stable source of income, increased household assets, increased savings and access to credit, improved social inclusion, participation in all graduation interventions.

⁹ Educational attainment is measured as completing at least one additional year of schooling or, for those out of school at baseline, re-entering primary or secondary school.

implementation responsibility for the proposed project. MLSP and NDMA staff at the national and local levels are responsible for the delivery of the cash transfer and complementary programs on the ground, in coordination with the county governments, where appropriate.

Within MLSP, the National Social Protection Secretariat (NSPS) has the mandate for coordination of all SP policy and programs in the country. The Secretariat serves as the PIU for KSEIP2 and will have overall responsibility for project oversight and coordination, including E&S risk management under Component 1. This will particularly involve coordination among other line ministries, humanitarian actors, and county governments on the implementation of project activities across all components. The NSPS will also lead the systems investments for the ESR (Subcomponent 3a).

Three other directorates within MLSP will also have implementation roles in KSEIP2:

- (a) Directorate of Social Assistance (DSA): Under KSEIP2, DSA will lead the Subcomponent 3b investments and carry out activities related to recertification of CCTP beneficiaries, systems enhancements, two-way citizen engagement, and grievance redress for all programs led by SDSP. It will also ensure cash payments to the beneficiaries of NICHE, EIP, and the adolescent program (NSNP and non-NSNP beneficiaries) under Components 1 and 2, in coordination with the Directorate of Children's Services (DCS), Directorate of Social Development (DSD), and NDMA.
- (b) DCS. For KSEIP2, DCS will lead all Component 1 activities, including NICHE and the new adolescent program, both at the national level and on the ground through county and subcounty officers, in collaboration with county and subcounty health and education officials. The DCS will also coordinate County Multisectoral Committees for implementation of Component 1.
- (c) DSD. For KSEIP2, DSD will lead the implementation of Subcomponents 2a and 2c at the national and county levels. The DSD will coordinate the County Multisectoral Committees to support implementation of economic inclusion activities.

In addition, NSPS activities are supported by five community volunteer groups, namely the Beneficiary Welfare Committees (BWCs), Lay Volunteer Counsellors (LVCs), Community Drought and Food security Committees (CDFSCs), Child Protection Volunteers (CPVs) and the Sub-Location Validation Committees (SLVCs). According to their terms of engagement, these volunteer groups are not expected to work full time. Compensation for work done is in the form of stipend but not in all cases. The committees are also supported with transport and airtime costs. The section below summarises their specific roles and membership.

- a. **Beneficiary Welfare Committees (BWCs)**, is a group of representatives of beneficiaries of Cash Transfer programs at the Locational level (which are essentially the second lowest administrative unit in Kenya after the sub location). Some of the locations (especially in Arid and Semi-Arid counties) occupy a wide geographical area (vast) with high number of beneficiaries and in this case the BWC will be constituted at the sub-locational level. The purpose of forming the BWC's is to increase the programme efficiency, accountability, transparency and awareness; and serve as a key link between the beneficiaries and the programme officers. The membership of the BWC includes older persons, minority VMGs etc. Each BWC should have a membership of fifteen (15) comprising members from CT-OVC, PWSD-CT, OP-CT and HSNP. Membership into the BWC is voluntary but they are supported with airtime and transport to perform their roles by the programme officers.
- b. **Lay Volunteer Counselors (LVCs)** who are citizens who voluntarily offers his/her time, skills and resources to support individuals and families in need of guidance and counselling, under the direction of the Social Development Officer without remuneration. The Directorate has enlisted a total of 2401 LVCs across the 47 counties (7 LVCs per sub-county).
- c. **Community Drought and Food security Committees (CDFSCs)**, are led by the NDMA and supported by both national and international organizations. These committees play a critical role in matters relating to drought and food security management at county level. Their roles include among others coordinating the implementation of national drought policies at the county level, managing emergency responses and mobilize resources during droughts and ensuring early warning information is shared with local populations.
- d. **Child Protection Volunteers (CPVs)** are volunteers who assist the SDO in undertaking functions such as promoting and protecting the rights and welfare of children in the community, provision of guidance to children in need of care and protection identification and reporting of

child protection cases and emerging trends to the SCCO for intervention and supporting case management process as guided by the SCCO etc.

- e. **Sub-Location Validation Committees (SLVCs)**, the total number of SLVCs in the 8 HSNP Counties is 920. Each SLVC has a membership of 10, bringing the number of numbers to 9,200. Their key roles include:
- Participate in the validation and targeting training.
 - Mobilize the community to attend the validation public Baraza.
 - Sensitize the community on the validation process by dissemination of information.
 - Represent the committee and community matters pertaining validation and targeting.
 - Receive and resolve complaints with escalation of unresolved cases to the Location validation Committee.
 - Participate in the validation and targeting training.

3.1 Expected Project Labor

13. According to ESS2 project workers are categorized into four broad categories including:
- a. Direct workers - people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project;
 - b. Contracted workers - people employed or engaged through third parties to perform work related to core functions of the project, regardless of location;
 - c. Primary suppliers - people employed or engaged by the Borrower's primary supplier; and
 - d. Community workers - people employed or engaged in providing community labor voluntarily, labour for community led projects, social safety nets and targeted assistance under Fragile Conflict and Violent (FCV) areas.

Direct Workers

14. This project will engage the following types of direct workers:
- a. **Project Management Unit (PMU):** As mentioned earlier, a PMU will be established within the SDSP to manage the project. The PMU will have a dedicated Project Coordinator (PC) with overall responsibility for the effective functioning of the Project. The Unit will be staffed by Government employees, with skills to undertake key functions such as financial management, procurement, E&S risk management and communication and Monitoring and Evaluation (M&E). Additional staff may be seconded from other Ministries and government agencies (such as the Department of Occupation Safety and Health) to strengthen the E&S risk management capacity within the project. The exact workforce at the PMU and each of the participating counties is still being determined by SPS. The PMU workforce will be required on full time basis throughout the project implementation period.
 - b. **Civil Servants from Ministries, Agencies and County governments** and staff of development partners on the project: All Government staff to be involved in the project (SDSP, NDMA, MoH, MoE, Meteorological Department, other Disasters Risk Management Agencies, , National Registration Bureau (NRB) and Civil Registration Services (CRS) and staff from the various County Governments departments) will remain subject to the terms and conditions of their existing public sector employment, which are governed by Constitution of Kenya (CoK), 2010, Employment Act 2007, existing Public Service Regulations and Human Resources Manuals. There will be no legal transfer of their employment or engagement to the project. Under SDSP, two of its departments (the Directorate of Children's Services -DCS and the Directorate of Social Development - DSD) have staff at both national and local levels and are responsible for the delivery of the cash transfer and complementary programs on the ground, in collaboration with the county governments, as appropriate. The NDMA has staff at both the national level and in the 23 ASAL counties in which it operates. The staff are responsible for the delivery of HSNP initiatives in collaboration with the county governments.

- c. **Service providers (Consultants and Contractors):** The PMU will be supported by national and/or international consultants and contractors, who will be hired on needs-basis. The consultants/contractors will be assigned to various functions including capacity building for project staff, policy formulation, documentation of lessons learnt to inform project planning, payment service providers, mentors/trainers for the various categories of project beneficiaries. The consultants and contractors will be governed by a set of mutually agreed contracts between them and the PMU and/or contracting agency. Based on the expected consultancy areas, the estimated number of individual consultants in the project is nineteen (19).

d. Community Health Promoters under the Ministry of Health

While there is no upper limit in terms of age for being a member of Community Health Promoters (CHP), they are required to meet the following are the qualifications:

- Be a citizen of Kenya.
- Above the age of 18 and is of sound mind.
- A responsible and respected member of the community.
- Understands the role of a community health promoter.
- A resident of the respective community for a continuous period of not less than five years prior to the appointment date.
- Literate and can read and write in at least one of the national languages and the local language; and is not disqualified for appointment to office by the above criteria of by any other law.

The roles and responsibilities

- Sensitize the community on the importance of healthy lifestyles and of quality health services
- Provide community disease surveillance by reporting early signs of imminent health disasters or emergencies.
- Enrol and monitor the health status of members of the households assigned to the community health promoter.
- Keep and maintain a record of members in all households assigned to the community health promoter.
- Monitor the rehabilitation and integration of persons who require such services in the community.
- Provide appropriate health advice to an assigned household in a language that the members of the household understand, including advice on—
 - Appropriate sanitation and hygiene techniques including household water treatment.
 - Good nutrition.
 - Maternal and postnatal care including advice on breastfeeding, immunization, child health care and family planning.
 - The prevention, transmission and management of communicable diseases; and
 - The prevention and management of non-communicable diseases
- Render first aid services to an assigned household and where necessary,
- Make referrals to the link facility.
- Monitor the growth of children under the age of five years in an assigned household.
- Provide support to the assigned household on quality family-based care and support for a patient.
- Submit reports, at such intervals as shall be determined by the county director of health, on the health of each member of an assigned household and the barriers to health and health care in the household to the community health officer.

- e. **Community Agricultural Extension Officers under the Ministry of Agriculture,** they are likely to support the value chains under the EIP component under the WFP. They usually work within a community and support farmers with a wide knowledge on farming practices.

Primary Supply Workers

15. A “primary supply worker” is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. Under the project supplies such as office furniture, vehicles, Information, Education and Communication (IEC) materials, ICT equipment will be required to enhance the functioning of the PMU and project implementation at both the national and county level. At this stage, the number of primary supply workers cannot be readily estimated.

16. The Project will therefore seek primary suppliers through contractors who will be commissioned on localized sub-project contracts, necessitating the engagement of workers of primary suppliers in the project. The primary suppliers will be required to demonstrate that they are managing child labor, forced labor and safety concerns for their workers. The project E&S specialists at national level will be required to carry out due diligence and monitoring to ensure compliance with the requirements of ESS2.

Community Workers

There are five KSEIP 2 Community-Level Volunteer Committees engaged by the project, and these are essentially citizens who volunteer their time and skills to support delivery of social protection services within their respective communities under the direction of the Social Development Officer, Children’s Officer and NDMA’s Field monitoring officers, without remuneration. Their services are required on an intermittent basis throughout the implementation period. Such community workers include:

1. Lay Counselling Volunteers (LCV) who essentially support individuals and families in need of guidance and counselling. The Directorate has enlisted a total of 2,401 LVCs across the 47 counties (7 LVCs per sub-county). Some of their key roles include to i) ensure the rights of older persons, persons with disabilities and other vulnerable members in the community are protected, ii) provide guidance and counselling services to individuals and families in need of care and protection at community level and iii) train parents and caregivers on skills and techniques of positive parenting
2. Child Protection Volunteers (CPV) whose main responsibility include promoting and protecting the rights and welfare of children in the community, provision of guidance to children in need of care and protection and identification and reporting of child protection cases and emerging trends to the SCCO for intervention. The estimated number of CPV is 1,800.
3. Community Drought and Food security Committees (CDFSCs), are led by the NDMA and supported by both national and international organizations. These committees play critical role in matter drought and food security management at county level. Their roles include among others coordinating the implementation of national drought policies at the county level, managing emergency responses and mobilize resources during droughts and ensuring early warning information is shared with local populations. The exact total number of workers is yet to be finalized but is an average of xx persons per county.
4. Beneficiary welfare committees (BWC) who are essentially a group of representatives of beneficiaries of Cash Transfer programs at the Locational (village) level. The purpose of forming the BWC’s is to increase the programme efficiency, accountability, transparency and awareness; and serve as a key link between the beneficiaries and the programme officers. The membership of the BWC includes older persons, minority VMGs etc. Each BWC should have a membership of fifteen (15) comprising members from CT-OVC, PWSD-CT, OP-CT and HSNP. There is a total of 2,866 BWCs with a total membership of 43,059. Some of their key roles is to:
 - Communicate payment information to beneficiaries/caregivers within their locality
 - Assist the sub county officers to trace and identify beneficiaries whose accounts are inactive
 - Support awareness creation and mobilization of beneficiaries/caregivers on program activities
 - Receive feedback from beneficiaries/caregivers and submit reports to the Sub-County officers.
5. Sub-location validation committees (SLVC)- The total number of SLVCs in the 8 HSNP Counties is 920. Each SLVC has a membership of 10, bringing the number of numbers to 9,200. Their key roles include:
 - Participate in validation and targeting training.
 - Mobilize the community to attend the validation public Baraza.

- Sensitize the community on the validation process by dissemination of information.
- Represent the committee and community matters pertaining to validation and targeting.
- Receive and resolve complaints with escalation of unresolved cases to the Location validation Committee

4. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

4.1 Project Overview

17. The project is conceptualized to strengthen poor and vulnerable households' social and economic inclusion and climate resilience. However, its overall Environment and Social (E&S) risk rating is assessed as Substantial with the environmental risk rating being Moderate while the Social risk rating is Substantial. The project will be implemented in areas that are increasingly affected by frequent and severe climate shocks with high malnutrition and child poverty potentially increasing the vulnerability of the target households. The scope of the project entails interventions such as : i) provision of nutrition-sensitive and shock-responsive support targeting children, adolescents, and youth; ii) preparing adolescents and youth for healthy and productive adulthood; iii) promoting savings and social insurance for informal workers; iv) promoting resilience and supporting livelihood diversification to mitigate and adapt to climate change in both ASAL and non-ASAL regions and v) supporting the Government to design and implement critical policy reforms enacted under the upcoming Social Protection Bill to enhance efficiency and effectiveness of NSNP.

4.2. Potential Labor Risks

18. Potential labor risks are those related to labor and working conditions, such as work-related discrimination, Occupational Health and Safety (OHS), gender-based violence (GBV) and sexual exploitation and abuse (SEA) and Sexual Harassment (SH). The PMU will assess and address these risks by developing recruitment guidelines, procedures and appropriate OHS measures and applying relevant provisions of the Employment Act 2007, Public Service regulations, Public Service HR manual, and the ESS2 and ESS4. There is no possibility of child labor or forced labor since this project shall only engage government staff and consultants who shall all be over 18 years of age, since this is the minimum age for employment by the Government. Age verification for consultants and for the community workers will be done on recruitment/engagement process through presentation of a national identity card or a passport. Table 2 presents a summary of the risks and mitigation measures.

Table 2: Potential labor risks and mitigation measures.

Risk/Impact	Description of Risk	Risk Mitigation Measures
ESS2: Labor and working conditions		
<p>1. Dispute over terms and conditions of employment</p>	<p>Some of the concerns related to this risk include:</p> <ul style="list-style-type: none"> ○ unclear/ undocumented terms and condition; ○ less and/ or delayed wages; ○ illegitimate deductions; ○ prolonged work hours and insufficient rest times; ○ unrecognized rights for taking maternity leave; ○ insufficient or no health coverage, ○ unclear termination policy, ○ Unequal salary for same job worked ○ Employers such as contractors/ subcontractors may retaliate against workers for demanding legitimate working conditions, or raising concerns regarding unsafe or unhealthy work situations, or any grievances raised, and such situations could lead to labor unrest. ○ Project workers expected to work long hours, far from home without timely/adequate remuneration. 	<p>All Project workers are to be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.</p> <p>The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of ESS2.</p> <p>This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.</p> <p>All employment will be voluntary.</p> <p>The workers will be provided with accessible means to raise workplace concerns. This will be done through establishing a worker Grievance Mechanism (GM) with its own appeal process including facilitating project workers to form and or join of collective bargaining bodies if needed.</p>
<p>2. Discrimination in relation to recruitment and employment</p>	<p>Widespread unemployment, especially among the youth, in Kenya could lead to increased risk of discrimination on the basis of gender, disability, ethnicity, sexual orientation/identity, or any other personal characteristic unrelated to inherent job requirements exists at all levels of project implementation</p> <p>Discrimination is likely to impact women, persons with disabilities, individuals from minority clans, vulnerable and disadvantaged groups</p>	<p>In line with the Employment Act 2007, decisions relating to the employment or treatment of project workers will not be made based on personal characteristics unrelated to inherent job requirements.</p> <p>The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</p> <p>Ensure adherence to the Employment Act 2007. The Employment Act 2007 stipulates that remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regard to race, sex, pregnancy, marital status, health status, ethnic or social origin, color, age, disability, religion,</p>

		<p>conscience, belief, culture, dress, language or place of birth and HIV status.</p> <p>NICHE relies on CHPs to deliver nutritional counselling and county governments are responsible for paying 50% of the KES 5,000 stipend to CHPs, which are shared by national and county governments. Where CHPs are engaged under KSEIP 2 on a full-time basis, the project pays the difference to ensure the CHPs receive the minimum wage (approximately 15, 000).</p>
3. Child labor:	<p>The risk is minimal (given the recruitment criteria for all government jobs) the risk may emerge through the primary supplier workers and the responsible suppliers will be required to demonstrate that they are managing child labor.</p>	<p>The primary supplier shall be contractually required not allow engagement of child labor. The PMU and especially the EHS and Social specialists will review procedures for staff engagement by primary suppliers. Where the risk of child labor is established, PMU will require the primary supplier to take appropriate remedial measures.</p> <p>Verification of the age of employees shall be undertaken prior to the engagement of labor and be documented.</p>
4. Forced labor	<p>Forced labor risk is unlikely as the project will work mainly with government staff. However, there may be risks related to primary supply workers and the responsible suppliers will be required to demonstrate that they do not accept forced labor.</p>	<p>The primary supplier shall be contractually required not allow engagement of forced labor. The PMU and especially the EHS and Social specialists will review procedures for staff engagement by primary suppliers. The PMU shall also undertake due diligence on the prequalified suppliers as regards their labor management policies and any history of forced labor. Where the risk of forced labor is established, PMU will require the primary supplier to take appropriate remedial measures.</p>
4. Occupation health and safety	<p>Unsafe work environment: workers may be subjected to poor working conditions, including lack of appropriate personal protective equipment (PPE) where needed and appropriate toilet facilities separate for males and females; insecurity while travelling to and from locations with incidents of banditry/cattle rustling, road safety hazards while using project vehicles on public roads.</p>	<p>The OHS measures will be designed and implemented to address:</p> <ul style="list-style-type: none"> ○ Identification of OHS hazards and risk analysis before commencing various project activities. For livelihood activities, further OHS measures shall be defined in the respective ESMPs. ○ Training of project workers on identified hazards, risks and their prevention and management measures, and maintenance of training records. Workers shall be sensitized on risks before being allowed to start activities that generate the risks and refresher trainings shall be provided; ○ Implementing the project's Security Management plan. All workers shall be sensitized on the SMP and expected to adhere to it throughout including in their journey plans. ○ Ensuring project drivers are duly qualified and trained in defensive driving. Only designated drivers shall be allowed to operate project

		<p>vehicles and suitable journey plans shall be maintained.</p> <ul style="list-style-type: none"> ○ Ensure project vehicles are maintained through regular servicing as per manufactures specification and records maintained. The government of Kenya vehicle fleet management policy shall be applied. All project vehicles shall be insured, and valid insurance maintained throughout the project implementation. ○ Documentation and reporting of occupational accidents, diseases and incidents; ○ The PMU will safeguard the interests of women, including gender parity at the workspace, provide appropriate sanitation facilities at the workplace and appropriate PPE for women and persons with disability, as needed
ESS4: Community Health and Safety		
<p>5. GBV/SEA/SH</p>	<p>The risks of Gender-Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH) could potentially be exacerbated by the project context including the vulnerable nature of the targeted households, cultural norms and the susceptibility of the target beneficiaries to SEA/SH, the Project’s gender-related objective of encouraging women’s participation in the development process,</p> <p>There is a risk of GBV including SEA and SH among the workers at the national, county and sub-county levels.</p>	<p>All workers will be required to sign a Code of Conduct (CoC) aimed at preventing and addressing harassment, intimidation and/or exploitation. (see CoC template in Annex 1),</p> <p>Workers to be sensitized on actual meaning and implication of the Code of Conduct before signing it.</p> <p>A separate GM structure (from the broad project GRM) will be set up to address GBV/SEA/SH issues at the PMU -Measures will be put in place to manage GBV/SEA/SH issues in a timely manner using a separate structure for reporting GBV/SEA/SH cases.</p> <p>Organizations such as the Red Cross, World Vision, and Groots Kenya operating in the KSEIP 2 counties were identified and engaged during project preparation and can support GBV management. The proposed enhanced call center under CCTP and HSNP that complements the project GM is expected to provide an avenue for the proactive engagement of beneficiaries; diversifying payment systems will allow for beneficiary choice, reduce direct contact with payment service provider agents, and mitigate the risk of SEA/SH. Volunteer committees, including BWCs, are an essential factor that complements the project GM and provides a layer of oversight during the regular interactions between project actors and beneficiaries and amongst beneficiaries. This could limit opportunities for SEA/SH. Ensure the volunteer committees are represented on the project GM at the locational and sub-county levels and trained as GM/GBV Focal Points. Further, build the capacity of communities, local leaders,</p>

		project workers at the national and county level on SEAH, develop and disseminate IEC materials that are informative and collaborate with gender officers etc.
6. Insecurity	<p>There is a potential risk of insecurity for project workers when they travel out of their workstations to different counties for capacity building and M&E. Some of the ASAL counties have incidences of cattle rustling/banditry and workers travelling to the affected areas may be caught up in crossfires or at times be deliberately targeted.</p> <p>The use of security personnel to escort project workers in some of the areas prone to insecurity may also pose a risk to the local communities, including potential use of excessive force while responding to situations, harassment including GBV.</p>	<p>The safety of the workers will be assured through restriction of movement of project vehicles (from 6am to 6pm) and residence in secure hotels across the country while they are on project-related assignments -Although the Project will not hire private Security to protect project staff, the PMU will work closely with the Ministry of Interior when staff visit counties with a history of insecurity. National Security personnel may be utilized. A project Security Management Plan (SMP) will be developed.</p> <p>Workplace processes will be put in place for project workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health.</p> <p>Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken.</p> <p>Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.</p> <p>Implement Projects' SMP which includes guidance on the use of security personnel including their Code of Conduct.</p>
7. Spread of diseases in communities including HIV and AIDS	The spread of HIV and other communicable diseases	<p>All project staff will be sensitized on the preventing communicable diseases - Communication on risks of infection with HIV and AIDS will be conducted throughout the project.</p> <p>Posters/flyers on HIV/AIDS will be developed and distributed at the national and county/sub-county offices).</p> <p>All workers will be required to sign the CoC which will also address this risk.</p>
Exposure to hazardous materials.	Climate resilience livelihood activities may encourage use of agrochemicals where crop and livestock value chains are promoted. The project will support beneficiaries in procuring some pesticides, herbicides, veterinary drugs and vaccines as well as fertilizers. Given lack of prior knowledge and low literacy levels among most of the targeted households, improper handling	<p>Ensure that risk of hazardous agrochemicals is assessed, and adequate measures incorporated in the site-specific ESMPs for the climate-resilient livelihood activities before they are commenced.</p> <p>Undertake beneficiary households' awareness, through the extension officers, to promote integrated pest management practices and where agrochemicals are used, safe handling practices.</p>

	(storage, application and disposal of used packaging) of agrochemicals may expose them and their families to hazardous chemical constituents with detrimental health impacts.	Sensitize the beneficiaries on maintenance of materials safety data sheets and reference in cases of emergency.
Injuries while using equipment.	As part of the value chain support, the project will procure various manual or powered equipment for use. E.g. honey processing, baler machines and boat engines for use by the beneficiaries. Operation of this equipment may pose safety hazards including being caught in between moving parts, electrocution, cuts/bruises etc.	<p>Restrict the operation of equipment to competent individuals who have been adequately trained on respective equipment operation.</p> <p>Undertake training on the hazards and prevention measures, including the appropriate use of Personal Protective Equipment (PPEs) to be procured alongside the equipment.</p> <p>All the equipment procured should have safe operation instructions and respective hazard warnings posted at points of installation.</p> <p>For powered equipment, ensure installation is done by qualified technicians and that the equipment is properly grounded and all guards and shields in place.</p> <p>Ensure that the servicing of the equipment is only done by duly qualified technicians.</p>

5. BRIEF OVERVIEW OF LABOR LEGISLATION

5.1 Terms and Conditions

19. Kenya has a very elaborate legal framework on matters of labor and working conditions. The Constitution of Kenya (CoK) 2010 provides a number of relevant clauses including Article 2 which recognizes ratified treaties as part of the laws of Kenya. Article 41 (on Labor Relations) addresses the entitlements and guarantees afforded to workers, employers and the unions, and exercisable by them within Kenya's employment regime. These entitlements are anchored on key human rights and freedoms including the right to human dignity in Article 28; freedom from all forms of slavery, servitude and forced labor in Article 30; and the right of everyone to have their privacy respected as provided for in Article 31. Article 27 on non-discrimination provides for equality and prohibits discrimination on various grounds including race, sex, pregnancy, marital status, health status, ethnic or social origin, color, age, disability, religion, conscience, belief, culture, dress, language or birth.

20. The applicable international instruments in Kenya include International Convention on the Elimination of All Forms of Racial Discrimination, 1965 (ICERD); Convention on the Rights of the Child, 1990, (CRC); Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, 1990 (ICRMW); Convention on the Rights of Persons with Disabilities; (CRPD) and Convention on the Elimination of All Forms of Discrimination against Women, 1979 (CEDAW).

21. The instruments of the International Labor Organization (ILO) applicable in Kenya include:

- a. Freedom of Association and Protection of the Right to Organize (ILO Convention 87);
- b. The Right to Organize and Collective Bargaining (ILO Convention 98);
- c. Forced Labor (ILO Convention 29);
- d. The Abolition of Forced Labor (ILO Convention 105);
- e. Minimum Age (of Employment) (ILO Convention 138);
- f. The Worst Forms of Child Labor (ILO Convention 182);
- g. Equal Remuneration (ILO Convention 100); and

h. Discrimination (Employment and Occupation) (ILO Convention 111).

22. The Employment Act 2007 is Kenya's codifying legislative enactment on the laws governing employment. It addresses itself to regulating the tripartite relationship that exists between the employers, employees and the government including the State's mediator-role in safeguarding the entitlements of both parties. The Act, which has been amended several times; defines the fundamental rights of employees, and provides basic conditions of employment for employees, including the regulation of employment of children. As such, this Act most closely aligns with essential imperatives that are evident in the ESS2 of the World Bank. The Act has a single subsidiary legislation titled the Employment (General) Rules, 2014 that largely expounds on the terms and conditions of work - aside from other procedural aspects; with an entire schedule outlining the minimum rights bestowed upon employees, and another dedicated to the requisite elements of the *Policy Statement on Sexual Harassment*.

23. The Employment Act addresses the employer-employee power-dynamic, focusing on the employer-employee engagement from the insular perspective of a direct contractual arrangement between the two parties. The assumption is that all persons who fit the descriptions of 'employer' and 'employee' are governed by this law including those implementing development projects.

24. The law has different approaches to defining the categories of employees, such as: by nature, and length of the employee-engagements. The categories include casual employees (who are not engaged for a longer period than 24 hours at a time), part-time, full-time employees, piece work (where the focus is the amount of work performed irrespective of the time occupied in its performance) and employees with probationary contracts (which address the formalities and length of the probationary period). The Act also provides for the minimum terms and conditions of employment of an employee and grounds upon which a contract may be nullified. This is intended to discourage any arrangements that seek to undermine the statutory standards.

25. The employment Act, 2007 further sets basic minimum conditions of employment, which among others states that (i) an employee shall be entitled to at least one rest day in every period of seven days and after every twelve consecutive months of service with employer to not less than twenty-one working days of leave with full pay (ii) A female employee shall be entitled to three months' maternity leave with full pay (iii) After two consecutive months of service with his employer, an employee shall be entitled to sick leave of not less than seven days with full pay and thereafter to sick leave of seven days with half day pay, in each period of twelve consecutive months of service. The Labor law prohibits the use of forced and child labor, and thereby set prohibitions on employment of children below 17 years, as per section 14 (8) Trade Dispute Act (Cap. 234).

5.2 Occupational Health and Safety

26. The Occupational Safety and Health (OSH) Act of 2007 governs workplace safety and health. The law provides for "the safety, health and welfare of workers and all persons lawfully present at workplaces and establishes the National Council for Occupational Safety and Health". This law is broadly concerned with potential hazards to persons in the workplace. These concerns would likely remain the same, if there's only one individual likely to be affected; and thus, the standards set under the Act are largely focused upon the environmental risks to persons at the workplace. Part VI (on Health-General Provisions), Part VII (on Machinery Safety), Part VIII (on Safety-General Provisions), Part IX (on Chemical Safety), Part XI (on Health, Safety and Welfare – Special Provisions) and Part XII (on Special Applications) provide for different occupational safety and health scenarios (in detail), with the intent of allowing for the management of the intended and unintended safety and health consequences that may be wrought by potential hazards. These safety and health consequences are more localized to individual workers, by virtue of their presence in the premise, than upon the wider society.

27. Employer-employee occupational safety and health collaborations will be through the Safety and Health Committees (that should be formed at each workplace), which empower the worker with the ability to manage the intended and unintended health and social consequences from the work being done. In addition, there will be a need for the creation of public awareness, which will further empower all persons

in the workplace to safeguard their own health through training and workplace publicity-campaign (mainly through signage) to generate social consciousness of potential occupational safety and health hazards

28. The Work Injury Benefits Act 2007 also addresses workplace health and safety. It provides compensation to employees for work-related injuries and diseases contracted in the course of their employment. The Act provides for the compensation of ‘injured’ employees as well as their dependents, who may be adversely affected by work injuries. Part III (on Right to Compensation) addresses the entitlements and guarantees afforded in respect of compensation.

29. Project implementation processes will adhere to the relevant OHS legislation requirements in Kenya, including the relevant requirements of interested parties that have been identified in the SEP. A check for legal compliance shall be undertaken to ensure that this project is compliant with the legal and other requirements, including:

- The National Occupational Safety and Health Policy, 2012;
- Work Injury Benefits Act, 2007;
- HIV/AIDS Prevention and Control Act, 2006;
- WB ESF;
- WBG EHS Guidelines;

30. Table 3 provides a summary of the key regulations in Kenya and their relevance to this project. Based on the existing national legislation and Bank’s requirements, the minimum standard terms and conditions of employment for all, except community, workers is presented in Annex 1

Table 3: Kenyan laws relevant to labor management in the project

No	Legislation	Provision	Relevance/Measures
1	Employment Act 2007	Define employer-employee relationships and the associated rights.	Define minimum legal rest days, leave entitlements including maternity and paternity leaves; Define minimum legal age of employment. Prohibits child labor Provides judicial recourse on labor disputes.
2	Occupational Safety and Health Act, 2007	This is an Act of Parliament to provide for the safety, health and welfare of all workers and all persons lawfully present at workplaces. It applies to all workplaces where any person is at work, whether temporarily or permanently.	Require employers to identify all safety and health risk and put in place measures to ensure workers are not exposed to safety and health risks during both project planning and operational phases, including training and workers participation through safety and health committees, regular safety and health audits.
3	Work Injury Benefits Act, 2007	This Act provides for compensation to employees for work related injuries and diseases contracted in the course of their employment and for connected purposes	SDSP shall comply with part II of this Act with regard to obligations of the employer including compensation for temporary, total or partial disablement, treatment as well as provision of first Aid Services to workers.
4	Public Health Act	Part III of the Public Health Act provides for the protection of human health	The project activities may expose the workers to diseases, such as

	(Cap 242) revised 2012	through prevention and guarding against introduction of infectious diseases into Kenya from outside, to promote public health and prevention, limitation or suppression of infectious, communicable or preventable disease within Kenya.	HIV/AIDS. The SDSPP will develop protocols to educate the staff on risks of infection and control measures.
5	HIV/AIDS Prevention and control Act, 2006	Part 11 Section 7 requires HIV and AIDS education in workplaces; specifically, provision of basic information and instruction on HIV/AIDS prevention and control.	The SDSPP will create awareness to the employees on issues related to HIV/AIDS. It will produce posters/flyers to be shared with all employees and pasted at workplaces.
6	Gender-based violence and SEA	-Abuse by workers, normalization of GBV stigma leads to non-reporting, poverty forces women/girls to engage in transactional sex -There is lack of access to services to address SEA, stigma, corruption -Several acts exist that provide protection against GBV/SEA including: -Sexual Offences Act, 2006 - Penal Code -HIV/AIDS Prevention and Control Act 2000 -Protection Against Domestic Violence Act, 2015 - Prohibition of Genital Mutilation Act, 2011 -National Gender and Equality Act, 2011	The project activities may expose workers to sexual harassment at the workplace and other forms of GBV. The PMU will ensure that: -All workers sign the CoC; -All workers are trained on GBV/SEA; -All workers are informed about the workplace GRM and the Project GRM.
6	Grievance mechanism (GM)	Issues to do with labor grievances are addressed in various legal documents including: -Employment Act in Part XII -Employment and Labour Relations Court Act -Labour Relations Act	-The project will establish a workplace GM that will address all matters related to the project -Information on the GM will be part of the induction process.

7. WORLD BANK PROVISIONS

31. The World Bank Environmental and Social Framework (ESF) consists of Ten (10) standards that aim at preventing and mitigating undue harm to people and their environment in any development projects involving the Bank. The applicable standard to this LMP is the Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions that outlines clear provisions for protection of all project workers as presented below

- a. Guidelines on Fair treatment, non-discrimination and equal opportunity: Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination on the basis of personal characteristics unrelated to inherent job requirements, with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. Part II Section 5 of the Employment Act, 2007 requires employers to promote equal opportunity in employment and strive to eliminate discrimination in any employment policy or practice. It also prohibits direct or indirect discrimination and harassment of employees and potential employees on the basis of race, color, sex, language, religion, political or other opinion, nationality, ethnic or social origin, disability, pregnancy, marital status or HIV status; recruitment, training, promotion, terms and conditions of employment, termination of employment or other matters arising out of

the employment. Consistent with this requirement, this LMP sets out measures to prevent and address harassment, intimidation, and/ or exploitation.

- b. Guidelines on gender and GBV: The project team will provide appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as women, people with disabilities, and children (of working age in accordance with this LMP). Such measures may be necessary only for specific periods of time, depending on the circumstances of the project worker(s) and the nature of the vulnerability.
- c. Guidelines on the child labor: The project shall only employ people aged 18 years and above as a precautionary measure.
- d. Guidelines on OHS requirements: Measures relating to OHS will be applied to the project. The OHS measures will include the requirements of this LMP and will take into account the General Environmental Health and Safety Guidelines (EHSGs) that include Good International Industry Practice (GIIP). The OHS measures applicable to the project will be set out in the legal agreement and the Environmental and Social Commitment Plan (ESCP).

8. RESPONSIBLE STAFF

32. The PMU will be responsible for the overall project management, coordination and compliance with safeguards requirements including those outlined in this LMP. The PMU will engage consultant(s) with expertise in environmental, social, OHS issues (the team should contact and work with Labor officers and OHS officers available in most counties countrywide). The PMU will be responsible for the following tasks:

- Undertake the overall implementation of this LMP;
- Engage and manage consultants in accordance with this LMP and the applicable Procurement Documents;
- Monitor project workers to ensure their activities are included in the LMP and the applicable Procurement Documents;
- Monitor the potential risks of child labor, forced labor and serious safety issues in relation to primary suppliers;
- Provide training to mitigate social risks of project workers;
- Ensure that the GM for project workers is established and implemented and that project workers are informed about it;
- Monitoring the implementation of the Worker Code of Conduct; and Report to the World Bank on labor and OHS performance and key risks and complaints.

33. Under KSEIP I, the PMU has i) one coordinator for Social aspects from SDSP with developing capacity in terms of understanding of World Bank E&S provisions, particularly on the inclusion of minority VMGs and other vulnerable or disadvantaged groups; ii) one Disability Inclusion Focal Point nominated to the project from the National Council for Persons with Disabilities (NCPWDs); iii) each SDSP's technical department (DSA, DSD, and DCS) has one Social Focal Point and iv) NDMA had two Social Focal Points who have since left after NDMA concluded its activities and will need to be reinstated or replaced.

34. To meaningfully support the preparation of Environmental and Social Risk Management (ESRM) instruments and ensure fidelity in implementation of the legally binding Environmental and Social Commitment Plan (ESCP) measures, SDSP will hire qualified, experienced and full-time Environment, Health and Safety (EHS) Specialist and Social specialist. The Social Specialist will possess a strong background, in social inclusion, grievance, and GBV management. NDMA will also hire an EHS specialist and Social Specialist as part of its PIU and nominate E&S focal points in each participating county. DSA shall hire a Grievance Officer since the project GM shall be domiciled at the DSA. The E&S team will be responsible for the following:

- Supervise workers' adherence to the LMP;
- Maintain records of recruitment and employment of contracted workers;
- Provide induction and Biannual training to contracted workers on environmental, social and OHS issues;

- Require primary supplier(s) to identify and address risks of child labor, forced labor and serious safety issues and undertake due diligence to ensure this is done;
- Develop and implement the GM for contracted workers, including ensuring that grievances received from the contracted workers are resolved promptly, and report the status of grievances and resolutions regularly to the PMT and World Bank;
- Ensure all workers understand and sign the CoC prior to the commencement of any project tasks and supervise compliance with the CoC;
- Ensure the abbreviated CoC (one-pager) is displayed in all project supported facilities (Annex 1); and,
- Report to the PMU on labor and OHS performance.

35. Key project staff and responsibility for implementation of the LMP are presented in Table 4

Table 4: Key Project Staff Responsible for Implementation of the LMP

No	Responsible Staff	Key Roles and Responsibilities
1	Project Coordinator	<ul style="list-style-type: none"> -Overall coordination and oversight of all project activities including compliance requirements. Liaison with the SDSP and NDMA management. -Link to the National Treasury Project Team. -Link to the World Bank Team. -Support the functions of the National Social Protection -Steering Committee, and the KSEIP2 National Coordination and Implementation Committee (KNCIC).
2	EHS and Social Specialists at National Level	<ul style="list-style-type: none"> -Oversee the development of the project OHS protocols for the workplace. -Oversee the implementation of the ESCP, LMP, SEP and VMGP and GBV SEAH prevention and response Plan. -Assess the risk of OHS issues on project workers and identify appropriate mitigation measures for implementation. -Develop safety protocols for the workplace and for individual staff. -Link with DOSH on all OHS related issues. -Monitor, document and report on all OHS matters, and provide training on codes of conduct and other relevant OHS matters. - Monitor, document and report on the GM. - Coordinate and implement capacity strengthening actions on SRM for project staff including E&S and GM Focal point persons. -Monitor, document and report on all capacity strengthening actions.
3	E&S Focal Persons from DSA, DSD and DCS	<p>Support the EHS and Social specialists in their respective departments/institution in the:</p> <ul style="list-style-type: none"> - Development of the project OHS protocols for the workplace. -Oversee the implementation of the ESCP, LMP, SEP and VMGP and GBV SEAH prevention and response Plan. -Assess the risk of OHS issues on project workers and identify appropriate mitigation measures for implementation. -Develop safety protocols for the workplace and for individual staff. -Link with DOSH on all OHS related issues. -Monitor, document and report on all OHS matters, and provide training on codes of conduct and other relevant OHS matters. - Monitor, document and report on the GM. - Coordinate and implement capacity strengthening actions on SRM for project staff including E&S and GM Focal point persons. -Monitor, document and report on all capacity strengthening actions. -Track project progress, including E&S aspects, complemented by digital tools where possible.

4	E&S Focal Point at county Level Social Development Officers and Children Officers	<ul style="list-style-type: none"> -Oversee the implementation of the safety protocols for the workplace and for individual staff. -Undertake the implementation of the ESCP, LMP, SEP and VMGP and GBV SEAH prevention and response Plan. -Assess the risk of OHS issues on project workers and identify appropriate mitigation measures for implementation. -monitor the implementation of safety protocols for the workplace and for individual staff. -Link with DOSH on all OHS related issues. -Monitor, document and report on all OHS matters, and provide training on codes of conduct and other relevant OHS matters. -Monitor, document and report on the GM. -Track project progress, including E&S aspects, complemented by digital tools where possible.
5	E&S Focal Points, within NDMA, DSA Grievance Officer at DSA	<p>DSA will have a GM officer who can double up as the GBV FP. NDMA, they have 2 ES FPs who can also double up as GM/GBV FPs. Their role will entail to;</p> <ul style="list-style-type: none"> -Support the development of a GM structure for the workplaces and protocol for reporting GBV related grievances. -Monitor, document and report on the GM.
7	The 5 volunteer community committees including CPV, LVC, SLVC, CDFSC, SLVCs and BWCs	<ul style="list-style-type: none"> -Will be trained as GM/GBV FPs at the locational (village) level. - Support in reporting and resolution of grievances at the local level under the guidance of the sub county DSD and DCS officers.
8	Beneficiary Welfare Committees	<ul style="list-style-type: none"> -Will facilitate beneficiary On-Demand Registration (ODR), inclusion in the ESR and grievance management for beneficiaries with limited digital connectivity or other access challenges.
9	M&E Officer	<ul style="list-style-type: none"> -Develop the project monitoring framework. -Train staff and partners on the framework. -Monitor, document and report on the overall M&E framework.

8. POLICIES AND PROCEDURES

36. Below is a summary of Indicative procedures to develop and implement the LMP policies provided below.

- a. **Occupational health and safety (OHS):** The SDSP will manage the project in a way that project workers are properly protected against possible OHS risks and consistent with the relevant provisions of the national OSH Act, Employment Act, ESS2 (including WBG Environmental, Health and Safety Guidelines (EHSGs), and WB standard procurement documents. The contractors will also be required to produce policies and procedures in line with these provisions. Key elements of OSH measures include: (i) identification of potential hazards to workers; (ii) provision of preventive and protective measures where needed; (ii) training of workers and maintenance of training records; (iv) documentation and reporting of occupational accidents and incidents; (v) emergency preparedness; and (vi) remedies for occupational injuries and fatalities.
- b. **Labor disputes over terms and conditions of employment:** To avoid labor disputes, fair terms and conditions will be applied for project workers (guided by relevant laws). The project will also have GMs for project workers (direct workers and contracted workers) to promptly address their workplace grievances (more details are provided in Section 9. Further, the project will respect the workers' right of labor unions and freedom of association, as set out in the Employment Act 2007.
- c. **Security risks:** Some of the target counties such as Wajir, Mandera, Garissa, West Pokot, Tana River, and Lamu have a history of insecurity in the form of banditry and resource-based conflict.

Protocols on staff members' movement when out of their work stations will be developed by the EHS and Social Specialists at national level. The SDSPP will work closely with the Ministry of Interior to ensure the security of the project staff when on work assignments in areas that have a history of insecurity. The Project will not hire private security. However, national security officers may be utilized.

- d. **GBV/SEA/SH incidents:** Given the implementation context, sexual harassment, exploitation and abuse of co-workers is a likely risk. Thus, all staff and contracted workers should sign the code of conduct (CoC) outlining expected standards of behavior in this regard and attend an awareness session on the same including the consequences of such actions. The SDSPP will identify a qualified trainer/consultant to offer training in GBV and SEA/SH (the development partners may be approached to offer support with this training).

A separate GM will be set up for addressing GBV and SEA/SH complaints as a strategy to avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal. Such reported cases will be dealt with according to the complainant's informed consent. Further, the complainant will be provided with information about the available services including confidential appropriate medical and psychological support; emergency accommodation; and any other necessary services as appropriate including legal assistance. Staff will immediately inform the survivor/complainant to go to a health center which specializes in free post-GBV health support (within 72 hours of the incident). All staff and GM focal point will be informed that if a case of GBV is reported to them, the only information they will establish is if the incident involves a worker on the project, the nature of the incident, the age and sex of the complainant and if the survivor/complainant was referred to service provision. If a worker on the project is involved, the incident will be immediately reported to the Project Coordinator who will provide further guidance after consulting with the World Bank.

- e. **Discrimination and exclusion of vulnerable groups:** The recruitment of project workers and their engagement will be on the basis of equal opportunity and fair treatment, and there will be no discrimination on any aspects of the employment relationship, such as recruitment and hiring, terms of employment (including wages and benefits), termination and access to training. The project shall comply with the Employment Act, 2007 on gender equality in the work place, which will include provision of maternity and sick leave. There will also be sufficient and suitable toilet and washing facilities, separate from men and women workers. The contracts with third parties will include these requirements which will also be part of the monitoring system.
- f. **Fatality and serious incidents:** In the event of an occupational fatality or serious injury, the PMU shall report to the World Bank as soon as it becomes aware of such incidents and inform the SDSPP in accordance with national reporting requirements. The PMU will conduct a root cause analysis for designing and implementing further corrective actions, agreed on with the Bank. Corrective actions shall be implemented in a timely manner in response to project-related incidents or accidents.
- g. **Monitoring and reporting:** The PMU shall report on the status of implementation of the above policies and procedures on a monthly basis. The PMU will closely monitor labor and OHS performance of the project and report to the World Bank on a quarterly basis

9. WORKER GRIEVANCE MECHANISM

37. Typical work place grievances include demand for employment opportunities; labor wage rates; delays of payment; disagreement over working conditions; and health and safety concerns in work environment. Although GBV/SEA/SH occurs in workplaces it is not always reported for fear of victimization. This assertion is confirmed under KSEIP I where no GBV cases were registered potentially indicating the limited in-house capacity within SDSPP and NDMA to manage SEAH risks even though the exacerbated risk of Intimate Partner Violence (IPV) due to cash transfers was noted. Under KSEIP I, due to the project's limited capacity to manage the risk of IPV and SEA/SH, SDSPP prepared a grievance reporting template, including an option for anonymous complaints to ensure confidential reporting, and

project sub-county focal points keep an updated map of GBV service providers and are in touch with county gender focal points on SEA management.

38. The worker GM will apply to direct and contracted workers only. In line with the ESS 2 provisions, SDSP will ensure that community workers have a separate mechanism to register grievances. Community workers will be sensitized on the available GM at the time of their engagement. Further, the project and worker GM will be GBV responsive to address SEA/SH concerns.

39. For this purpose, SDSP shall review and strengthen the GM applied under KSEIP 1 to ensure that it effectively addresses workers concerns and is sensitive to GBV SEAH risks. For this reason, the KSEIP GM was reviewed by both the stakeholders engaged and the WB team (more details on the review are provided in the project VMG framework) and some of the key findings and recommendations as relates to ESS2 are presented below.

- As currently designed the KSEIP1 GMs do not provide for workers grievance handling mechanism and yet KSEIP 2 will engage various categories of workers who may have concerns that need to be addressed. Further, workplace concerns are usually different from issues raised by project-affected parties and other stakeholders, and therefore call for a separate mechanism to address them. The workers GM need to have its own appeal process for complainant who may be dissatisfied with the resolutions provided under the workers GM.
- The KSEIP 1 GM also needs to provide linkage and contact information of alternative mechanism for addressing grievance especially for complainants who are dissatisfied with the project GM including the World Bank Grievance Redress Service (GRS), the World Bank Independent Inspection panel and legal institutions such as the Kenya Human Rights Commission and the Ethics and Anti-Corruption Commission.
- Ensure that the GM provides clear timelines for managing grievances at the various levels
- Ensure that the GM provides for an appeal process to provide an alternative avenue for the dissatisfied persons to seek redress on their complaint. The labor laws provide for the national appeals process that could be utilized by any aggrieved staff if they consider the process established by the project to be ineffective and/or unfair. The grievance mechanism will therefore not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

40. As a way forward, SDSP is required to review and enhance the KSEIP 1 GM in light of the findings and recommendations provided above and develop an effective grievance system for project workers for application under KSEIP 2. The GM needs to allow for anonymous complaints to be raised and addressed. Individuals who submit their complaints or grievances may request that their name be kept confidential, and this should be respected. The grievances raised by workers will be recorded with the actions taken by each unit. The summary of grievance cases will be reported to the World Bank as part of the regular reporting. Where the aggrieved direct workers wish to escalate their issues or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the workers may raise the issues with the World Bank task team or use the other channels stated above. Once developed the worker GM should be shared with the WB for review prior to project effectiveness.

10. RESOURCES FOR IMPLEMENTATION OF THE LMP

10.1 Estimated Costs for Implementation of the LMP

The estimated budget for implementing the LMP is presented in Table 5. All costs related to development of project and workers GM, staff capacity development for GM operationalization and monitoring and evaluation aspects are provided under the SEP.

Table 5: Estimated budget for implementing the LMP

Labor Management Activities	Quantity	Unit Cost KES	Total Cost KES
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Conduct an OHS audit through an independent consultant after the first year of project operations.	1	650,000	650,000
Costs for operationalizing the workers GM	5 years	240,000	1,200,000
Total			1,850,000

All costs related to awareness creation to beneficiaries and local leadership, induction of project participants, training of project workers including community volunteer groups on the provisions of the KSEIP 2 E&S instruments are captured in the Stakeholder Engagement Plan (SEP), as well as a single budget to monitor the implementation of all E&S aspects.

Annex 1: Terms and Conditions for Employment

The following relevant provisions of the Employment Act, 2007 mainstreamed to GoK Human Resources Manual regarding terms and conditions of work shall apply to all workers except community workers.

- 1) Content of individual contract in-line with Employment Act 2007 (Section 10)
 - Subject to the provision of this Act or regulations made thereunder, a written individual contract of employment shall specify the following: (a) name and father's name of worker; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of contract.
- 1) Notice for termination of contract in-line with Employment Act, 2007 (Part VI; Sections 35 - 51)
 - Either of the contracting parties may terminate a contract of employment by giving written notice in-line with the provisions of employment Act, 2007:
 - (b) Not less than ten days in the case of manual workers.
 - (b) Not less than 30 days in the case of non-manual workers:
Provided that no notice needs be given in case the duration of contract does not exceed one month.
- 1) Protection of wages in line with Employment Act, 2007 (Part IV; Sections 17 - 25)
 - Taking into consideration the economic and social conditions of the country (and in consistence with the provisions of Employment Act, 2007 and relevant Agency Human Resources Manual), the minimum wages for any category of workers may be determined by the Salaries Remuneration Commission (SRC).
- 1) Hours of work – Employment Act, 2007 (Article 85, 86)
 - The normal hours of work of a worker shall not exceed eight a day or 48 a week.
 - Hours worked more than the normal hours of work shall not exceed 12 a week and shall entitle a worker to a proportionate overtime payment in-line with the provisions of applicable Human Resources Manuals on allowances.
- 1) Weekly rest
 - Every worker shall be entitled to one day's rest each week, which should normally fall on Sunday. It shall consist of at least 24 consecutive hours each week.
 - Workers shall also be entitled to a rest day on public holidays recognized as such by the State.
- 1) Annual leave (Employment Act, 2007)
 - Workers shall be entitled to 30 days' leave with pay for every year of continuous service.
 - An entitlement to leave with pay shall normally be acquired after a full year of continuous service.
- 1) Fringe benefits (Employment Act 2007)
 - Any employer shall provide (a) accommodation when a worker is required to be away from his normal residence; (b) free food to workers, or subsistence allowance in place thereof; (c) free transport to and from the place of work, when a worker is required to work in a town or locality away from his normal residence.
- 1) Deductions from remuneration (Employment Act 2007)
 - No deductions other than those prescribed by the code or regulations made hereunder or any other law or collective labor agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing.
- 1) Death benefit (Employment Act 2007)
 - In case of death of a worker during his/her contract of employment, the employer shall pay to his/her heirs an amount not less than 15 days' remuneration as death benefit for funeral services.
- 1) Maternity and Paternity Leaves (Employment Act, 2007)
 - A woman worker shall be entitled for maternity leave with pay for 90 days and male workers 14 days in-line with the provisions of the employment Act, 2007 and applicable Human Resources Manuals.

Note: The terms and conditions for service should align with workplace policies for workers whose duties go beyond the timelines indicated in the Employment Act 2007.

Annex 2- Sample Code of Conduct for KSEIP 2 Project Workers

Objective

This Worker Code of Conduct for labor management establishes clear expectations for behavior and performance, helping to create a respectful, productive, and safe work environment.

The KSEIP2 Project Workers will uphold the following principles:

1. Professional Behavior and Attitude

- Workers are expected to exhibit professionalism in all interactions with colleagues, supervisors, clients, and visitors.
- Personal integrity, honesty, and accountability are essential in performing all job duties.
- Discrimination, sexual exploitation abuse and harassment, bullying, or any form of disrespectful behavior will not be tolerated.
- It is an offence to have sexual relationship with anyone under the age of 18. It also prohibits project workers from engaging in any form of sexual exploitation or abuse.

2. Punctuality and Attendance

- Project workers must adhere to scheduled working hours, arrive on time, and avoid unnecessary absences.
- Workers should follow proper procedures for requesting leave, notifying of absences, and providing necessary documentation.

3. Health, Safety, and Environment

- Employees are responsible for understanding and following all health and safety guidelines to prevent accidents and ensure their own safety and that of others.
- Proper use of personal protective equipment (PPE) and adherence to safety protocols are mandatory.
- Workers should report any unsafe conditions or potential hazards to supervisors promptly.

4. Compliance with Laws and Company Policies

- Employees are required to comply with all applicable laws, regulations, and company policies, including those related to employment, health, safety, and the environment.
- This includes adhering to all anti-corruption, anti-bribery, and ethical standards.

5. Confidentiality and Data Protection

- Workers must safeguard any confidential or proprietary information they access and avoid sharing it with unauthorized persons.
- Personal data of colleagues, clients, and company information should be handled securely and responsibly, in compliance with company and legal requirements.

6. Work Quality and Productivity

- Employees are expected to carry out their duties diligently, meeting quality standards and deadlines.
- They should take initiative to improve performance, participate in training opportunities, and work toward achieving company goals.

7. Use of Company/Institutional Resources

- Workers must use company resources, including equipment, tools, and facilities, responsibly and solely for work-related purposes.
- Any misuse, damage, or unauthorized use of company resources is subject to disciplinary action.

8. Prohibited Substances

- The use, possession, or distribution of illegal drugs, alcohol, or controlled substances on company property or during work hours is strictly prohibited.

- Employees are expected to report to work fit for duty and not under the influence of any substances that impair performance.

9. Reporting Violations

- Employees are encouraged to report any breaches of this code of conduct or other misconduct through the appropriate channels.
- The company guarantees protection from retaliation for those who report violations in good faith.

10. Disciplinary Actions

- Failure to comply with this Code of Conduct may lead to disciplinary actions, which can include verbal or written warnings, suspension, or termination of employment, depending on the severity of the violation.

11. Code of Conduct Certification

I have read this Code of Conduct and do certify that:

- o I understand the Workers Code of Conduct.
- o I understand that I have a responsibility to ask questions, seek guidance, and report suspected violations of the Code.
- o To the best of my knowledge, the organisation reserves the right to change, rescind, and add to this Code of Conduct at its sole and absolute discretion and may do so at any time in writing or otherwise.

Employee SignatureDate.....
Name.....

Job Location/Specification/Designation.....
Witness signature.....
Witness Name.....

11. Declaration by the

I _____ hereby certify that the above code of conduct represents who we are as an organisation. I shall ensure that the practical and professional conduct of our employees and staff are in line with the provisions of this Code of Conduct and that each of them shall be required to individually sign it and ensure compliance. I confirm as the Company that I shall remain in good standing and respect of this Code of Conduct.

Signed by: _____

Title:

Date: _____