

REPUBLIC OF RWANDA



Ministry of ICT and Innovation

RWANDA DIGITAL ACCELERATION PROJECT (P173373)

LABOUR MANAGEMENT PROCEDURES (LMP)

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TABLE OF CONTENTS

LIST OF ANNEXES	iii
LIST OF TABLES	iii
LIST OF ABBREVIATION AND ACRONYMS	iv
EXECUTIVE SUMMARY	1
1. INTRODUCTION	5
1.1. Project Background-----	5
1.2. Project Description and project components-----	5
1.2.1. Project boundaries	5
1.2.2. Project Development Objective (PDO)	5
1.2.3. Project components.....	5
1.3. Rationale, objectives, and Application of LMP-----	13
1.3.1. Rationale of the Labour Management Procedures.....	13
1.3.2. Objectives and purpose of Labour Management Procedures	13
1.4. Overview of labour use in the project -----	14
1.4.1. Application.....	14
1.4.2. Project Specific Labour Categories	14
2. LEGAL AND REGULATORY FRAMEWORK FOR LABOUR AND WORKING CONDITIONS 16	
2.1. Environmental and Social Standard 2 (ESS2): Labour and Working Conditions -----	16
2.2. Brief overview of labour legislation in Rwanda -----	16
2.3. Other international laws/treaties or conventions -----	18
2.3.1. International Labour Organization (ILO).....	18
2.3.2. Convention on Elimination of All Forms of Discrimination against Women, 1979	18
2.3.3. International Convention on Protection of Migrant Workers and members of their families, 1990	18
2.3.4. The UN Conventions on the Rights of Persons with Disabilities, 2007	19
3. ASSESSMENT OF KEY POTENTIAL LABOUR RISKS	20
3.1. Potential labour risks associated with the RDAP -----	20
3.2. COVID-19 risks and management procedures-----	25
3.2.1. Scope of application	25
3.2.2. Possible methods of transmission at workplaces.....	25
3.2.3. Basic Prevention and Mitigation Measures	25
3.2.4. Basic Prevention and Mitigation Measures	25
3.2.5. Monitoring and reporting requirements	26
4. TERMS AND CONDITIONS OF HIRING AND EMPLOYMENT	26
4.1. Terms and conditions of hiring-----	26
4.1.1. Non-discrimination and equal opportunity	26
4.1.2. Workers' organizations	26
4.1.3. Age of employment	26
4.2. Terms and Conditions for employment-----	27
4.2.1. Employment contracts.....	27
4.2.2. Wages	27
4.2.3. Working hours	27
4.2.4. Collective agreement.....	28
4.3. Policies and procedures for labour related risks -----	28
4.3.1. Gender Based Violence and sexual harassment	28

4.3.2.	Child Labour and minimum age	28
4.3.3.	Occupational Health and Safety	29
4.3.4.	Responsible staff	30
4.3.5.	Training of workers	30
5.	GRIEVANCE REDRESS MECHANISM	31
5.1.	Workers grievance redress mechanism	31
5.2.	Grievance channel for Gender-Based Violence	32
5.3.	Grievance for workers and labour contracting issues	33
5.4.	For workers safety issues	33
5.5.	Grievance process for non-labour related issues involving project workers	33
6.	PRIMARY SUPPLY WORKERS, CONTRACTOR MANAGEMENT	35
6.1.	Primary Supply Workers	35
6.2.	Contractor Management	35
6.2.1.	Contractual obligations	35
6.2.2.	Hiring	36
6.2.3.	Worker Accommodation	37
6.2.4.	Insurance	37
6.2.5.	Security	37
6.2.6.	Timing of Labour Requirements	37
6.2.7.	Incident management and investigation	37
7.	PERFORMANCE MONITORING AND REPORTING	39
7.1.	LMP performance monitoring	39
7.1.1.	Assessments	39
7.1.2.	Audits	39
7.1.3.	Performance indicators	39
7.2.	Training and Awareness	42
7.3.	Reporting on labour and working conditions	42
	REFERENCES	44
	ANNEXES	45

LIST OF ANNEXES

Annex 1: Template for M&E framework for the LMP 45
Annex 2: Incident reporting form 45
Annex 3: Complaint form 48
Annex 4: Contractor’s Code of Conduct 49
Annex 5: Individual code of conduct in case of contractor 52
Annex 6: First Aid Box Contents Checklist 55
Annex 7: Occupational health and safety inspection checklist 56
Annex 8: Employment, Health and Safety conditions Monitoring Form (Checklist) 60
Annex 9: Sample Incident Response structure 61

LIST OF TABLES

Table 1: Project components 6
Table 2: Category of workers under Rwanda Digital Acceleration Project 14
Table 3: Generic Risk Assessment 21
Table 4: Labour and working conditions performance indicators **Error! Bookmark not defined.**
Table 5: Training and Awareness Plan 42

LIST OF ABBREVIATION AND ACRONYMS

AIIB	: Asian Infrastructure Investment Bank
BP	: Bank Procedures
BRD	: Development Bank of Rwanda
EA	: Environmental Assessment
ESF	: Environmental and Social Framework
ESIA	: Environmental and Social Impact Assessment
ESMP	: Environmental and Social Management Plans
ESMF	: Environment and Social Management Framework
ESCP	: Environmental and Social Commitment
E&S	: Environment and Social
HSMP	: Health and Safety Management Plan
IDA	: International Development Association
ICT	: Information Communication and Technology
IT	: Information Technology
ESS	: Environmental and Social Standards
GGCRS	: Green Growth and Climate Resilience Strategy
GoR	: Government of Rwanda
HIV/AIDS	: Human Immune Deficiency Syndrome
INGO	: International Non-Government Organisation
LMP	: Labour Management Procedures
SEP	: Stakeholder Engagement Plan
M&E	: Monitoring and Evaluation
MoE	: Ministry of Environment
MINALOC	: Ministry of Local Government
MINICT	: Ministry of Information, Technology and Communication and Innovation
PPSD	: Project Procurement Strategy for Development
PSC	: Project Steering Committee
RDAP	: Rwanda Digital Acceleration Project
RPF	: Resettlement Policy Framework
RISA	: Rwanda Information Society Authority
MoU	: Memorandum of Understanding
REMA	: Rwanda Environment Management Authority
RURA	: Rwanda Utilities Regulatory Authority
SDG	: Sustainable Development Goals
SPIU	: Single Project Implementation Unit
WBG	: World Bank Group

EXECUTIVE SUMMARY

1. Background

This document is a Labour Management Procedures (LMP) for the Rwanda Digital Acceleration Project (P173373). The proposed project is designed to accelerate country-wide digital transformation, as well as facilitate Rwanda's integration in the emerging regional digital market. The project will expand digital adoption, bringing more Rwandans online by addressing the major barriers that dampen demand for digital services and spearheading a series of interventions that promote digital inclusion. The project will also enable Rwanda to leverage critical enabling digital platforms and data-driven solutions to improve the efficiency of public service delivery and expand the adoption of digitally-enabled services. Finally, the project will also increase Rwanda's capacity to support digitally-enabled innovation and productivity-gains, by strengthening the local digital innovation and entrepreneurship ecosystem, supporting tech firms to move from start-ups to growth and the adoption of digital technologies in key sectors.

To implement the project, the Government of Rwanda is negotiating funds from the World Bank (WB)/ International Development Association (IDA) and the Asian Infrastructure Investment Bank (AIIB) as co-financing agencies. The total project amount is two hundred million US dollars (\$200m) including \$100 million provided as a loan and \$100 million as a grant. The Project will be funded equally by World Bank (WB)/ International Development Association (IDA) and Asian Infrastructure Investment Bank (AIIB). The project will be implemented by the Rwanda Information Society Authority (RISA) under through the Ministry of ICT and Innovation and the Development Bank of Rwanda (BRD).

2. Project Objectives and Project Components

Project Development Objectives: Increase access to broadband, digital public services, and strengthen the digital innovation ecosystem. To meet this objective, the proposed project is designed around four integrated and mutually reinforcing components:

✓ **Component 1: Digital Access and Inclusion (US\$60.5 million)**

This component will increase digital access and inclusion through investment in digital access enablers, focusing on under-served areas and groups. A series of interventions that address key demand-side barriers identified as hampering access to high-quality broadband will be finance. This includes support for smart device affordability financing schemes, an umbrella basic digital literacy initiative, as well as a local connectivity access scheme targeting unconnected government offices, schools, hospitals, and marketplaces.

Component 2: Digital public service delivery (US\$100 million)

This component will strengthen the GoR's ability to deliver digital services, allowing for increased resilience and adaptability to health, climate, and other shocks. Activities financed aim to respond to the COVID-19 crisis by 'building back better' through investments that strengthen GoR's ability to deliver services that are secure, data-driven, paperless, and cashless, and that improve both the front-end user-experience of digital public services as well as back-end government efficiency.

Component 3: Digital Innovation and Entrepreneurship (US\$29.5 million)

This component aims to strengthen the local digital entrepreneurship ecosystem and talent base. Activities financed will support better innovation ecosystem coordination, better service provision by entrepreneurship support organizations (ESOs), expand access to early-stage financing, and promoted advanced digital innovation capabilities.

Component 4: Project Management (US\$10 million)

This component will finance project management associated with administering the project. It will finance the operational and staffing costs of the Single Project Implementation Unit (SPIU), including

the hiring of expert consultants in key areas such as project management, technical advisory and implementation support. Operational costs would also be covered, including support for capacity building and training. This component will also cover continuous stakeholder consultation costs, and any larger M&E work undertaken.

3. Objectives and purpose of Labour Management Procedures

During the project preparation it was agreed that Rwanda Digital Acceleration Project will comply with World Bank Environmental and Social Framework (ESF) and National Regulations. WB Standard ESS2: Labour and Working Conditions requires the Implementing Entity to prepare and implement a Labour Management Procedures. The LMP guides the Implementing Entity on how to minimize potential Labour risks during the project implementation such as labour influx, child labour, associated Gender-Based Violence, occupation health and safety risks and any other employment risks.

This Labour Management Procedures will follow the objectives set out in the ESS2 and national labour law including:

- To promote safety and health at work.
- To promote the fair treatment, nondiscrimination, and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS2) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labour and child labour.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 (Labour and Working Conditions) to the Project in the following manner:

- People employed or engaged directly by the GoR to work specifically in relation to the Project, recruited in accordance with the normal recruitment procedures of contractual staff in public service.
- People employed or engaged by contractors to perform work related to core function of the project.
- People working in borrow pits, quarry sites and construction materials suppliers in general.

4. Rationale of the Labour Management Procedure

The RDAP will require the civil works activities where the use of Labour is inevitable. Therefore, ESS2 requires working conditions and management of workers relationship including terms and conditions of employment, nondiscrimination and equal opportunity, workers organizations; protecting the workforce including child labour and minimum age and forced labour; grievance mechanism and Occupational Health and Safety (OHS). ESS2 also includes labour and contracts; management of workers; access of information and grievance mechanisms.

5. Legal and Regulatory Framework

Rwanda's legal and regulatory framework includes the following laws:

- LAW N° 66/2018 OF 30/08/2018 regulating Labour in Rwanda
- National Strategy for Transformation (NST1; 2017-2024)
- Law N°57/2018 of 13/08/2018 on Immigration and Emigration in Rwanda
- Ministerial instructions no 01/2017 of 17/11/2017 relating to prevention and fight against child Labour;

- Ministerial Order N°02 of 17/05/2012 sufficiently provides conditions for Occupational Health and Safety;
- Law no 37/2016 of 08/09/2016 determining organization, jurisdiction, and competence and functioning of Abunzi committee;
- Law N°62/2018 of 25/08/2018 governing Public Procurement in Rwanda; and
- Fundamental principles and rights to work of 1998.

Rwanda also is a signatory of international treaties or conventions including the ILO.

6. Anticipated Key Labour Risks

Workers at construction sites are likely to face risks resulting from unsafe work, unsafe working place, unsafe act and unsafe behavior. The likely risks to be faced by workers at construction sites include the following:

- ✓ **Injuries:** This is a risk for workers at construction sites and this may result from one of the possible causes such as contact with equipment or falling objects, slips or falls, overexertion, general transportation or exposure to harmful substances.
- ✓ **Car/motorcycle accidents:** This risk can happen at the time of transporting construction materials or monitoring activities.
- ✓ **Upper or lower Respiratory Tract Infections:** Construction sites are a throng of activity and kick up dust; an often invisible.
- ✓ **Environmental hazards (snakes, wasps, bees, etc.):** this should happen when the workers are placed in the bush, forest and other exposed area with environmental hazards,
- ✓ GBV/SH, discrimination/non-inclusion of certain groups, Labour influx, disagreement on contracts at implementation, conflict.

The mitigation measures have been shown along with the key risk and detailed risk mitigation that will be developed during the project implementation by the contractor.

7. Terms and Conditions of Hiring and Employment

Terms and conditions of hiring are given and the contents are highlighted in the entire documents based on non-discrimination and equal opportunity, workers' organizations, age of employment, the verification of the age of project workers will follow the below process, and procedure to be followed if underage workers are found working on the project. This was reviewed specifically on employment contracts, wages, working hours, and collective agreement.

8. Grievance Redress Mechanism

The grievance redress mechanism is related to the workers and the grievance in case of GBV and grievance process if non-labour related matter involving the project workers. Figure 2 of this LMP portrays the Workers' Grievance Redress Mechanism. The project grievance mechanism will not impede workers or project affected people's access to the legal system. Local communities have existing traditional and cultural grievance redress mechanisms (Abunzi committees) established and regulated by law no 37/2016 of 08/09/2016 determining organization, jurisdiction, and competence and functioning of Abunzi committee (adjudication/mediation committees). Further, the labour inspector will play inspection and mediation role before cases can be brought to relevant court.

9. Primary supply workers

The primary supply workers have been identified. The procedure for monitoring and reporting on primary supply workers, in the event of identification of child labour, is that it will be reported to concerned authorities. In other hand where foreign suppliers would be contracted, contractors will be required to inquire during their procurement process whether the supplier has been accused or

sanctioned for any of these issues and their corporate requirements related to child labour, forced labour, and safety.

10. Contractor management

The contracts with selected contractors will include provisions related to labour and occupational health and safety, as provided in the World Bank Standards Procurement Documents 2018 and law N°62/2018 of 25/08/2018 governing Public Procurement in Rwanda. The Supervision Consultant will manage and monitor the performance of Contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties).

11. Labour Management Procedures Performance Monitoring

The purpose of labour performance monitoring is to determine if the outputs, deliveries and schedules planned have been achieved so that action can be taken to correct the discrepancies as quickly as possible. A set of the monitoring indicators has been established by the Government of Rwanda and will be monitored on regular basis to assess the compliance by the implementers of this Labour Management Procedures.

1. INTRODUCTION

1.1. Project Background

Rwanda Digital Acceleration Project, hereafter referred to as the Project, is designed to accelerate country-wide digital transformation, as well as facilitate Rwanda's integration into the emerging regional digital market. The project will expand digital adoption, bringing more Rwandans online by addressing the major barriers that dampen demand for digital services and spearheading a series of interventions that promote digital inclusion. The project will also enable Rwanda to leverage critical enabling digital platforms and data-driven solutions to improve the efficiency of public service delivery and expand the adoption of digitally-enabled services. Finally, the project will increase Rwanda's capacity to support digitally-enabled innovation and productivity-gains by strengthening the local digital innovation and entrepreneurship ecosystem, supporting tech firms to move from startups to growth and the adoption of digital technologies in key sectors. As set out in the ICT Sector Strategic Plan 2018-2024, Rwanda targets fast tracking Rwanda's transformation to a knowledge-based society. Its key objectives include the following:

Broadband for all by 2024: Broadband is considered a “basic need” for all Rwandans. This shall be realized by promoting “broadband as a utility”.

Government Digital Transformation by 2024: Government should be able to serve people 24 hours a day. With a plan to conduct all essential Government transactions online, it will be possible to provide ubiquitous Government services and achieve effective and efficient Government to Business, Government to Citizens, and Government to Government interactions.

Digital Literacy for all: Rwanda is determined to become a knowledge-based economy. Everyone in Rwanda, regardless of their socio-economic-political stature, needs to be digitally literate to transform their lives and contribute to society.

1.2. Project Description and project components

1.2.1. Project boundaries

The project will be implemented in all 30 districts of Rwanda.

1.2.2. Project Development Objective (PDO)

PDO Statement

Increase access to broadband, digital public services, and strengthen the digital innovation ecosystem.

PDO Level Indicators are:

(a) **PDO indicator 1: Increase access to broadband**

Internet penetration rate (mobile + fixed) (of which, percent female)

(b) **PDO indicator 2: Increase access to digital public services**

Number of fully transactional G2P, G2B and G2G e-services that are introduced, upgraded, or enabled.

(c) **PDO indicator 3: Strengthen the digital innovation ecosystem**

Number of start-ups creating a digital technology solution (of which percentage female owned)

1.2.3. Project components

The project aims to accelerate country-wide digital transformation focusing on critical digital enablers that “future-proof” economic growth. Based on the findings and recommendations of the Digital Economy Initiative for Africa (DE4A) diagnostics conducted, project activities seek to expand digital adoption by spearheading a series of innovative access initiatives. The project will also enhance government's digital service capabilities, equipping government with the ability to harness the power

of big data and offer quality data-driven solutions based on shared digital standards, platforms, and infrastructure. Finally, the project will increase Rwanda's capacity to support digitally-enabled innovation, by strengthening the local entrepreneurship ecosystem, supporting tech firms to move from startups to growth and by developing Rwanda's digital talent base.

Table 1: Project components

Components	Allocation (\$US million)
1. Digital Access and Inclusion <i>Focused on creating digitally enabled citizens</i>	60.5
1.1: Access to affordable smart devices	15.0
1.2: Basic digital skills for all	8.0
1.3: Last mile connectivity access	33.5
1.4: Legal, regulatory, and institutional capacity for broadband market development	4.0
2. Digital Public Service Delivery <i>Focused on creating a digitally enabled government, as well as creating entry points for private sector innovation</i>	100.0
2.1: Digital identification, authentication, and trust services	39.3
2.2: Government data management, sharing and analytics	10.7
2.3: E-services in key sectors	30.5
2.4: Cybersecurity resilience and data protection	19.5
3. Digital Innovation and Entrepreneurship <i>Focused on supporting digitally enabled businesses</i>	29.5
3.1: Regional digital entrepreneurship hub	22.0
3.2: Next generation capabilities for the digital economy	7.5
4. Project Management <i>Project implementation support</i>	10.0
TOTAL	200.0

🎯 **Component 1: Digital Access and Inclusion (US\$60.5 million)**

This component will increase digital access and inclusion through investment in digital access enablers, focusing on under-served areas and groups. A series of interventions that address identified demand-side barriers hampering access to high-quality broadband will be financed. This includes support for smart device affordability financing schemes, an umbrella basic digital literacy initiative, as well as a local connectivity access scheme targeting unconnected government offices, schools, hospitals, and marketplaces. Activities supported will help to connect more users to high-speed internet, and subsequently enable wider access to and demand for data-driven public and commercial e-services (financed under Components 2 and 3). Financing provided will support wider local readiness for COVID-19 response and recovery, as digital tools and systems have proved critical to an agile response, where digital access is viewed as a basic pre-requisite. By providing catalytic funding to stimulate demand by key user-groups and in low-income market segments the project hopes to crowd in more private sector investment on the supply-side. Upstream support for an enabling legal, regulatory and policy environment for competitive broadband market development will also be provided, with a view of stimulating wider access, quality, affordability and sustainability, resulting in a more vibrant broadband market that can support wider access and service expansion.

✓ **Sub-component 1.1: Access to affordable smart devices (US\$15 million)**

This sub-component will provide financing support to facilitate device purchase by low-income household and key user-groups. Activities financed will target users currently unable to afford upfront smart device purchase, and secure needed credit. Prioritized user-groups will include Rwanda's poorest households, as well as teachers and students. The scheme will be led by RISA, leveraging support from the Development Bank of Rwanda (BRD) to allow for the use of commercial financing instruments offered by the financial intermediary. Various financial instruments will be considered, and a phased approach is envisaged, including initially piloting, evaluation and incremental scale-up over time. The project will finance an in-depth market assessment and feasibility study to refine key design elements. Key approaches considered include grant-based

subsidies for Rwanda's poorest households, with eligibility and subsidy levels based on the *Ubudehe* household income classification system and existing device ownership, as well as guarantees to manage the challenges associated with high credit risk and cost, but other interventions will also be explored. Key activities to be financed include:

- (a) **Technical assistance and capacity building for fund development** to allow for the establishment of device affordability fund at the Development Bank of Rwanda (BRD), based on an in-depth feasibility study and market sounding, and the development of a fund-specific project implementation manual that will detail how financial instruments introduced will be implemented and disbursed, including eligibility criteria and processing requirements.
- (b) **Capitalization of a device affordability fund and operationalization of related financing schemes**, where the project will cover the costs of the financial instruments deployed, and any other operational costs.
- (c) **Independent verification**, whereby the project would finance a third-party verification agent to verify compliance for the financing schemes.
- (d) **Communication and outreach** through campaigns, sharing success stories and lessons learned to publicize the device affordability scheme to key stakeholders and targeted beneficiaries.

✓ **Sub-component 1.2: Digital literacy for all (US\$8 million)**

This sub-component will help tackle Rwanda's lingering basic digital skills gap through a national digital literacy scheme that will enable end-users to access and use basic digital devices and data-driven services safely and effectively. This activity will help expand the national coverage of Rwanda's existing flagship Digital Ambassador's Program (DAP), with the aim of training more people in basic digital literacy across all 2,148 cells. A revamped iteration of the existing scheme (version 2.0) will be scaled, and run by the RISA, building in more sustainability, inclusion, and performance-based management, including tailored and task-based training approaches sensitive to gender and persons with disabilities. The scheme will also be broadened to enable the participation of more non-profit and for-profit digital skills providers. The initiative will be anchored in an overarching digital skills assessment and new national digital skills framework, developed in close collaboration with the MINICT, MINEDUC and digital skills providers. Key activities to be financed include:

- (a) **Technical assistance for a digital skills architecture and M&E framework**, development of a national digital skills framework aligned with global best practices and continued evaluation of the DAP.
- (b) **Financing development and operationalization of the new DAP 2.0 model** covering incremental operating costs, training, and equipment, and setting up a shared digital skills training platform allowing partner agencies to contribute through training material, shared M&E tools, building in more sustainability.

✓ **Sub-component 1.3: Last mile connectivity access (US\$33.5 million)**

This sub-component will expand access to high-speed internet among select public institutions, as well as targeted public spaces to enable wider digital services provision. Financing will connect select government offices, school, hospitals and citizen service access points with broadband, and support movement toward a more resilient, secure and centrally managed dedicated government network (GovNet), connecting public sector organizations at central, district, sector and cell-level that currently lack high-speed internet access. The GoR is also keen to connect key commercial centers with public Wi-Fi that can stimulate greater commercial digital services usage. Demand aggregation and pre-purchase of capacity will be leveraged to catalyze infrastructure investment. Upfront purchase of internet bandwidth from private sector operators, under indefensible right of use (IRU) OpEx contracts, covering a period of 10-15 years, will serve as the investment guarantee needed to incentivize private sector CapEx investment in the roll-out of last-mile access network that connect target locations, but also benefit the wider consumer base in the vicinity of connected locations, with government serving as the anchor tenant required for enhanced service

provision. A market study will support a comprehensive needs assessment and refine the implementation approach. Key activities to be financed include:

- (a) **Support for network planning and management:** RISA will receive targeted technical assistance to support network planning, development of technical specifications and capacity requirement to develop a closed virtual network, and a central Networks Operations Center (NOC) to enhance its management of GovNet.
- (b) **Connectivity capacity purchases for select public institutions and priority locations.** Awarded on a competitive basis, covering the provision of international internet bandwidth and various geographic lots, featuring minimum capacity and technical requirements for targeted institutional and locations.
- (c) **Enabling ICT infrastructure for target institutions,** for facilitating internet access and use. Institutions such as public schools prioritized for connectivity access will be supported with electricity and basic IT equipment for teaching.

✓ **Sub-component 1.4: Legal, regulatory, and institutional capacity for broadband market development (US\$4 million)**

This sub-component will provide upstream enabling legal, regulatory support, as well as capacity building to stimulate broadband market development, focusing on the telecommunication sector. It will support modernization of the legal, regulatory, and institutional frameworks governing the telecoms sector, with financing for technical assistance, training, systems and equipment acquisition needed to support regulatory reform in selected areas, with the aim of boosting competition, access, inclusion through service expansion, innovation and adoption of emerging technology. Areas for support identified include: (i) quality of service (QoS) monitoring (ii) number portability (iii) strengthening of the Universal Access Fund (UAF) as well as emerging technologies (iv) support for operationalizing IFC's recommendations on development of a new broadband policy, spectrum management, infrastructure sharing and (v) support for climate change adaptation through specialized trainings for MDAs on emergency response preparedness, operational support for the current e-waste management strategy, and development of climate-resilient and energy-efficient infrastructure standards. Technical assistance will also be provided to enable the collection of gender-disaggregated data. The MINICT, RISA and RURA are expected to be the main beneficiaries of activities financed under this sub-component.

🌀 **Component 2: Digital public service delivery (US\$100 million)**

This component will strengthen the GoR's ability to securely deliver more digital services, allowing for increased resilience and adaptability to health, climate, and other shocks. Activities financed aim to respond to the COVID-19 crisis by 'building back better' through investments that strengthen GoR's ability to deliver services that are secure, data-driven, paperless, and cashless, and that improve both the front-end user-experience of digital public services as well as back-end government efficiency. This will be achieved by developing shared frameworks on issues such as interoperability, and by leveraging re-usable and shared digital infrastructure and platforms for digital identification and other trust services, as well as data management that (a) enable expansion of sectoral digitization and e-service initiatives; (b) allow the GoR to scale the provision of just-in-time critical G2G, G2B and G2P e-services; and (c) support big data analytics that inform policy making, planning and e-service development. An enabling environment for securely scaling e-services will also be supported through investments that strengthen GoR's capacity for managing risks related to cybersecurity and data protection.

✓ **Sub-component 2.1: Digital identification, authentication, and trust services (US\$39.3 million)**

This sub-component will strengthen the existing foundational ID ecosystem, comprised of national identification (ID) and civil registration, to support the expansion and efficiency of service delivery in

key sectors for both in-person and online transactions. The investments planned will bring Rwanda's foundational ID ecosystem in full compliance with the ten Principles on Identification for Sustainable Development and in alignment with other international best practices, to maximize the socio-economic benefits and development impacts that stem from trusted and inclusive ID systems while mitigating the risks. Activities to be financed include:

- (a) **Modernizing the national ID system** by: (i) introducing new credentials, such as a cost-efficient national ID card, and verifiable virtual credential and a mobile ID equivalent; (ii) improving the quality of data, efficiency and inclusiveness of registration, in support of identity verification and authentication; (iii) extending national ID coverage to children (with consent of parents and guardians and adhering to other child protection norms) in order to facilitate enhanced education, health and social protection service delivery. This will finance related consultancy services, central software and hardware upgrades and replacement, registration campaigns, registration kits, credential issuance, cybersecurity security and data protection measures, and related capacity building of both government personnel and the users.
- (b) **Digitizing civil registration archives** by converting paper birth and death certificates, marriage registration forms and other civil registration documents into digital formats and indexing them. This will improve the ability of NIDA to provide effective pre-registration services for the modernized national ID and will become the basis for an efficient retrieval of civil registration records and better user experience in support of public and private sector services that require proof of civil registration status.
- (c) **Strengthening the use of the national ID for in-person identity verification and introduction of a digital ID for fully remote service delivery** by: (i) developing capabilities for fingerprint, iris, demographic and SMS one time password identity verification mechanisms in support of more efficient in-person transactions, with an effective exception handling mechanisms to ensure that there is no exclusion from accessing services; (ii) introducing various digital credentials, authentication and e-signature capabilities for online transactions. This will finance consultations, consultancy services, policy and regulatory development, technical designs, software and hardware upgrades, and integration of the new identity verification and authentication modalities into service delivery in key sectors (e.g. hardware, software and process re-engineering for priority MDAs, as well as developing tools for the private sector to do the same), and related awareness raising.
- (d) **Stakeholder engagement, help desks, and grievance redressal for the ID-related services** by: (i) creating accessible channels to enable citizens and residents who face challenges with registration or using their credentials (including in cases of verification failure) to seek recourse within reasonable time frames; **and** (ii) organizing meaningful consultations with communities, civil society, government institutions and the private sector to inform the design and implementation of this ID sub-component. This will finance business processes re-engineering for handling grievances, an online complaints portal, a call center, development of a grievance tracking management platform, and related public consultations and communications.

✓ **Sub-component 2.2: Government data management, sharing and analytics (US\$10.7 million)**

This sub-component will improve the GoR's ability to securely manage, share, analyze and harness data for improved service delivery, policy development and planning, on the back of shared data frameworks, platforms, infrastructure and big data analytic capabilities. Stronger capacity for managing, sharing, and analyzing government data will play an integral role in enhancing GoR's ability to expand and improve its e-service offering. Activities financed are designed to fully capture the opportunity presented by big data and lay the foundation for the introduction of more advanced use cases in big data analytics, including leveraging predictive capabilities to support forecasting. Support provided will primarily be anchored at RISA, and include the development of shared data governance frameworks, shared government data infrastructure, whole-of-government data interoperability structures, pooled data analytics capacity, featuring

the creation of a central 'Government Data Hub' envisioned as a collaborative platform for better use of digital data by government. Key activities to be financed include:

- (a) **Developing national and big data governance and management frameworks**, including technical assistance to support the development of enabling legal, strategic and policy frameworks through feasibility studies, data sharing guidelines, templates, standards, and protocols as well as related training.
- (b) **Operationalizing the Government Data Hub**, including financing related software, hardware, hosting, and technical assistance for deploying and operationalizing the hub at RISA, in close collaboration with sectoral MDAs that produce large amounts of data. Further, support for cataloguing and tagging, cleaning, and formatting government data for upload, and anonymizing data for release will also be provided. This will also allow government to make data sets public.
- (c) **Financing upgrade of the Government Enterprise Service Bus (GESB)**, operated by RISA, to enable seamless back-end data exchange between various MDAs. Support will be provided for training on the GESB's maintenance and operation, as well as any technical assistance required to support systems integration.
- (d) **Implementation of strategically selected big data use cases** to demonstrate the value of big data analytics in priority sectors (e.g., health, education, social protection and agriculture), including those supporting climate change adaptation.

✓ **Sub-component 2.3: e-Services in key sectors (US\$30.5 million)**

This sub-component will expand the availability of high-quality transactional e-services in key sectors. Priority sectors identified include health, social protection, agriculture, local government, as well as trade and industry. Support provided will cover both (a) just-in-time support for the roll-out of demand-driven G2G, G2B and G2P e-services primed for full digitization that leverage and demonstrate the value of using reusable and shared infrastructure and solutions financed by the project; as well as support (b) more comprehensive and in-depth flagship sectoral digitization initiatives that involve the development of sector specific back-end systems (but building on shared frameworks and infrastructure) and sector-wide business processes re-engineering. Funding related to category (a) e-services will be allocated on an annual basis, following a structured prioritization exercise with sectoral MDAs, and due consideration to both readiness and expected impact. Meanwhile, the flagship digitization initiatives selected in health and social protection sectors, based on their expected high-level contribution to COVID-19 response and recovery, will showcase how sector-wide digitization can facilitate cross-cutting transformation of service delivery. RISA will be spearheading all e-services financed, working closely with respective MDAs, through its sectoral Chief Digital Officers and dedicated technical committees established. Cybersecurity, data privacy, and secure data-sharing principles, informed consent and user-centric design will be mainstreamed for all e-services financed under this sub-component, with special attention given to ensuring access by vulnerable groups. To ensure adequate technical capacity at RISA, MINICT and within sectoral MDAs to launch, maintain and upgrade respective e-services and back-end systems financed, this sub-component will also cover an extensive digital skills training program for the civil service staff. Key activities to be financed include:

- (a) **Support for strategic planning and design of e-services** for both the digital flagships initiatives in key sectors, as well as demand-driven citizen-, business- and government-facing e-services including end-user consultations.
- (b) **Development of select e-services in key sectors.** Financing provided will cover aspects such as software development, systems integration, IT equipment, data hosting requirements, technical and end-user training, as needed. Some priority e-services have already been identified

for implementation in year one, including support for a new e-Parliament system, a Unified Registry System, and a Building Permit Management Information System.

- (c) **Flagship sectoral digitization initiative: Health.** Help transform service delivery in the health sector by enabling the full digitization and integration of existing and health systems such as the Health Information Exchange (HIE) platform, Electronic Medical Records (EMR) system introduced across multiple points of care, supporting its set-up and use at more health posts.
- (d) **Flagship sectoral digitization initiative: Social protection.** focus on streamlining and digitizing G2P payments for social transfers, digitization of SACCOs, including existing paper-based records and support for related systems financing.
- (e) **Comprehensive capacity building and change management through skills assessment and training** to creating a cadre of digitally savvy government leaders and IT professionals to facilitate the successful development, deployment, and maintenance of e-services.

✓ **Sub-component 2.4: Cybersecurity resilience and data protection (US\$19.5 million)**

This sub-component will strengthen the GoR's capacity to mitigate risks associated with the expansion of digital public services by enhancing its capabilities to detect, prevent, respond, mitigate and recover from cybersecurity attacks as well as manage data protection. It will support the development of a robust enabling environment through strengthened cybersecurity governance and institutional frameworks, technical and operational capabilities, as well as cyber skills development for a trusted online transactions environment and the security and resilience of digital infrastructure and systems. It will also lay the foundations for safeguarding data protection in compliance with forthcoming legislation, by supporting the establishment and operationalization of a Data Protection Office (DPO). Key activities to be financed include:

- (a) **Strengthened cybersecurity management capacity**, which will feature support for the newly established NCSA and existing Rwanda Computer Security Incident Response Team (CSIRT).
- (b) **Foundations for data protection operationalization** that will finance (i) the development of governance and institutional frameworks, and (ii) the DPO's technical and operational capacity and (iii) capacity building awareness raising programs.

🌀 **Component 3: Digital Innovation and Entrepreneurship (US\$29.5 million)**

This component will strengthen the local digital entrepreneurship ecosystem and talent base. Activities financed will support better innovation ecosystem coordination, better service provision by entrepreneurship support organizations (ESOs), expand access to early-stage financing, and promote advanced digital innovation capabilities. By strengthening the local entrepreneurial and innovation ecosystem, this component will contribute to the Covid-19 pandemic response and recovery by supporting startups that can aid the development of data-driven, digital products and services relevant to the response. Activities financed will leverage and complement the interventions proposed under Component 2 by also encouraging the use of new public dataset made available and public goods introduced. A stronger local entrepreneurship ecosystem will also aide in developing locally relevant content and services that can help stimulate digital adoption and uptake of digital services, auxiliary to interventions under Component 1.

Sub-component 3.1: Regional digital entrepreneurship hub (US\$22 million)

This sub-component will improve the survival and growth rates of technology-enabled startups in Rwanda and strengthen Rwanda's position as a regional 'test bed' for innovation. Support will be provided to create an enabling strategic, policy, regulatory and institutional environment that is conducive to stimulating growth of digital innovation, businesses and startups, positioning Rwanda as a regional digital entrepreneurship hub. Mechanisms to strengthen the quality, sustainability, and range of ESOs and related services available will be financed, including support for acceleration

services that can strengthen international market linkages. All support provided will consider the challenges that startups and young firms have been facing due to the COVID-19 pandemic. Interventions made will help create a more robust and attractive pipeline of viable startups poised for scale-up and strengthen Rwanda's innovation capacity, contributing to wider job creation and productivity gains critical to COVID-19 recovery. Key activities to be financed include:

- (a) **Enabling strategies, policies and institutions for digital innovation**, support will also be provided to MINICT, RISA, the Rwanda Development Board (RDB) and Kigali Innovation City (KIC), including financing for training, technical assistance IT equipment, operating costs associated with industry consultation etc.
- (b) **Performance-based grants for Ecosystem Support Organizations (ESOs) that serve digital startups**, which aim to encourage quality-based and self-sustaining ESO models that offer better services, and entrepreneurship support programs.
- (c) **International accelerator that serves digital startups**, with financing support provided to attract a high-quality international player to the local market allowing local startups to benefit from their existing expertise, curricula, networks, and brand power.
- (d) **Early-stage finance mobilization for digital innovation**, including support for investment events, training programs and establishment of an early-stage financing mechanism to be managed by the BRD, which could potentially serve as a fund of funds to catalyze private sector investment whereby the project would contribute financing to capitalize the fund as well as the overhead fees.

✓ **Sub-component 3.2: Next generation capabilities for the digital economy (US\$7.5 million)**

This sub-component will equip young Rwandans with advanced 21st-century digital skills, boosting local capacity to contribute to digital entrepreneurship and innovation. A two-pronged approach will be adopted; on the one hand supporting wider access to digital skills within traditional TVET and tertiary education and supporting business-models for advanced digital skills provision on the other. By building the local digital talent pipeline and equipping Rwandans with advanced skills for jobs of the future, this sub-component will actively help stem the rise in unemployment expected on account of Covid-19. Key activities to be financed include:

- (a) **Further development of the Rwanda Coding Academy (RCA)**¹, managed by the MINICT, allowing the RCA to scale and develop a more effective operating and training model.
- (b) **Performance-based grants for technology boot camps** and other innovative digital technology skills training models that support their expansion and operations.
- (c) **Ph.D. scholarships for highly specialized digital training**, such as AI, robotics, blockchain, awarded on a yearly and competitive basis. Supported scholars will be required to support digital government initiatives.

🌀 **Component 4: Project Management (US\$10 million)**

This component will finance project management associated with administering the project. It will finance the operational and staffing costs of the Single Project Implementation Unit (SPIU), including the hiring of expert consultants in key areas such as project management, technical advisory and implementation support. Operational costs would also be covered, including support for capacity building and training. This component will also cover continuous stakeholder consultation costs, and any larger M&E work undertaken.

¹ RCA is a special model school inceptioned by the Government of Rwanda. It is hybrid of both general education and TVET. It teaches Software Development, Embedded Systems Programming, and Cyber-Security. The Rwandan government and the Swiss Agency for Development and Cooperation (SDC) recently launched the Rwanda Coding Academy in partnership with the Ministry of ICT, Ministry of Education and Rwanda Polytechnic. See: <http://www.rca.ac.rw/about-us.php>

1.3. Rationale, objectives, and Application of LMP

1.3.1. Rationale of the Labour Management Procedures

Rwanda Digital acceleration Project is not expected to be a labor-intensive project. However, some of the proposed activities including laying fiber optics, minor rehabilitation, and development of software and installation systems will involve recruitment and use of workers. Therefore, this Labor Management Procedures (LMP) are developed by the Rwanda Information Society Authority (RISA) for the Proposed Rwanda Digital Acceleration Project in fulfillment of the requirements of the World Bank's Environmental and Social Standard 2 (ESS2) under the Environmental and Social Framework (ESF) and national labour regulations. This LMP is developed in line with Project Environment and Social Management Framework (ESMF) as the main reference document, to provide guidance on how to manage workplace related aspects of the project. The preparation of this LMP provides both easy access to information to all project workers, monitors and development partners, and emphasizes RISA's top management commitment to the welfare and safety of workers.

1.3.2. Objectives and purpose of Labour Management Procedures

This Labour Management Procedures will follow the objectives set out in ESS2 and national labour law including to:

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

1.4. Overview of labour use in the project

1.4.1. Application

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal, or migrant workers. The LMP is applicable, as per ESS2 (Labour and Working Conditions) to the Project in the following manner:

- (a) people employed or engaged directly by RISA (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers)
- (b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers)
- (c) people employed or engaged by RISA primary suppliers (primary supply workers); and
- (d) people working in borrow pits, quarry sites and construction materials suppliers in general
- (e) people employed on a regular basis by the Government/Borrower. This includes PIU Coordinator and other PIU Staff

1.4.2. Project Specific Labour Categories

✓ Project Planning, supervision and management activities

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

✓ Excavation, Loading, offloading of materials and cable hauling

This shall, mainly have unskilled labour with basic awareness provided on manual handling and other in-house awareness sessions. These shall mainly be community members and shall ensure safe offloading activities, traffic management along routes of interest. The successful implementation of the project shall entail skilled, semi-skilled and unskilled labour. The unskilled casual workers and semi-skilled Labour force shall earn daily wages but still hold workman's compensation during project works execution.

The project shall include direct workers (working for RISA), contracted (working with contractors and sub-contractors), casual workers (hired from host communities), and primary supply workers (workers attached to a supplier of project materials where applicable), and government civil servants (attached or relevant to the project). RISA shall enjoy benefits from a pool of personnel that have also developed required skills through an apprenticeship in past phases. In addition to the uniform 8 hours of work per day, employment terms for various workers shall be as per the table below:

Table 2: Category of Workers under Rwanda Digital Acceleration Project

Category	Definition	Employment Terms
Government Civil Servant	People employed on a regular basis by the Government /borrower. This includes PIU coordinator and other PIU staff.	Full time contracts
Direct workers	People employed or engaged directly by Implementing Entities (RISA, BRD etc) to work specifically in relation to the Project. This may include for instance E&S consultants/ supervising consultants working for the PIU.	Part-time contracts
Contracted workers	People employed or engaged through third parties to perform work related to core functions of the project, regardless of location. This includes workers working for contractors/supervising farms.	Wage (daily payment) and employment contracts
Casual workers	People working in borrow pits and quarry sites; most recruited from host communities	Wage (daily payment) and employment contracts

Primary supply workers	People employed or engaged by the Borrower’s primary suppliers. This may include people working for suppliers such as at quarry sites or source of other material used under projects or employed by service providers	Wage (daily payment) and employment contracts
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The Labour Management Procedures will be implemented in conjunction with a number of plans, policies and procedures including but not limited to Waste management plan, risk assessments, Journey Management Procedure, Grievance Redress Mechanism and specifically a workers grievance redress mechanism shall cater for all categories of workers including casual workers, Archaeological chance finds procedure, new recruited induction procedure, park or protected areas induction forms, permit to Work System and Task Specific Safety Analysis or Job Safety Analysis and Hand tools inspection, developed overtime shall offer guidance to the teams during project implementation.

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

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

2. LEGAL AND REGULATORY FRAMEWORK FOR LABOUR AND WORKING CONDITIONS

The following section discusses in summary the national policies, regulatory or laws, international treaties or conventions ratified by Rwanda and systems that are applicable to the implementation of this project.

2.1. Environmental and Social Standard 2 (ESS2): Labour and Working Conditions

The World Bank's requirements related to Labour are outlined in Environmental and Social Standard 2 on Labour and Working Conditions (ESS2) under the ESF. This helps the client in promoting 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. Key objectives of the ESS2 are to:

- Promote safety and health at work;
 - Promote the fair treatment, nondiscrimination and equal opportunity of project workers;
 - Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age), in accordance with ESS 2 and migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
 - Prevent the use of all forms of forced labour and child labour;
 - Support the principles of freedom of association and collective bargaining of project workers; in a manner consistent with national law; and
 - Provide project workers with accessible means to raise workplace concerns.
- i. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal, and migrant workers. Where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.
 - ii. The Government of Rwanda as the Borrower is responsible for developing and implementing written Labour management procedures applicable to the project. These procedures set out the way in which project workers will be managed, in accordance with the requirements of national law and ESS2. The procedures will address the way in which ESS2 will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties to manage their workers.
 - iii. Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national Labour 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. 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.
 - iv. 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.

2.2. Brief overview of labour legislation in Rwanda

The working conditions in Rwanda are governed by the Law N° 66/2018 of 30/08/2018 regulating Labour and its implementing orders. This Law applies all aspect of Labour be it formal and informal sectors and provides guidelines related to relationship between an employee and his/her employer in regard to: contract, wages and other benefits, working environment, working hours and different types of allowed leaves which the employee is entitled to.

This law also sets standards in terms of employment age and prohibits all form of forced Labour, discrimination, and sexual harassment. More specifically, RDAP will trigger the following articles during its life cycle:

- **Article 11** of the law provides guidelines on the conclusion of an employment and provides options for written and unwritten contracts provided that whichever of both has proof. Considering this, an employment contract for RDAP workers shall be fixed and in written form with specification of employment terms and conditions and shall be signed off by the employer and employee so as to avoid any conflict or dispute that may arise in relation to this.
- **According to article 40** of the Labour law, the rights of an employee include the following:
 - ✓ to work in an environment where health and safety in the workplace are guaranteed; to receive equal salary for works of equal value without discrimination of any kind;
 - ✓ to be provided leave as provided for by law;
 - ✓ to join a trade union of his/her choice;
 - ✓ to be trained by his/her employer; and
 - ✓ to receive information relevant to his/her work.

Article 43. In terms of working hours, RISA will comply with Article 43 of the law which sets 45 as the maximum working hours per week. However, it provides a window for extra hours for an employee upon the agreement with his or her employer on appropriate compensation for overtime and leaves the responsibility to the employer to prepare a daily timetable for work hours and break for an employee. According to article 44 an employer provides an employee with a break of not less than twenty-four (24) hours a week. Articles 45, 51 and 56 expand on the type of leave that an employee is entitled to including circumstantial, sick leave, and maternity leave, among others.

Article 67. As demanded by **Article 67**, employers on a project will pay the employee the whole salary to which he/she is entitled and deposit it in an account given by the employee in writing in a bank or in a financial institution recognised in accordance with the provisions on payment intervals of the written contract signed by the 2 parties which could be every day for an employee employed on hourly or daily basis, every week for an employee recruited for a week, every fifteen days for an employee recruited for a fortnight and every month for employee recruited on a one-month basis. In terms of social security contribution and benefits, an employer shall affiliate direct workers to Rwanda Social Security Board (RSSB) for occupational risks and pension.

Article 102. Concerning the settlement disputes, RISA will enforce **Article 102** which puts forward amicable settlement. It states that employees' representatives amicably settle individual Labour disputes between employers and employees. If employees' representatives fail to settle the disputes amicably, the concerned party refers the matter to the Labour inspector of the area where enterprise is located then to the national level if no settlement is reached. The next steps shall be competent courts.

Article 12. Apart from foreign consultant who might be contracted to perform specific duties that might require special expertise that cannot be sourced locally, in this project, the likelihood of migrant workers is very low. Nevertheless, in the event of their employment, provisions of the law regulating labour in Rwanda and other relevant laws on these matters shall be applied especially **article 12** the Law N° 66/2018 of 30/08/2018. Foreign consultants will be governed by the law N°57/2018 of 13/08/2018 on Immigration and Emigration in Rwanda which provides for the matters relating to residence permit for foreign employee.

Article 9. The recruitment of project workers will be free from any kind of discrimination as provided for by the Law regulating Labour in Rwanda especially in its **article 9** stipulating that “An employer must give employees equal opportunities at the workplace”. “An employer is prohibited from discriminating employees on basis of ethnic origin, family or ancestry, clan, skin color or race, sex, region, economic categories, religion or faith, opinion, fortune, cultural difference, language, physical or mental disability or any other form of discrimination. Every employer must pay employees equal salary for work of equal value without discrimination of any kind”. The same provision of the law will also be applicable in case of any labour influx occurrence.

Article 6. Within the framework of prohibiting child Labour, RISA will conform to article 6 of the Labour law that sets the minimum age of employment at 16 and prohibits the employment of underage children in dangerous environments.

Article 7 prohibits any form of forced labour, article 8 prohibits sexual harassment in workplace. Sexual harassment in any form against supervisee is prohibited. It is prohibited to dismiss an employee for having reported or testified on sexual harassment committed by his/her supervisor. If there is tangible evidence that an employee has resigned due to sexual harassment committed against him/her by his/her supervisor, his/ her resignation is considered as unfair dismissal. All project workers will sign a Code of Conduct.

2.3. Other international laws/treaties or conventions

2.3.1. International Labour Organization (ILO)

Rwanda as a member of the International Labour Organization (ILO) has ratified several international treaties or conventions therefore it adheres to its standards. The national Law N° 66/2018 of 30/08/2018 regulating Labour in Rwanda was elaborated in reference to the International Labour Law. Hence, this LMP was prepared and will be implemented in respect of the international Labour standards. More specifically 34 conventions were ratified and some of them are into force and others will be in force from May 16, 2020 such as Labour administration convention, 1978 (no 150) and other are abrogated due to different issues mainly, the following principles as set forth in the Declaration on Fundamental Principles and Rights at Work of 1998 will be respected:

- The right of workers to associate freely and bargain collectively;
- The end of forced and compulsory labour;
- The end of child labour;
- The end of unfair discrimination among workers;
- Governance Conventions.

2.3.2. Convention on Elimination of All Forms of Discrimination against Women, 1979

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

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

2.3.3. International Convention on Protection of Migrant Workers and members of their families, 1990

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

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

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

3. ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

3.1. Potential labour risks associated with the RDAP

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

Site teams shall carry out site specific assessments during toolbox talks and pre-job planning meetings with reference to the ESMF and the generic risk assessment subsequently provided in table 3.

Table 3: Generic Risk Assessment

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
1. Labour recruitment and working conditions	Human rights abuse especially discrimination, exploitation and abuse in the recruitment process to vulnerable groups (the girl child, women and children, Under age workers, people with disabilities – forced labour, minorities, these including persons with rare conditions like albinism could easily be taken advantage of and not be recruited or abused after recruitment	Host communities and contractor staff	2	3	M	<ul style="list-style-type: none"> Continuous coordination with the Labour office in each district in regard to recruitment of all personnel Provide roles earmarked for vulnerable groups like flag personnel, record or stock taking team members among others Have the none-discrimination project related policy discussed during inductions to all staff. Provide secure channels for reporting any actual or suspected abuse of human rights including aspects related to vulnerable groups and GBV. Provide for appropriate Task Specific Safety Analysis (TSSA) for jobs carried out with vulnerable groups provided special attention. 	M
	Likely incidents of child Labour or forced Labour	Host communities	4	2	M	<ul style="list-style-type: none"> No children shall be engaged in the project particularly, those below 18 years and attending school Request for a letter from Local Authorities during employment to establish residence and contact persons 	L
	Likely presence of migrants or seasonal workers including risks associated with Labour influx	Host communities	4	2	M	<ul style="list-style-type: none"> Most of the casual jobs shall be reserved for project affected communities/local content 	L
	Gender based violence	Host Communities and female Labourers	4	2	M	<ul style="list-style-type: none"> All workers shall be inducted to the project code of conduct before contract signing Sensitization on what constitutes GBV and the penalties All criminal cases shall be documented and handed over to Police 	L
2. Pre-project stakeholder engagement and project disclosure meetings (these often take place with prior permissions from District or contractor leadership teams. However, the	Legacy issues leading to stakeholder fatigue due to numerous similar projects being implemented in the community. Stakeholders could project negativity due to unfulfilled/delayed pledges by various projects implementers, e.g., the pipeline project	RISA staff and contractors, pre-project launch team	4	2	M	<ul style="list-style-type: none"> Manage stakeholder expectations and communicate realistic project outcomes Utilize broader channels of communication to reach out to teams that may have not been invited for meetings 	L
	Lack of sufficient information availed to project beneficiary, limited project acceptance, physical attacks and lack of support from local leaders	RISA staff and contractors	3	2	M	<ul style="list-style-type: none"> Ensure stakeholder engagements prior to project implementation and throughout the project life cycle, use project supporters as influencers while engaging new beneficiaries 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
remoteness of some sites could make communication hard while prior unattended issues from different projects would breed ripple effects on how the project is perceived						<ul style="list-style-type: none"> Communicate the availability of a grievance management system to all stakeholders Constitute and operationalize the Grievance redress committees to constitute locally voted members 	
	Impersonation and conmen on jobs/ beneficiaries could lead to financial losses and abuse of vulnerable groups. The project could attract opportunistic/ exploitative vices (impersonation and conmen) and expose vulnerable groups (project workers, job seekers).	Host communities or general public	4	3	M	<ul style="list-style-type: none"> Introduce legally contracted Service Providers to local leaders through stakeholder engagements/workshops Provide identification for Service Providers Institute proper recruitment channels that provide for criteria and recommendations from the local population for local content 	M
3. Transport of equipment and personnel to site	Bad drivers, poor road conditions could lead to accidents	Trucks/ equipment, Project personnel, third parties	3	3	M	<ul style="list-style-type: none"> Ensure that drivers have relevant permits Use permit to work, non-authorized people should not be allowed at the workplace Contractors should have an accident log to record all these occurrences 	L
	Equipment damage that could cause injuries to workers	Trucks/ equipment,	3	3	M	<ul style="list-style-type: none"> Use competent personnel to manage equipment Carry out routine equipment inspection and maintenance 	L
	Road accidents due to poor road conditions, incompetent drivers, bad drivers, black spots, Road kills especially in animal keeping communities and protected areas	Access Roads and Highways	3	3	M	<ul style="list-style-type: none"> Routine inductions for project teams Make use of Journey movement plan (JMP) with known journey managers. Ensure that drivers are trained in defensive driving. Provide for routine vehicle inspections and servicing 	L
	Injury to people, machines, Equipment damage, Environmental pollution	Final destination (offloading equipment)	3	3	M	<ul style="list-style-type: none"> Acquire Authorization, use permit to work, use competent personnel to do the work, non-authorized people should not be allowed at the workplace Proper waste disposal Provide personal protective equipment and train personnel on use of PPE 	L
	Injuries to personnel excavating the trenches and third parties passing by (pinch points, bruises, entanglement)	Project staff Third parties and animals	4	4	H	<ul style="list-style-type: none"> Awareness sessions on powered tools, excavations to project implementation staff Provide for appropriate PPE and enforce PPE usage. Also provide reflector jackets for visibility/safety of workers Barricade off areas to be excavated and utilize warning signs understandable by the host communities to reduce on spectators 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
4. Construction and rehabilitation works						<ul style="list-style-type: none"> Carry out community/ stakeholder awareness programmes including in schools that are in the proximity of project sites Provide for rest breaks to reduce on the stress exposed to workers during project execution Contractor should have a sound PPE policy approved by the project management team Provide fully stocked first aid kits and trained first aiders for project teams in the field. Ensure that contractors have known functioning phone contacts for medical personnel or facilities where project staff can be taken for medical treatment Follow RISA project incident reporting procedure for all near misses and incidents in the project area 	
	Food poisoning and hygiene related issues	Workers or field teams	2	5	M	<ul style="list-style-type: none"> Utilize authorized food vendors during the operations and ensure that these are effectively paid by the contractor Provide awareness sessions to project teams on food safety and hygiene 	L
	Biological hazards like snakes, wasps and disease-causing organisms.	Developer, contractor and third parties	2	2	L	<ul style="list-style-type: none"> Provide for proper site screening prior to excavation works especially in swampy areas. Provide for sound waste management and ensure that workers have rangers to guide them at all times while in protected areas. Ensure that all project teams are inducted 	L
	Noise and Dust emissions especially during the borrowing tool usage. Loose material excavated is easily blown by wind. This could also impact on workers if no protection is provided	Workers, Office users, Patients in Hospitals, Court disruptions, Neighboring households, pedestrians	1	3	L	<ul style="list-style-type: none"> Utilize dust suppressing method like water sprinkling. Utilize silencers where appropriate. Ensure that units are services to reduce on noise emissions. Provide for excavation works during off peak hours to check on potential disruptions Provide appropriate PPE like ear morphs for project execution teams Carry out regular equipment servicing 	L
	Poor housekeeping and associated risks of trips and falls, vermin accumulation among others	Host communities and the contractor	4	3	H	<ul style="list-style-type: none"> Ensure good housekeeping is adhered to and teams provided with awareness sessions on the same Provide for waste collection points and transport waste off site 	L
	Fall from heights/Accidents,	Personnel working, non-authorized personnel on	4	4	H	<ul style="list-style-type: none"> Use well standardized and inspected scaffolds and climbers with reasonable practicability, Non-authorized personnel should not be allowed on site, use appropriate PPE and signage, cordon off the area of 	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
		site, existing trees, existing power lines and other utilities, motor vehicles and vehicles passing near the site.				work and acquire permission from the district environment officer before cutting any existing tree or altering any water body.	
	Road accidents, bad drivers, black spots, potholes on the roads, poor visibility, animals crossing, driving under the influence of drugs, Driving while talking on phone, poor journey management plan.	Workers, Communities along utilized routes (Highway), machinery and Equipment	H	H	H	<ul style="list-style-type: none"> • Make use of Journey movement plan(JMP), use your seat belts, don't drive while under the influence of drugs, don't drive while talking on phone, use competent drivers, be vigilant while driving with other road users, follow road safety rules, signage and speed limits. • Provide for training in defensive driving for all project drivers and disciplinary measures for non-compliance • Non-authorized people should not be allowed at the work place during loading operations • Provide for barricades and appropriate supervision during critical operations 	L
L: Likelihood, C: Consequence		L: Low, M: Moderate	H: High		Rating: Impact significance/ consequence		

3.2. COVID-19 risks and management procedures

This section describes general guidance to manage COVID-19 risks during project implementation. Specific risks assessment and mitigation measures will be included in site specific COVID-19 contingency Plan.

3.2.1. Scope of application

These procedures provide guidance to prevent workplace exposures to acute respiratory illnesses, including COVID-19, in non-healthcare settings. The procedures also provide planning considerations if there are widespread community outbreaks of COVID-19.

3.2.2. Possible methods of transmission at workplaces

COVID-19 transmission risks include, but are not limited to:

- **Droplets** – The virus can be transmitted by breathing infected droplets. Droplets can be produced during coughing or sneezing or even by exhales from infected persons. These droplets can travel up to 1meter.
- **Direct** – Person to person transmission by direct contact with an infected person. (e.g., hugging, shaking hands). The virus can enter the body through nose, mouth, or eyes.
- **Indirect** – When an infected person coughs, sneezes or exhales, droplets of infected fluid may get released and contaminate nearby surfaces and objects, such as desks, tables, telephones, computers etc. An uninfected person may be exposed to the virus by touching these surfaces and then touching his eyes, nose, or mouth.

3.2.3. Basic Prevention and Mitigation Measures

- ✓ Employees should practice the following necessary precautions to avoid infections from COVID-19,
- ✓ Frequently clean hands by using alcohol-based hand rub or soap and water
- ✓ Avoid touching eyes, nose and mouth and hand shaking
- ✓ Avoid close contact with anyone who has fever and cough, keep distance (at least 1m) between yourself and others, particularly anyone who's coughing or sneezing
- ✓ When coughing and sneezing cover mouth and nose with flexed elbow or use tissue paper – dispose tissue away immediately in the designated bin and wash hands thoroughly
- ✓ Employees should practice the following necessary precautions to avoid infections from COVID-19.
- ✓ Stay at home if you have mild respiratory symptoms and no travel history; and seek medical care if you have fever, cough and difficulty breathing, telling health provider of travel History

3.2.4. Basic Prevention and Mitigation Measures

In an event of a suspected case in the working area, a health care officer will protect himself with proper PPE and visit the patient, check the temperature, check the symptoms and provide mask and gloves to the patient, and call the project manager to provide the isolation room and communicate to the ESHS Manager. Take the patient to the isolation room and call health service. In case of a confirmed case has been reported by any of stakeholders in the project site, immediately work will stop and will perform self-quarantine by all workers at the work site. In case a confirmed case has been reported in the work area during the restriction period, site management will call district hospital for testing all employees in the area.

3.2.5. Monitoring and reporting requirements

Monitoring and reporting on COVID-19 will be included in overall environmental and social management and will be included in contractor's obligations. This will also include awareness and sensitisation. ESHS managers at all levels will closely monitor the necessary requirements in working areas to ensure the systems are in place according to the COVID-19 Site Specific Management Plan.

4. TERMS AND CONDITIONS OF HIRING AND EMPLOYMENT

4.1. Terms and conditions of hiring

4.1.1. Non-discrimination and equal opportunity

The recruitment of project workers will be free from any kind of discrimination as provided for by the Law regulating Labour in Rwanda especially in its article 9 stipulating that "An employer must give employees equal opportunities at the workplace". "An employer is prohibited from discriminating employees on basis of ethnic origin, family or ancestry, clan, skin color or race, sex, region, economic categories, religion or faith, opinion, fortune, cultural difference, language, physical or mental disability or any other form of discrimination. Every employer must pay employees equal salary for work of equal value without discrimination of any kind." The same provision of the law will also be applicable in case of any labour influx occurrence during the project implementation.

4.1.2. Workers' organizations

In accordance with Article 83 of the Labour Law relating to employees' right to freedom of association on the rights of workers, a worker will have the right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker.

4.1.3. Age of employment

Considering the article 6 of the Labour Law which points out with a general outlook on various prohibited forms of work for the child, the ministerial instructions no 01/2017 of 17/11/2017 relating to prevention and fight against child labour in its article 9 states that a child aged 16-17 may perform work like an adult of above 18 years as long as the work is not forced and is in compliance with national legislation. The minimum age of employment for this project shall therefore be 16 years and to ensure compliance, all employees will be required to produce National Identification Card as proof of their identity and age. However, it 'is recommended' to hire those aged 16 years during holiday seasons when they are not attending schools or if they demonstrate that they have completed schools to avoid increase in school drop-outs.

This article is in compliance with ESS 2 paragraph 19 where a set of hazardous conditions for children are stated and subsequently prohibits their employment under those conditions. To be more cautious, all prohibited harmful or hazardous working conditions for children will be highlighted in the contract and the ESMP so that minimum age children can be hired to perform only light activities as provided by the law. The law as well provides a range of penalties that can be applied to any person who breaches the law in regard to child labour.

Contractors, suppliers, and sub-contractors will be required to respect the above regulations and the Minister of Public Service and Labour, Ministry of Local Government through local government authorities who are in the territorial administration of the project intervention must enforce the Ministerial instructions on the Prevention and fight against child labour and reserve the right to conduct inspections as they wish.

✓ **The verification of the age of project workers will follow the process below**

In accordance with the Law N° 66/2018 of 30/08/2018 regulating Labour in Rwanda, through labour inspection, project personnel in charge of environment and social safeguards will inspect the workplace to ensure that there are no underage workers employed in the project and compliance with national and international Labour standards.

Apart from the safeguards team at PIU, non-government institutions and NGOs that are engaged in child protection are also welcome to collaborate and conduct their due diligence, provide guidelines, carry out awareness in the project area and raise a red flag where they find discrepancies and non-compliance with child protection good practices, the Stakeholder Engagement Plan will identify all those who will be involved in such activity.

✓ **Procedure to be followed if underage workers are found working on the project**

Referenced to an article 117 of law regulating labour in Rwanda, it states that the employment of underage children is criminal. In this project, if ever it was to be revealed that an employer has employed underage workers, the case will be reported to the concerned authorities (Rwanda Investigation Bureau) and the employer will be prosecuted. The direct referee at grassroots level will be the grievance redress committees at community level. They will receive and record the case and refer it to the Labour inspector of the area to handle it using appropriate legal mechanisms. In case the violation is confirmed by competent authorities, the sanctions prescribed by the Law in its articles 117, 119 and 121 will be applied.

4.2. Terms and Conditions for employment

4.2.1. Employment contracts

As stated in this LMP the terms and conditions of employment in Rwanda are governed by the provisions of the Law of 2018 regulating Labour in Rwanda which makes it mandatory for employers to give its employees work contracts. For this project, written agreements will be fostered over unwritten ones in a bid to better protect workers' rights and avoid unnecessary disputes. The contractor will submit copies of employment contracts to the SPIU and to District (Labour inspector) and random inspections will be carried out to ensure compliance.

4.2.2. Wages

In practice, all over the country, in the absence of a law on minimum wage, sets daily wages for non-skilled labour between 3000-6000 Rwf for semi-skilled workers. Therefore, unless better wages are negotiated between the contractor and workers, contractors will be required to comply with the common practice national wide. In all cases, the most current local wages in construction and installation industry in reference to others ongoing or recently completed construction projects of the same magnitude will be used as reference while negotiating and during monitoring of compliance by the labour inspectors and safeguards teams. The law also allows collective bargaining and where employees will deem it necessary it will be done. In ensuring full compliance with the law in this regard, contractors will be required to furnish Districts with copies of contract for all its workforce. Contractors will not be allowed to deploy any employee to work in the project if such copy of employment contract of that employee has not been handed to the District's Labour Inspector.

4.2.3. Working hours

Article 43 of the labour law provides reference for working hours. It states that the maximum working hours are forty-five (45) hours a week. However, an employee can work extra hours upon the agreement with his/her employer on subsequent compensation. The daily timetable for work hours and break for an employee is determined by the employer. The daily rest period granted by

the employer to the employee is not counted as work hours. During project course, 45 hours will be the standard for working hours, however, conditions for overtime will be discussed and agreed on between the contractors and workers so as to ensure that every side's rights are fulfilled.

4.2.4. Collective agreement

Collective agreements are allowed by article 91 of the Labour Law therefore at the wish of project workers collective bargaining and agreements will be conducted.

4.3. Policies and procedures for labour related risks

4.3.1. Gender Based Violence and sexual harassment

The contractors are obliged by the law to create and maintain an environment which prevents GBV and sexual harassment. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment. GBV constitutes acts of gross misconduct, providing grounds for sanctions, penalties and/or termination of employment. Subsequently there will be zero tolerance for any GBV on the work sites and in its surroundings. Sexual interactions by employees at any level with individuals under the age of legal consent, as defined in the applicable national legislation of the country are prohibited. In order to ensure compliance with the law and make possible the enactment of sanctions in case of non-compliance by an employee, all employees will sign a legally binding code of conduct.

Given the sensitivity and the low level of understanding of GBV related matters in the community at large and the stigma attached to it; also taking into consideration the social and psychological damages that are usually associated with it, all cases of GBV will be handled through a special Internal Task Force for GBV. The task force will include project staff namely: Human resource officer and social safeguards specialist from the contractor, Social Safeguards Specialist from the SPIU, Gender Monitoring Officer, Social Safeguards Specialist from the supervising firm, Women representative from the GRC at cell level and GBV service provider in the area of GBV prevention and handled referral pathways for the GBV survivors. From there onward, all existing legal channels will be used and in case of conviction the perpetrator will be punished in accordance with the law. The same mechanism applies to any sexual interaction between employees with underage children. In any case, the SPIU E&S Specialist will closely follow up and contractors. The established GBV action plan will be an instrument for reference under this project. In order to mitigate health threats, employers will be required to comply with the following:

- Provision of sanitary and waste disposal facilities at each subproject site will be a requirement. Furthermore, awareness campaigns on communicable diseases such as HIV/AIDS will be held regularly on construction sites both for project workers and local communities at large. Trainings on GBV will be provided regularly to the workers and the community at large.
- Contractors will be urged to hire non-skilled and semi-skilled workers from local communities. This will significantly empower local communities economically while preserving social cohesion as well.

4.3.2. Child Labour and minimum age

Various measures will be in place to prevent and control child Labour. These measures include the establishment of project Grievance Redress Committees at the community level. In the event of identification of child Labour or forced Labour cases, it will be reported to the above committees from cell level to the District through the Sector and membership of these committees will include local authorities at Cell, Sector and District level and elected representatives from the workers and the community. The Labour Law also provides for penal and administrative penalties in case of

non-compliance with labour provisions, the code of conduct will be signed by all employees before commencement of any works.

As regards general understanding and implementation of occupational health and safety requirements, the National Policy on Occupational Safety and Health of 2014 and the Law n° 66/2018 of 30/08/2018 regulating labour in its article 77 provides for that an employer must ensure the health, safety and welfare in the workplace for employees working in his/her enterprise and for all persons who frequent the enterprise.

In the same view, during the implementation of this project, where contractors will be hired for construction activities, contractors will be responsible for protection of workers against risks related to Occupational Health and Safety. Similarly, the employer will protect direct workers from OHS related risks through provision of health insurance and ensuring that the working environment is safe and secured. The comprehensive insurance will be provided for construction sites. There will be a precondition that local labour will be hired upon possession of community-based health insurance (Mutuelle de Santé) and this has taken roots among Rwandan citizens to ensure they have the valid health insurance at the beginning of every fiscal year.

The policy and laws on Occupational Health and Safety mentioned above also provide that an employer conducts a risk assessment at workplace, develops workplace health and safety guidelines, recruits a Personnel in charge of Occupational Health and Safety where is required by the law and establishes Occupational Health and Safety committees. It is in this framework that, the employer and contractors will be required to respect these legal requirements for ensuring safety and health of workers.

Vulnerable project workers such as women and workers with disabilities will be given due attention by protecting them from any form of mistreatment or harassment and will be provided with assistance whenever deemed necessary.

4.3.3. Occupational Health and Safety

Generally, National legislation provides for all five branches of Occupational Safety and Health namely: occupational medicine, occupational hygiene, occupational ergonomics, occupational psycho-sociology and occupational well-being. Specifically, the Ministerial Order N°02 of 17/05/2012 sufficiently provides conditions for Occupational Health and Safety for employer's duties as well as employee's duties for Occupational Health and Safety in the workplace.

The duties of the employer include the following:

- Ensure the health, safety and welfare at workplace for all persons working in his/her workplace.
- Provide workers with work premises and tools that are appropriate for the work to be done and adequately protect the worker from any damage to his/her health;
- Assure the workers, in consideration of their activities, of regular, reliable and timely renewal of collective and individual means for specific protection;
- Conduct a prior identification and analysis of hazards and risks that may result from the nature of the work such as its location and the work environment, machinery, materials and products to be used, as well as the process and conditions under which the work is done and to take effective protective measures;
- Informing employees about any risks likely to result from the use of new technologies and its imminent danger;
- Ensure that information linked to the protection system is in a clear and readable language and is regularly displayed on all premises likely to cause risks;

- Ensure the respect of measures on protection of health and safety at workplace are taken by competent authorities;
- Make no deductions from an employee's remuneration, levy or charge an employee in respect of anything done or provided in pursuance of this order or any regulation made thereunder;
- Notify to the national occupational safety and health professional/expert and the labour inspector in Districts, and the social security organ any accident, dangerous occurrence, or occupational poisoning which has occurred at the workplace; within four (4) days of the occurrence of the accident.

Duties of employees/workers include the following:

- Avoid and declare to his/her colleagues all risks that could endanger either his/her own safety and health, or that of his/her colleagues or third parties at work;
- Observe all rules and regulations issued to him/her due to the specific nature of his/her operations;
- Immediately declare to the employer any occurrence of infection, such as any skin or moist tissue linings infection or any disease likely to be related to the work;
- Have any wound treated and protected in case of handling substances likely to be contaminated by infectious germs or toxic
- Immediately report any damage on premises for both individual and collective protection;
- Avoid damaging, dirtying or misusing the prescribed means of protection availed to him/her.

4.3.4. Responsible staff

This section identifies the organs and/or staff within the project who will be responsible for engagement and management of project workers in accordance to the categories they belong to. The organs/staff who will be responsible for OHS, training of workers, addressing workers' grievance are also identified under this section.

✓ **Engagement and management of project direct workers**

The project direct workers will be managed under the framework of RISA-SPIU.

✓ **Engagement and management of contractors/subcontractors**

The contractors will be managed by the RISA-SPIU headed by the SPIU Coordinator while subcontractors will be managed by the contractors.

✓ **Occupational Health and Safety (OHS)**

This responsibility will be under the Safeguards Specialists, Human Resources staff (Social Safeguards Specialist, Environmental Safeguards Specialist, HR Officer) and Project managers to ensure safety and health at workplaces. However, all project workers will be trained on occupational health and safety, its approaches and hazard avoidance concepts. Each contractor will have the safeguards staff who will have Occupational Health and Safety as his responsibility and the overall coordination will be ensured by SPIU safeguards staff.

4.3.5. Training of workers

Training will be managed under existing structures of RDB specifically under its department of Capacity Development and Employment. However, training of staff on Occupational Health and Safety (Hygiene, Risk assessment and management, Accident/Hazard avoidance, STDs, GBV, SEA, SH, etc.) will be the responsibility for RISA-SPIU in collaboration with relevant institutions such as Ministry of Labour and Public Service, Gender Monitoring Office, and Ministry of Health through District Hospitals where the project will be implemented. Contractors will also undertake this responsibility for their workers.

5. GRIEVANCE REDRESS MECHANISM

5.1. Workers grievance redress mechanism

Provisions in law N° 66/2018 of 30/08/2018 regulating labour in Rwanda will be applied for Grievance Redress Mechanism for workers. Grievance redress mechanism shall be established under RISA-SPIU to address complaints arising during the project implementation. Project direct workers will be informed about the grievance redress mechanism during meetings at the time of the induction and training will be provided where required, this will follow the same procedure as described in the approved MINICT manual of procedure for grievance management. Contracted workers will be informed about grievance redress mechanism through meetings at workplaces as well as notices to be made available at the workplace. The Grievance Redress Committees (GRCs) to be established as mentioned earlier will also handle the arising grievances. The process pertaining to how to go about grievances handling are documented for further reference. The worker's GRCs will be established based on the structure below and will be followed by all contractors throughout project implementation.

The workers; GRC shall be composed at the site level by the contractor representative, the supervising firm representative, and the workers representative at the site level while the GRC at District level shall be composed of the labour inspector at the District level as advisor, workers representative, contractor representative, the supervising firm representative; and at the SPIU Level, the committee will be composed of the Social and Environmental Safeguards Specialists, Project Coordinator, Human Resource Specialist as the focal point of the SPIU, the contractor representative, the supervising firm representative and the workers representative. RISA-SPIU will require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of design stage. The construction contractors will prepare their Labour Management Procedures before the start of civil works, which will also include a detailed description of the workers grievance mechanism.

The workers grievance mechanism will include:

- A procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances;
- A register to record and track the timely resolution of grievances;
- A responsible department to receive, record and track resolution of grievances.

The supervision firm's safeguards staff will monitor the contractors' recording and resolution of grievances, and report these to RISA-SPIU in their monthly progress reports. The process will be monitored by the GRM Focal Point, the safeguards specialists will be responsible for the project GRM.

The direct workers grievance mechanism will be described in staff induction trainings, which will be provided to the new recruited project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances;
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially;
- Anonymous grievances will be treated equally as other grievances, whose origin is known;
- Management will treat grievances seriously and take timely and appropriate action in response.

Information about the existence of the grievance mechanism will be readily available to all project Workers (direct and contracted) through notice displaying boards, the presence of “suggestion boxes”, and other means of communication as required.

5.2. Grievance channel for Gender-Based Violence

When a GBV-related complaint is received at the first or second tier of the GRM, the complaint should be kept confidential by the person/persons receiving the complaint, and immediately reported to Isange One Stop Center (IOSC), a national police-led center established to provide comprehensive support to victims of GBV. The complaint should be reported to the relevant committee and immediate actions should be taken that is consistent with the wishes and choices, rights and dignity of the complainant. The complainant should be given information in simple and clear terms on the steps for filing complaints and the possible outcomes, the timelines and the types of support available to be able to make informed decisions.

For GBV cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant survivor. The recording of incidence should be limited to the nature of complaint put exactly in the words of the complainant, the age of the survivor and if, to the best of their knowledge, the perpetrator was associated with the project. The complainant should decide on whether they would like to be referred to the grievance committee and the complainant should give consent to share basic monitoring data.

Safety & Well-Being: The safety of the survivor shall be ensured at all times including during reporting, investigation, and the provision of victim assistance. Those involved in the management of complaints will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different, the subject of the complaint, and the organizations involved), and streamline ways to prevent additional harm in all the complaint handling process.

The survivor is never to blame for reporting an act of GBV and should never be made to feel investigated. On the contrary, it is important that she/he feels that her/his story is heard, believed and valued. The actions and responses of the complaint mechanism will be guided by respect for the choices, needs, rights, and the dignity of the survivor.

Confidentiality: The confidentiality of complainants, survivors, and other relevant parties must be respected at all times. All GBV-related information must be kept confidential, identities must be protected, and the personal information on survivors should be collected and shared only with the informed consent of the person concerned and on a strict need-to-know basis.

Survivor-Centered Approach: All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor’s choices, needs, safety, and wellbeing remain at the center in all matters and procedures. As such, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor, whose agency and resilience must be fostered through the complaint process.

Accessibility and non-discrimination: The mechanism must be accessible to all potential complainants and sufficient information must be given on how to access it, making the complaints process accessible to the largest possible number of people. This includes identifying and instituting various entry points that are both gender and context sensitive. To facilitate incidents reporting and avoid stigmatization, reports from third parties (witnesses, people suspicious or aware of an incident, etc.) must also follow accountability protocols.

5.3. Grievance for workers and labour contracting issues

i) Individual Labour disputes: Article 102 of law n° 66/2018 of 30/08/2018 regulating Labour in Rwanda

Workers will elect representatives who will form a committee that will act as the Workers Grievance Redress Committee. As mandated by article 102 of the law regulating labour in Rwanda, the employees' representatives amicably settle individual labour disputes between employers and employees. If employees' representatives fail to settle the disputes amicably, the concerned party refers the matter to the Labour Inspector of the area where enterprise is located. In the case of proposed project it will be the District where works will be being implemented and the elected workers representative will play the role of focal point of the workers grievance and he/she will report to the supervising firm and liaise with District Labour Inspector and SPIU to assist and participate in grievance for its resolution.

If the Labour Inspector at the District fails to settle the dispute due to the nature of the case or the conflict of interests, he/she refers the dispute to the Labour Inspector at the national level stating grounds to refer such a dispute. If amicable settlement fails at the national level, the case is referred to the competent court. In any case, the SPIU will be informed from the beginning of any workers grievances and provide insight and mediation if possible. The matter will be referred to the Labour Inspector only if the SPIU fails to do the mediation.

ii) Collective labour disputes: LAW N° 66/2018 OF 30/08/2018 regulating Labour in Rwanda

The law requires that collective labour disputes be directly notified to the labour inspector of the area by the workers representatives. Within this framework, any collective Labour disputes that will arise under project, will be addressed to Labour inspector at District level for assessment and settlement. In case of escalation, the matter will be referred to the national level.

Before escalating the collective Labour dispute, the SPIU through the Environmental and Social Specialist Safeguards will be alerted. Necessary investigations will be conducted, and the contractor will be duly approached. The matter will be referred to the Labour inspector only if the SPIU and workers representatives fail at amicable settlement.

5.4. For worker safety issues

All grievances related to workers safety will be addressed through the Occupational Health and Safety committee as required by Article 78 of the Labour Law.

5.5. Grievance process for non-labour related issues involving project workers

In the project area there might be other conflicts related to relationships between the workers and the local community. Depending on who is the aggrieved party, the following mechanism will be used:

- **Worker against other worker:** These grievances will be handled through the Workers Grievance Committee/representatives.
- **Community member against a worker:** If there is any grievance from a community member against a worker, they will be handled through the Workers Grievance Committees/representatives.
- **Worker against a community member:** The project will establish a project grievance committee at various levels of the local administration scheme in Rwanda from the Cell, Sector up to the District local government. This grievance mechanism as described in the precedent section, will have the mandate of solving all complaints and grievances related to project activities and impacting local communities. Any grievance from a worker against a community member will be handled through this established committee.

The project grievance mechanism will not impede workers or project affected people's access to the legal system. Local communities have existing traditional and cultural grievance redress mechanisms (Abunzi² committees) established and regulated by law no 37/2016 of 08/09/2016 determining organization, jurisdiction, and competence and functioning of Abunzi committee (adjudication/mediation committees).

These are established at cell and Sector level to solve community-based conflicts and grievances their regulatory body being the Ministry of Justice. This mechanism cannot be overlooked by the project. The population can choose to use this channel instead of the project grievance mechanism. The escalation at this level leads to the court process. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per National Legal procedure.

² Abunzi means mediators elected among members of community.

6. PRIMARY SUPPLY WORKERS AND CONTRACTOR MANAGEMENT

6.1. Primary Supply Workers

The primary suppliers for the project will mainly be for construction material (brick, cement, cables and devices, etc.) suppliers, electrical and electronic devices suppliers, IT and communication equipment suppliers, etc.

Digital industries are not known to involve significant risks of child labour and forced labour. It is expected that these primary suppliers will be large scale international companies. For construction material suppliers, contractors shall be required to carry out due diligence to identify if there are significant risks that the suppliers are exploiting child or forced labour or exposing worker to serious safety issues. In instances where foreign suppliers are likely to be contracted, the contractor will be required to inquire during his/her procurement process about whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labour, forced labour, and safety. If there are any risks related to child and forced labour, and safety identified, the contractor will notify SPIU and will address these risks and may avoid such suppliers, where possible.

Where a significant risk of child labour or serious safety issues in relation to primary suppliers has been identified, the procedure for monitoring and reporting on primary supply workers will involve various measures that have been put in place to prevent and control them such as establishment of child labour prevention committees from District to Cell level. In the event of identification of child labour cases, it will be reported to concerned authorities, The labour law also provides for penal and administrative penalties in case of non-compliance with labour law provisions. In instances where local suppliers would be engaged, contractors shall be required to carry out due diligence procedure to identify if there are significant risks that the suppliers are exploiting child or forced labour or exposing worker to serious safety issues. On the other hand, where foreign suppliers are contracted, contractors will be required to inquire during their procurement process whether the supplier has been accused or sanctioned for any of these issues and their corporate requirements related to child labour, forced labour, and safety. If there are any risks related to child and forced labour, and safety identified, in case of occurrence, the sanctions stipulated by Rwanda labour law will be applied.

6.2. Contractor Management

6.2.1. Contractual obligations

RISA-SPIU will use the Bank's 2018 Standard Procurement Documents for solicitations and contracts, and these include Labour and occupational, health and safety requirements.

As part of the process to select design and build contractors who will engage contracted workers, RISA-SPIU and/or the supervision consultant may review the following information:

- Information in public records, for example, corporate registers and public documents relating to violations of applicable Labour law, including reports from Labour inspectorates and other enforcement bodies in the Districts where the project will be implemented;
- Business licenses, registrations, permits, and approvals;
- Documents relating to a Labour management system, including OHS issues, for example, Labour prepared management procedures;
- Identification of Labour management, safety, and health personnel, their qualifications, and certifications;
- Workers' certifications/permits/training to perform contracted work;
- Records of safety and health violations, and responses;
- Accident and fatality records and notifications to hierarchical authorities;
- Records of legally required worker benefits and proof of workers' enrollment in the related programs;
- Worker payroll records, including hours worked and pay received;

- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting ESS2.

The contracts with selected contractors will include provisions related to Labour and occupational health and safety, as provided in the World Bank Standards Procurement Documents 2018 and law N°62/2018 of 25/08/2018 governing Public Procurement in Rwanda. Further, the contractor will be requested to prepare Contractor's code of conduct. Sample contractor's Code of conduct is provided in **annex 4**.

The Supervision Consultant will manage and monitor the performance of Contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (Obligations, representations, and warranties). This may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of Labour management records and reports compiled by contractors. Contractors' Labour management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of noncompliance with national law; and (e) records of training provided for contracted workers to explain Labour and working conditions and OHS for the project.

6.2.2. Hiring

All work shall be carried out by personnel considered eligible to provide Labour by law (above 18 years of age) upon presentation of a valid National Identification Card and recommendation letter from the resident Local Council chairpersons. For avoidance of doubt, this shall be under the guidance of the Ministry of Public Service and Labour. The minimum acceptable age of minors employed on the project will be sixteen (16) upon approval by the District Labour Officer and consideration will be given to young family heads. They shall be engaged in non-hazardous³⁴ that is not labour intensive for instance housekeeping and stock-taking.

The Contractor/ sub-contractors must ensure that all project workers sign employment contracts and Code of Conduct agreements. Casual labour will have a timesheet in duplicate. Sample code of conduct is provided in **annex 5**.

Equitable employment aspects of the project shall be streamlined throughout the project cycle in compliance with ESS2. Aspects of salaries and wages shall be in line with:

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

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

³ ESS2 specifies work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include: (a) work with exposure to physical, psychological or sexual abuse (b) working at heights or in confined spaces (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, temperatures, noise or vibration damaging to health, etc.

All workers, including casual laborers employed by the project, shall be documented and have written contracts stipulating all the above and other aspects as per the laws governing Rwanda and materially consistent with objective of ESS2 and in compliance of this LMP. All workers will be issued a code of conduct stipulating the acceptable work behavior and punitive measures provided to mitigate against SEA and GVB.

6.2.3. Worker Accommodation

There are no workers camps anticipated under this project. Staff who will have to spend night outside their usual residents will only utilize existing accommodation facilities in project districts as a way of supporting local businesses and reducing on project environmental footprint. All accommodations shall have clean running water and shall ensure that care is taken on:

- Malaria management
- Hygiene related aspects of the project including provision of hand washing soap and sanitizer where available and bathing facilities
- Proper human waste management including provision of adequate number of toilet facilities
- Appropriate lighting and ventilation
- Provision of proper muster points and
- Medical emergency points and readily accessible first aid kits maintained by health and safety representatives. First aid Content checklist is provided in **Annex 6**.
- Gender considerations especially for separate accommodation and sanitation facilities
- Avoidance of locations that are hot spots for prostitution
- Social distancing and other standard operating procedures when/where relevant

6.2.4. Insurance

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

6.2.5. Security

All personnel shall be provided with appropriate security during project implementation and this shall be in collaboration with state security agencies like National Police and private security firms where applicable.

6.2.6. Timing of Labour Requirements

All workers shall work for 8 hours a day during the day starting at 8:00am with one hour lunch break and end at 4pm. Night time operations shall be conducted on a needs only basis after activity specific risk assessment, toolbox talks and appropriate permit to work approval for this as a non-routine operation. This shall enable proper hazard identification and provision of mitigation measures. This caters mainly for works in busy town settings where daytime work has a potential to disrupt routine activities in the area. Teams working at night will have rested during the daytime. In scenarios where workers have to travel a distance longer than 1 km, transportation shall be provided from accommodation to site/sites and time utilized for movements to and from the site shall form part of the working hours in the day.

6.2.7. Incident management and investigation

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

among others as per incident management plan. Sample incident reporting form is provided in **annex 2**.

Any severe injury (requiring off-site medical care) or fatality incident shall be immediately reported to the RISA and to the Bank within 24hours with basic information and a detailed incident report including the following will be submitted as soon as possible, ideally within 10 working days:

- a) root cause analysis and
- b) corrective action plan on:
 - 1) immediate mitigation measures in case of continuing danger (e.g. fencing, signboard, guards)
 - 2) compensation to the affected family based on a clear rationale
 - 3) risk assessment and correct application of ESHS management procedures, and
 - 4) Medium- and long-term mitigation measures including enhancement of safety measures, audits, and additional training.

7. PERFORMANCE MONITORING AND REPORTING

7.1. LMP performance monitoring

Monitoring is a continuous assessment that aims at showing all stakeholders with early detailed information on the progress or delay of the ongoing assessed activities planned under the project. It is an oversight of the activity's implementation stage where the project is and the extent to which implementation is reached. Its purpose is to determine if the outputs, deliveries, and schedules planned have been reached so that action can be taken to correct the discrepancies as quickly as possible.

Processes for monitoring, assessment and audit is developed to:

- ✓ Document the implementation and effectiveness of management and mitigation measures;
- ✓ Assess actual impacts against predicted impacts; and
- ✓ Demonstrate compliance with applicable legal and other requirements.

Monitoring will be undertaken for both direct hires (including casual labor) and contract workers. The contractor safeguards team, the supervising engineer, the District Labor Officer and RISA safeguards team will undertake both desktop and field-based inspection programs to confirm that specified mitigation measures are being implemented effectively and achieving the intended outcomes.

7.1.1. Assessments

The contractor environmental and social safeguards officer will take a lead in undertaking periodic assessments to determine the degree to which, the commitments outlined in this Plan are being met. This will include site inspections and monitoring of grievances. The assessments will be undertaken by suitably qualified personnel conversant with labor management issues. Assessment findings will be prioritized and disclosed closed in a timely manner.

7.1.2. Audits

It is envisaged that, the supervising engineer, District Labour Inspector and RISA Environmental and Social Safeguards specialists, at their discretion, will audit the contractors or suppliers to determine their compliance with this Plan. In addition, the above staff may also, at their discretion, undertake audits of other third-party facilities and providers, as relevant to the Environmental and Social Management Plan. The Independent Environmental and Social Consultant, on behalf of RISA may also be engaged to conduct periodic monitoring reviews of the Project, largely based on the social and environmental controls set out in the Environmental and Social Management Plan.

7.1.3. Performance indicators

Performance indicators are used to measure and track performance against the effectiveness of mitigation and control measures described in this Plan. Indicators can be divided into two groups i.e. leading indicators and lagging indicators. Leading indicators predict actions to be taken to prevent a risk from escalating - such as complaints from workers about, for example, the quality of camp food. An example of a lagging indicator would be a work stoppage over camp conditions. General performance indicators may also be relevant, such as training and awareness numbers. Performance indicators must be measurable against a specified target. The performance indicators outlined in **Error! Reference source not found.** apply to this Plan:

Table 4: Labour and working conditions performance indicators

ITEMS	Indicator	Target	Frequency	Responsible
HEALTH AND SAFETY POLICIES, PLANS AND PROCEDURES				
Availability of Health and Safety Plan	Approved document on Health and Safety Plan	One	Once	Contractor
Workers training on Health and Safety Plan	Number of toolbox talks	Three	Quarterly	Contractor
FIRE AND EMERGENCIES				

ITEMS	Indicator	Target	Frequency	Responsible
Emergency procedures e.g. for evacuating the site in case of fire, or for rescue from a confined space	Approved document on Emergency procedures	One	once	Contractor
Training on Emergency procedures	Number of toolbox talks	Three trainings	Quarterly	Contractor
Fire extinguishers provided	Number of extinguisher	All project-sites	As needed	Contractor
Training on how to use fire extinguishers	Number of training provided and participants in each training	All workers	As needed	Contractor
Emergency assembly point known by each employee and clearly marked	Number of Emergency point	One per site	Once	Contractor
HYGIENE, SANITATION AND ENVIRONMENT				
Presence of sanitary facilities	Number of sanitary facilities available	At least one for 20 people, separated for men and women	Once	Contractor
Hygienic conditions of toilets and washing facilities?	Inspection report	Once a week	Weekly	Supervising Engineer/ Contractor
Management of hazardous substances and non-hazardous substances during collection process	Amount of collected waste by type	All waste collected separately	Monthly and as need	Contractor
ACCESS ON SITE				
Register for site access	Register	One	Always available at project sites	Contractor
Security personnel	Number of security personnel recruited	two	Always available at project sites	Contractor
WORK AT HEIGHT				
Appropriate protection to stop people or materials falling.	Number by time	All workers	Ongoing	Contractor
Appropriate measures to prevent construction materials from falling from the top	Procedures manual developed and approved	One	once	Contractor
PERSONAL PROTECTIVE EQUIPMENT				
PPE is available and worn when required: observation	Number by time	All workers	Ongoing	Contractor
Training in PPE use and care: Ask worker	Number of toolbox talks	One every month	On monthly basis	Contractor
Provision of personnel protective equipment	Number of PPE/workers supplied by type	All workers are provided with PPE	Quarterly	Contractor
INCIDENT REPORTING, RECORDING AND INVESTIGATION				
Accidents and incidents Cases	Number of cases reported	All cases	Weekly Monthly	Contractor
SAFETY TOOLS, MACHINERY AND EQUIPMENT				
Noise levels of machines	Noise level	Noise below acceptable limits	Quarterly	Contractor
Technical control of machines	Vehicle inspection certificate	All machines	Every six Months	Contractor
FIRST AID EMERGENCIES				
Availability of complete First aid kit	Number of Kits	One by working area	As needed	Contractor
Trained First aid helper	Number of helper trained	One by working area	Ongoing	Contractor
DISEASE PREVENTION, SURVEILLANCE AND EMPLOYEE WELFARE				
Medical check- up for the employees	Checkup report	Two check up	Once a year	Contractor
Health insurance coverage to help accessing medical benefits for affected employees	Number of workers by Insurance	All workers		
Sickness cases	Number by type of disease	All cases recorded	Monthly	Contractor
Existence of awareness program of workers on hygiene and sanitation, communicable	Awareness report	One per quarter	Quarterly	Contractor

ITEMS	Indicator	Target	Frequency	Responsible
and non- communicable diseases like HIV/AIDS, malaria, hypertension, diabetes,.. ...				
Does tobacco and alcohol prohibited at workplace				Contractor
Other items				
Grievances lodged and resolved	Type and number	Closed or adequately responded to within 30 days.	Monthly	Contractor
Disciplinary cases	Type and number	Reduction in disciplinary breaches.	Monthly	Contractor
Pay slips/general payment queries	Type and number at each step of GRM	Reduction in queries and enquiries on payments.	Monthly	Contractor
Lost hours due to industrial actions /strikes.	Number of hours	Zero	Monthly	Contractor
Worker recruitment	Number of workers for each contractor disaggregated by gender and origin	This will depend on recruitment Plan	Monthly	Contractor
Contract validity	Number of workers with valid contract by gender	All workers	Monthly	Contractor
Training provided to workers on OHS, GBV and sexual harassment	Number of trained people by topic and by gender	All workers	Twice a year	Contractor
Incident and accident	Number of incidents and accidents by level (minor, severe)	All incidents and accidents should be reported	Monthly	Contractor
Workers code of conduct	Percentage of workers who signed code of conduct	100%	Ongoing	Contractor/ Supervising engineer/ Labour inspector

A detailed check list that will be used during monitoring is in **annex 7**. Monthly and quarterly reports will be prepared by the RISA, and the quarterly reports will be shared with the World Bank and AIIB. Incidents reports will be prepared as well if circumstances require it. More details on reporting requirements are provided in the Environmental and Social Commitment Plan (ESCP) prepared under this project. The monitoring and evaluation framework for the LMP is attached (**Annex 1**) to this Labour management procedures given that the indicators might be varied depending on different parameters based on project phase.

7.2. Training and Awareness

Before the development of a training and awareness program, a needs analysis will be conducted. The needs analysis will be based on requirements of this Plan. It involves a basic assessment of the knowledge and skills of the people involved in training implementation. Regardless of the outcome of the needs analysis, the training and awareness program will cover, at a minimum, the areas outlined in Table 5.

Table 5: Training and Awareness Plan

No.	What	Who	When	Frequency
01.	Mitigation measures including all procedures	Contractor, supervising engineer and personnel who will be involved in training, reporting or monitoring.	Prior to commencement of work	Once prior to commencement of work
02.	Workplace induction including: Pay slips; Disciplinary and grievance procedures; Cultural awareness; and Code of conduct.	All workers	Prior to commencement of work.	Annually
03.	Camp induction including: - Rules and regulations - Code of conduct - Interaction with communities - Health, safety and security.	All workers	Prior to commencement of work.	Annually
04.	- Monitoring	Personnel who will be conducting monitoring events.	Before monitoring commences	Annually
05.	- Reporting and performance indicators	Personnel who will be compiling reports relating to labour and working conditions.	Before reporting commences	Annually
06	- Human rights awareness	- Senior Management, Supervisors, security personnel (staff and contracted).	Prior to commencement of work	As required by changes in training materials or awareness topics.

7.3. Reporting on labour and working conditions

Environment and social management quarterly and annual reports will include a section on labour and working conditions under the project. Based on indicators in table 4, the report will provide evidence on how labour is performing and how safe the project is during its implementation. Action points from these reports are tracked with action parties assigned to them to ensure completion. A detailed check list that will be used during monitoring is in **annex 8**.

Monthly and quarterly reports will be prepared, and the quarterly reports will be shared with the World Bank and other development partners. Incidents reports will be prepared as well if circumstances require it. More details on reporting requirements are provided in the Environmental and Social Commitment Plan (ESCP) prepared under this project. The Monitoring and Evaluation framework for LMP is attached (**annex 1**) to this Labour management procedures given that the indicators might be varied depending on different parameters based on project phase.

A periodic report will be compiled to address the labour and working conditions aspects contained in this Plan, including the following for both supervising Engineer and contractor activities:

- Grievances lodged by type and number, illustrated with graphs. Open grievances by type and number;

- Disciplinary action by type and number, including graphs;
- Induction training numbers, queries and comments;
- Issues raised by workers' committees and action taken;
- Workforce numbers by local and foreign workers - actual against planned;
- Actual demobilization numbers against planned targets. Incidents around demobilization;
- Industrial relations incidents - stoppages go slows, threats, damage to property, violence;
- Lost hours by category; and
- Absenteeism, sick leave and late arrivals.

Environment and Social management quarterly and annual report will include a section on labour and working conditions under the project. Labour and working condition reporting indicators are presented in table 4 while sample incident reporting form is presented in **Annex 2** and sample incident Response structure is presented in **annex 9**.

REFERENCES

1. World Bank Group. 2017. The World Bank Environmental and Social Framework, 106p.
2. MoE, 2018. The Law (No. 48/2018 of 13/08/2018) on Environment determining the modalities for protecting, conserving and promoting the environment;
3. MIFOTRA, 2018. [Law N° 66/2018 du 30/08/2018 Regulating Labour in Rwanda:](#)
4. REMA, 2006. General guidelines and Procedure for Environmental Impact Assessment.
5. World Bank, 2005. Environmental and Social Framework for World Bank Projects with Multiple Small-scale subprojects. Africa Region.
6. World Bank, 1998. Pollution Prevention and Abatement Handbook: Towards Cleaner Production. Washington, D.C

ANNEXES

Annex 1: Template for M&E framework for the LMP

INDICATORS BASELINE (What is the current value?)	TARGET (What is the target value?)	DATA SOURCE (Where/from whom will the data be obtained?)	TECHNIQUE (How will it be measured?)	FREQUENCY (How often will it be measured?)	RESPONSIBLE (Who will measure it?)	REPORTING (Where will it be reported?)

Annex 2: Incident reporting form

Date Reported	
Division	
Region	
Office / Sub Location	
Business Unit	
Classification (select one)	<input type="checkbox"/> Drill or Inspection <input type="checkbox"/> Environmental Incident <input type="checkbox"/> External Event <input type="checkbox"/> Hazard <input type="checkbox"/> I and I – First Aid <input type="checkbox"/> I and I – Lost Time <input type="checkbox"/> I and I – Medical Treatment <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Near Miss <input type="checkbox"/> Property Damage <input type="checkbox"/> Safety Alert/News/Meeting <input type="checkbox"/> Safety Talk Conducted <input type="checkbox"/> Security
Activity at time of incident (select one)	<input type="checkbox"/> External Event <input type="checkbox"/> Office Base related <input type="checkbox"/> Project Site related <input type="checkbox"/> Travel Related <input type="checkbox"/> Not applicable

Event Details

Date of Event		Time of Event	
Project Number (if applicable)			
Total time away from work due to injury *Method of recording would be in hour and half hour intervals i.e. 7, 7.5, 24 etc.			
Person Reporting Incident			
<input type="checkbox"/> Provide this person permission to view/modify this item			
Describe event in your own words:			
Exact Location of the Event e.g. third floor corridor near lunchroom			
Is the location of the event a Contractor? -controlled office or facility?	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A

Does this incident need to be reported to the Client/ Principal Contractor of the respective project where the incident occurred?	<input type="radio"/> Yes <input type="radio"/> N/A <input type="radio"/> No
Immediate Response by Personnel on Site:	

Injury Details (Fill out this section if the incident involves an injury)

Injured Person Name		
Injured Person is (select one)	<input type="checkbox"/> Contractor employee <input type="checkbox"/> Contractor to <input type="checkbox"/> Subcontractor/Sub consultant to <input type="checkbox"/> Visitor to(Name of contractor)..... site <input type="checkbox"/> Member of the public <input type="checkbox"/> Other	
Home Address		
Witness		
Witness Contact Details		
Nature of Injury (select one)	<input type="checkbox"/> Amputation <input type="checkbox"/> Electric shock <input type="checkbox"/> Asthma or other respiratory illness <input type="checkbox"/> Effects of exposure to the elements <input type="checkbox"/> Biological illness or Blood born pathogen <input type="checkbox"/> Fracture <input type="checkbox"/> Bruise, contusion or crushing injury <input type="checkbox"/> Internal injury <input type="checkbox"/> Burn <input type="checkbox"/> Poisoning or effects of substances <input type="checkbox"/> Concussion <input type="checkbox"/> Psychological <input type="checkbox"/> Cuts/Foreign body penetration <input type="checkbox"/> Sensory loss <input type="checkbox"/> Dermatitis or other skin condition <input type="checkbox"/> Sprain/Strain <input type="checkbox"/> Dislocation <input type="checkbox"/> Superficial injury <input type="checkbox"/> <input type="checkbox"/> Other	
Body Part affected (select one)	<input type="checkbox"/> Ear <input type="checkbox"/> Trunk <input type="checkbox"/> Eye <input type="checkbox"/> Back <input type="checkbox"/> Face <input type="checkbox"/> Internal organs <input type="checkbox"/> Head <input type="checkbox"/> Hip or leg <input type="checkbox"/> Neck <input type="checkbox"/> Feet or toes <input type="checkbox"/> Shoulder or arm <input type="checkbox"/> Multiple locations <input type="checkbox"/> Hand or fingers <input type="checkbox"/> Not applicable	
Cause of Injury (select one)	<input type="checkbox"/> Bite or sting <input type="checkbox"/> Muscular stress <input type="checkbox"/> Contact with object <input type="checkbox"/> Physical/mental abuse <input type="checkbox"/> Struck by object <input type="checkbox"/> Trapped between <input type="checkbox"/> Exposure to element/substance <input type="checkbox"/> Trapped by <input type="checkbox"/> Fall from height <input type="checkbox"/> Vehicle accident <input type="checkbox"/> Fall at same level <input type="checkbox"/> Not otherwise specified	
Description of Treatment:		
First aid administered by		
After treatment the injured person (select one)	<input type="checkbox"/> Returned to work <input type="checkbox"/> Went home <input type="checkbox"/> Transported to medical centre	
First full day or shift that injured person missed		
Injured person returned to work on		
Injured person returned to permanent duties		

Will a compensation claim be lodged? (select one)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure
Add additional details if necessary	

Annex 3: Complaint form

Complaint Form		
Grievance Number		Copies to forward to:
Name of the recorder		(Original) Receiver Party
District/ Sector/Cell		(Copy)- Responsible Party
Date		
INFORMATION ABOUT GRIEVANCE		
Define the Grievance		
INFORMATION ABOUT THE COMPLAINANT		Forms of Receive
Name-Surname		Phone line
Address		Community/Information meetings
Village/ Cell		Mail
Sector/ District		Informal
Signature of Complainant		Other

Grievances Close Out Form

Grievance Number:.....
 Define immediate action required:.....
 Define long term action required (if necessary).....

Verification of corrective action and sign off

Corrective action taken	Due date

Responsible Party

Notes: This part will be filled in and signed by the complainant when he/she receives the compensation or file is closed out

Complainant:.....
 Name and Signature.....
 Date
 Representative of Responsible Party
 Title, Name and Signature..... Date:.....

Annex 4: Contractor's Code of Conduct

Implementing Environmental, Social Health and Safety (ESHS) and Occupational Health and Safety (OHS) Standards Preventing Gender-Based Violence (GBV) and Violence against Children (VAC)

(Name of contractor) acknowledges that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable, be it on the work site, the work site surroundings, at worker's camps, or the surrounding communities.

The company considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

(Name of contractor) agrees that while working on the project every employee will:

- Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by employer.
- Shall wear personal protective equipment (PPE), in the correct prescribed manner, at all times when at the work site or engaged in project related activities.
- Take all practical steps to implement the organization's environmental and social management plan (CESMP).
- Implement the OHS Management Plan.
- Adhere to a zero-alcohol policy during work activities, and refrain from the use of illegal substances at all times.
- Consent to a police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior, e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.
- Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- Unless there is the full consent⁵ by all parties involved, every worker shall not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the GRM (Grievance Redress Mechanism) or to the manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my employer or not, or any breaches of this Code of Conduct.

⁵ **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

Quality of products and services

(Name of the contractor) expects that products and services provided by each sub-contractor will be of the highest quality and will be fairly and reasonably priced so that **(Name of the contractor)** customers are served with the best value. In addition to any specific requirements in the agreement with **(Name of the contractor)**, products and services will meet or exceed applicable government standards, including environmental and safety standards.

Health and Safety

(Name of the contractor) is dedicated to providing safe, injury-free working conditions and a healthy work environment. Compliance with this commitment is a condition of any sub-Contractor engagement with **(Name of the contractor)**.

Workplace safety

Each Sub-Contractor is responsible for ensuring that its Representatives complete all necessary safety training and per formwork in conformance with all applicable safety rules, laws, standards and procedures and for complying with and enforcing any additional **(Name of the contractor)** safety policies and procedures communicated to Sub-Contractor.

Reporting injuries, damage and unsafe conditions

In addition to any other legal reporting requirements, **(Name of the contractor)** and each Contractor must immediately report any occupational injuries, unsafe conditions or practices and damage to property occurring as a result of the **(Name of the contractor)/Sub-Contractor** or its Representative's activities to MINICT or any deserved entity.

Alcohol and drug use

(Name of the contractor)'s commitment to providing a healthy and safe working environment is compromised by the consumption of alcohol and illegal drugs. While performing work for **(Name of the contractor)**, Employees, Sub-Contractors and Representatives must not consume, use or be impaired by alcohol or illegal drugs or be under the influence of prescription drugs that impair a person's ability to perform work in a safe and efficient manner.

Workplace violence

Acts or threats of physical violence, intimidation and harassment will not be tolerated. Engaging in violence or threatening or intimidating behavior may result in termination of the contract with **(Name of the contractor)** or removal of the Representative from **(Name of the contractor)** property, as deemed appropriate by **(Name of the contractor)**.

The Environment

MINICT is committed to conducting its business in an environmentally responsible manner. **(Name of Contractor)** and Representatives will comply with all applicable environmental laws and regulations and operate in a way that minimize the negative environmental impact of the products and services.

Ethics

(Name of Contractor) must operate within the highest standards of ethical conduct when dealing with REG, Representatives, MINICT employees, customers and the public. **(Name of Contractor)** will ensure that its actions, and those of its Representatives, comply with the letter and spirit of this Code.

Anti-corruption

(name of contractor) and Representatives are committed to zero tolerance against corruption and shall not engage in any form of bribery, extortion, embezzlement or other corrupt practices.

Fair competition

When conducting works **(Name of Contractor)** and Representatives shall uphold fair standards in recruiting and competition.

Confidentiality

Confidential information includes information that is not known by the public and that may be harmful to the organization, its employees or its customers if disclosed. **(Name of the Contractor)** is committed to

safeguarding and protecting its own confidential information and the personal information of its customers and employees. Sub-Contractor must maintain the confidentiality of information entrusted to it in accordance with its agreements with (**Name of the Company**) and applicable law. The obligation to protect (**Name of the Company**)'s confidential information continues even after the business relationship with (**Name of the Company**) ends.

Updates to Code and Disclaimer

(**Name of the Contractor**) reserves the right to amend and modify this Contractor Code of Conduct at its discretion. The provisions of the Code are not intended to change any obligations set forth in the Contractor's agreement with MINICT and in the event of any conflict, the terms in the agreement with MINICT will prevail.

Annex 5: Individual code of conduct in case of contractor Implementing Environmental, Social Health and Safety (ESHS) and Occupational Health and Safety (OHS) Standards

Preventing Gender-Based Violence (GBV) and Violence Against Children (VAC)

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable, be it on the work site, the work site surroundings, at worker's camps, or the surrounding communities.

The company considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

- Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
- Shall wear my personal protective equipment (PPE), in the correct prescribed manner, at all times when at the work site or engaged in project-related activities.
- Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
- Implement the OHS Management Plan.
- Adhere to a zero-alcohol policy during work activities, and refrain from the use of illegal substances at all times.
- Consent to a police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior, e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.
- Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- Unless there is the full consent by all parties involved, I shall not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the GRM (Grievance Redress Mechanism) or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my employer or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also "Use of children's images for work related purposes" below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other Labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including Labour laws in relation to child Labour.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film shall be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer shall take disciplinary action which could include:

- Informal warning.
- Formal warning.
- Additional Training.
- Loss of up to one week's salary.
- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- Termination of employment.
- Report to the police if wanted.

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

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex 6: First Aid Box Contents Checklist

MATERIAL	CHARACTERISTICS	QUANTITY	QUANTITY PRESENT IN BOX	COMMENTS
ADMINISTRATIVE MATERIAL				
List of the first aid material		1		
List of the contact numbers in case of emergence		1		
Pen		1		
Notebooks	Format A5	1		
LIGHT STUFF				
Torch	Small	1		
Batteries	1.5 V	4		
Match box		1		
Candles	mm 45x110	5		
HYGIENIC, DISINFECTION AND PROTECTION MATERIALS				
Water container	250 ml	1		
Soap	200 g	1		
Towel	60x30 cm	2		
Sterile and non-sterile gloves	Different sizes	10		
Antiseptic solution	200 ml	1		
Vaseline gauzes	10 cm x10 cm	10		
Non sterile gauzes	10x20 cm	50		
Sterile gauzes	10x10 cm	25		
Adhesive bands		1		
Dressing ready for use	Different size	1 box		
MATERIAL FOR BANDAGE AND IMMOBILISATION				
Gauze bandages	8 cm x 4 m	15		
Elastic bandages	10 cm x 5 m	15		
Triangular bandages		7		
Arm sling		1		
Safety blanket	35 x 45 cm	2		
INSTRUMENTS				
Scissors	14.5 cm	1 pair		
Safety pin	Box	1		
DRUGS				
Analgesic – antipyretics (Paracetamol)	Tablets	100		
Oral rehydration solution	27.9 g/1 L	3		
Magnesium Trisilicate	Tablets	100		
Anti-inflammatory	ointment or spray	1		

Annex 7: Occupational health and safety inspection checklist

Contractor/Developer Name:		Date:	
Location:		No of Employees:	
Conducted By:			
S – Satisfactory	NS – Not Satisfactory	NA – Not Applicable	

#	ITEMS	S	NS	NA	NOTES/ TAKEN	ACTION
1	HEALTH AND SAFETY POLICIES, PLANS AND PROCEDURES					
1.1	Is Health and Safety Policy /Plan developed and available?					
1.2	Is Health and Safety Policy /Plan communicated to the staff?					
1.3	Are Health and Safety Policy/ plan enforced					
1.4	Are Health and safety procedures in place (Incident reporting & investigation, first aid, fire emergencies)					
2	FIRE AND EMERGENCIES					
2.1	Are there emergency procedures e.g. for evacuating the site in case of fire, or for rescue from a confined space?					
2.2	Do people on site know what the procedures are?					
2.3	Is there means of raising the alarm, and does it work?					
2.4	Is there a way to contact the emergency services from site?					
2.5	Are there adequate escape routes and are these kept clear?					
2.6	Are suitable fire extinguishers provided and checked regularly?					
2.7	Are workers trained to use fire extinguishers?					
2.8	Are smoking and other ignition sources banned in areas where gases or flammable liquids are stored or used?					
2.9	Are gas cylinders, associated hoses and equipment properly maintained and in good condition?					
2.10	Fire evacuation plan is posted?					
2.11	Workers know the plan: Ask a worker					
2.12	Is flammable and combustible waste removed regularly and stored in suitable bins or skips?					
2.13	Does emergency assembly point known by each employee and clearly marked					
3	HYGIENE, SANITATION AND ENVIRONMENT					
3.1	Are workers protected from air cool drafts or excessive heat					
3.2	Are lighting levels in work areas adequate: Observation					
3.3	Signs are posted when floors are wet (e.g., when floors are washed, spills)					
3.4	Aisles are marked, clear and unobstructed					
3.5	Stairs are kept clear and unobstructed					
3.6	Are all work areas clean, sanitary and orderly?					
3.7	Are work surfaces kept dry or appropriate means taken to assure the surfaces are slip- resistant					
3.8	Are all toilets and washing facilities clean and sanitary and free from bad smell? Existence of water and soap					
3.9	Are hazardous substances separated with non-hazardous substances during collection process					
3.10	Are floors clean and free from oil or grease					
4	ACCESS ON SITE					
4.1	Can everyone get to their place of work safely and work there safely?					
4.2	Are access routes in good condition and clearly signposted?					
4.3	Are holes protected with clearly marked and fixed covers to prevent falls?					
4.4	Is the site tidy, and are materials stored safely?					

#	ITEMS	S	NS	NA	NOTES/ TAKEN	ACTION
4.5	Are temporary structures stable, adequately braced and not overloaded?					
4.6	Is lighting adequate, especially when work is being carried on after dark outside or inside buildings?					
5	WORK AT HEIGHT					
5.1	Is there appropriate protection to stop people or materials falling?					
5.2	Is there appropriate measures to prevent construction materials from falling from the top?					
5.3	Have you taken precautions to stop people falling through fragile materials e.g. by providing barriers, covers or working platforms?					
5.4	Are people kept away from the area below high-height work? If this is not possible, have additional precautions been taken to stop debris falling onto them?					
6	PERSONAL PROTECTIVE EQUIPMENT					
6.1	PPE is available and worn when required: observation					
6.2	Training in PPE use and care: Ask worker					
6.3	Is all personal protective equipment maintained in a sanitary condition and ready for use					
6.4	All staff are trained and sensitized on the need to use and usage of protective equipment available to him/her					
6.5	Have workers had information and training on the noise so they know what the risks are from noise on site, and what they need to do to avoid those risks?					
7	INCIDENT REPORTING, RECORDING AND INVESTIGATION					
7.1	Are all accidents and incidents reported?					
7.2	All incidents reported immediately using relevant incident report forms					
7.3	The immediate supervisor investigates the cause of the incident, and complete Accident/Incident Report Form or Near Miss Form					
8	SAFETY TOOLS, MACHINERY AND EQUIPMENT					
8.1	Is equipment, safety tools and machinery kept clean					
8.2	Are operators properly trained					
8.3	Are noise levels of machines controlled					
8.4	Are machinery fumes, exhaust and wastes controlled					
8.5	Guarding and safety devices in place					
8.6	Start/Stop switches clearly marked and easy to reach					
8.7	Safe operating procedures available					
8.8	Manufacturers' manuals available for all tools and machinery					
8.9	Are all dangerous parts guarded, e.g. gears, chains drives, projecting engine shafts?					
8.10	Are guards secured and in good repair?					
9	FIRST AID EMERGENCIES					
9.1	Is the first aid kit accessible and clearly labeled					
9.2	Is the first aid kit adequate and complete					
9.3	Is the first aid kit clean and dry					
9.4	Are emergency phone numbers displayed					
9.5	Do workers know where to go and who to call for first aid assistance					
9.6	Do workers know where to find personal protective equipment					
9.7	Do workers know how to use personal protective equipment					
9.8	Do workers receive adequate first aid related training					
10	HAZARDOUS SUBSTANCES MANAGEMENT					
10.1	Hazardous substances policies and procedures available					
10.2	Hazardous substances are properly labeled, stored and disposed of					
10.3	A material safety data sheet (MSDS) for each product used is available for worker's reference and included in the hazardous substances register					

#	ITEMS	S	NS	NA	NOTES/ TAKEN	ACTION
10.4	Have you identified all harmful substances and materials, such as asbestos, lead, solvents, paints, cement and dust?					
10.5	Have you identified and put into place precautions to prevent or control exposure to hazardous substances, by: i) doing the work in a different way, to remove the risk entirely; ii) using a less hazardous material; or iii) using tools fitted with dust extraction?					
10.6	Have you checked whether a licensed contractor is needed to deal with asbestos on site? (Most work with asbestos requires a license, although you can do some very limited work with material which contains asbestos without one.)					
10.7	Have workers had information and training so they know what the risks are from the hazardous substances used and produced on site, and what they need to do to avoid the risks?					
10.8	Have you arranged health surveillance for people using certain hazardous substances (e.g. lead)?					
11	DISEASE PREVENTION, SURVEILLANCE AND EMPLOYEE WELFARE					
11.1	Does contractor/ MINICT organize a medical check- up for the employees					
11.2	Does contractor/ MINICT organize vaccination for specific diseases: Hepatitis B,...					
11.3	Does contractor/ MINICT provide fitness facilities (sports) for their employees					
11.4	Does contractor/ MINICT provide health insurance coverage to help accessing medical benefits for affected employees: Precise					
11.5	Does contractor/ MINICT provide refreshment facilities (water, milk,) for their employees					
11.6	Existence of awareness program of workers: hygiene and sanitation, communicable and non- communicable diseases like HIV/AIDS, malaria, hypertension, diabetes,.. ...					
11.7	Does tobacco and alcohol prohibited at workplace					
12	OTHER HEALTH AND SAFETY REQUIREMENTS					
12.1	Did Contractor /developer appointed a health and safety officer at the site?					
12.2	Does contractor/ developer perform prior and periodic risk assessment?					
12.3	Does a contractor/ developer perform inspection and keep all the records findings					
12.4	Does contractor /developer report monthly injuries statistics by using provided template?					
12.5	Does Contractor / developer organize training of his/ her staff on health, safety and welfare issue?					
12.6	Does contractor/developer record and report any accident/ incident as soon as practicable (within 24 hours) after its occurrence to the health and safety personnel?					
12.7	Does contractor/ developer provide health and safety briefs/ tool box talks with all staff under supervision every day before departure to worksites?					
12.8	The existence of infirmary with a trained nurse and ambulance service always available at the site					
12.9	Site is kept clean, free from effluvia arising from any drain or other places					
12.10	Contractor's employees have valid insurance for occupational accidents/injuries and medical insurance					
12.11	Provision of adequate and suitable washroom clean in orderly condition					

Rwanda Digital Acceleration project- Labour Management Procedures (LMP)

#	ITEMS	S	NS	NA	NOTES/ TAKEN	ACTION
12.12	Place reserved for taking meals, if available at site, is maintained in perfect state of cleanliness and such place shall meet the satisfactory standards of comfort and hygiene.					

Annex 8: Employment, Health and Safety conditions Monitoring Form (Checklist)

Contractor' name: Site name.....Date:

Instructions; Tick (√) if available, put a cross(X) if unavailable.

Tick (√) if there's evidence, put a cross(X) if there's no evidence.

N0	Monthly Checklist: EHS items	Available	Unavailable	Type of evidence	Comment
1	Current Employee List				
2	Valid Working Contract				
3	Appointment letters;				
4	Inductions – all contractor staff				
5	Reporting: Incidents, accidents tracker/register.				
6	Grievance redress mechanism				
7	Health and Safety Committee				
	Sanitary facilities: toilets (separate for men and women), hand washing facilities, waste collection points.				
9	PPE (boots, gloves, helmets, masks, etc.): Branded & Properly worn at all times,				
10	Awareness on SGBV and STD				
11	Valid First Aid Kit				
12	Valid Fire extinguishers;				
13	The incident register				

Annex 9: Sample Incident Response structure

