

**The Federal Democratic Republic of
Ethiopia
Ministry of Finance
Channel One Programs Coordinating Department
Human Capital Operation (HCO) (P172284)**

Environment and Social Management Framework (ESMF)

June, 2025

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| Acronyms | |
|----------|--|
| BoA | Bureau of Agriculture |
| BoE | Bureau of Education |
| BOFEDs | Bureau of Finance and Economic Development |
| BoH | Bureau of Health |
| BoSA | Bureau of Social Affairs |
| BoW | Bureau of Water |
| CoC | Code of Conduct |
| COPCD | Channel-One (Programs) Coordination Department |
| EHS | Environment, Health and Safety |
| EHSGs | Environment, Health and Safety Guidelines |
| EIA | Environmental Impact Assessment |
| EPA | Environmental Protection Authority |
| E&S | Environment and Safety |
| ESCOP | Environmental and Social Codes of Practice |
| ESCP | Environmental and Social Commitment Plan |
| ESF | Environmental and Social Framework |
| ESIA | Environmental and Social Impact Assessment |
| ESMF | Environmental and Social Management Framework |
| ESMP | Environmental and Social Management Plan |
| ESRM | Environmental and Social Risk Management |
| ESSs | Environment and Social Standards |
| GBV | Gender-Based Violence |
| GPG | General Purpose Grant |
| GRC | Grievance Redress Committee |
| GRM | Grievance Redress Mechanism |
| GRS | Grievance Redress Service |
| HCO | Human Capital Operation |
| HUCs | Historically Underserved Communities |
| IDPs | Internally Displaced Persons |
| IPF | Investment Project Financing |
| LMP | Labour Management Procedure |
| M&E | Monitoring and Evaluation |
| MoA | Ministry of Agriculture |
| MoE | Ministry of Education |
| MoF | Ministry of Finance |
| MoH | Ministry of Health |
| MoPD | Ministry of Planning and Development |
| MoWE | Ministry of Water and Energy |
| MoWSA | Ministry of Women and Social Affairs |
| NPCU | National Project Coordination Unit |
| OSH | Occupational Safety and Health |

| | |
|---------|---|
| PBB | Program Based Budgeting |
| PCR | Physical Cultural Resource |
| PFM | Public Finance Management |
| PforR | Program-for-Results |
| PIUs | Project Implementation Units |
| PPE | Personal Protective Equipment |
| PSC | Project Steering Committee |
| REPA | Regional Environmental Protection Authority |
| RPCU | Regional Project Coordination Unit |
| SEA/ SH | Sexual Exploitation and Abuse/ Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| SPG | Specific Purpose Grant |
| SRAMP | Security Risk Assessment and Management Plan |
| TA | Technical Assistance |
| TC | Technical Committee |
| VGs | Vulnerable Groups |
| WASH | Water, Sanitation and Health |
| WCC | Woreda Coordination Committee |
| WOFEDs | Woreda Office of Finance and Economic Development |
| WPCU | Woreda Project Coordination Unit |

Executive Summary

The World Bank will be supporting the Ministry of Finance in implementing the Human Capital Operation (HCO) project. The HCO objective is to improve learning outcomes and nutrition services for girls and boys, and to strengthen service delivery and accountability, in all regions including areas affected by conflict, droughts and high levels of refugees. The implementation of the project will cover 42 Specific Purpose Grant (SPG) Woredas, in 12 Regions and one City Administration. The HCO is hybrid Purpose for Results (PforR) and Investment Project Financing (IPF) Project. The IPF component will finance a package of interventions to improve human capital outcomes in areas affected by conflict, droughts, and high levels of refugees, as well as to provide Technical Assistance (TA) and capacity building support to strengthen systems and quality services across the country, with a particular focus on regions affected by drought and high levels of refugees. The IPF component has three sub-components: Subcomponent 2.1 will focus on the design and implementation of multisector interventions in areas affected by conflict, droughts, and high levels of refugees, drawing from a menu of services based on area-specific priorities and global evidence. Subcomponent 2.2: Developing models for innovation designed to address learning poverty and reduce stunting in selected SPG Woredas. Subcomponent 2.3: Strengthening systems and accountability for improved service delivery at various levels. This subcomponent will strengthen participatory, multisectoral planning, budgeting, and data management at federal, regional, zonal, and woreda levels while providing TA on Public Finance Management (PFM), Program-Based Budgeting (PBB), governance, procurement, and environmental and social risk management. Specific locations of subproject activities are not known at this stage, because the needs assessment for the basic sectors in areas affected by conflict, droughts, and high levels of refugees has yet to be completed. The subproject locations will be known after the needs assessment is completed for each locality.

This Environmental and Social Management Framework (ESMF) has been prepared to screen the potential environmental and social risks and impacts of proposed project activities and propose suitable mitigation measures and appropriate plans to manage these risks and impacts. The methodology used to undertake the study is in line with the requirements of the country's Environmental and Social Impact Assessment (ESIA) guideline and World Bank Environmental and Social Framework (ESF). Thus, reviewing relevant laws, policies, and related documents to ensure a comprehensive understanding of the regulatory framework. Furthermore, consultative meetings were arranged, offering a platform for representatives from primary project implementing bodies and partner organizations to share their viewpoints and perspectives.

The potential environmental and social risks for project activities are identified as impacts linked to classroom construction, rehabilitation (including installation of solar power), and Water, Sanitation and Health (WASH) infrastructure in existing school premises, as well as support access to WASH through construction, maintenance, and use of improved latrines. Some of the key potential Environment and Safety (E&S) risks and impacts can be managed at the early stages of the planning and design by avoiding or minimizing the impacts using the exclusion list.

The potential environmental and social risks for project activities include:

- Air pollution due to dust generated by construction activities;
- Noise pollution from machinery and trucks;
- Public and workers' health and safety;
- Waste generation during distribution of education and medical equipment and disposal of E-waste;
- Labor risks involving working conditions, child labor and minimum age, and grievances;
- Exclusion of disadvantaged or vulnerable individuals and groups as well as historically underserved communities (HUCs);
- Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

These risks will be managed and mitigated through the application of the environmental and social management plan (ESMP) to be prepared based on the risk level of each subproject identified through the E&S screening process. GBV Action Plan has been prepared to address SEA/SH related risks. The Project will establish a grievance mechanism for workers, as stipulated under **ESS2** to ensure effective management of labour-related concerns. This mechanism provides workers with a structured process to report issues such as occupational health and safety risks, contractual grievance, security risk, discrimination, harassment, delayed wages, or violations of labour rights. On the other hand, the **community-level Grievance Redress Mechanism (GRM)** provides a formal channel for local communities affected by the project to raise concerns.

Implementation Arrangement: The Ministry of Finance (MoF) will have overall responsibility for the implementation of the Project. The five sector ministries involved in the implementation are the Ministry of Health (MoH), Ministry of Education (MoE), Ministry of Agriculture (MoA), Ministry of Water and Energy (MoWE), and Ministry of Women and Social Affairs (MoWSA). Other implementers include the Ministry of Planning and Development (MoPD), and the Environmental Protection Authority (EPA). The sector ministries and agencies will be responsible for supervision, monitoring, and reporting of their respective technical areas under the HCO. At the regional level, the Bureau of Finance and Economic Development (BOFEDs) will have similar responsibilities to that of the MOF at the federal level. BOFEDs and Channel One Programs coordinators at the regional level, in collaboration with regional implementing bureaus/institutions such as the Bureau of Education (BoE), Bureau of Health (BoH), Bureau of Water (BoW), Bureau of Agriculture (BoA), and Bureau of Social Affairs (BoSA), will facilitate Project implementation and reporting. At the local level, the Woreda Office of Finance and Economic Development (WOFEDs) and Urban Administration Offices of Finance will have responsibilities like those of the BOFEDs. E&S training will be provided to all parties responsible for implementing the ESMF, including contractors. The total estimated budget proposed for ESMF implementation will include costs associated with the E&S training.

Monitoring: The MoF will be responsible for monitoring the achievement of HCO objectives and results with input from the relevant ministries, bureaus, and agencies. The MoF will coordinate with the different implementing units and facilitate coordination meetings and site visits to monitor project implementation. The Environmental and Social Specialists within the National Project Coordination unit (NPCU) will prepare reports on a quarterly, semi-annual, and annual basis on the implementation of the ESMF. These reports will be presented to the Project Steering Committee (PSC), EPA, and the World Bank. The PIUs will also monitor progress at the implementing agencies monthly through site visits and written reports from contractors.

A separate **Stakeholder Engagement Plan (SEP)** has been prepared for the Project, based the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found on the MoF and World Bank websites. The Security Risk Assessment and Management Plan (SRAMP) was developed in January 2025. Meanwhile, the Labour Management Procedure (LMP) was prepared in June 2024 and has been annexed as Annex 5. Additionally, Gender-Based Violence Risk Assessment and Action Plan has been annexed to this ESMF. The Historically Underserved Peoples Planning Framework has also been prepared to guide on how related issues will be addressed during implementation.

1. Introduction

This ESMF is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the HCO Project. The project objective is to improve learning outcomes and nutrition services for girls and boys, and to strengthen service delivery and accountability, in all regions including areas affected by conflict, droughts and high levels of refugees. The implementation of the project will cover 42 SPG Woredas, in 12 Regions and one City Administration. The HCO is hybrid PforR and IPF Project. The IPF component will finance a package of interventions to improve human capital outcomes in areas affected by conflict, droughts, and high levels of refugees, as well as providing TA and capacity building support to strengthen systems and quality services across the country, with a particular focus on regions affected by drought and high levels of refugees. The IPF component has three sub-components: Subcomponent 2.1 will focus on the design and implementation of multisector interventions in areas affected by conflict, droughts, and high levels of refugees, drawing from a menu of services based on area-specific priorities and global evidence. Subcomponent 2.2: Developing models for innovation designed to address learning poverty and reduce stunting in selected SPG Woredas. Subcomponent 2.3: Strengthening systems and accountability for improved service delivery at various levels. This subcomponent will strengthen participatory, multisectoral planning, budgeting, and data management at federal, regional, zonal, and woreda levels while providing TA on PFM, PBB, governance, procurement, and environmental and social risk management. The MoF will be implementing the Project activities.

This ESMF follows the World Bank ESF as well as the national and regional laws and regulations of Ethiopia. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), Labour Management Procedure (LMP), GBV action plan, Security management Plan (SMP) and Social Assessment (SA)/ Underserved Local Communities Planning Framework.

2. Project Description

The IPF component will finance a package of interventions to improve human capital outcomes capacity building support to strengthen systems and quality services and provide TA as well across the country, with a particular focus on regions affected by conflict, drought and high levels of refugees.

The IPF component 2 has three sub-component.

Sub-component 2.1: Design the implementation of multi-sector intervention in areas affected by conflicts, drought, and high level of refugees.

This subcomponent will focus on support resilience and rebuilding of service delivery system in areas affected by conflicts, drought, and high levels of refugees; support the education system and nutrition intervention in high risk woredas affected the most by the conflict, drought, and high level of refugees.

- This subcomponent will specifically target high-risk areas with activities such as: **Supporting Resilience and Service Delivery Systems:** it will be enhancing system resilience, providing socio-emotional support, and promoting inclusiveness.
- **Education System Support:** it will be assisting high-risk woredas severely affected by conflict to recover learning losses. This includes financing interventions to support school return and boost learning outcomes by strengthening community mobilization, school readiness, improving teaching and learning environments, and increasing school retention, especially for girls.
- **Nutrition Interventions:** it will be addressing the key determinants of chronic malnutrition (stunting) in high-risk woredas through multisectoral interventions.

Sub Component 2.2: Developing models for innovation designed to address learning poverty and reduce stunting in SPG woredas.

This component will support technical innovations for effective service delivery in the selected SPG pilot woredas. The project will provide TA and capacity building support, introducing tailored innovations to address context-specific demand and supply-side barriers faced by the selected woredas in delivering priority services that support Human Capital SPGs. The TA and capacity-building assistance will encompass a range of initiatives, including audio-visual learning programs, virtual science laboratories, e-learning platforms, and model demonstration schools. Leveraging virtual learning modalities will ensure uninterrupted educational opportunities, even during instances of floods or other natural disasters that disrupt in-person learning. Additionally, to combat stunting, technical assistance will focus on supporting integrated Social and Behavior Change Communication (SBCC) approaches, technologies to reinforce Growth Monitoring and Promotion (GMP), and impactful nutrition-sensitive interventions.

This subcomponent functions within two domains: the Learning Poverty domain and the Stunting Reduction domain.

Learning Poverty domain: to improve the efficiency and effectiveness of teaching and learning outcomes, innovative models may include:

- Developing audio-visual learning programs for young children (ages 3-10), and their parents and teachers, focusing on language learning as well as cognitive, physical, social, and emotional development.
- Setting up virtual science laboratories for secondary schools through digital platforms.
- Creating e-learning platforms for teachers' professional development.
- Establishing demonstration schools for innovative teaching and learning.

Stunting Reduction Domain: to improve nutrition outcomes, innovative approaches may include:

- Adapting gender-sensitive, harmonized, and evidence-based behavior change strategies to increase service uptake, promote optimal practices, and increase the frequency of contact with behavior change agents.
- Testing innovative tools to improve the measurement and promotion of growth monitoring and enhance the overall quality of maternal and child nutrition services.
- Strengthening gender, nutrition, water, and climate-smart agriculture interventions targeting vulnerable households.

Sub-component 2.3: strengthening system and accountability for improved service delivery at various levels.

This subcomponent will provide technical assistance on PFM reforms at both regional and woreda levels. It will offer support in areas such as PFM, governance, procurement, and environmental and social risk management, alongside capacity-building initiatives.

The activities to be undertaken under this subcomponent include:

- **Enhancing Participatory, Multisectoral Planning and Budgeting:** this includes capacity building and improving the quality of data collection, verification, and utilization at federal, regional, zonal, and woreda levels.
- **Strengthening Social Accountability and Governance:** this involves promoting, institutionalizing, and sustaining Social Accountability and Grievance Redress Mechanisms previously supported under Enhancing Shared Prosperity through Equitable Services (ESPES); enhancing PFM including PBB; improving governance and procurement systems and reforms; and strengthening Environmental and Social (E&S) risk management. Additionally, it includes updating guidelines and providing training for Women Development Groups (WDGs) and establishing 'gender equality hubs' in the SPG pilot woredas to advance gender equality at the community level.

The MoF will coordinate project activities, including day-to-day implementation, coordination, supervision, and overall management of project activities. The five sector ministries involved in the implementation are the MoH, MoE, MoA, MoWE, and MoWSA. Other implementers include the MoPD, and the EPA. The sector ministries and agencies will be responsible for supervision, monitoring, and reporting of their respective technical areas under the HCO. At the regional level, the BOFEDs will have similar responsibilities to that of the MOF at the federal level. BOFEDs and Channel One Programs coordinators at the regional level, in collaboration with regional implementing bureaus/institutions such as the BoE, BoH, BoW, BoA, and BoSA, will facilitate

Project implementation and reporting. At the local level, the Woreda Office of Finance and Economic Development (WOFEDs) and Urban Administration Offices of Finance will have responsibilities like those of the BOFEDs.

3. Environmental and Social Policies, Regulations, and Laws

3.1. Ethiopia's Legal Framework

Table 1: Ethiopia's Relevant Legal Framework

| Law | Description and Relevance to Project Activities |
|--|--|
| Environmental Policy of Ethiopia | The 1997 Environmental Policy of Ethiopia requires adherence to the principles of sustainable development and mandates that Environmental Impact Assessments consider effects on both human and natural environments. It ensures early integration of environmental concerns into project and program design, recognizes the importance of public consultation, includes mitigation and contingency plans, and establishes auditing and monitoring mechanisms. |
| National Occupational Safety and Health Policy and Strategy | The primary goal of the national Occupational Safety and Health (OSH) Policy and strategy is to effectively mitigate, prevent, or minimize workplace hazards and promote the well-being of workers. By providing comprehensive OSH services across all workplaces, this initiative aims to contribute to the socioeconomic development of the country. The Ministry of Labor and Skills (MoLS) is the government agency responsible for overseeing employee health and safety in both private and public workplaces. |
| The National Policy on Ethiopian Women | The national policy on women was introduced in 1993 with the objective of promoting fair and gender-sensitive public policies that empower women in various aspects, particularly education and property rights, as well as involving them in decision-making processes. The policy places significant emphasis on improving safe working conditions, guaranteeing access to essential services, and safeguarding women from harmful traditional practices. |
| National Employment Policy | Ethiopia introduced its National Employment Policy and Strategy (NEPS) in 2009 with the objective of promoting social welfare and equity by combating poverty. The policy encompasses three core elements, which include providing guidelines for enhancing productive employment and ensuring decent working conditions across the country. The ultimate aim of the policy is to mitigate the risk of political and civil unrest arising from widespread unemployment by addressing both the supply and demand sides of the Labour market to foster the creation of productive employment opportunities. The policy's second objective is to expedite and sustain economic growth and development by effectively harnessing the country's Labour force as its most crucial and valuable resource. |
| Environmental and Social Impact Assessment Proclamation, No.299/2002 | The ESIA is a compulsory requirement for designated project categories, regardless of whether they are undertaken by public or private entities. Projects subject to ESIA must obtain official approval from either the Federal EPA or the respective Regional EPA prior to commencement of implementation. |
| Environmental Pollution Control Proclamation, No. 300/2002 | The proclamation was enacted to address and minimize pollution resulting from socio-economic development initiatives. Its primary purpose is to establish a legal framework for developing ambient environmental quality standards in Ethiopia and to ensure compliance with these standards. |
| Solid Waste Management | The objective of this proclamation is to enhance the capacity at all levels to prevent any adverse impacts and transform solid waste into economically and socially beneficial resources. Every administrative unit is required to establish |

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| Proclamation, No. 513/2007 | appropriate solid waste management facilities, and waste generators must dispose of their waste exclusively at these established facilities. The proclamation imposes certain obligations on urban administrations, including the creation of favorable conditions to encourage investment in solid waste management services. Additionally, any individual involved in the collection, transportation, use, or disposal of solid waste must obtain a permit from the relevant department of the urban administrations prior to engaging in such activities. |
| Public Health Proclamation, No. 200/2000 | The primary objectives of this proclamation are to implement the national health policy, promote public health, and establish a healthy environment for future generations, ensuring their ability to fulfil their responsibilities. The proclamation emphasizes the proper management of waste to prevent adverse effects on public health. It stipulates that waste should be collected in designated areas that do not pose risks to public health, and disposal methods should not harm the environment or people's well-being. |
| Labour Proclamation, No. 1156/2019 | Proclamation 1156/2019 encompasses various aspects, including health and safety at work, fostering harmonious industrial relations, setting minimum workplace standards, and addressing vulnerabilities in the workplace. Articles 92-93 of the proclamation outline the responsibilities of both employers and employees within the workplace, including the appointment of safety officers and committees. The labour proclamation mandates that employers ensure occupational safety, health, and the creation of a favourable working environment for their employees. |
| The FDRE Constitution Article 89 on Historically Underserved Communities (HUCs) | Article 89 of the Ethiopian constitution recognizes regions and peoples historically underserved or least advantaged in economic and social developments to equally participate in and benefit from the implementation of the proposed subprojects. Consequently, the provision in Sub-Article 4 of the same article requires the project design measures to mitigate the disproportionate adverse risks and impacts of the project. |

3. 2. National Environmental and Social Assessment and Permitting

The Federal EPA is the lead agency responsible for formulating policies, strategies, laws, and standards to ensure that social and economic development activities sustainably enhance human welfare and the safety of the environment as per Article 6 of Proclamation No. 295/2002. EPA is responsible for establishing a system for undertaking ESIA in public and private sector projects, developing a directive that identifies categories of projects likely to generate adverse impacts and require a full Environmental Impact Assessment (EIA), and issuing guidelines for the preparation and evaluation of Environmental Impact Study Reports. The Environmental Impact Assessment Procedural Guideline categorizes projects into three: those requiring full ESIA (Schedule 1), those that require partial ESIA (Schedule2) and those that do not need ESIA (Schedule 3). In addition, EPA is responsible for reviewing and approving ESIA reports of projects that are implemented at federal level and projects that are likely to generate interregional impacts. EPA is also responsible for monitoring, auditing, and regulating the implementation and performance of such projects.

Proclamation No. 295/2002 requires regional states to establish or designate their own regional environmental agencies. Regarding ESIA, Proclamation No. 299/2002 gives such agencies the responsibility to review and approve ESIA reports of projects that are licensed, executed, or

supervised by regional states and that are not likely to generate interregional impacts. Regional environmental agencies are also responsible for monitoring, auditing and regulating the implementation of such projects.

3.3. World Bank Standards and Key Gaps with the National Framework

The project will follow the World Bank ESSs, as well as the World Bank Environment, Health and Safety Guidelines (EHSs). The program doesn't pose direct effect that leads to adverse social or environmental impact, however the limited institutional capacity especially at woreda level could affect the smooth implementation of the program which may entail substantial risk. The HCO is expected to have a range of environmental benefits as it will expand the agroforestry system in the woreda help regulate water flow, reduce erosion, and improve water quality in watersheds. Moreover, these practices improve soil health by enhancing soil structure, nutrient cycling, and water retention capacity. The project also has social positive impacts like generate local employment, enhance access to education, improvement in livelihood, support the development of healthcare infrastructure, increase food production and guarantee community food security. However, there are also potential negative environmental impacts including loss of vegetation due to construction of demonstration rooms, laboratory rooms and toilets that leads to depletion of biodiversity, pollution of soil, water, air and occupational health and safety of workers. Solid and hazardous waste generation during distribution of education and medical material/equipment. The potential social risks are largely due to risk of SEA/SH, and risk related to the exclusion of vulnerable and underserved groups and individuals from program benefits.

Table 2: Relevant World Bank ESS and Key Gaps with the National Framework

| E&S Standard | Relevance |
|--|--|
| 1. Assessment and Management of Environmental and Social Risks and Impacts | ESS1 is relevant for the project because project activities are expected to pose substantial environmental and social risks such as generation of medical waste from health facilities, potential for depletion and pollution of surface and groundwater resources, risk on workers' health and safety, risks on biodiversity and ecosystems, exclusion of vulnerable and underserved groups. National laws prioritize the mitigation of environmental risks over social risks, leading to a greater emphasis on upholding the provisions of ESS1. |
| 2. Labor and Working Conditions | ESS2 is relevant for the project because there are certain labor risks for project workers. Labor-related risks include (i) inadequate terms and conditions of employment, and (ii) occupational health and safety risks (iii) security risks to project workers. Proclamation 1156/2019 generally adheres to the principles outlined in the ESS2. However, the ESS2 stands out by specifically and extensively addressing the needs and rights of vulnerable and disadvantaged workers. |
| 3. Resource Efficiency and Pollution Prevention and Management | ESS3 is relevant for the project because the project activities are expected to cause pollution from solid and hazardous wastes generated from construction and health facilities, chemicals from school laboratory. The national laws equally sufficiently address the risk and its management. |
| 4. Community Health and Safety | ESS4 relevant because the project activities may increase community exposure to risks and impacts such as health risks related to pollution of water and soil from hazardous waste from the health facilities, and also e-wastes. Additionally, the project will involve the construction of a |

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| | demonstration room and toilet facilities, which may result in the release of particulate matter into the air. The ESS4 comprehensively outlines community health risks and mandates specific measures to mitigate them. Consequently, the project fully adheres to the requirements set forth in the ESS4, Security Management Plan has also been prepared to address ESS4 requirements. |
| 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources | The HCO involves rehabilitation of infrastructure and hence, ESS6 will be applied since activities may affect biodiversity and may be located in areas providing ecosystem services, upon which potentially local communities be dependent for survival, sustenance, livelihood or primary income source. The national ESIA proclamation equally addresses the procedures to avoid the risks and impacts. |
| 7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities | ESS7 applies to a distinct social and cultural group identified in accordance with paragraphs 8 and 9 of the ESS7. Since the HCO activities are to be implemented in regions where underserved communities or groups are residing, this standard shall be applied. These includes Vulnerable groups in the project implementation areas and Underserved Communities in emerging regions such as Gambella, Benishangul Gumuz, Somali and Afar regions as well as pastoralists in Oromia Regions of the country. |
| 8. Cultural Heritage | ESS8 is relevant because it outlines measures specifically designed to protect cultural heritage throughout the project life cycle, as well as general provisions addressing risks and impacts to cultural heritage resulting from project activities. Moreover, national legislation broadly addresses the provisions of the ESS8 requirements. Therefore, in order to ensure comprehensive protection and compliance, all the ESS8 requirements should be upheld. |
| 10. Stakeholder Engagement and Information Disclosure | ESS10 is relevant for all projects given the need to engage with beneficiaries and stakeholders on development activities that affect their lives. The national laws on stakeholder consultation plans and procedures are not comprehensive, and disclosure of project information to stakeholder is limited and their views on the risks and impacts are not fully captured. The ESS10 provision of the stakeholder engagement plan (SEP) preparation is more inclusive and hence upheld. |

4. Potential Environmental and Social Risk Impacts and Standard Mitigation Measures

The E&S risks are Substantial for the IPF component. The IPF component will finance a package of interventions to improve human capital outcomes in areas affected by conflict, drought, and high levels of refugees as well as provide TA and capacity building support to strengthen systems and quality services across the country. The activities under this component will respond to the findings from the HCO technical assessments, including risk mitigation measures.

Beyond the TA, the IPF subcomponent 1 includes the support in rebuilding of the service delivery system, and support of education system and nutrition interventions in woredas affected the most by conflict. The IPF component will benefit conflict-affected communities, refugees and host communities, and frontline workers through capacity building interventions such as trainings, strengthening community mobilization for school return, school readiness, improving teaching and learning environments, and additional nutrition interventions. Construction activities with new land acquisition have not been included under the IPF. The IPF component will support classroom extension, rehabilitation (including installation of solar power), and WASH infrastructure in existing school premises, as well as support access to WASH through construction, maintenance, and use of improved latrines and handwashing stations at the household level. There are some environmental, social, health, and safety risks associated with the IPF project. The risks and impacts result from activities in component 2 described below in Table 3.

Table 3: Environmental and Social Risks and Mitigation Measures

| Component 2: Investment Project Financing (IPF) | Risks and Impacts | Mitigation Measures |
|--|--|--|
| Subcomponent 2.1: Design and implementation of multi-sector interventions in areas affected by conflicts, drought, and high levels of refugees. | Implementing agencies reluctance to build the institutional capacity for environmental and social management, inadequate coordination among sectors (education, health, agriculture, water) leading to gaps in service delivery. | <ul style="list-style-type: none"> ❖ Establish an ESMS at federal and regional levels in the human capital sectors that do not yet have E&S management structures. ❖ Create awareness and organize capacity building sessions for the leadership of the basic sectors on E&S issues. ❖ Enhance the capacity of newly recruited and assigned experts and technical staff at regional and woreda levels. ❖ Establish and functionalize institutional arrangements for coordination works among sectors. |
| Subcomponent 2.1.1 Support resilience and rebuilding of service delivery systems in areas affected by conflicts, drought, and high levels of refugees | Solid and hazardous waste generation during distribution of education and medical material/equipment | <ul style="list-style-type: none"> ❖ Establish waste management systems in schools and health centers. ❖ Ensure proper segregation of school/health waste at the point of generation to facilitate recycling and safe disposal. ❖ Provide training on safe handling and storage practices, and ensure proper disposal of hazardous materials. ❖ Use recycled and eco-friendly materials for school supplies and infrastructure. ❖ Encourage the use of recyclable or biodegradable packaging materials. |
| Subcomponent 2.1.2 Support the education system in high-risk woredas affected the most by the conflict, droughts, and high levels of refugees to recover learning losses | Impacts on natural habitat (biodiversity) and Physical Cultural Resources (PCR) | <ul style="list-style-type: none"> ❖ Ensure that impacts are not overlooked and screen all woreda level projects for possible impacts on physical cultural resources and be alert to the possibility of chance findings. ❖ Assess the status and presence of sensitive species in the area and ensure that no sensitive fauna and flora species are found within and around the construction area that could be affected by the program activities. ❖ Plantation of indigenous plants in place of the damaged one. ❖ Care must be given for the existing indigenous trees if possible shifting the position of the building structure. ❖ Train school staff and local technicians on the operation and maintenance of solar and WASH systems. |
| | Air pollution from dust of Rehabilitation activities | <ul style="list-style-type: none"> ❖ To reduce dust, use appropriate construction site management guidelines (e.g., sprinkling the surface with water to minimize dust blow during construction and rehabilitation). ❖ Reduce movement of vehicles during rush hours and school hours. |

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| | | <ul style="list-style-type: none"> ❖ Dust control and suppression measures including regular application of water on or near construction sites and settlement areas. ❖ Reduce dust generation by practicing traffic speed limits. ❖ Ensure regular maintenance of vehicles, machinery and equipment used at project site. |
| | Topography Alteration | <ul style="list-style-type: none"> ❖ Restoration of borrow sites through back-filling, landscaping and re-establishing vegetation cover. ❖ Avoiding side-casting of excavation materials on down-slope by depositing it only in approved disposal sites. ❖ Planting of appropriate grass, shrub or tree species on cut slopes. |
| | Potential for depletion and pollution of surface and groundwater resources | <ul style="list-style-type: none"> ❖ Ensure proper design and construction of demonstration rooms, toilets, and laboratory rooms that possess proper drainage systems and septic tanks. ❖ Developing and enforcing strict erosion and sediment control measures to reduce runoff from construction sites. ❖ Implementing water-saving technologies and practices. ❖ Educating the importance of protecting water resources and encouraging sustainable practices. |
| | Workers' health and safety | <ul style="list-style-type: none"> ❖ Employing and OSH plan:-Ensure proper usage of safety protocols, including the wearing of Personal Protective Equipment (PPE) and the agreement with contractors will include the provision of PPE and emergency kit as binding requirements. ❖ Conduct safety training for construction workers prior to beginning work. ❖ Create awareness in the school community on the potential safety and health impacts of construction. ❖ Monitor contractors during the construction of facilities. Monitoring the movement, handling and management of wastes to ensure they safely managed and don't present any Environment, Health and Safety (EHS) risks. ❖ Fencing of the construction areas to avoid unauthorized access. |
| Subcomponent 2.1.3 Support nutrition interventions in high-risk woredas affected the most by the conflict, droughts, and high levels of refugees | Public health Safety | <ul style="list-style-type: none"> ❖ Implement erosion control measures, and adhere to environmental regulations during construction. ❖ Provide education on proper hygiene practices, including handwashing, to promote effective use of sanitation facilities and reduce health risks. |

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| | | <ul style="list-style-type: none"> ❖ Establish regular monitoring and maintenance protocols to ensure the functionality and cleanliness of latrines and handwashing stations. ❖ Ensure equitable access to improved sanitation facilities for all community members, prioritizing marginalized groups to address social disparities. |
| Subcomponent 2.2: Developing models for innovation designed to address learning poverty and reduce stunting in selected SPG woredas | Environmental Implications(Water, Soil, and Biodiversity impact) of e-wastes | <ul style="list-style-type: none"> ❖ Ensure the proper implementation of the regulations and ensure efficient utilization of resources. |
| Subcomponent 2.2.1 To improve learning outcomes | Risk of pollution from E-waste | <ul style="list-style-type: none"> ❖ Implement a safe disposal procedure for malfunctioned and defect electronic equipment should be stored and handled separately. ❖ Raise awareness about the importance of extending the life of electronic devices through proper care and maintenance. ❖ Store e-waste in closed containers (radioactive proofed), away from direct sunlight, wind and rain. ❖ Conducting periodic inspections of e-waste storage areas and documenting the findings. ❖ Promote the use of durable, long-lasting equipment to minimize waste. ❖ Design energy-efficient platforms and encourage the use of low-power devices. |
| Subcomponent 2.2.2 To address stunting | Resource use and waste generation | <ul style="list-style-type: none"> ❖ Implement proper waste segregation, recycling, and disposal systems, especially for hazardous materials like medical waste. ❖ Use energy-efficient devices and renewable energy sources to power digital tools and healthcare facilities. ❖ Train healthcare workers on the safe use and disposal of chemicals and biological materials. |
| Social risks crosscutting multiple subcomponent activities: | Labor risks involving working conditions, management of worker relationships, child labor and minimum age, and labor grievance | <ul style="list-style-type: none"> ❖ Follow the relevant measures in the LMP. ❖ Aware the labor risks related to workers activity. ❖ Establish clear policies for conflict resolution, ensuring employees know how to address issues. ❖ Strictly enforce laws prohibiting child labor, ensuring that violators face consequences. ❖ Ensure that adult workers receive fair wages. ❖ Implement and enforce safety protocols to protect employees from workplace hazards. |

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| | Exclusion of vulnerable and disadvantaged groups; HUCs | <ul style="list-style-type: none"> ❖ Give due emphasis to the needs of the vulnerable and Historically Underserved Communities, refugees and host communities to enable equitable access and benefit sharing. ❖ Arrange separate consultation methods (e.g. one-on-one interview or focus group discussion) for VGs, HUCs, and consider their views and special needs in designing the subproject activities. ❖ Consider service provision to people with disabilities and other vulnerable or disadvantaged groups during HCO implementation of human capital sectors. |
| | Sexual Exploitation and Abuse/Sexual harassment (SEA/SH) | <ul style="list-style-type: none"> ❖ Establish clear policies that explicitly address Gender Based Violence GBV/SEA/SH in the workplace, including prevention, reporting, and support mechanisms. ❖ Conduct comprehensive training programs to raise awareness about GBV/SEA/SH, its forms, and the project's zero-tolerance policy. ❖ Provide adequate support services, including counseling, medical assistance, and legal support for victims of GBV/SEA/SH. ❖ Promote gender equality and inclusivity within the HCO project by ensuring equal opportunities, fair treatment, and non-discrimination. ❖ Encourage the participation and representation of women in decision-making processes. ❖ Regularly monitor and evaluate the effectiveness of GBV/SEA/SH prevention measures and response mechanisms. ❖ Develop Code of Conduct (CoC) to be signed by all and commits all persons engaged. ❖ Strengthen and support girls' clubs in schools and create awareness of GBV risks associated with construction. |

4.1. Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

The category of disadvantaged and vulnerable groups of people refers to people who may be disproportionately impacted or further disadvantaged by the project (due to age, gender, ethnicity, disability, economic status or extremely poor, illiterate persons) compared to other groups due to their vulnerable conditions. In the HCO, the group broadly includes women in general, children, the elderly, disabled and chronically ill persons who are limited in their capacity to take advantage of the project development benefits, and workers in conflict affected regions and areas. In conflict affected areas, this group includes internally displaced persons (IDPs) and migrants. Besides, there are historically underserved communities who are described under ESS7, those HUCs in Sub-Saharan Africa (SSA), who are socially marginalized and often far from access to project benefits due to social exclusion, poor representation in governance and lack of participation in development initiatives. To address this, the Historically Underserved Local Communities Planning Framework is currently being prepared and will be implemented during the project's execution. Underserved communities and vulnerable groups face disproportionate social risks and may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. The following category summarizes the disadvantaged and vulnerable groups in this project:

- ✓ Women in maternity state (pre and post-natal state);
- ✓ Children;
- ✓ The elderly;
- ✓ Persons with disabilities;
- ✓ Chronically ill persons;
- ✓ Workers in conflict affected regions and areas;
- ✓ Protracted IDPs and migrants;
- ✓ Pastoralists and agro-pastoralists on mobility;
- ✓ Unemployed youth/rural;
- ✓ People living with HIV/AIDS;
- ✓ Economically poor and less skilled persons.

The major risks the vulnerable and disadvantaged groups face include the following:

- ✓ Intentionally and/or unintentionally denied access to project information and benefits;
- ✓ Women may not be given equal opportunities for capacity-building training;
- ✓ Discrimination from taking project jobs;
- ✓ Exclusion from participation (during consultations) and project activity identifications;
- ✓ Exposure to physically challenging tasks, unsuitable for their conditions;
- ✓ Risk of exposure to emotional, psychological and physical abuses;
- ✓ Women face non-consensual sexual advance in return for job recruitment;
- ✓ Project workers pressure women community members for non-consensual sexual act in return for promises of benefits from the project services;
- ✓ Civil work and primary supply contractors may engage in child labor;
- ✓ Visually impaired employees may not access project information if documents are not in Braille form;

- ✓ HUCs have a distinct language often different from the official language or languages of the country or region in which they reside. Hence, the project information may not be provided in the channels tailored to the needs of HUCs;
- ✓ HUCs have cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture, thus, the methods of project information disclosure may not be provided in the formats that take these distinctive features into account;
- ✓ The social and economic status of the HUCs frequently limits their capacity to defend their rights to and interests in the project.

Risk mitigation measures:

- ✓ Conduct an inclusive and transparent community consultations as per the SEP procedures.
- ✓ Establish a framework that provides opportunities for full participation at each stage of project activity preparation and implementation;
- ✓ Promote fair treatment, non-discrimination, and equal opportunity in trainings and job placements;
- ✓ Establish a framework to provide affected vulnerable and disadvantaged communities with all relevant information about the project (including an assessment of potential adverse effects of the project on the affected vulnerable and disadvantaged) in a culturally appropriate manner at each stage of project implementation, translations of project documentations in local languages and dialects will be utilized;
- ✓ Ensure such groups are well represented in committees, associations, consultations either through individuals or representative associations in all project activities;
- ✓ Ensure non-discrimination policy, laws and guidelines are properly observed and principles are adhered;
- ✓ Ensure beneficiary selection and targeting criteria are inclusive enough and considerate of all disadvantaged and vulnerable groups;
- ✓ Provide equal opportunity and strictly observe non-discrimination of vulnerable groups from any benefits;
- ✓ Incorporate affirmative actions for vulnerable groups regarding employment opportunities.
- ✓ Provide training and capacitate vulnerable groups to enable them to fully benefit from the projects;
- ✓ Women should be fairly represented in the Grievance Redress Committee (GRC);
- ✓ There should be clear communication structure, means for grievance complaints filing process for women and other vulnerable groups;
- ✓ Make all services accessible to vulnerable groups (fair distribution of benefits to beneficiaries).

4.2. Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts

Some of the potential environmental and social risks and impacts anticipated from the sub-project activities of the IPF project can be effectively avoided or minimized at the early stages of planning and design by considering, improving design structures, using technology inputs, maintaining quality and standards of design materials, adhering to

regulatory requirements, and preparing risk/impact management plans and emergency plans.

Table 4: E&S risk and impacts mitigation measures at the planning and design phase of the project.

| Potential environmental and social risks and impacts from sub-project activities | Planning and design measures to Avoid/minimize risks and impacts |
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| Impact on biodiversity and Physical Cultural Resources (PCR) | <ul style="list-style-type: none"> ❖ Avoid the risk using the exclusion criteria in this ESMF during sub-project activity and site identification and propose alternative routes/sites. ❖ Adjust design to avoid removal of natural vegetation. ❖ Adjust sub-project activity designs to avoid/minimize the risks on biodiversity. ❖ Prepare ESMPs in line with ESF requirements. |
| Noise pollution from machineries, trucks, and air pollution from dust from a construction activities | <ul style="list-style-type: none"> ❖ Comply with noise pollution control standards and include the same as part of the planning. ❖ Ensure design components include dust minimization and control measures during planning. ❖ Include appropriate PPEs as part of the planning and design preparation. ❖ Conduct appropriate ESMP to manage impacts of construction machineries. |
| Solid and hazardous waste generation | <ul style="list-style-type: none"> ❖ Prepare Safe disposal and management plan, as per recommendations of EPA and Environmental, Health and Safety (EHS) Guidelines of the World Bank. |
| Pollution of surface and groundwater resources | <ul style="list-style-type: none"> ❖ Provide spill containment and proper chemical storage areas in labs with secondary containment basins. |
| Public health Safety | <ul style="list-style-type: none"> ❖ Design effective drainage systems to manage wastewater and stormwater. ❖ Integrate hygiene education programs. |
| Labor risks involving working conditions, management of worker relationships, child labor and minimum age, and labor grievance | <p>Introduce the GRM</p> <p>Implement measures outlined in the LMP</p> |
| Risk of social exclusion and vulnerability of the disadvantaged and vulnerable groups | <ul style="list-style-type: none"> ❖ Ensure transparent and inclusive consultations during project identification, risk analysis and consultation processes. ❖ Ensure project activity designs are considerate of vulnerable groups and underserved communities. ❖ Ensure vulnerable groups and underserved communities are well identified, informed and included in project benefits. |
| Gender-based violence, sexual exploitation and abuse, and sexual harassment (GBV/SEA/SH) | <ul style="list-style-type: none"> ❖ Provide awareness training to all workers and community members on GBV/SEA/SH. ❖ Educate workers and communities using posters, flyers in local languages about GBV/SEA/SH, during field days, public gatherings. ❖ Provide training to workers on GBV/SEA/SH. |

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| | <ul style="list-style-type: none"> ❖ Prepare code of conduct for all project workers to read, understand and sign for taking responsibility in case of violations rules. ❖ Put in place a functioning GRM for workplace complaints at the project site. ❖ Address complaints in timely and appropriate manner using the GRM and legal channels. |
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5. Procedures and Implementation Arrangements

5.1. Environmental and Social Risk Management Procedures

The procedures for screening and managing environmental and social risks will be applied throughout the project cycle. These procedures effectively incorporate and prioritize mitigation measures from project screening to decommissioning phases. In summary, the procedures aim to do the following:

Table 5: Project Cycle and E&S Management Procedures

| Project Stage | E&S Stage | E&S Management Procedures | Responsibility |
|--|-----------|--|---|
| Assessment and Analysis: Identification of Subprojects | Screening | <ul style="list-style-type: none"> ❖ During the process of identifying subprojects, verify subproject eligibility by referring the exclusion list in table 6 below. ❖ Use the screening form in Annex 1 for all activities to identify and evaluate potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject. ❖ Determine the documentation, permits, and approvals needed as per the regulations outlined in the Federal EPA Proclamations, including EIA Proclamation No. 299/2002. | PIU environment and social staff. Environment and social focal persons from partner and beneficiary institutions |
| Formulation and Planning: Planning for subproject activities, including human and budgetary resources and monitoring measures | Planning | <ul style="list-style-type: none"> ❖ Based on Screening Form adopt and/or prepare relevant environmental and social procedures and plans. ❖ For activities requiring ESMPs, a sampling approach such as typology and geographical location, following a risk-based approach will be employed to determine the required number of a representative ESMP preparation of subprojects prior to implementing the project. The ESMP will undergo review process and no objection by the World Bank prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for sub-project activities not subject to bidding). ❖ Ensure that the contents of the ESMPs are shared with relevant stakeholders (implementing sectors and partners) in an accessible manner and consultations are held with the affected communities in accordance with the SEP. ❖ Complete all documentation, permits, and clearances required under the | PIU environment and social staff |

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| | | <p>FEPA/REPA Environmental Regulation.</p> <ul style="list-style-type: none"> ❖ Provide training to staff members tasked with implementing and monitoring of plans (PIU, WPCU, E&S focal person, as well as contractors). ❖ Integrate appropriate environmental and social procedures and plans into contractor bidding documents; ensure contractors receive comprehensive training on the relevant procedures and plans. ❖ Provide this ESMF and the LMP to contractors as part of the bidding process for ESMP preparation. | |
| Implementation and Monitoring: Implementation support and continuous monitoring for projects | Implementation | <ul style="list-style-type: none"> ❖ Ensure the implementation of ESMPs by conducting regular monthly site inspections carried out by the PIUs and regional and woreda focal points reporting from the field, in addition to planned monitoring activities like quarterly and biannual reports. ❖ Track grievances/resolutions/beneficiary feedback. ❖ Continue awareness raising and/or training for E&S focal points, sector staff, contractors, communities. | <ul style="list-style-type: none"> ❖ Regional Project Coordination Unit(RPCU)/Woreda Project Coordination Unit (WPCU) |
| Review and Evaluation: Qualitative, quantitative, and/or participatory data collection on a sample basis. | Operation/ Completion | <ul style="list-style-type: none"> ❖ Assess whether plans have been effectively implemented. ❖ Confirm identification of corrective actions have been done in case of any non-compliances with ESF requirements. ❖ Ensure that physical sites are properly restored, stabilized and impacts are mitigated. ❖ Ensure E&S measures are taken in accordance with legal agreements and WB E&S standards and national EPA requirement. | <ul style="list-style-type: none"> ❖ EPA |

a. Subproject Assessment and Analysis – E&S Screening

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 6: Exclusion List of Criteria for Sub-project Identification and Screening

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| <ul style="list-style-type: none"> ❖ If the operation will have adverse impacts on environmentally sensitive areas like wetlands, cultural and religious sites of significance, valuable archaeological locations, cultural and natural heritage sites, groundwater recharge zones, and drinking water reserves. |
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- ❖ If the activity poses a serious risk of land degradation, air pollution, water pollution, damage to wildlife habitat sacred sites.
- ❖ Any project activity that encroaches upon environmentally delicate zones or any actions that impact such areas, including protected areas or critical zones for biodiversity preservation, as stipulated in national legislation.
- ❖ If the environmental impacts and its mitigation measures are not evidently explained.
- ❖ Activities involving child labor or forced labor; the involvement of children aged 15 to 18 in activities related to the project that could be dangerous, interfere with their education, or harm their well-being in any way, such as child labor exploitation, human trafficking, or engaging children in subprojects, is strictly prohibited.
- ❖ Activities that contribute to significant Greenhouse Gases (GHGs) emissions without mitigation measures.
- ❖ Support of production of any hazardous good, including alcohol, tobacco, and controlled substances.
- ❖ Projects that involve involuntary resettlement .
- ❖ Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc) for large-scale commercial purposes.
- ❖ Projects associated with significant human rights violations.
- ❖ Production or trade of arms or munitions.
- ❖ Manufacturing or production of asbestos or certain hazardous chemicals.
- ❖ Activities that promote corruption or fraudulent practices.

As a second step, the MoF/NPCU will use the *E&S Screening Form in Annex 1* to identify and assess relevant environmental and social risks specific to the activities, and identify the appropriate mitigation measures. The Screening Form lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the ESMP, the LMP, Chance Find Procedures, etc.). The MoF/NPCU will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

b. Subproject Formulation and Planning – E&S Planning

Based on the process above and the Screening Form, the MoF/NPCU and PIUs of MoE, MoH, MoWE, and MoA will adopt the necessary environmental and social management measures such as the ESCOPs, the LMP, SRAMP, GBV/SEA Plan, etc.) or develop relevant site-specific environmental and social management plans.

If site-specific ESMPs are necessary, the MoF/NPCU and/or the Contractor will prepare these ESMPs and other applicable documents as needed. The MoF/NPCU and the other implementing partners NPCU will provide approval and compile ESMPs and other applicable forms. The contents of the ESMPs will be shared with relevant stakeholders (implementing partners in other key sector Ministries and respective sectors regional bureaus and Woreda Offices) in an accessible manner (in hard and soft copies through project websites), and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared. Some

moderate risk subprojects may require the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

The first five (or more) ESMPs—or, alternatively, the first five ESMPs in each subproject category, or another number agreed upon with the World Bank—will be submitted to the World Bank for prior review and no objection. After these initial five reviews, the World Bank, the MoF/NPCU, and other implementing partners will reassess and determine whether prior review remains necessary for subsequent ESMPs or specific categories of ESMPs (e.g., for activities exceeding a certain budget threshold or for certain high-risk activities).

Additionally, before commencing any project activities, the MoF/NPCU must ensure all required documentation.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The MoF/NPCU should provide such training to field staff such as E&S experts, focal persons in other key sector Ministries and relevant line bureaus in the regions and woreda offices.

The MoF/NPCU should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The MoF/NPCU should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The MoF/NPCU should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

c. Implementation and Monitoring – E&S Implementation

During implementation, the MoF/NPCU will conduct regular monitoring visits. Contractors implementing subproject activities will be responsible for implementing the mitigation measures in the E&S risk management documents, under the MoF/NPCU oversight. The MoF/NPCU working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring. At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the other key sector Ministries and the regional line bureaus will be submitted to the MoF/NPCU at the national level, where they will be aggregated and submitted to the World Bank on a quarterly/biannual basis.

Throughout the Project implementation stage, the MoF/NPCU will continue to provide training and awareness raising to relevant stakeholders, such as staff of the implementing partners in the key Ministries, selected contractors, and communities in the implementation Woredas, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below, in Section 5.4. The MoF/NPCU will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

If the MoF/NPCU becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within **48 hours** of becoming aware of such incident. A **fatality** is automatically classified as a serious incident, as are incidents of **forced or child labor**, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

d. Review and Evaluation – E&S Completion

Upon operation/completion of Project activities, the MoF/NPCU will review and evaluate progress and completion of project activities, and all required environmental and social mitigation measures. Especially for civil works, the MoF/NPCU will monitor activities regarding site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The MoF/NPCU will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

5.2. Technical Assistance Activities

The MoF/NPCU will ensure that design consultancies, and other technical consultancies, and studies (including feasibility studies of sub-project activities), capacity building support and activities, training, and any other technical assistance activities sought from third parties under the Project are carried out in accordance with a well-designed Terms of Reference acceptable to the World Bank, that are consistent with the relevant ESSs. The draft Terms of References will be shared with the World Bank for review and No Objection approval prior to initiating the bidding process. They will also ensure that the outputs of such activities comply with the agreed Terms of Reference.

5.3. Implementation Arrangements

As described below, the ESMF will be implemented through the project management structure established in the HCO implementation. At the Federal level, MoF/NPCU will be responsible for the federal level management, the relevant or regional finance and economic development bureau/ RPCU will be responsible for region level management. At the Woreda level, the Woreda finance and economic development

office/ WPCU will be responsible for the management and coordination at the Woreda level management. Capacity building trainings, resources distribution and monitoring and reporting flows follow this structure. Contractors to be engaged in for sub-project implementation will be required to comply with E&S risk management plans and procedures, including the ESMP, ESCOPs, LMP, and local legislation. Such provision will be specified in the contractor's agreements. Contractors will be expected to disseminate and create awareness within their workforce of E&S risk management compliance for their effective implementation. The overall project implementation and this ESMF is carried out as follows:

Federal Level

The MoF serves as the primary coordinating body for the HCO project, operating within the COPCD, the designated unit responsible for the HCO project execution. Federal Level HCO Steering Committee is established, incorporating the main human capital sectors; MoE, MoH, MoA, MoWE, MoWSA and MoPD and chaired by MoF, State Minister of Economic Cooperation. The Federal Steering Committee will ensure proper coordination on planning, allocation, flow of funds, compilation of data, and endorsement of the results of the annual performance assessment and final year allocation. The NPCU will consist of project personnel, including an E&S specialist who will supervise the ESMF implementation. The Federal Steering Committee supervises the overall progress of the HCO.

PIUs in Key Implementing Agencies

Federal PIUs/Technical Committees are formed within executing bodies like the MoE, MoH, MoA, MoWE, MoPD, MoWSA and EPA. The PIUs shall be populated with technical experts including E&S safeguard experts and complementary project management teams to fill the gap in experience and expertise in executing the operation at the key implementing agencies. The PIU team will be responsible for the implementation of day-to-day project activities and coordinating with other partner institutions. The PIUs will report to the MoF/COPCD.

Regional and Woreda Level

In the respective regions, the regional HCO technical committee (TCs) and the SPG woreda TCs chaired by BoFED and WoFED respectively, will facilitate the implementation of the project activities in the regional HC bureaus and HC woreda offices. The focal person or the E&S expert in the region and woreda will report the progress of project implementation directly to the respective Regional and Woreda TCs. This information will later be collated and submitted to the MoF/COPCD by BoFEDs. Consequently, each participating region and SPG woreda will have a designated project focal person responsible for implementing the ESMF, managing project activities, and coordinating with the TCs at the regional and SPG woreda implementing bodies.

Contractors those to be engaged in the project activities implementation through contractual arrangements will be required to comply with the Project's environmental and social mitigation and management measures as specified in the ESMPs, ESCOPs, and contract documents, as well as national and local legislation. They will have the responsibility to take all necessary measures to protect the health and safety of workers

and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. They will be required to fully comply with the World Bank EHSs.

Table 7: ESMF Implementation Arrangements

| Level/ Responsible Party | Roles and Responsibilities |
|--------------------------------------|--|
| Federal Level MoF/ COPCD/NPCU | <ul style="list-style-type: none"> ❖ Provide support, oversight, and quality control to the PIUs staff, RPCU, and WPCU staff working on environmental and social risk management. ❖ Collect, review, and provide quality assurance and approval to screening reports and ESMPs as relevant. Keep documentation of all project activity progress. ❖ Oversee overall implementation of the Environmental and Social Risk Management (ESRM) instruments and monitor the environmental and social mitigation measures and management activities, compile progress reports from PIUs, and report to the World Bank on a quarterly basis. ❖ Train the key implementing partners' staff at federal and regional levels, Woreda level staff, and some contractors who will be responsible for implementing the ESMF and other instruments during project implementation. ❖ If contracting is managed at federal level, ensure that all bidding and contract documents include all relevant E&S management provisions per screening forms, ESMPs, and ESCOPs. ❖ Support the regional and Woreda level experts in organizing capacity building programs and in the preparation of ESMP for sub-projects with environmental and social concerns. ❖ As required, update this ESMF and other instruments. ❖ Disclose this ESMF, and other instruments to the public/stakeholders. ❖ Facilitate and provide training for sector office experts and E&S experts at regional and woreda levels. |
| FEPA | <ul style="list-style-type: none"> ❖ Reviewing and provide approval of ESMP related to the HCO. ❖ Facilitate and provide training for the staff of Implementing Agencies, key sector Ministry experts and E&S experts at federal and regional levels. |
| MoH, MoE, MoA, MoWE, MoPD, MoWSA/PIU | <ul style="list-style-type: none"> ❖ Supervise the daily implementation and monitoring of measures to mitigate environmental and social risks and impacts, and provide monthly progress and performance reports to the MoF/COPCD/NPCU. ❖ Ensure project activities do not fall within the exclusion list. ❖ Complete screening form for pertinent subproject activities and submit them to the MoF/COPCD/NPCU. ❖ Offer training to contractors and regional E&S safeguard experts on pertinent environmental and social risk mitigation strategies in consultation with Federal EPA. |
| Regional Bureaus | <ul style="list-style-type: none"> ❖ Coordinate and facilitate the execution of project activities, oversee the monitoring of environmental and social risk mitigation measures, and provide monthly progress and |

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| | <p>performance reports to the respective PIUs/TCs/BOFEDs as relevant.</p> <ul style="list-style-type: none"> ❖ While identifying sub-projects, verify that project activities are not included in the exclusion list. Complete Screening Forms for relevant subproject activities and submit them to the PIUs. ❖ When managing contracting at the regional level, make sure that all bidding and contract documents contain all necessary E&S risk management provisions according to the screening forms, ESMPs, and ESCOPs. ❖ Offer training to contractors on pertinent environmental and social risk mitigation measures in consultation with Regional Environmental Protection Authority (REPA). |
| REPA | <ul style="list-style-type: none"> ❖ Review and clear screening reports submitted by implementing sector bureaus. ❖ Review the preparation of ESMPs by consultants where required, review and clear ToR, review and clear ESMPs and participate on public consultation activities. ❖ Oversee the execution of environmental and social risk mitigation measures by the sector offices at the regional level and local contractors. ❖ Deliver capacity-building training and additional technical assistance, as required, to regional and woreda level experts and E&S safeguard focal persons. |
| Woreda Offices | <ul style="list-style-type: none"> ❖ Oversee day-to-day implementation and monitoring of environmental and social risk and impact mitigation measures, and reports progress and performance to the RPCU on a monthly basis. ❖ Complete site-specific ESMPs for subproject activities and submit the same to the RPCU. ❖ Ensure project activities do not fall under the exclusion list. Fill out Screening Forms for relevant subproject activities and submit to the RPCU. ❖ Oversee implementation of this ESMF and other project specific environmental and social instruments at Woreda level. |
| Woreda Environment Protection Office | <ul style="list-style-type: none"> ❖ Review screening reports of sub-project activities by sector offices. ❖ Provide training to local contractors and Woreda level E&S safeguard focal persons on relevant environmental and social risk and impact mitigation measures. |
| Local contractors | <ul style="list-style-type: none"> ❖ Adhere to the environmental and social mitigation and management measures outlined in the ESMPs, and contract documents of the project, in addition to complying with relevant national and local laws. ❖ Implement all essential measures to safeguard the health and safety of workers and community members, and prevent, reduce, or address any environmental damage arising from project operations. ❖ Ensure complete adherence to World Bank EHSGs. |

5.4. Proposed Training and Capacity Building

Technical assistance and capacity building are crucial elements of the HCO project. Therefore, environmental training aimed at ensuring the efficient implementation of the ESMF will be provided. This training will be conducted by environmental and social specialists from both the Federal and Regional EPA, with assistance from environmental and social experts affiliated with the World Bank. As part of the comprehensive project implementation framework, the ESMF is being put into practice. Therefore, the objective of this planned training and capacity development is to integrate environmental and social aspects into the various stages of sub-project identification, planning, execution, risk mitigation, and monitoring. This training will empower personnel from implementing organizations, especially environmental and social specialists and focal points, with the essential expertise and understanding required for screening, monitoring, inspecting, identifying, and analyzing environmental and social risks and impacts. It will also equip them to implement mitigation measures outlined in the ESMF effectively. The proposed trainings to support the implementation of this ESMF include awareness creation and overall understanding of the E&S process for the federal, regional and Woreda level steering and technical committees, and application of ESRM tools (ESMF, LMP, ESMP, SA and SRAMP) and E&S implementation, monitoring and reporting for federal and regional E&S safeguard specialists, Woreda E&S safeguard focal persons, and sector specialists at different level of implementation.

Table 8: Proposed Training and Capacity Building for ESMF Implementation

| Level | Responsibly body | Target Groups | Topics/Themes to be Covered |
|---------|-------------------------------------|--|---|
| Federal | World Bank/ FEPA/ Consultants | National Staff at the MoF, MoE, MoH, MoA, MoWE, MoPD, MoWSA, COPCD, NPCU, PIUs, Monitoring and Evaluation (M&E) experts; E&S safeguard specialists | <ul style="list-style-type: none"> ❖ Awareness on E&S risks, impacts and management mechanisms. ❖ Environmental and social screening process; ❖ Preparation of terms of reference for carrying out ESMPs. ❖ Review and clearance of the screening results and separate ESMP reports. ❖ Incident and accident reporting. ❖ E&S monitoring and reporting. ❖ Application of ESRM tools (ESMF, ESMP, SEA/SH(GBV) action plan, Underserved Local Communities Planning Framework, and SRAMP). ❖ GRM and E&S audit. ❖ Occupational and community health and safety risk. ❖ How to monitor safeguard implementation. <p>Relevant policies and Laws</p> <ul style="list-style-type: none"> ❖ National policies and legislations. |

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| | | | <ul style="list-style-type: none"> ❖ World Bank ESS standards, EHSGs. |
| Regional | National staff/Consultants/REPA | Regional staff of key sector bureaus, finance managers, M&E experts, E&S safeguard specialists, Contractors | <ul style="list-style-type: none"> ❖ Awareness on E&S risks, impacts and management mechanisms. ❖ Application of ESRM tools (ESMF, ESMP, SA, and SRAMP). ❖ Incident and accident reporting. ❖ Selection and application of relevant E&S risk and impact management measures/instruments. ❖ E&S monitoring and reporting. ❖ GRM and E&S audit. ❖ Occupational and Community Health and Safety risk management. <p>Relevant policies and Laws</p> <ul style="list-style-type: none"> ❖ National policies and legislations. ❖ World Bank ESS standards, EHSGs. |
| | Regional staff/E&S safeguard specialists | Contractors | <ul style="list-style-type: none"> ❖ Application of LMP, including CoC, incident reporting, GBV, SEA/SH prevention measures. ❖ Application of ESCOPs or ESMPs, as relevant. ❖ E&S implementation, monitoring and reporting. ❖ Occupational Health and Safety measures. |
| Woreda level | RPCU, E&S safeguard specialists | Woreda Coordination office staff, E&S focal persons, experts from sector offices Local contractors | <ul style="list-style-type: none"> ❖ Sub-project identification, screening and reporting. ❖ Understating of the ESRM tools, ESIA and ESMP preparation. ❖ Application of SEP, GBV/SEA/SH and its response mechanism, the GRM and beneficiary feedback mechanism. ❖ Application of LMP, including Code of Conduct, incident reporting, GBV, SEA/SH. ❖ Application of ESCOPs or ESMPs, as relevant. ❖ E&S implementation, monitoring and reporting. ❖ E&S audit. |
| Community level | Regional staff/E&S safeguard specialists | Community members | <ul style="list-style-type: none"> ❖ Community health and safety issues. ❖ GBV, SEA/SH issues, prevention, response measures. ❖ Grievance redress mechanism. ❖ Worker Code of Conduct. |

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| | | | ❖ The benefits of public consultation. |
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5.5. Estimated Budget

The E&S safeguard implementation is an integral part of the sub-project activities in all the components of the project. The E&S management mechanism is crucial to prevent adverse impacts and potential risks to society and the environment that emanate from the implementation of project activities. Hence, the E&S management instruments serve to ensure sustainability of project interventions. This indicative budget includes cost for the following activities of the ESMF implementation.

- ✓ Management, implementation, monitoring (staffing and operation).
- ✓ Training and capacity building.
- ✓ E&S auditing.

The salaries of E&S safeguard specialists at the NPCU, RPCU and E&S focal persons at Woreda levels and operational costs are covered under this budget. Periodic (quarterly and monthly by Woreda experts) monitoring on the progress of E&S implementation and effectiveness of the mitigation measures will be carried out periodically, and the cost of monitoring covered under this budget. Whereas the actual cost of the mitigation measures are not included in the ESMF implementation budget, since such costs are covered directly or indirectly by contractors as part of the cost for construction under each component.

Table 9: Estimated budget for ESMF Implementation

| No | Activity | Estimated Cost (USD) |
|----|---|----------------------|
| | Management, implementation and monitoring | |
| 1 | Environmental and social staff (MOF/COPCD/NPCU, RPCU, and WPCU) | 1,400,000 |
| 2 | Preparation of site-specific ESMPs and other site-specific plans | 70,000 |
| 3 | Supervision and monitoring of the implementation of site-specific ESMPs and other site-specific plans | 100,000 |
| 4 | Cost of obtaining clearances or permits | 25,000 |
| | Total | 1,595,000 |
| | Training and Capacity Building | |
| 1 | Training of Federal level experts and stakeholders (2 per year for five years) | 110,000 |
| 2 | Trainings for stakeholder and Regional staff (2 per year for five years) | 60,000 |
| 3 | Trainings for Woreda (3 per year for four years) | 80,000 |
| 4 | Biannual Environmental and Social workshop organized by moF | 50,000 |
| 5 | Training materials preparation | 30,000 |

| | | |
|--------------------|--|------------------|
| | Total Cost | 330,000 |
| | E&S Audit | |
| 1 | Environmental and Social Audit (E&S safeguard staff) | 40,000 |
| 2 | E&S audit by external consultants | 70,000 |
| | Total Cost | 110,000 |
| Grant Total | | 2,035,000 |

6. Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner that arise in the Project area either due to the actions of the implementing institutions (MoF, MoE, MoH, MoA, MoWE etc), or by the activities of contractors/subcontractors. The MoF/NPCU and PIUs will be responsible for managing the GRM and cascade the responsibilities to Regional and Woreda focal points, contractors and subcontractors who are engaged in implementing sub-project activities at Woreda levels. The E&S specialists from MoF/NPCU and PIUs shall monitor the grievance resolution process at the Federal, Regional and Woreda levels of the respective implementing entities. Project Affected Persons (PAPs) and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines, and contact persons both verbally and through written materials (often notice boards postings, emails, websites, flyers) and information brochures during consultations meetings and other stakeholder engagement activities. The MoF/NPCU and PIUs will implement an effective GRM, to help third parties to avoid resorting to the judicial system as far as possible. Complainants can seek redress from the judicial system at any time. The step-by-step process does not deter them from approaching the courts. All grievances related correspondence shall be documented, and the grievance resolution process will be systematically tracked.

6.1. The Grievance Redress Process

The GRM procedure commences with establishing a GRC at the implementing agencies at the Federal level, at the regional level, and at the woreda level. The composition, roles and responsibilities of the respective GRCs are described below:

Composition of GRCs at the Federal and Regional Levels

MoF/NPCU GRC: as MoF is the lead implementing agency, it will form a GRC at the NPCU, which will be composed of the NPCU project coordinator, the E&S specialists, and senior technical expert, gender specialist, HR manager and M&E expert.

PIUs GRC: (MoE, MoH, MoA, MoWE, MoPD, MoWSA): The primary implementing agencies will establish their individual GRCs, comprising the project implementation unit leader, E&S specialists, senior technical expert, HR manager, gender expert, and M&E expert.

Regional Bureau GRC: The relevant line bureaus will designate a focal person. This focal person will serve as the lead coordinator. Consequently, the regional GRC will consist of the regional focal person, E&S experts, senior technical expert, gender expert, HR manager, and M&E expert.

Woreda Office GRC: The Woreda GRC serves as the primary entry point for grievance redressal, playing a pivotal role in the entire process. Given its frontline position, the GRC must conduct thorough and critical investigations to ensure grievances are properly documented, validated, and addressed. This initial stage is crucial, as it sets the foundation for effective resolution and prevents unnecessary escalations. By meticulously gathering evidence through site visits, engaging with complainants and community members, and assessing the legitimacy of each case, the

Woreda GRC ensures transparency and accountability. Its effectiveness directly impacts public trust in the redressal system, making its role indispensable in fostering fair and timely solutions at the grassroots level.

The appropriate departmental offices will appoint a focal individual who will act as the primary coordinator. As a result, the woreda GRC will include the woreda focal individual, environmental and social experts, senior technical expert, gender expert, HR manager, and M&E expert.

Roles of GRCs:

The E&S specialists will serve as the secretariat for the GRCs. The GRCs will be responsible for:

- Receiving complaints from beneficiaries/complainants, recording/documenting them, and conducting verification.
- Offering hearings and resolutions.
- Referring complaints to higher authorities if they remain unresolved.

When complainants raise a grievance, the project management or the GRC are expected to provide any of the following:

- Acknowledgment of the grievance.
- A sincere response to the questions or issues raised.
- An apology, appropriate compensation, and
- Adjustment of the actions or activities that led to the grievance, as well as other equitable remedies.

The GRC will monitor complaints from various stakeholders regarding the project. The complaints filed should be related to the project's components, implementation, and management.

The IPF project grievance resolution process will involve the following main steps:

Receiving grievances: Any individual from the impacted communities or who feels affected by the project is eligible to submit a grievance (in written, verbal, text message, telephone, etc., as suitable for the complainant).

Recording the complaint: The GRC secretariat or designated focal person who has received the complaint will use the GRM logbook for registration purposes.

Referral and review of complaints: The GRC will assess the complaint, address it, or direct it to the relevant authority, such as the next higher body (PSC) or formal courts.

Informing the complainant: The decision, resolution, or action taken by the grievance committee will be communicated to the complainant within the specified timeframe for feedback.

Closing the complaint: If the complainant accepts the decision or resolution, or if the complaint is unrelated to the project or any of its elements, or if it is under judicial review, the closure will be carried out according to the relevant procedure, as acknowledged and approved by the complainant.

Clear avenues for lodging complaints should be established, including a specific phone number for calls, a number for SMS/text messages, an email address, a designated focal point, and a physical address for registering complaints. These channels need to be

widely publicized among beneficiaries. Posters and other informational materials should be prominently displayed. The following section outlines the steps and timelines of the redress process.

Table 10: Steps in the Grievance Redress Process

| Steps | Process | Description | Completion time frame | Responsible Body or Person |
|-------|--|--|---|--------------------------------------|
| 1 | Receiving the complaint | Document the date of reception, complainant's name, complaint details, and notify the RPCU-GRC | 1 day | Secretary to GRC at the Woreda level |
| 2 | Acknowledgement of grievance | By letter, email, or phone | 1 day | By the secretary of the GRC |
| 3 | Evaluate and establish the legitimacy of the grievance | Conduct a site visit; listen to the complainant or community; evaluate the validity | 3 days | Woreda GRC |
| 4 | Carry out and oversee a redress action | Upon validation of the complaint, resolve the issue | 10 days | The relevant Woreda GRC |
| 5 | If the issue remains unresolved after 15 days, escalate it to Regional GRC | The GRC assesses the redress processes and outcomes, proposing an intervention solution. Site visits and discussions with the complainant or community will provide additional details | Within 15 days of receiving the complaint from Woreda | The Regional GRC |
| 6 | If the issue remains unresolved after 15 days, escalate it to NPCU/PIU-GRC | The GRC assesses the redress steps and conclusions, provide an intervention solution | Within 10 days of receiving the complaint | The relevant NPCU/PIU-GRC |
| 7 | If the issue remains unresolved after 10 days, escalate it to PSC | Examine the redress steps and conclusions, and offer an intervention solution | Within 10 days of receiving the complaint | MoF/NPCU-GRC, PSC |
| 8 | Judicial adjudication | Pursue the complaint in a court of law | No fixed time | complaint |

The complaints recorded, resolved, and referred will be reported quarterly with the environmental and social implementation performance report to the World Bank and other relevant stakeholders.

6.2. World Bank Grievance Redress Services

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate GRS, please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7. Stakeholder Engagement, Disclosure, and Consultations

The SEP for human capital program (HCP) was prepared on June 2022 to assess stakeholder interest and support, incorporating their views into project design and environmental/social performance. The stakeholder consultation aims to establish a structure for ensuring meaningful stakeholder engagement, raising awareness, and fostering a deeper understanding of key issues. This will help ensure the project is executed efficiently within the designated timeline, meeting the expectations of all involved parties. Consultations and information dissemination of the HCP project are made with the intention of serving the following four major purposes: (i) to understand the interests, views and needs of stakeholders and the communities; (ii) to ensure there is sufficient coordination between the implementing partners, government body and community structures; (iii) to receive the concerns, feedbacks and comments as well as grievances from stakeholders and communities on the design and implementation of the project; and (iv) to transparently share accountability mechanisms on all aspects of the project. All feedback and concerns gathered from stakeholders and communities will be handled by the NPCU and RPCU. Any additional feedback or grievances raised will be addressed through the project's GRM.

The purposes of consultations are explicitly outlined in the SEP. specifically, stakeholder consultations serve the following purposes and address key issues. The stakeholder consultations serve the following purposes and address the issues:

- ✓ Establish and sustain communication channels between the project and stakeholders to integrate their feedback and concerns into sub-project design, implementation, and monitoring. This approach aims to minimize adverse effects while maximizing project benefits.
- ✓ Inform and discuss about the nature and scale of adverse impacts and to identify priorities of remedial measures for the impacts in a more transparent and participatory manner;
- ✓ Incorporate the perspectives of affected communities and officials to integrate their input and suggestions into the development of mitigation strategies and benefit-enhancement measures.
- ✓ Identify and consider stakeholder priorities and expectations when executing mitigation measures.
- ✓ Increase public awareness and understanding of HCO to ensure its acceptance.

The consultation process employs an inclusive, participatory methodology across all stages of sub-project planning and execution. Through community meetings and public forums, stakeholders will be engaged on all subproject components - including potential environmental/social impacts and corresponding mitigation measures - ensuring full transparency. During the preparation of the ESMF for the IPF project, consultations were conducted with experts at Federal, Regional, and Woreda levels, as well as with diverse community groups across multiple project implementation woredas.

Consultations were held at the Federal Project Implementing Agencies from November 5–8, 2024, involving seven individuals at the federal level. At the regional level, twelve people were interviewed from November 14–15, 2024. Additionally, eighty participants across eight different woredas were consulted on November 18–19, 2024. Furthermore, discussions with local communities benefiting from the HCO were

conducted in eight selected woredas from November 20–23, 2024, engaging sixty-seven participants across these woredas.

Experts have identified several critical challenges that may arise during implementation of the HCO program. Key concerns will likely include the inadequate management of hazardous waste from school chemical laboratories and healthcare facilities, as well as potential emissions of particulate matter during facility rehabilitation and construction. The program may also face difficulties in ensuring equitable access, as vulnerable groups—particularly women, children, the elderly, and persons with disabilities—risk being excluded from program benefits without proper safeguards. Coordination challenges among government bodies, NGOs, and local leaders could hinder effective implementation unless addressed proactively. Furthermore, insufficient engagement of local communities in program design and execution may undermine both community ownership and long-term sustainability. Without robust monitoring and evaluation systems from the outset, the program may struggle to accurately assess progress and measure impact.

To address these anticipated challenges, the HCO program should implement targeted interventions. Comprehensive hazardous waste management protocols should be established for school laboratories and healthcare facilities, along with emission control measures during construction activities. Specific inclusion mechanisms must be incorporated to ensure that vulnerable groups—particularly women, children, the elderly, and persons with disabilities—receive equitable access to the program. A structured coordination framework with clear roles for government agencies, NGOs, and local leaders is essential to enhance implementation efficiency. Community participation should be institutionalized through regular consultations and decision-making roles in program design and execution to foster ownership. Additionally, a robust monitoring and evaluation system should be developed from the program's inception, featuring clear indicators and regular reporting mechanisms to effectively track progress and impact. These proactive measures will help mitigate risks while maximizing the program's effectiveness and sustainability.

The potential adverse social and environmental effects of the project should be disclosed on the MoF website as well as the World Bank website. Additionally, public disclosure will be made through billboards, banners, flyers, magazines, and other media outlets. In compliance with the World Bank's Public Consultation and Disclosure Policy, the NPCU will make copies of the ESMF available at accessible public locations. This will allow the public and other stakeholders to express their views and comment on the project's potential environmental and social impacts, as well as the respective Environmental and Social (E&S) risk management measures aimed at minimizing or avoiding anticipated impacts. The Security Risk Assessment and Management Plan (SRAMP) was developed in January 2025. Meanwhile, the LMP was prepared in June 2024 and has been annexed to this ESMF (Annex 5). Additionally, Gender-Based Violence Risk Assessment and Action Plan has been annexed to this ESMF (Annex 6). Historically Underserved Communities Planning Framework has also been prepared.

Annexes

Annex 1. Screening Checklist

The Environmental and Social (E&S) Screening process consists of a two-stage procedure: (1) Initial screening utilizing the Exclusion List of the ESMF; and (2) Assessing the proposed activities to determine the approach for managing E&S risks. This Screening Form constitutes the second phase of the screening process and must be applied to all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

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| Sub-project Title |
| Subproject Location |
| Regional Unit in Charge |
| Estimated Cost |
| Start/Completion Date |
| Brief Description of Subproject |
| Brief Description of Subproject |

2. Environmental and Social Screening Questionnaires

| List of Question | Yes | No | Next Steps |
|--|-----|----|--|
| ESS1: Assessment and Management of Environmental and Social Risks and Impacts | | | |
| 1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria? | | | If "Yes": Exclude from project. |
| 2. Does the subproject involve new construction or significant expansion of ponds, small and micro dams, solid waste management systems, shelters, roads (including access roads), community centers, cold stores, veterinary centers, laboratories, livestock marketing facility, schools, bridges? | | | If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents |
| 3. Does the subproject involve renovation or rehabilitation of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters? | | | If "Yes": 1. Apply relevant measures based on the ESMFMP in Annex 2 (unless one of the questions below raises specific environmental risks and requires a site-specific ESMP). 2. Include E&S risk management measures in bidding documents. |
| 4. Will construction or renovation works require new borrow pits or quarries to be opened? | | | If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents. |

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| 5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹ | | | If “Yes”: Apply relevant measures described in the ESMF and SEP. |
| ESS2: Labor and Working Conditions | | | |
| 6. Does the subproject involve uses of goods and equipment involving forced labor and child labor? | | | If “Yes”: Exclude from project. |
| 7. Does the subproject engage in the recruitment of labor including direct, contracted, primary supply, and/or community workers? | | | If “Yes”: Apply LMP in Annex 5. |
| 8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSs? Do workers need PPE relative to the potential risks and hazards associated with their work? | | | If “Yes”: Apply LMP in Annex 5. |
| 9. Is there a risk that women may be underpaid when compared to men when working on the project construction? | | | If “Yes”: Apply LMP in Annex 5. |
| ESS3: Pollution Prevention and Management | | | |
| 10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities? | | | If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents. |
| 11. Are works likely to cause significant negative impacts to air and / or water quality? | | | If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents. |
| 12. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts? | | | If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents. |
| ESS4: Community Health and Safety | | | |
| 13. Is there a risk of increased community exposure to communicable disease (such as HIV/AIDS, Malaria), or increase in the risk of traffic related accidents? | | | If “Yes”: Apply LMP in Annex 5 and relevant measures in SEP. |
| 14. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?) | | | If “Yes”: Apply LMP in Annex 5. |
| 15. Is there a risk that SEA/SH may increase as a result of project works? | | | If “Yes”: Apply LMP in Annex 5 |
| 16. Would any public facilities, such as schools, health clinic, church be negatively affected by construction? | | | If “Yes”: Apply relevant measures based on the ESMFMP in Annex 2 (unless one of the other |

¹ “Disadvantaged or vulnerable” refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits.

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| | | | questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP). |
| 17. Will the subproject require the government to retain workers to provide security to safeguard the subproject? | | | If “Yes”: Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel. |
| ESS6: Natural habitats, Environmentally sensitive areas or threatened species | | | |
| 18. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ² whether directly or indirectly, or which would lead to adverse impacts on natural habitats ³ ? | | | If “Yes”: Exclude from project. |
| 19. Will the project involve the conversion or degradation of non-critical natural habitats? | | | If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents. |
| 20. Will this activity require clearance of trees, including inland natural vegetation? | | | If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Exclude from project if more than 0.5 hectares of tree and vegetation cutting is expected. 3. Include E&S risk management measures in bidding documents. |
| 21. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)? | | | If “Yes”: Exclude from project. |
| ESS7: Sub-Saharan African Historically Underserved Traditional Local Communities | | | |
| 22. Underserved Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively? | | | If “Yes”: Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP. |
| ESS8: Historical, archaeological or cultural heritage site | | | |
| 23. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility? | | | If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. |

² Environmental and Social Standard 6, paragraph 23: “Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d).”

³ Environmental and Social Standard 6, paragraph 21: “Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area’s primary ecological functions and species composition.”

Sub-project classification: high/substantial/moderate/low risk. Following the screening and risk assessment categorization of the sub-projects, categorize them into Schedule 1 (substantial risk), Schedule 2 (moderate risk), and Schedule 3 (low risk) sub-projects. Based on the result from the screening above, please list the E&S risk management tools to be prepared / adopt and implemented:

- a)
- b)

Name and title of person who conducted screening:

Date of screening:

Annex 2: The Environmental and Social Management Framework Monitoring Plan

| Issues | Environmental and Social Prevention/Mitigation Measures | Responsible Party | Monitoring Period |
|---------------------------|---|--|-----------------------------|
| Air Quality | <ul style="list-style-type: none"> ❖ Minimize dust from exposed work sites by applying water on the ground regularly during dry season. ❖ Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. ❖ Ensure regular maintenance of vehicles, machinery and equipment used at project site. | Contractors Implementing partners | During implementation phase |
| Solid and hazardous waste | <ul style="list-style-type: none"> ❖ Implement proper waste segregation, recycling, and disposal systems, especially for hazardous materials like e-waste and medical waste. ❖ Establish waste management systems in schools and health centers. ❖ Ensure proper segregation of school/health waste at the point of generation to facilitate recycling and safe disposal. ❖ Provide training on safe handling and storage practices, and ensure proper disposal of hazardous materials. ❖ Use recycled and eco-friendly materials for school supplies and infrastructure | Contractors Implementing partners | During implementation phase |
| Workers Health and Safety | <ul style="list-style-type: none"> ❖ Mandate the use of personal protective equipment for workers as necessary. ❖ Conduct safety training for construction workers prior to beginning work. About the risks associated from equipment and ensuring adequate training on the use of the equipment. ❖ Monitor contractors during the construction of facilities. Monitoring the movement, handling and management of wastes to ensure they safely managed and don't present any EHS risks. | PIUs, Contractors, Implementing Partners | During implementation phase |

| | | | |
|--|---|--------------------------------------|-----------------------------|
| Biodiversity | <ul style="list-style-type: none"> ❖ No cutting of trees or destruction of vegetation other than on construction site. ❖ Assess the status and presence of sensitive species in the area and ensure that no sensitive fauna and flora species are found within and around the construction area that could be affected by the program activities. ❖ Plantation of indigenous plants in place of the damaged one. | Contractors Implementing partners | During implementation phase |
| Potential for depletion and pollution of surface and groundwater resources | <ul style="list-style-type: none"> ❖ Implementing water-saving technologies and practices. ❖ Developing and enforcing strict erosion and sediment control measures to reduce runoff from construction sites. | Contractors Implementing partners | During implementation phase |
| Emergency Preparedness | <ul style="list-style-type: none"> ❖ Provide appropriate security personnel and enclosures to prevent unauthorized entry in to the construction site. ❖ Provide appropriate type of fire-fighting equipment suitable for the construction site. ❖ Display emergency contact numbers clearly and prominently at strategic places in construction site. ❖ Communicate the roles and responsibilities of laborers in case of emergency in the monthly meetings with contractors. | Contractors Implementing partners | During implementation phase |
| Child labor and minimum age | <ul style="list-style-type: none"> ❖ Follow the relevant measures in the Labor Management Procedures-LMP. ❖ Strictly enforce laws prohibiting child labor. ❖ Do not hire children of less than 15 years of age in accordance with the labour law Proc. No. 1156/2019. | Contractor | During implementation phase |
| SEA/SH | <ul style="list-style-type: none"> ❖ Ensure sufficient measures to avoid any SEA/SH issues and protection of all workers. The contractor will ensure SEA/SH responsive GRM. ❖ Conduct comprehensive training programs to raise awareness about GBV/SEA/SH, its forms, and | Contractor | During implementation phase |

| | | | |
|--|--------------------------------------|--|--|
| | the project's zero-tolerance policy. | | |
|--|--------------------------------------|--|--|

Annex 3: Environmental and Social Management Plan (ESMP) Template

Environmental and social risks and impacts associated to subproject location and scope of activities. Hence site specific instruments like ESMP will be developed for each individual subproject or project activity.

1. Subproject Information

| | |
|------------------------|--|
| Subproject Title: | |
| Estimated Cost: | |
| Start/Completion Date: | |

Introduction

2. Site/Location Description

This section concisely describes the proposed location and its geographic, ecological, social and temporal context including global positioning system (GPS) points, any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map showing relative location of the site onto the ESMP.

Methodology of the Assessment

Policy and Legal Framework Review

3. Subproject Description and Activities

This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads, flood protection structures, small irrigation dams, clinics, storage facilities, etc...).

Environmental and Social Baseline survey

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures.

Environmental and Social Management Plan

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Responsible body | Location | Timeframe | frequency | Cost estimate |
|-----------------------------------|---|------------------|----------|-----------|-----------|---------------|
| | | | | | | |

Environmental and Social Monitoring plan

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Responsible body | Indicators of Monitoring | Methodology | frequency | Cost estimate |
|-----------------------------------|---|------------------|--------------------------|-------------|-----------|---------------|
| | | | | | | |

5. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

6. Implementation Schedule and Cost Estimates

This section states the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.

Environmental and Social Monitoring plan

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Responsible body | Indicators of monitoring | frequency | Cost estimate |
|-----------------------------------|---|------------------|--------------------------|-----------|---------------|
| | | | | | |

5. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

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7. Attachments

ESCOPs, site specific SEP etc.

Review & Approval

| | |
|----------------------|--------------------------------|
| Prepared By: | Signature |
| Position: | Date |
| Reviewed By: | Approved By: (Signature) |
| Signature..... | |
| Position: Date | Position: Date |
| | |

Annex 4: Guideline for ESMP Preparation and contents of ESMP

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures.

The content of the ESMP will include the following:

(a) Mitigation: The plan will include compensatory measures, if applicable. Specifically, the ESMP:

- ❖ identifies and summarizes all anticipated adverse environmental and social impacts
- ❖ describe with technical detail each mitigation measure,
- ❖ estimates any potential environmental and social impacts of these measures; and
- ❖ Takes into account, and is consistent with, other mitigation plans required for the project (e .g. for involuntary resettlement, indigenous peoples, or cultural heritage) .

(b) Monitoring: the ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation .

(c) Capacity Development and Training

- ❖ The ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and Ministry level.
- ❖ Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures
- ❖ The ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures

(d) Implementation Schedule and Cost Estimates: For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides

- ❖ An implementation schedule for measures that must be carried out as part of the project
- The capital and recurrent cost estimates and sources of funds for implementing the ESMP.

Annex 5: Labor Management Procedure (LMP)

1. Introduction

1.1. Background

The Federal Democratic Republic of Ethiopia and the World Bank Group (WBG) are currently engaged in preparing for the implementation of the national Human Capital Operation (HCO), which mainly aims to strengthen delivery of and accountability for basic services. The operation will improve services to address stunting and learning poverty reduction by supporting the national development plans and strategies. The operation will achieve its aim through improving access to education, health and water services through multi-sectoral, outcome-oriented, and targeted approach in its investments.

The HCO comprises three components: Component 1, Programs for Results (PforR); Component 2, Investment Program Financing (IPF); and Component 3, Contingent Emergency Response (CERC). This document pertains to the IPF component of the HCO, which will provide technical assistance to strengthen systems and capacity for quality service delivery at national, regional, and woreda levels.

The operation recognizes the significance of the World Bank's Environmental and Social Standards for identifying and assessing and managing the environmental and social (E&S) risks and impacts associated with its IPF component. The reviews undertaken by the Bank have classified environmental and social risks of the IPF component as moderate. In response, the Government of Ethiopia, through the Ministry of Finance (MoF), the coordinating and implementing agency for the operation, has developed several key instruments to address these risks. One such instrument is the Labor Management Plan (LMP).

Labor Management Procedures (LMP) of Operation will set out the approach to meeting the objectives of World Bank's ESS2. Focusing on the IPF component of the operation, the LMP identifies the different types of project workers that are likely to be involved and sets out the way in which the different types of project workers are managed. The LMP describes worker characteristics, provides an overview of key potential labour risks, and identifies relevant legislation that relates to labor, and occupational health and safety (OHS) in the project area.

1.2. Operation Description

1.2.1. Operation Development Objective

The Human Capital Operation (HCO) objective is to improve learning outcomes and nutrition services for girls and boys, and to strengthen service delivery and accountability, in all regions including areas affected by conflict, droughts and high levels of refugees.

1.2.2. Operation Components

The operation consists of three components: 1. Program for Results (PforR), 2., Investment Project Financing (IPF) and 3. Contingent Emergency Response Component (CERC) components.

Component 1: Program for Results (PforR): The PforR component of the operation has outlined to achieve the following result areas:

- **Result area 1:** Strengthen basic service delivery systems to mitigate the impact of the crises (including conflict, droughts, and high levels of refugees) on access and quality

of basic services nationally through investments in health, education, agriculture, and water and sanitation.

- **Result area 2:** Improve learning outcomes and address stunting in selected woredas. Under results area 2, the Human Capital SPGs will have two windows of intervention—one to improve learning and the other to contribute to stunting reduction in the target woredas—directly linking to the HCO PDO targets for learning and nutrition.

Component 2: Investment Program Financing: the primary goals of the IPF component include funding a set of interventions aimed at enhancing human capital outcomes in regions impacted by conflict, droughts, and significant refugee populations. Additionally, the component seeks to offer technical assistance and capacity-building support to enhance systems and ensure the delivery of high-quality services nationwide, with specific emphasis on regions struggling with drought and high refugee concentrations.

Sub-component 2.1: Protect and improve human capital outcomes in areas -affected by conflict,

droughts and high level of refugees

This subcomponent will focus on designing and implementing multisectoral interventions in regions affected by conflict, drought, and significant refugee populations. These interventions will be tailored to address specific area-based priorities and informed by global evidence. The primary objective is to strengthen the delivery of essential services within a multisectoral framework, with a particular emphasis on fostering resilience, reconstructing service delivery systems, and providing socio-emotional support to children, adolescents, students, communities, and frontline personnel in key social sectors such as education, health, agriculture, and water.

This subcomponent will specifically target high-risk areas, including Tigray, with activities such as:

1. **Supporting Resilience and Service Delivery Systems:** it will be enhancing system resilience, providing socio-emotional support, and promoting inclusiveness.
2. **Education System Support:** it will be assisting high-risk woredas severely affected by conflict to recover learning losses. This includes financing interventions to support school return and boost learning outcomes by strengthening community mobilization, school readiness, improving teaching and learning environments, and increasing school retention, especially for girls.
3. **Nutrition Interventions:** it will be addressing the key determinants of chronic malnutrition (stunting) in high-risk woredas through multisectoral interventions. This will be closely coordinated with the new health operation (Ethiopia PforR for Strengthening Primary Health Care Services (P175167)) to support the prevention and treatment of acute malnutrition (wasting) and other essential health services in conflict-affected woredas.

These interventions will be closely coordinated with other existing initiatives such as the 3R-4-CACE Projects, the Productive Safety Net Program (PSNP), GEQIP-E, and partnerships with organizations like UNHCR in refugee host communities.

Sub-component 2.2: Building models for innovation to address learning poverty and reduce stunting in the selected SPG woredas.

This component will support technical innovations for effective service delivery in the selected Special Purpose Grant (SPG) pilot woredas. The project will provide technical assistance (TA) and capacity building support, introducing tailored innovations to address context-specific demand and supply-side barriers faced by the selected woredas in delivering priority services that support Human Capital SPGs. The TA and capacity-building assistance will encompass a range of initiatives, including audio-visual learning programs, virtual science laboratories, e-learning platforms, and model demonstration schools. Leveraging virtual learning modalities will ensure uninterrupted educational opportunities, even during instances of floods or other natural disasters that disrupt in-person learning. Additionally, to combat stunting, technical assistance will focus on supporting integrated Social and Behavior Change Communication (SBCC) approaches, technologies to reinforce Growth Monitoring and Promotion (GMP), and impactful nutrition-sensitive interventions. The TA will also engage federal, regional, zonal, and woreda stakeholders to enable them to play a more effective role in facilitating and supporting quality service delivery and human capital formation.

This subcomponent operates across two windows: the Learning Poverty Window and the Stunting Reduction Window.

Learning Poverty Window: to improve the efficiency and effectiveness of teaching and learning outcomes, innovative models may include:

1. Developing audio-visual learning programs for young children (ages 3-10), and their parents and teachers, focusing on language learning as well as cognitive, physical, social, and emotional development.
2. Setting up virtual science laboratories for secondary schools through digital platforms.
3. Creating e-learning platforms for teachers' professional development.
4. Establishing demonstration schools for innovative teaching and learning.

Stunting Reduction Window: to improve nutrition outcomes, innovative approaches may include:

1. Adapting gender-sensitive, harmonized, and evidence-based behavior change strategies to increase service uptake, promote optimal practices, and increase the frequency of contact with behavior change agents.
2. Testing innovative tools to improve the measurement and promotion of growth monitoring and enhance the overall quality of maternal and child nutrition services.
3. Strengthening gender, nutrition, water, and climate-smart agriculture interventions targeting vulnerable households.

Sub-component 2.3: Strengthening systems and accountability for improved service delivery

This subcomponent will provide technical assistance on public financial management (PFM) reforms at regional and woreda levels. It will offer support in PFM, governance, procurement, and environmental and social safeguard reforms, along with capacity building. This includes anti-fraud and corruption training focused on recording and reporting complaints related to maladministration, poor service delivery, and procurement to ethics officers, beginning with the SPG woredas. Additionally, budget oversight training will be provided to Woreda Council Budget and Finance Standing Committees to strengthen their capacity in following up on audit findings.

The following initiatives will be implemented in this sub-component:

1. **Enhancing Participatory, Multisectoral Planning and Budgeting:** this includes capacity building and improving the quality of data collection, verification, and utilization at federal, regional, zonal, and woreda levels.

2. **Strengthening Social Accountability and Governance:** this involves promoting, institutionalizing, and sustaining Social Accountability and Grievance Redress Mechanisms previously supported under ESPES; enhancing Public Financial Management (PFM) including Program-Based Budgeting (PBB); improving governance and procurement systems and reforms; and bolstering Environmental and Social (E&S) safeguard systems. Additionally, it includes updating guidelines and providing training for Women Development Groups (WDGs) and establishing 'gender equality hubs' in the SPG pilot woredas to advance gender equality at the community level.
3. **Integrating Refugees into Basic Service Delivery:** it will be enhancing government capacity at all levels to integrate refugees into the basic service delivery system to create medium-to-long-term development opportunities for both refugees and their host communities.
4. **Building Capacity in Drought-Affected Areas:** it will be improving preparedness for mitigating and adapting to climate-related shocks in drought-affected areas.
5. **Project Management and Coordination:** this involves the Ministry of Finance (MOF) managing and coordinating the overall project and overseeing sector ministries. It includes covering the costs of independent Third-Party Monitoring (TPM) if necessary. Additionally, it will encompass an impact evaluation to assess the effectiveness of the new innovations introduced under the SPG for potential expansion.

Component 3: The Contingent Emergency Response Component (CERC): This component of the HCO focuses on addressing the uncertainties inherent in program planning and implementation, restrictions from various factors such as pandemics, internal conflicts, man-made and natural disasters, environmental degradation, and other social and economic crises. Given the ongoing uncertainty surrounding the course of the COVID-19 pandemic, persistent conflicts in certain regions, and the associated political, social, and economic instabilities facing the country, along with the potential for natural disasters to disrupt the delivery of essential human development services, a contingent Emergency Response Component (CERC) has been incorporated into the HCO framework.

1.3. Institutional arrangement and Beneficiaries of the HCO

The implementation arrangement for the HCO is based on the decentralized government structures of Ethiopia at the national, regional/city, woreda/kebele ⁴ and community levels. At the national level, the implementation of the HCO shall be coordinated by MoF in collaboration with the established service delivery secretariat (SDS) and with the support of government agencies and sectors. The four core federal ministries including Ministry of Education (MOE), Ministry of Health (MOH), Ministry of Agriculture (MOA), Ministry of Water and Energy (MOWE) and other ministries and agencies like Ministry of Women and Social Affairs (MOWSA), Ministry of Planning and Development (MOPD), and Central Statistics Agency will be responsible for the supervision, monitoring and reporting of their respective technical areas. At the regional/city and woreda level, regional bureaus of finance and economic development (BOFED) and woreda offices of finance and economic development (WOFED) will play a coordination role while respective offices of agriculture, health, water and energy,

⁴ The Government of the Federal Democratic Republic of Ethiopia has a federal structure that includes national (or federal), regional, zonal, and woreda and/or kebele levels, from top to bottom. The regions are autonomous, with woreda/kebele being the lowest level of structure. In some parts of the country, the woreda is the lowest level, while in others, the kebele is the lowest. When we refer to woreda/kebele, it implies that the lowest level structure might be either woreda or kebele, depending on the region's context.

and women and social affairs at regional and woreda levels will play a role in monitoring and reporting of sectoral results in their respective domains. Further, the selected woredas will be responsible for the implementation of the Human Capital Specific Purpose Grant (HC SPG).

There will be a Federal Steering Committee (SC) chaired by MoF, the State Minister of Economic Cooperation and comprising of relevant ministries (MoE, MoH, MoA, MoWE, MoWSA and MoPD) and other agencies/commissions to provide overall guidance, operational oversight, track performance, and strengthen inter-ministerial coordination. The World Bank and other contributing development partners (DPs) will be part of the SC. The Service Delivery Secretariat (SDS) will be the secretary of the SC.

Technical Committees (TC) will be established at the three level of government: Federal, regional and woreda/city level. They will be chaired by the Department head of COPCD/MoF at federal level, deputy head of BoFED/BoF at regional level and WoFED head at woreda/city level. Technical committees will provide operational oversight, track performance, and strengthen inter-ministerial /bureau/office coordination. Regional and woreda level councils will provide general oversight of the subnational government bureaus/institutions involved in HCO implementation.

Children from the age of three to grade three; girls in the primary, middle and secondary schools; students in primary, middle and secondary schools; teachers in primary, middle and secondary schools and parents of the students in the targeted woredas are the direct beneficiaries of the HCO Operation. The community, parents, students and teachers at large will be the indirect beneficiaries of the Operation.

1.4. Environment and Social Aspects

For its Investment Project Financing (IPF) component, the HCO addresses the environmental and social aspects through the World Bank's Environmental and Social Framework (ESF). One of these Standards- ESS 2- relates to labor and working conditions and requires Borrowers to develop labor management procedures (LMP). The LMP identifies main labor requirements and risks, helping the Borrower determine the necessary resources to address labor issues. The LMP is a living document, initiated and finalized early in Operation's preparation and reviewed and updated throughout its development and implementation. This document details the types of workers likely to be deployed by the Operation and its management.

1.5. Scope and Structure of the LMP

The scope of the LMP is outlined in the World Bank's ESS 2. The engagement will be planned as an integral part of Component 2 (IPF) of the Operation's environmental and social assessment, as well as its design and implementation. The LMP includes ten chapters, with Chapter 1 serving as the introduction. It provides background information about the HCO, including its development objective, components, subcomponents, implementation structure, and modalities. An overview of labor use in the Operation is presented in chapter 2. Key potential labor risks are described in chapter 3. Chapter 4 discusses the legislative frameworks governing labor employment in Ethiopia and compares them with that of the World Bank's ESS 2. Implementation arrangements, age requirement, policies and procedures and timing of labor requirements are covered in chapters of 5 to 7. The grievance redress mechanism, contractor management, and Operation annual work plan are presented in the final three chapters 8, 9 and 10, respectively.

2. Overview of labor use during the Operation

2.1. Type of workers

ESS 2 categorizes the Operation workers into: direct workers, contracted workers, community workers and primary supply workers. Though it is not possible at this point to present planned numbers of workers as it depends on the scope of the work and demand of human resource, the HCO envisaged employing around 150 direct workers, and unidentified number of contracted and primary supply workers for the required positions of qualified staff and focal persons to the Operation at federal, regional, zonal and woreda levels. The direct workers are those deployed as civil servants and ‘technical consultants’ by the Operation and they will be governed by mutually agreed contracts. The contract workers will be employed based on the importance and demand of other implementing parties/agencies like contractors, construction workers, service providers, sub-contractors, and other intermediaries, details of which will be known as and when implementation of activities begins. The primary supply workers will be employed as per the interest of the primary suppliers of goods and materials for the Operation. However, assignment of community workers to the HCO is not considered as relevant because communities are not expected to provide labor as a contribution to the Operation. Local community members may be hired as the contracted workers by the contractors based on terms of contract that are consistent with this LMP.

The labor use of the HCO under each type of workers is described as follows:

Direct workers: This category of workers will include both permanent and temporary employees as well as consultants assigned to the activities directly contributing to the achievement of the HCO/IPF at federal, regional, zonal and woreda level structures.

An estimated 150 direct workers are expected to be employed and assigned to the Service Delivery Secretariat at the Ministry of Finance within the Channel One Programs Coordinating Department. Additionally, environmental and social focal persons will be assigned by the MOF and each core Operation implementing sector, including the Ministry of Health, Ministry of Education, the Ministry of Women and Social Affairs, Ministry of Agriculture, Ministry of Water and Energy, Agency for Civil Society Organizations, and the Ministry of Planning and Development.

This also includes the type of workers required at regional, zonal and woreda level core sector offices, such as teachers, agricultural and health professionals, information technology (IT) specialists, procurement and finance experts, as well as social and environmental specialists.

Contracted workers: under this category, two types of contracted workers are expected for the Operation implementation. The first group includes service providers, which includes the staffs to be hired by the federal and regional SDS as an individual consultant or firm/CSO to facilitate the development and implementation of the HCO at the federal, regional and zonal/woreda level. This will include IT and audiovisual professionals; environment and agricultural professionals; and experts from the fields of medicine, nutrition and education and others. The second type of contracted workers are contracted/temporary civil servants that include workers and local services providers which will be recruited by the SDS and other contractors or implementing agencies which are responsible to provide a specific deliverable for the key Operation activities at the regional and local level. These could be workers for financial and procurement services; laboratory services; system developers; innovators; contractors, construction workers and others.

Community workers: Community workers are not relevant for the HCO/IPF. Even if local community members are hired as contracted workers in the Operation, they will not be hired

for the purpose of job creation or as part of safety net approach. They will be hired as contracted workers per provisions of this LMP.

Primary supply workers: The Operation will utilize direct source of goods and services or training & learning materials essential for the Operation from primary suppliers. The implementing agency (MoF/SDS) will require incorporating legal provisions in the contracts of the primary supply workers on use of child/forced labor and explicit prohibition and compliance with OHS regulations. The PCU will identify potential risks of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers during Operation implementation. The ability of the implementing agency to address these risks will depend upon the SDS's level of control or influence over its primary suppliers. Where remedy is not possible, the SDS will, within a reasonable period, shift the Operation's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements of this LMP.

2.2. Number of Operation Workers

Direct workers: Total number of workers, the employees of MoF SDC and core implementing government sectors at the federal, regional and woreda level, dedicated to this Operation is estimated at around 150.

Contracted workers (service providers and civil work contractors):- The precise number of contracted Operation workers who will be employed is currently unknown. . This information will become available once implementation commence. Recruitment will involve individuals or firms providing technical assistance under the different components. Additionally, direct work and contract work is open to internally displaced persons (IDPs) and returnees who are integrating into the community based on their interest and capabilities.

Primary supply workers: the estimated number of primary supply workers to be engaged in the Operation could not be figured out at this stage.

2.3. Workforce characteristics

Given the nature of the Operation workforce (mostly skilled professionals) and characteristics of the labor force market in Ethiopia, it is likely that the workforce, especially the professional from the fields of health, education, finance, IT and system development workers, will be predominantly male. Female workers are expected in the firms/CSOs, individual consultants, primary suppliers and PCU. The hiring decisions will be based on the principle of non-discrimination and equal opportunity. The expectation is that the majority of labor will be locally hired with the exception of a few skilled workers. Provisions will be made to train and hire as many as possible from local communities where the activities are taking place.

2.4. Timing of labor requirements

The direct workers will generally be required full time and around a year for the Operation duration. TA consultants and civil works contract workers will be required as per the need. Some typical positions need to consider the timing as they might be essential at the beginning, in the middle or end of the Operation period. So, it will be up to the contractor to mobilize labor force to coincide with the type of work and the season. Timing and duration of the employment of contracted workers will be known at later stages; however, they will only be engaged for the duration of respective sub-components which will be unlikely to extend more than 12 months.

3. Assessment of key potential labor risks

The labor risks for the Operation can be defined based on the nature and location where Operation activities will be carried out. Considering the HCO/IPF activities of technical assistance provision in innovation and service provision, no major risks are envisaged, and the potential labor risks are described below. To mitigate potential labor risks during the implementation of the operation, a Code of Conduct (CoC) will be developed and signed by all types of workers during the recruitment process.

Based on current national conditions, the main labor risks associated with the HCO's implementation are assessed to be related to the potentially hazardous work environment, labor influx and the associated gender-based violence (GBV), child/forced labor and other risks in relation to recruitment and employment procedures.

Since the IPF component focuses on technical assistance and capacity building schemes, civil works to be supported under the Operation will be very small in scale. Under the IPF subcomponents, there is a plan to build models of innovation to promote stunting reduction and reduce learning poverty. To achieve the intended improvement of the efficiency and effectiveness of teaching and learning outcomes through innovative models, might require building of basic infrastructures like rooms for laboratories, demonstration rooms and latrine facilities within schools and households and this will demand a labor force for the civil works.

Child and forced labor: The risks of child/forced labor in the Operation areas are considered as low given the type and size of the IPF investments. This risk will be mitigated through certification of laborer's age using legally acknowledged documents like national identification card or birth certificates. In addition, awareness raising programs will be conducted to the community on the existing national laws and proclamation which prohibit child and forced labor as well as on the negative impacts of child and forced labor. The contractors also will be required to commit against the use of child/ forced labor in their contract, and the SDS staff in charge of contractor supervision will monitor and report the absence of child/ forced labor risks in the Operation implementation.

Labor influx: Considering the minimal job openings in the Operation areas, it is expected that the Operation area will experience low labor influx. At the regional and woreda level the Operation will be implemented by local contractors and all contracted workers will be hired locally except for the specific areas which require specialized skills. To manage the risks associated with labor influx which is related to the interaction between Operation workers and local communities like communicable diseases and gender-based violence will be managed through contractual agreements, code of conduct and trainings. These procedures are guided by the national legislation and also follow the guidelines of the Bank's ESS2 and ESS4, its interim note on "COVID-19 Considerations in civil Works Operations" and the technical note on public consultations and stakeholder's engagement in WB-supported operations.

Gender-based violence: Due to young ages of the potential workers in the Operation areas and their sense of freedom to act outside their family environment and social control scheme, there will be a potential of sexual harassment of women and girls, exploitative sexual relations and illegal sexual relations with minors from the local community. The expected minimal GBV risks in the Operation areas will be managed by the contractor's commitment for GBV prevention by setting up guidelines and creating or strengthening structures to respond for GBV issues through development of code of conduct, GBV action plan, assigning GBV focal point, and creating grievance redress mechanism (GRM) for the Operation. In addition, there will be sensitization trainings and dialogues with the workers and local communities on the prevention and response mechanisms of GBV. The SDS staff in charge of contractor supervision will monitor and report the absence of GBV risks in the Operation implementation.

Occupational Health and Safety (OHS) risks: Since most contracted workers are professionals who are supposed to provide technical assistance (TA) in their respective areas of expertise, the occupational health and safety (OHS) risk of the HCO is estimated to be low. However, small-scale civil works, such as the construction of laboratory rooms, demonstration rooms, and latrine facilities within schools and households, present potential OHS risks. Despite the small scale, these risks could be significant due to the nature of civil works. Studies have shown that work involving small contractors often has considerable OHS risks due to the limited capacity of their workers.

The types of OHS risks associated with the IPF component of the operation for both TA and contractors include:

- **Risks Related to Internal Conflicts and Displacements:** these could compromise the safety and security of the Operation workers, leading to forced displacement, imprisonment, injuries, or even death.
- **Community Health and Safety Risks:** the interaction of Operation workers with local communities and among themselves could spread communicable diseases (such as HIV and COVID-19).
- **Workplace Risks:** Accidents or injuries may occur due to the lack or inappropriate use of personal protective equipment (PPE). This also includes risks from the work environment (such as fire hazards and lack of amenities), laboratory demonstrations involving hazardous materials, excessive work hours, excavation, work-at-height, confined space entry during pit latrine construction, hot works, electrical hazards, hazardous chemicals (cement, fuel, paint), ambient air/noise emissions, poor housekeeping, and manual handling.
- **Security Risks, Traffic/Road Safety Risks, and Ergonomic Risks:** these arise from the operation activities related to the basic services supported by the project, such as schools and health clinics.

All contractors will be required to develop and implement written labor management procedures, including measures to establish and maintain a safe working environment in compliance with ESS2 and labor proclamation (article 7, Labor Proclamation 1156/2019). Continuous health and safety risk monitoring in the Operation areas is recommended, with appropriate actions taken according to identified risks.

The primary suppliers are also susceptible to occupational health and safety (OHS) risks, which are not exceptional. These risks primarily include hazards encountered during the loading and unloading of goods, as well as risks related to traffic and road safety. To effectively address these OHS risks, primary suppliers must implement comprehensive procedures and mitigation measures. This could involve protocols for safe handling practices during loading and unloading operations, as well as measures to ensure the safety of their workers while navigating traffic and roadways. By prioritizing OHS protocols, primary suppliers can contribute to safer working environments and reduce the likelihood of accidents or injuries.

Employment risks: Workers will be hired by the MoF, SDS and other core sectors, either directly as Operation implementation staff and individual consultants or indirectly as part of contracts from other firms, service providers and civil works contractors. According to its management, SDS heavily relies on donor-funded Operations and has approved budgets per Operation, and cannot exceed the budget ceilings. Due to this gap multiple positions might be forced to be covered by one TA and this in turn creates employment risks for other unemployed community members in terms of restricted employment opportunity; and extended hours of work and overtimes without compensation for the TAs. As stated in the article four of the labor proclamation 1156/19 the working hours has to be limited and compensation should be in place for the extra time,

Geography and seasonality risks: Given the mountainous terrain, poor transportation and

difficulty in access, punctuality in terms of time and labor productivity at times could be below expectations. Attending to accidents and emergencies could also be an issue.

Security risk: As the HCO implementation concentrates at the woreda levels, TAs are expected to travel away from their residence to the Operation areas. The possible occurrence of internal conflicts in the Operation areas might create a security risk on the Operation staff. To manage the security risks due to internal conflicts and unrest, the contractors and regional or local administration have to conduct risk assessment, and based on the evidences they are expected to develop their capacity to respond to the needs and manage risks. They are also expected to develop a contingency plan which builds on the local government, the contractors and the community's preparedness in order to enhance the rapid provision of effective assistance and protection for the workers and the community.

Furthermore, the Operation office take the following actions:

- Protocols on staff members' movement (when out of their work stations or travel to Operation areas) will be developed
- The Operation office will work closely with the government structures to ensure the security of the Operation staff
- The Operation will not hire armed security as part of the Operation activities.

Discrimination: Discrimination is a potential risk in the Operation areas in terms of inappropriate treatment or harassment of Operation workers due to: gender, age, disability, ethnicity, or religion; potential exclusion or preferences with respect to recruitment, hiring, termination of employment, and working conditions; terms of employment made on the basis of personal characteristics unrelated to inherent work requirements; and exclusion or unfair selection criteria that alienate Operation workers for training and career development. As per the Ethiopian Labor Law and ESS2, discrimination is unacceptable in the HCO/IPF and both support equal opportunities for women and men, with emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria.

The above potential lists of labor risks in the HCO implementation are associated with the direct, contract and primary suppliers' workers of the Operation. The specific labor risks associated with the three Operation worker categories is summarized as follows:

I. Risks associated with direct workers

- Risks in terms and conditions of employment
- Risks of discrimination and deprivation of equal opportunity
- Risks of child labor and forced labor
- Gender-Based Violence, Risks of sexual harassment and assault
- Risks related to occupational health and safety
- Risk of absence of a mechanism to express grievances and to protect rights of workers
- Geography and seasonality risks
- Security situation

II. Risks associated with Contract workers

- Occupational Health and Safety (OHS) risks
- Risk of non-compliance by the contracting entity
- Risk of absence of access to grievance mechanisms during engagement
- Risk of Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual harassment

III. Risks associated with primary suppliers' workers

- Risk of child and forced labor
- Risks related to traffic and road safety
- Hazardous conditions during loading and unloading

4. Overview of labor legislation: Terms and conditions

4.1. National Legislation

Article 42 of the Constitution of the Federal Democratic Republic of Ethiopia (1995) on the rights of labor provides employees the right to:

- Reasonable limitation of working hours, to rest, to leisure, to periodic leaves with pay,
- Remuneration for public holidays as well as healthy and safe work environment
- Form trade unions and other associations to bargain collectively with employers or other organizations that affect their interests.
- Express grievances, including the right to strike.
- Equal pay for equal work

The Labor Proclamation 1156/2019, Labor proclamation 377/2003 and Federal Civil Service Proclamation 1064/2017 are the fundamental legislative acts of the Government of Ethiopia to regulate all matters arising in relation to labor. These acts govern the rights and freedoms of the parties of employment relationships, establishment of the minimum guarantees of the rights and freedoms in the sphere of work. They prohibit discrimination and guarantee that all citizens have equal rights to work regardless of their race, gender, language, religion, political beliefs, social status, and property.

4.2. Relevant legal provisions

In addition to the provisions of ESS2, the terms and conditions of the following labor laws of the Government of Ethiopia will apply for workers: Labor Proclamation No. 377/2003; Federal Civil Servants Proclamation 1064/2017; Labor Proclamation No.1156/2019 (complements Labor Proclamation No. 377/2003); Employment Exchange Service Proclamation No. 632/2009; and Proclamation No. 568/2008 on the Right to Employment of Persons with Disability.

- i. **Forced and child labor:** Forced and child labor is prohibited under Article 36 of the 1995 national Constitution and is a punishable offence under the Criminal Code Proclamation no. 414/2004. The Labor Proclamation no 377/2003 has set a minimum age for employment at 14 years and the new labor proclamation no 1156/2019 raised the employability age to 15 years. Minimum age for hazardous work is set at 18 years; however, the Labor Proclamation allows children above the age of 15 to engage in hazardous work if it is performed following a government-approved vocational training course. In addition, article 89 and 90 of the Labor Proclamation has set restrictions on what type of work can be done by workers under the age of 18, and what hours of work are permissible. Normal working hours for young persons may not exceed seven hours per day. It is prohibited to employ young workers on night work between 10 p.m. and 6 a.m.; overtime work; weekly rest days; and public holidays.
- ii. **Age of Employment:** Ethiopian law prohibits anyone under 18 from performing “unhealthy or heavy” work and there are special requirements for leave, work hours, and other conditions of employment. Ethiopia has ratified ILO’s convention of Minimum Age Convention No. 138/1973 and it sets the minimum age for employment and the minimum age for hazardous work as 15 and 18 respectively, through its Labor Proclamation No.1156/2019, Article 89(1-4). Workers between the ages of 15 to 18 years are classified as young workers and it is prohibited to employ young workers to carry out work which, on account of its nature or due to the condition in which it is carried out, endangers the life or health of young workers. The SDS will ensure that no construction workers under 18 years are employed unless they are hired for office work and it will undertake monitoring, at a minimum every six months, of all Operation

workers, to ensure that there are no direct hires or community workers under 18 years of age, and that all contractors and subcontractors involved in the Operation are not employing/engaging anyone under 18 years of age for work in relation to the Operation. Based on the local legislation, workers between 15-18 years could be hired for office work with shortened working hours (during out of school time with guardian permission). Contractors will be required to verify and identify the age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or medical or school record. If a child under the minimum age is discovered working on the Operation, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

- iii. **Wages and deductions:** In Ethiopia there is no national minimum wage. It exists only for the public workers which is around 420 ETB. Some governmental institutions set their own minimum wages. Minimum wages in the public sector are determined at national level depending on the nature of service and level of skill of the worker (employee). Based on the decision of the Council of Ministers, the Ministry of Civil Service notifies the minimum wage together with the different levels of salary to be paid for all employees for different skill level and types of services. It is calculated on daily, hourly, weekly and/or monthly basis.

According to the 1997 Labor Act, wages are only paid for the work done by the worker except in case interruption on employer's behalf which makes it impossible to work (i.e. interruption in supply of tools and raw materials). Article 56(1) of the 1156/2019 Labor Proclamation requires the employers to pay wages in cash on working day at the workplace unless otherwise agreed. In case date of payment (where already decided) falls on a weekly rest day or public holiday, the wages are paid on the preceding working day (Article 56 (2)). Wages are paid directly to the worker or to the person authorized by the worker (Article 57). Wages may be paid in kind, but it may not be more than 30% of the wages paid in cash. An employer is under the obligation to pay the worker wages and other compensations in accordance with the national labor proclamation or the collective agreement.

Generally, employer is not allowed to deduct wages except where it is provided by the law or collective agreement or work rules; or in accordance with a court order or a written agreement with the worker (Article 58 of the proclamation 1156/2019). The amount of deduction must not exceed one third of the monthly wages of the worker. It is obligatory for an employer to keep a record of payment in a register specifying the gross pay and method of calculation of wages; other variable remunerations; the amount and type of deduction; and the net pay and other relevant particulars, unless there is a special arrangement on which the signature of the worker is affixed. This register must be easily accessible to all the workers and the entries are explained to the worker on request.

Women:- The Labor Proclamation 1156/2019 (Article 86) prohibits assignment of women on dangerous or hazardous works. This article also prohibits overtime assignments for pregnant women and employment contract termination during pregnancy and until four months after delivery. In accordance with the Constitution of Ethiopia, Article 35 (5(a)) and Labor Proclamation 1156/2019 (Article 88), female workers are entitled to fully paid maternity leave, paid leave for medical examinations related to pregnancy and paid leave during pregnancy on recommendation of a medical doctor. There is no explicit provision in the law, which gives a female worker the right to return to same position after availing her maternity leave. However, because an employer can't terminate a female worker's contract on maternity leave, it gives an

implied right to return to the same job. In the Labor Proclamation there is no a binding provision that obligated employers to provide free time and space to nursing mothers. However, the Federal Civil Servants Proclamation 1064/2017 urges government institutions to establish a nursery where female civil servants could breastfeed and take care of their babies in their work places.

- iv. **Working hours:** According to Article 33 of the 1064/2017 Federal Civil Servants Proclamation, regular working hours of civil servants shall be determined on the basis of the condition of work and not exceed 39 hours per week. Article 61 (2) and Article 64 of the Labor Proclamation No. 1156/2019 puts the standard hours of work per day as 8 hours and as 40 hours per week, with less allowed for those under 18. The number of hours per day, and days per week, is established in the contract/agreement between the employer and employee.
- v. **Leave:** Article 42 (2) of the Ethiopian Constitution entitles workers with the right of having a reasonable limitation of working hours, to rest, to leisure, to periodic leaves with pay, to remuneration for public holidays as well as healthy and safe work environment.

Annual leave: Article 37 & 38 of the Federal Civil Servants Proclamation No 1064/2017 and Article 76 -78 of the Labor Proclamation No 1156/2019 entitle the workers to uninterrupted annual leave with pay. In addition to national holidays, workers are entitled to 16 working days of paid annual leave on completion of one year of service plus one working day for every additional year of service. For a worker with 5 years of service, the period of paid annual leave is 18 working days (one day extra for every two additional years of service).

Sick leave: The Labor Proclamation 1156/2019 (Article 85 & 86) provides that a worker should complete six months for sick leave entitlement of up to six months within a year. However, the worker should notify the employer the next day from absence from work. The worker should present a sick leave certificate issued by a duly recognized medical facility. The worker will be paid (i) first one month, with payment of 100% of his/her wages; (ii) for the next two months, with payment of 50% of his/her wage; and (iii) for the next three months, without pay.

Family events: workers are entitled for leave with pay for events such as marriage, paternity leave, maximum of two rounds of leave for exceptional and serious events.

- vi. **Overtime work:** overtime is the work done in excess of the normal daily hours of work. A worker may not be compelled to work overtime except in case of accident (actual or expected), force majeure, urgent work, or substitution of absent workers assigned on work that runs continuously without interruption. Overtime work may not exceed 4 hours in a day or 12 hours in a week. If a worker works beyond the stipulated working hours during the week days, i.e., 8 hours a day and 48 hours a week, he/she is entitled to an overtime premium as follows: - 150% of normal hourly rate for overtime work between 06 a.m. to 10 p.m.; 175% of normal hourly rate for overtime work between 10 p.m. to 06 a.m.; 200% of the normal hourly rate for work on a weekly rest day; and 250% of the normal hourly rate for work on a public holiday.
- vii. **Occupational Health and Safety and Working Environment:** Occupational health and safety is governed by the Constitution of Ethiopia. Workers right for healthy and safe work environment is stated under Article 42(2) of the Constitution. In accordance with the Labor Proclamation 377/2003 and 1156/2019, every employee has the right to enjoy suitable measures of protection and safety & hygiene at work as the employer is

required to take all necessary measures to safeguard the health & safety of workers. It is considered unlawful for an employer to require a worker to execute work, which is hazardous to his life. Article 92 and 93 of the 2019 Labor Proclamation narrates the roles and responsibilities of employers and employees related to occupational health and labor safety.

Employer must take appropriate measures to ensure that workers are properly instructed and notified about the risks and imminent dangers related to their respective occupations and precautions necessary to avoid accidents and injury to health. Medical examination of newly employed workers and those engaged in hazardous work, at employer's expense, is necessary. Measures should be taken to ensure that the processes of work are not a source or cause of physical, chemical, biological, and psychological hazards to the health and safety of the workers. It is obligatory for an employer to establish occupational safety and health committee in the establishment according to the directive issued by the Minister. Employment accidents and occupational diseases must get registered and notified to the labor inspector. To keep workplace and its premises free from hazards related to health and safety of worker, employer must implement the directives issued by the appropriate authority in accordance with this proclamation.

Workers must also obey all health and safety instructions issued by the employer or by the competent authority and co-operate in the formulation of work rules to safeguard his health and safety, and to implement them. Workers are prohibited from interfering, removing, displacing, damaging or destroying any safety devices or other appliances furnished for workers' protection. Further, workers are prohibited from obstructing any method or process adopted with a view to minimizing the occupational hazard. Ethiopian law does not specifically state that it prohibits an employer to react against a worker for reporting a dangerous work situation or removing himself/herself from a dangerous work situation.

- viii. Benefits in the case of employment injuries:** Proclamation 1156/2019 declares that, where a worker sustains employment injury, the employer shall cover the following expenses, among others: 1) general and specialized medical and surgical care; 2) hospital and pharmaceutical care; 3) any necessary prosthetic or orthopedic appliances. A worker who has sustained employment injury shall be entitled to: a) periodical payment while he is temporarily disabled; b) disablement pension or gratuity or compensation where he sustains permanent disablement; c) Survivors' pension or compensation to his dependent when he dies.

4.3. The World Bank Environment and Social Standards: ESS 2

The World Bank's requirements related to labor are outlined in its ESS Standard (ESS2) that helps the Borrowers in promoting sound worker-management relationships and enhance the development benefits of a Operation by providing workers fair treatment, and safe and healthy working conditions. Key objectives of the ESS 2 are to: promote safety and health at work; promote the fair treatment, nondiscrimination and equal opportunity of Operation workers; protect Operation workers, including vulnerable workers such as women, persons with disabilities, children and migrant workers, contracted workers, community workers and primary supply workers, as appropriate; prevent the use of all forms of forced labor and child labor; support the principles of freedom of association and collective bargaining of Operation workers; in a manner consistent with national law; and provide Operation workers with accessible means to raise workplace concerns. ESS2 applies to Operation workers including fulltime, part-time, temporary, seasonal and migrant workers. Where government civil servants are working in connection with the Operation, 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 Operation. ESS2 will not apply to government civil servants.

The ESS 2 requires the Borrower to develop and implement written labor management procedures applicable to the Operations. These procedures will set out the way in which Operation workers will be managed, in accordance with the requirements of national law and the ESS. The procedures will address the way in which the ESS will apply to different categories of Operation workers including direct workers, and the way in which the Borrower will require third parties to manage their workers. Operation 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 labor and employment law, including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of the ESS. 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.

4.4. Policy Gap

The WB ESS2 outlines specific requirements for each aspect of working conditions and the rights and safety of employees, which the operation will adhere to during its implementation. In this section, we will assess the Ethiopian National Labor Proclamation against the elements and requirements of WB ESS2 to identify both policy gaps and strengths.

Summary of Ethiopian Labor proclamation in comparison to the World Bank ESS 2 Requirements

| Elements of ESS | Major WB requirements | Key requirements in Ethiopia legal framework |
|--|---|--|
| Working conditions and management of labor relations | <ul style="list-style-type: none"> - Written labor management procedures - Terms and conditions of employment - Nondiscrimination and equal opportunity - Worker's organizations - Elaborate Labor Management Plans including Contractor's Environment And Social Management Plan (ESMP) warranted | <ul style="list-style-type: none"> - Written employment contract required, including procedures and employment conditions - Specific nondiscrimination and equal opportunity requirements - No provision for Labor Management Plans |
| Protecting the work force | <ul style="list-style-type: none"> - Child labor prohibition - Forced labor prohibition | <ul style="list-style-type: none"> - No forced labor allowed - Child labor prohibited |
| Grievance mechanism | <ul style="list-style-type: none"> - GRM should be in place for direct and contracted workers | <ul style="list-style-type: none"> - No Operation specific GRM is warranted. - Grievance registration and follow-up procedures are stated |
| OHS | <ul style="list-style-type: none"> - Detailed Procedure required for each and every Operation. - Requirements to protect workers, train workers, document incidents, emergency preparation, addressing issues; and - Monitor OSH performance | <ul style="list-style-type: none"> - There is no detailed procedure specific to each and every Operation |
| Category of workers | <ul style="list-style-type: none"> - Specifies categories of workers | <ul style="list-style-type: none"> - No reference to community and primary supply workers |

| Elements of ESS | Major WB requirements | Key requirements in Ethiopia legal framework |
|------------------------|--|--|
| Minimum age of workers | <ul style="list-style-type: none"> - Persons below 14 years of age are not allowed to be employed - Those between 14 and 18 years of age are allowed to be employed with set of restrictions on the type of work they will be engaged in | - Employment permissible for 15 plus age, but with guardian permission, 14 years children might be employed under certain conditions |

5. Labor Management Procedure Implementation and Responsibility of Staff

The entity responsible for managing workers varies depending on the type of workers and the location. Direct workers will be managed by the MoF and other core implementing ministries at the national level, following the guidelines outlined in the Federal Civil Servants Proclamation 1064/2017, along with their respective regional bureaus. The terms and conditions of the contracted workforce would be determined by the laws specified in section four above. The Social Development and Safeguards (SDS) coordinator at the MoF oversees and guides all the workers associated with the Operation. Additionally, the SDS, Social Development Specialist and Monitoring and Evaluation (M&E) Specialist will each have distinct responsibilities, which include:

Implement this labor management procedure (LMP); develop the capacity of operation workers and contractors to implement the LMP and related OHS mitigation procedures and protocols

Ensure that contractors engaged in civil works comply with this LMP, and prepare occupational health and safety plans before mobilizing to the field;

- Ensure the contracts with the contractors are developed in line with the provisions of this LMP and the Operation's Environment and Social Management Plan (ESMP);
- Monitor to verify that contractors are meeting labour and OHS obligations toward contracted and subcontracted workers as required by the Ethiopian law and respective contracts between SDS and the contractors;
- Monitor contractors' and subcontractors' implementation of labor management procedures;
- Monitor compliance with occupational health and safety standards at all workplaces in line with Ethiopian occupational health and safety legislation;
- Monitor and implement training on LMP and OHS for Operation workers;
- Ensure that the grievance redress mechanism for Operation workers is established and implemented and that workers are informed of its purpose and how to use it;
- Have a system for regular monitoring and reporting on labor and occupational safety and health performance;
- Monitor implementation of the Worker Code of Conduct;
- Ensure that contractors develop and implement specific environmental and social management plans
- Timely reporting of accidents and incidents, and providing subsequent responses to the accidents/incidents.

The Contractors roles and responsibilities to the implementation of the Labor Management Procedures (LMP) and Occupational Health and Safety (OHS) encompass the following:

- Adhere to the labor management procedures and occupational health and safety requirements stated in the contracts signed with SDS;
- Supervise the implementation of labor management procedures and occupational health and safety requirements by subcontractors;
- Maintain accurate records of recruitment and employment of contracted workers as

- provided in their contracts;
- Clearly communicate job descriptions and employment conditions to all workers;
- Ensure that every worker hired by contractor or subcontractor is aware of the Project Coordination Unit (PCU) dedicated phone number, email address, and web for submitting grievances;
- Provide induction and regular training to employees in labor protection requirements, including training on their rights under Ethiopian law, job related risks, , and measures to mitigate these risks.
- Collaborate with SDS Social and Environment Specialists to conduct training sessions on labor management procedures and occupational safety, aimed at enhancing subcontractor performance.
- Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct before commencing work and supervise compliance with the Code throughout the project duration.

6. Policies and Procedures for Management of Labor Issues under the Operation

This section sets out the anticipated policies and procedures as mitigation measures that will be adopted by the Operation to address the labor risks and impacts identified in section 3.

a. Employment procedure and work conditions: Decisions relating to the employment or treatment of Operation workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of Operation 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. The following policies and procedure will be adhered to ensure the fair treatment of Operation workers in employment procedures and working conditions:

- Recruitment procedures will be transparent, public and non-discriminatory, and open with respect to ethnicity, religion, disability or gender.
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract.
- Workers will be informed at least two months before their expected release date of the coming termination.
- The contracted workers will not be required to pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Employer.
- Depending on the origin of the employer and workers, employment terms and conditions will be communicated in a language that is understandable to both parties.
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- Where disabled persons are hired, accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication, etc.
- Men and women will be given equal opportunities relating to all recruitment opportunities under the Operation.
- Workers will be presented with details of grievance procedures, including the different channels they can resort to and the processes for escalation where necessary.

b. Child and Forced Labor

In Ethiopia forced and child labor is prohibited under Article 36 of the 1995 national constitution and punishable offence under the criminal code proclamation no. 414/2004. The following policies and procedure will be abided by the contractors and Operation coordination offices to prevent child and forced labor in the HCO:

- The labor management procedure will be followed as a guide to set a minimum age for employment, restrictions on what type of work can be done by workers between the age of 15 and 18, and what hours of work are permissible for the works between the age of 15-18 in the Operation works.
- Contractors will be required to verify and identify the age of all workers through official documents
- If a child under the minimum age is discovered working on the Operation, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.
- Create control mechanisms like supervising staff to monitor the adherence to this LMP and Ethiopian Labor Law and Procedures.
- Awareness raising events should be conducted for all stakeholders regarding child and forced labor.

c. Occupational Health and Safety (OHS): As indicated in chapter 3, the main OHS risks are related to internal conflicts, communicable diseases and accidents due to lack of PPE. The Operation will ensure that workers are properly instructed and notified about the risks, imminent danger and preventive measure related to their respective occupations and precautions necessary to avoid accidents and injury to their health. The following are the main procedures to be considered:

- Provision of proper safety and emergency regulations for the prevention of fire, traffic, workplace and other accidents
- Awareness and training of workers regarding their work activity
- Adhering to the national labor law and its OHS portion as well to the WBG safety guidelines
- Immediate and appropriate steps to investigate and rectify any risks to health and safety arising from the work activity
- Appropriate directions signs will be installed to indicate the clear direction in case of emergency for visitors and workers.
- Supply of stretches and first aid boxes, together with rescue facilities at Site
- All workers should be trained in disease's prevention (i.e. Usage of Condoms, Hygiene, Social Distancing, Measures of reducing airborne diseases, ...) and basic treatment aspect.
- Reducing the number of workers at a time in times of epidemic and pandemic, and distributing standard PPE (i.e. Masks, gloves, hand sanitizers, ...).

d. Discrimination and exclusion of vulnerable groups: The recruitment of Operation workers and their engagement will be on the basis of equal opportunity and fair treatment, and there will be no discrimination on any aspects of the Operation. Recruitment protocols will be developed and monitored. In this regard, the Operation will adhere to the following procedures:

- The Operation will implement labor standards and working conditions as per the national law particularly where it applies to equal opportunities and non-discrimination.
- The employment of Operation workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship including but not limited to: recruitment requirements; training opportunities; termination of employment;

- inappropriate treatment or harassment including sexual harassment.
 - Where people with disability are hired, accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication, etc.
 - Men and women will be given equal opportunities relating to all recruitment opportunities under the Operation.
 - The Operation will also provide all measures necessary for protecting vulnerable groups of workers such as the disabled, and women.
 - Codes of conduct will be developed
 - The workforce GRM will be communicated to all workers
 - Induction trainings and refresher trainings will be provided for all workers.
 - All Operation workers will be provided with clear and understandable terms and conditions of employment in writing.
 - Workers will be presented with details of grievance procedures, including the different channels they can resort to and the processes for escalation.
- e. **Security risks:** To ensure the safety of the Operation workers in the areas where insecurity and internal conflicts arise in the forms of political, ideological and resource-based conflict the following procedures will be adhered in the Operation area:
- Protocols on staff members' movement when out of their work stations will be developed
 - The Operation office will work closely with the government structures to ensure the security of the Operation staff
 - The Operation will not hire armed security as part of this Operation.
- f. **Gender-based violence:** A separate procedure will be developed to address GBV/SEA complaints as may arise during Operation implementation. The procedure will incorporate the following aspects to prevent and response GBV in workplace:
- Provide training on GBV Prevention and Response to all the workers involved in the Operation.
 - A proper and comprehensive GRM should be prepared and GRM awareness sessions should be inducted for all Operation workers.
 - Complaint Box, GRM Hotline and other relevant GRM tools should be easily accessible to all workers.
 - Privacy and confidentiality should be taken seriously while filing complaints, to gain trust and ensure transparent implementation.
 - Immediate actions should be taken when facing serious issues.
 - Where GBV/SEA case is reported, the complainant will be provided with information about the available services including: confidential and appropriate medical and psychological support; emergency accommodation; and any other necessary services as appropriate including legal assistance.
 - Codes of conduct (CoC) will be developed which will include provisions on Sexual and gender-based violence (SGBV) and safety. Induction trainings and refresher training will be provided for all workers on the purpose of the CoC, the importance of adhering to it and serious consequences in the event that the CoCs are violated
 - Workers will be presented with details of grievance procedures, including the referral pathways in the event of GBV related complaints.

Monitoring and reporting play a pivotal role in managing labor issues within the Human Capital Operation. Through the implementation of robust monitoring and reporting mechanisms, the HCO can effectively address labor concerns, uphold compliance with relevant regulations, and foster a safe and equitable work environment for all employees. This will be accomplished

through the following activities:

- **Data Collection:** gathering of relevant information related to labor issues, such as workforce demographics, employment contracts, working conditions, and any grievances or disputes.
- **Compliance Monitoring:** regular compliance assessment with ESS2, national labor laws, regulations, and contractual agreements within the operation.
- **Incident Reporting:** establishing procedures for reporting and investigating any labor-related incidents, including accidents, injuries, harassment, discrimination, or violations of labor rights.
- **Stakeholder Engagement:** engaging with relevant stakeholders, including employees, labor unions, government agencies, and civil society organizations, to gather feedback, address concerns, and ensure transparency in labor management practices.
- **Documentation and Record-Keeping:** maintaining accurate records of labor-related activities, including employment contracts, training programs, performance evaluations, and disciplinary actions.
- **Regular Reporting:** providing regular reports on labor-related activities, including compliance status, incident investigations, and stakeholder engagement efforts, to relevant stakeholders and decision-makers within the operation.
- **Continuous Improvement:** utilizing feedback from monitoring and reporting processes to identify areas for improvement and implementing corrective actions to enhance labor management practices and outcomes within the operation.

7. Terms and Conditions of Employment

The terms and conditions applying to the Operation workers are set out in reference to the national labor laws and legislations, UN conventions, and international human rights instruments.

The national labor laws and regulations include: Labor Proclamation No. 42/1993 (replaced by Labor Proclamation No. 377/2003), (ii) Labor Proclamation No. 377/2003, (iii) Labor Proclamation No.1156/2019 (complements, does not replace, Labor Proclamation No. 377/2003), (iv) Employment Exchange Service Proclamation No. 632/2009, and (v) Right to Employment of Persons with Disability Proclamation No. 568/2008.

Ethiopia is a signatory to the UN conventions and has ratified the major international human rights instruments. Ethiopia has also ratified the following ILO conventions:- Forced Labor Convention No. 29/1930; Freedom of Association and Protection of the Right to Organize Convention No. 87/1948; Employment Service Convention No. 88/1948; Right to Organize and Collective Bargaining Convention No. 98/1949; Abolition of Forced Labor Convention, No.105/1957; Minimum Age Convention No. 138/1973; Occupational Safety and Health Convention No. 156/1981; Termination of Employment Convention No. 158/1982; The Rights of the Child Convention 1989; and The Worst Forms of Child Labor Convention No. 182/1999. To access these conventions please visit this website www.ilo.org/ethiopia.

In addition to the national and international labor laws and procedures, the terms and conditions applying to SDS workers are set out in the internal human resource (HR) regulations of the federal and regional Operation implementing agencies. These internal labor rules and regulations will apply to all SDS employees who are assigned to work on the Operation (direct workers). Terms and conditions of part-time direct workers will be determined by their individual contracts. There will be two types of employment contracts applied by the SDS: a one-year employment agreements and short-term service contracts. Majority of staff will be permanent staff with one-year employment agreements with fixed monthly wage rates. All the recruiting procedures will be documented and filed in the folders in accordance to the requirements of Labour Proclamation of the Federal Democratic Republic of Ethiopia. Under the Operation, direct workers will be properly paid for any overtime work to be conducted as

per their terms of contract in line with the national law. The work hours for SDS workers are 40 hours per week, eight hours per workday. The contractors' labor management procedure will set out terms and conditions for the contracted and subcontracted workers. These terms and conditions will be in line, at a minimum, with this labor management procedure, the national Labor Proclamation and specified in the standard contracts to be used by the SDS under the Operation.

The following are major terms and conditions apply to Operation workers in accordance with the national labor proclamations, laws and conventions.

Contracts

- The Operation, and contractors, subcontractor, and delegates of contracts shall pay rates of wages and observe hours and conditions of employment which are not less favorable than those established in the country.
- Contractors and sub-contractors shall be certified according to the Government Requirements for governmental contractors including that contractors are certify that the wages and conditions of employment of all those employed by the contractor in the trade or industry in which the contractor is seeking to contract with the Government are fair and reasonable.
- The contracts will be guided by the principle of collective bargaining is applicable and where there is no minimum wage or rates established in the country, the guiding principle will be of fair wages and reasonable rates commensurate with governmental minimum wage and similar established rates and conditions.
- In keeping with the labor proclamation, the contractor shall keep proper wage records and time sheets for all those employed in relation to the execution of the contract, and the contractor shall produce the wage records and timesheets for the inspection of any person authorized by the Operation or the Labor authorities of Ethiopia.
- Contractors are required by law, to post conditions of work in conspicuous places informing workers of their rights and conditions of work.
- The contractor shall ensure sufficient insurance so as to pay compensation to workers.
- A subcontractor shall be bound to conform to the conditions of the main contract and the main contractor shall be responsible for the observance of all contract conditions.
- Contractors and subcontractors shall recognize the right of their workers to be members of the trade unions.

Minimum Wage

- All Operation workers shall be paid a wage that is above or equal to the minimum wage as established by the Government of Ethiopia for civil servants and Operation workers.
- Wages will be paid on a weekly, bi-weekly or monthly basis. Each employee is entitled to a statement accompanying pay that clarifies the following: (a) the worker's gross wages due at the end of that pay period; (b) the amount of every deduction from his or her wages during that pay period and the purpose for which each deduction was made; and (c) the worker's net wages payable at the end of that pay period.

Hours of Work

- The maximum number of ordinary hours of work for employees shall be 40 hours per week with the ordinary working days being Mondays to Saturdays.
- Operation workers are prohibited from working more than 10 hours per day inclusive of two hours for lunch and rest periods.
- No person under the age of eighteen years shall be employed or allowed to work between the hours of 9.00 p.m. to 6.00 a.m.

8. Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to help resolve complaints in a timely, effective and efficient manner.

8.1. Operation- level Grievance Redress Mechanism (GRM)

Operation-level Grievance Redress Mechanism (GRM) refers to a structured process established within the operation to address and resolve grievances raised by individuals or groups affected by the operation's activities. This mechanism provides a formal avenue for stakeholders, such as employees, contractors, community members, or other stakeholders, to voice their concerns, complaints, or grievances related to the operation's impacts, activities, or conduct. The Operation-level GRM will be culturally appropriate, effective, accessible, and transparent, ensuring that all stakeholders are aware of its existence.

The operation-level GRM typically involves the following key components:

- **Accessibility:** ensuring that stakeholders have access to the grievance mechanism and are aware of how to use it. This may include providing information through various channels, such as workshops, posters, or community meetings.
- **Transparency:** maintaining transparency in the grievance process by clearly outlining the procedures for submitting grievances, the timeline for resolution, and the roles and responsibilities of all parties involved.
- **Fairness:** upholding principles of fairness and impartiality throughout the grievance process, including providing opportunities for all parties to present their perspectives and evidence.
- **Confidentiality:** protecting the confidentiality of individuals submitting grievances and ensuring that sensitive information is handled appropriately.
- **Timeliness:** resolving grievances in a timely manner to prevent escalation and minimize negative impacts on stakeholders.
- **Accountability:** holding accountable those responsible for addressing grievances and ensuring that appropriate actions are taken to address identified issues.
- **Feedback and Learning:** utilizing feedback from the grievance process to identify systemic issues, improve operations, and enhance stakeholder engagement practices.

The operation-level Grievance Redress Mechanism (GRM) is an essential component of responsible business practices, social accountability, and sustainable development. It provides affected stakeholders with a means to seek redress for grievances, fostering trust and legitimacy in the operation's activities.

Various channels will be available for submitting grievances at the operation level, including in-person, through suggestion boxes, or by phone to the grievance redress committees (GRC) established by the Operation at local levels (kebele/woredas).

Members of an operation-level GRC typically include representatives from various stakeholders involved in the operation. Below are their respective roles and responsibilities:

- **Operation Manager or Leader:** will oversee the overall implementation of the GRM and ensure that grievances are addressed in a timely and effective manner.
- **Community Representatives:** individuals selected from the affected communities to represent their interests and ensure that community concerns are adequately addressed.
- **Chair of the Woreda/kebele Council:** the government official from the local government structure who will provide guidance and support in resolving grievances within the framework of existing laws and regulations.
- **Human Resources Manager of the Operation:** will handle employee-related grievances

- and ensures compliance with labor laws and company policies.
- Environmental and Social Specialists of the Operation: will responsible for assessing the environmental and social impacts of the project and addressing related grievances from stakeholders.
- Legal Advisor of the Operation: will provide guidance on legal matters related to grievances and ensures that the GRM process complies with relevant laws and regulations.
- Communications Officer of the Operation: will be responsible for disseminating information about the GRM process to stakeholders and managing communication channels for submitting grievances.
- Monitoring and Evaluation Officer: will track and evaluate the effectiveness of the GRM process, identifies areas for improvement, and ensures accountability in addressing grievances.
- Project Beneficiaries: individuals or groups directly affected by the project who have the right to submit grievances and participate in the resolution process.

Each member of the GRM committee has a responsibility to ensure that grievances are addressed fairly, transparently, and in accordance with established procedures. They must collaborate effectively to identify solutions that address the concerns of all stakeholders and contribute to the overall success of the project.

Complaints will be organized and forwarded to the woredas/kebele council, then to the GRM focal person at the Service Delivery Secretariat (SDS) and Operation management/lead for resolution. An awareness-raising campaign will be conducted for Operation stakeholders including workers, beneficiaries, contractors and the community at large to inform them about the presence of the GRM and their right to voice any concerns, complaints, and issues related to the HCO.

The GRM offers a transparent and credible process for achieving fair, effective, and lasting outcomes. It also fosters trust and cooperation, serving as an integral component of broader consultation efforts that facilitate corrective actions.

The Operation-level GRM typically addresses a wide range of grievances related to the operation's activities, impacts, or conduct. Some common types of grievances that may be addressed and managed by the Operation-level GRM include:

- Employment-related Grievances: complaints related to working conditions, wages, benefits, contracts, discrimination, harassment, or other issues affecting employees or workers involved in the operation.
- Community Grievances: concerns raised by members of local communities affected by the operation, such as land disputes, loss of livelihoods, environmental pollution, noise, or other negative impacts on their well-being.
- Safety and Health Grievances: complaints regarding workplace safety, health hazards, accidents, injuries, or failure to comply with safety regulations or standards.
- Environmental Grievances: allegations of environmental damage, pollution, resource depletion, or other adverse impacts on natural ecosystems or biodiversity caused by the operation's activities.
- Social Grievances: issues related to social impacts of the operation, such as displacement, cultural heritage preservation, community development, social inclusion, or social conflicts arising from the operation's presence.
- Contractual Grievances: disputes arising from contractual agreements between the operation and contractors, suppliers, or service providers, such as non-payment, breach of contract, or failure to deliver services as agreed.
- Human Rights Grievances: complaints alleging violations of human rights, including

labor rights, land rights, or rights to participation and consultation.

- Access to Services Grievances: concerns related to access to essential services, such as water, electricity, healthcare, education, or other public services impacted by the operation.
- Cultural and Heritage Grievances: issues related to the preservation of cultural heritage, sacred sites, traditional knowledge, or cultural practices affected by the operation.
- Ethical Conduct Grievances: allegations of unethical behavior, corruption, fraud, or misconduct by employees, contractors, or other stakeholders associated with the operation.

The Operation-level GRM provides a structured process for stakeholders to raise, investigate, and resolve grievances in a fair, transparent, and timely manner, contributing to improved accountability, stakeholder engagement, and the overall sustainability of the operation.

The grievance mechanism for Operation-level grievances reported by staff, beneficiaries, community members, contractors, and other stakeholders operates as follows:

1. Submission of Grievances:

- Points of Contact: grievances can be submitted through various channels. For staff and contractors, the primary point of contact is the designated grievance officer or representative of the contractor. For community members, beneficiaries, and other stakeholders, grievances can be submitted to the grievance redress committees (GRC) established at the kebele, woreda, regional, and national levels.
- Methods: grievances can be submitted in person, via telephone, through suggestion boxes, in writing, or via a dedicated email and telephone number. Anonymity is respected if requested.

2. Receipt and Registration:

- Upon receiving a grievance, the designated staff member or GRC representative logs the complaint into a grievance registry. This registry records all pertinent details, including the date of submission, nature of the grievance, and any actions taken.
- The designated staff member or GRC representative notifies the Operation manager and the Environmental and Social Specialist (ESS) about the received grievance.

3. Initial Review:

- The grievance is reviewed to determine its nature and severity. If the grievance involves Operation management staff, the Operation coordinator or focal person may need to recuse themselves if directly implicated.

4. Acknowledgment:

- An acknowledgment of the grievance is sent to the complainant within a specified timeframe, typically within a few days of receipt. This acknowledgment includes an overview of the grievance process and an estimated timeline for resolution.

5. Investigation and Resolution:

- Standard Grievances: the contractor or designated staff member attempts to address standard grievances within three weeks. This involves investigating the grievance, consulting relevant parties, and identifying potential solutions.
- Urgent Matters: for urgent grievances like GBV, a shorter resolution period is applied, ranging from 24 hours to 15 days. These grievances are prioritized based on their impact and urgency.

6. Documentation:

- All steps taken to investigate and resolve the grievance are documented in the registry. This includes communication with the complainant, findings from the investigation, and the resolution process.

7. Communication of Outcome:

- Once the grievance is resolved, the designated staff member or contractor notifies

the Operation coordinator and provides a report detailing the resolution. The complainant is informed in writing about the measures taken to address their grievance and the final outcome.

8. Public Awareness:

- The Grievance Redress Mechanism is publicized through various channels to ensure awareness among all stakeholders. This includes posting information on the Ministry of Finance's website, regional and woreda-level finance offices' websites, public notices, billboards at sub-Operation sites, brochures distributed in communities, and messages in print and broadcast media.

9. Monitoring and Feedback:

- The effectiveness of the GRM is regularly monitored and evaluated. Feedback from the grievance process is used to identify systemic issues, improve policies and practices, and enhance communication and trust between the Operation and its stakeholders.

By implementing these steps, the Operation-level GRM ensures that grievances from staff, beneficiaries, community members, contractors, and other stakeholders are addressed promptly, fairly, and transparently, contributing to a positive and accountable Operation environment.

8.2. Principles and Procedures of the Workers Grievances Redress Mechanism (WGRM)

The Workers Grievances Redress Mechanism (WGRM) is a structured process within the operation to address and resolve grievances raised by workers or employees. It provides a formal mechanism for workers to voice their internal concerns, complaints, or grievances related to their employment, working conditions, or other issues affecting them in the workplace. It is specifically designed for employees, contractors, and other workers involved in the Operation.

- This Workers' GRM is not the same as the grievance mechanism to be established for Operation affected stakeholders as it addresses grievances related to working conditions, wages, benefits, discrimination, harassment, workplace safety, and other employment-related issues.
- Both direct and contracted workers will be informed of the WGRM at the time of recruitment and the measures put in place to protect them against any reprisal for its use.
- The WGRM will be easily accessible via the disclosure of a hotline and/or office hours and transparently disclosed to all employees to raise workplace concerns.
- The WGRM shall be transparent in using clear procedures.
- There will be no discrimination against those who express grievances, and all grievances will be treated confidentially.
- Anonymous grievances will also be accepted and treated equally as other grievances whose origins are known.
- Operation coordination committees, SDS and other responsible Operation management will treat grievances seriously and take timely and appropriate action in response.
- The aggrieved parties shall be informed within 15 days of their grievance application either with a respective solution or with a request of extension in cases where more information is needed.
- The aggrieved party shall have the option to refer to a grievance log with key information that will be established by the woreda council and regional bureau of finance.
- Grievance logbook will be maintained in the Operation office.
- The WGRM, however, does not replace or override the requirement that the SDS

provide for workplace processes for Operation workers to report work situations that they believe are not safe or healthy, such as reporting requirements regarding workplace injuries and accidents.

- The WGRM will not prevent workers to use judicial procedure or administrative remedies that might be available under the law or existing arbitration procedures or substitute for collective agreements grievance mechanisms, if preferred.

8.3. Worker Grievances Redress Mechanism (WGRM) Structure

The structure of the WGRM for the HCO will be set at the woreda, regional and national level.

Woreda level structure:

The woreda coordination committee (WCC) to be established in each woreda administration (council) will address and resolve complaints within 15 days of receiving complaints from contractors or Operation workers. The woreda coordination committee will be headed by the head of the woreda office of finance and economic development. The WCC will be supported by a locally based Woreda Operation Coordinator (WPC) hired by the SDS, who will be assigned to serve as the Grievance Focal Point (GFP) and will be responsible for maintaining feedback logs. If the issue cannot be resolved at the woreda level, then it will be escalated by the regional Operation coordinator to the central SDS.

Regional level structure:

The Operation coordination committee at regional level lead by the regional BoFED will address the grievances which are beyond the capacity of the contractors and woreda level Operation coordination committees. If the cases required further intervention the regional level coordination committee will refer the case to the federal level coordination unit/SDS.

National level structure:

If there is a situation in which there is no response from the woreda and regional level GFP, or if the response is not satisfactory then complainants and feedback providers have an option to contact the federal coordination unit/SDS directly to follow up on the issue. The SDS will establish a Grievance Management Group (comprising M&E, E&S safeguards specialists) and will assign a GFP to be responsible for complaints and issues related to all woredas and components. The SDS coordinator will make a final decision after a thorough review of the investigation and verification findings. The timeline for complaint resolution at the central SDS level will be 30 days upon receipt of the complaint. The complainant will be informed of the outcome immediately and at the latest within 5 days of the decision. If the complaint is still not resolved to the satisfaction of the complainant, then s/he can submit her/his complaint to the appropriate labor dispute court through formal labor division courts or the labor relations board for conciliation.

8.4. Grievance Logs

The Grievance Focal Points will maintain local grievance logs to ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type of appeal
- Category of appeal
- People responsible for the study and execution of the appeal
- Deadline of resolving the appeal
- Agreed action plan.

The woreda Operation Social Development Specialist and Woreda Operation Coordinators will ensure that each complaint has an individual reference number and is appropriately tracked and recorded when actions are completed. The log should contain the following information:

- Name of the PAP, his/her location and details of his / her complaint.
- Date of reporting by the complainant.
- Date when the Grievance Log was uploaded onto the Operation database.
- Details of corrective action proposed and name of the approval authority.
- Date when the proposed corrective action was sent to the complainant (if appropriate).
- Details of the Grievance Committee meeting (if appropriate).
- Date when the complaint was closed out.
- Date when the response was sent to the complainant.

8.5. Monitoring and Reporting on Grievances

The PCU social development specialist will be responsible for:

- Collecting and analyzing the qualitative data from GFPs on the number, substance and status of complaints and uploading them into the single Operation database
- Monitoring outstanding issues and proposing measures to resolve them and
- Submitting quarterly reports on GRM mechanisms to the SDS M&E Specialist.

The quarterly reports shall include section related to GRM, which provides updated information on the status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.); on number of received grievances/(applications, suggestions, complaints, requests, positive feedback) and number of resolved grievances; on the type of grievances and responses, issues provided and grievances that remain unresolved; level of satisfaction by the measures (response) taken; and any correction measures taken.

8.6. World Bank Grievance Redress System and Inspection Panel

The GRM is a vital component of the World Bank's commitment to accountability and responsiveness in its projects, providing a structured avenue for stakeholders to raise concerns. The Inspection Panel plays a crucial role in ensuring these mechanisms work effectively by independently investigating complaints and ensuring the Bank adheres to its policies, thus protecting the rights and interests of affected communities.

World Bank Grievance Redress Service (GRS)

The World Bank's Grievance Redress Service (GRS) is a specific mechanism designed to address concerns and complaints from individuals and communities who believe they have been adversely affected by a World Bank-financed project. The GRS aims to provide a transparent and responsive avenue for stakeholders to voice their grievances, ensuring that these issues are addressed promptly and effectively.

The WB's GRS have the following key characteristics

Accessibility: the GRS is accessible to anyone who feels affected by a World Bank-funded project. Stakeholders can submit grievances through various channels, including online submission, email, fax, or mail.

Confidentiality: the GRS respects the confidentiality of complainants. If requested, the identity of the complainant is kept confidential to protect them from potential retaliation.

Timeliness: the GRS aims to acknowledge receipt of complaints within ten business days and seeks to provide a response or resolution within a specified period, generally 45 business days.

Transparency: the process and outcomes of grievance redress are communicated clearly to the

complainant, ensuring that they are informed about the steps taken to resolve their concerns.

Inclusivity: the GRS is designed to be inclusive, allowing individuals, communities, and other stakeholders to submit grievances, regardless of their location or socio-economic status.

Non-Retaliation: the World Bank ensures that no retaliatory actions are taken against those who file complaints.

The Implementation Process of the WB's GRS

1. Submission of Grievance: complaints can be submitted to the WB's GRS through multiple channels:
 - Online: Via the GRS website.
 - Email: Sent to the designated GRS email address.
 - Fax or Mail: Directly to the GRS office.
2. Acknowledgment: upon receiving a grievance, the GRS acknowledges receipt within ten business days.
3. Initial Assessment: the GRS conducts an initial assessment to determine the nature of the grievance and its eligibility. This involves verifying whether the complaint is related to a World Bank-funded project and falls within the scope of the GRS.
4. Referral and Response: eligible grievances are referred to the appropriate project team or World Bank unit for action. The GRS coordinates with relevant parties to investigate the grievance and develop a response.
5. Resolution and Feedback: the GRS aims to resolve grievances within 45 business days. The resolution process may involve further investigation, stakeholder consultations, and action plans to address the issues raised. The complainant is informed of the findings and any corrective actions taken.
6. Follow-up and Monitoring: The GRS monitors the implementation of agreed-upon actions to ensure that the grievance is adequately addressed and resolved.

Role of the WB's Inspection Panel in GRM

The Inspection Panel is an independent accountability mechanism of the World Bank. It was established in 1993 to ensure that the Bank adheres to its operational policies and procedures, particularly in projects that have significant social and environmental impacts. The Panel serves as an impartial body to address complaints from individuals and communities who believe they have been or are likely to be adversely affected by a World Bank-funded project.

Functions of the WB's Inspection Panel

1. Receive Complaints: The Panel receives and registers complaints (known as "Requests for Inspection") from affected parties. These complaints must allege that harm has occurred or is likely to occur due to a failure by the World Bank to follow its operational policies and procedures.
2. Eligibility Assessment: The Panel conducts an initial review to determine whether the complaint is eligible for further investigation. This involves checking whether the complaint meets certain criteria, such as being submitted by affected parties and relating to a World Bank-financed project.
3. Investigation: If the complaint is deemed eligible, the Panel conducts a thorough investigation. This may include field visits, meetings with stakeholders, and review of project documents. The Panel examines whether the Bank has complied with its policies and whether any non-compliance has caused harm to the complainants.
4. Reporting: After completing the investigation, the Panel issues a report to the World Bank's Board of Executive Directors. The report includes findings and recommendations for corrective actions. The Board then decides on the actions to be taken based on the Panel's findings.

5. **Monitoring and Follow-up:** The Panel may also monitor the implementation of the Board's decisions and the World Bank's actions to ensure that the issues raised in the complaint are adequately addressed.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <https://www.worldbank.org/en/Operations-operations/products-and-services/grievance-redress-service>

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

9. Contractor Management

Contract management in World Bank operations is a critical process that ensures the successful implementation of projects financed by the World Bank. It involves overseeing and managing contracts throughout their lifecycle, from planning and procurement to execution and completion. Effective contract management ensures that projects are completed on time, within budget, and in compliance with contractual terms and World Bank guidelines.

In implementing the LMP under the HCO, contract management plays a vital role in ensuring the smooth execution of the project. The phases of contract management, from planning and procurement to closeout and evaluation, provide a structured framework for overseeing and managing contracts throughout their lifecycle. This ensures that the labor management procedure is implemented efficiently, within budget, and in compliance with contractual terms and World Bank guidelines.

The contractor selection process mirrors the transparency and competitiveness standards set by the World Bank's Procurement Framework, ensuring that qualified contractors are selected through a rigorous evaluation process. Key requirements such as eligibility criteria and qualification standards are adhered to, ensuring that selected contractors possess the necessary expertise and experience to successfully implement the labor management procedure.

Additionally, the periodicity of reports in contract management ensures consistent monitoring, accountability, and transparency, facilitating progress tracking and compliance with contractual terms, which is crucial for the effective implementation of the labor management procedure under the HCO.

The key phases of contract management in World Bank operations include:

- Planning and Procurement, which involves identifying project requirements, developing a procurement plan, and selecting the most qualified contractor through a competitive bidding process;
- Contract Award and Mobilization, where the contract is formally awarded and signed, allowing the contractor to mobilize resources;
- Contract Execution and Performance Monitoring, which entails regular monitoring of work progress, quality assurance, financial management, and adherence to environmental and social safeguards;
- Contract Administration, focusing on managing changes, resolving issues, and preparing progress reports; and

Contract Closeout and Evaluation, involving final inspections, issuance of a completion certificate, processing final payments, and conducting a project evaluation to assess performance and gather lessons learned.

10. Operationalization of the LMP- Operation Annual Work Plan and Budget

The client will ensure the commitments and planned activities in this labor management procedure are operationalized through the Operation annual work plan and budget. The client must include environmental and social activities in this LMP with estimated budget in the annual work plan and budget. The Operation annual work plan and budget passes through a review by task team leaders and environmental and social development specialists prior to issuance of no objection.

| Provision | Federal level MOF and other core implementing ministries' Civil Servant, including consultants | Regional level Bureau of Finance and other core implementing bureaus' Civil Servant, including consultants | Woreda level finance office and other core implementing bureaus' staff and council members | Federal, and woreda level Operation Coordination Unit staff | Woreda level short term contract workers |
|--|--|--|--|---|--|
| Working contract | X | X | X | X | X |
| Adequate periods of rest per week, annual holiday and sick, maternity and family leave | X | X | X | X | X |
| Termination process in accordance with Ethiopian Labor Law, relevant International Conventions Ethiopia ratified | X | X | X | X | X |
| Non-Discrimination | X | X | X | X | X |
| Workers' organization | X | X | X | X | X |
| Minimum age of employment | X | X | X | X | X |
| Monthly salary payment | X | X | X | X | X |
| Code of Conduct | X | X | X | X | X |
| Occupational Health and Safety | X | X | X | X | X |

11. Annex

Code of Conduct (CoC)

1. Background

This Code of Conduct provides practical guidance to workers, consultants, volunteers and the contractor and sub-contractors workers in the Ethiopian Human Capital Operation Service Delivery Secretariat, regional Operation coordination office, woreda coordination office (SPG woredas). This CoC will guide Operation workers to effectively prevent and address any form of discrimination and harassment in the workplace in accordance with the National Labour Proclamations and the Environmental Social Health and Safety (ESHS) requirements of the World Bank (WB)

(Name of the Operation coordinator/Contractor/Supervision Consultant) is committed to create a workplace, at all its working locations, that, at all the times, is free from discrimination and harassment where co-workers are respected and provided an appropriate work presidential in camps' environment so as to encourage good performance and conduct.

2. Definitions

- **Environmental Social Health and Safety (ESHS):** an umbrella term covering issues related to the impact of the Operation on the environment, communities and workers.
- **Occupational Health and Safety (OHS)** is concerned with protecting the safety, health and welfare of people engaged in work or employment.
- **Gender-Based Violence (GBV)** is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (IASC 2015). Women and girls are disproportionately affected by GBV across the globe.
- **Sexual Harassment (SH)** is unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the Operation, and not between staff and Operation beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report each. Both women and men can experience SH.
- **Sexual Exploitation and Abuse (SEA)** is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys and men can experience SEA. In the context of WB supported Operations, Operation beneficiaries or members of Operation-affected communities may experience SEA.
- **Child** is used interchangeably with the term ‘minor’ and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.
- **Child Protection (CP)** is an activity or initiative designed to protect children from any form of harm, particularly arising from violence against children.
- **Child/Forced Marriage** is the marriage of an individual against her or his will. Child marriage is a formal marriage or informal union before age 18. Since Ethiopia has adopted the international human rights standards, child marriages, reasoning that, is classified as a form of forced marriage as children are not legally competent to agree to such unions i.e. those under age 18 are unable to give informed consent.
- **Consent** is 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 using 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 WB considers that consent cannot be given by children under the age of 18, even if 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.
- **Minimum Age for Admission to Employment under the Labor Proclamation:** the Labor Proclamation No. 1159/19 also contains various provisions pivotal for the purpose of addressing child labor. This is the most important piece of legislation for addressing child labour. Article 89 of the Proclamation provides that a “young worker” is a person who is between the ages of 14 and 18. It also prescribes that no one may employ persons under 14. Thus, the law prohibits the employment of young persons in work which by their nature and/or the conditions under which they are carried out endanger the lives or health of young workers performing them.
- **Workplace:** in the CoC refers not only to the specific location where work is being performed, such as an office or workstations, or construction operation sites, but also to locations where work-related business may be conducted. These could include, but are not limited to, as applicable: (i) Work related social activities, such a reception organized by

the Operation for staff or clients, etc.; (ii) Conferences and training sessions; (iii) Official business travel and business meals; and (iv) Work related telephone conversations as well as communications through electronic media.

3. Scope

This code of conduct applies to all employees of the supervision consultants and contractors (including sub-contractors and day workers) of the HCO. The code of conduct forms part of a contract between the Operation and workers. Workers shall mean all individuals on full-time or part-time employment with the Operation, with permanent, probationary, trainee (apprentice), temporary or contractual appointment.

4. Purpose

The purpose of this Code of Conduct is to describe the standards of behavior and conduct expected from workplace participants in their dealings with agents, customers, suppliers, clients, co-workers, management and the general public, and establish guidelines that:

- Clearly define obligations on all Operation workers (including contractors and sub-contractors' workers) with regard to implementing the Operation's environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements, and;
- Help to prevent, report and address issues related to Gender-Based Violence (GBV), Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) within the work site and in its immediate surrounding communities interacting due to the Operation.

Individual Code of Conduct

This Code of Conduct defines the expected standards and behaviors that all foreign (expats) and local staffs should adhere during working and leisure time personal engagement.

I _____ (Worker's Name and Working Position) _____ have read, understand and agree to this Code of Conduct. I commit to the required standards of behavior and practice as outlined in adhering to environmental social health and safety (ESHS) standards, the Operation's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV), Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) is of utmost importance.

Article 1. Professionalism

- i) Workers shall perform any duties associated with their position in a conscientious, competent and honest manner
- ii) Workers shall adhere to ethical and legal standards to be maintained in business
- iii) Workers shall dress and act in public in a professional manner that does not reflect adversely on the organization or other employees
- iv) Workers' use of social media shall not compromise the organization's reputation and include derogatory, shaming or other personal attacks towards or about Workers, the governing body, volunteers, client or other stakeholders including communities of the Operation area,
- v) Workers shall maintain knowledge and skills at levels consistent with developments in technology, legislation and management necessary to carry out duties and responsibilities,
- vi) Workers shall keep the person in charge or delegate, informed of whereabouts and intended time of return, if going out independently, including during off-duty periods.
- vii) Workers shall not engage in any public and/or political activity which is unethical or unlawful.

- viii) Workers shall be aware of social and socio-political rank in communities and make sure that clan leaders, administrators and community elders are treated with the distinctive respect they deserve.

Article 2. Responsibility to Personal behavior

2.1 Employment relationships and respect to others

- i) Workers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national, international labor and social security laws and regulations,
- ii) Workers shall treat each other with respect and courtesy, having regard for their dignity and rights,
- iii) Workers shall act fairly and equitably, respecting diversity in the environment in which they work in and they shall prevent and respond to unlawful discrimination against other employees, volunteers, clients and stakeholders,
- iv) Workers shall avoid discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel based on family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), political conviction or social, civic, or health status),
- v) Workers shall properly interact with the local community, members of the local community, and any affected person(s) by conveying an attitude of respect to their culture and traditions.

2.2 Harassment or Abuse

- i) The Operation is committed to provide a work environment that is free of inappropriate behavior of all kinds and harassment because of age, physical disability, marital status, race, religion, caste, sex or gender.
- ii) Workers shall not engage in sexual harassment and are prohibited to use language or behavior, towards women, men and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally unacceptable.
- iii) Workers shall 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.).
- iv) Workers shall 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.
- v) Unless there is the full consent by all parties involved, employees 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.
- vi) Consider reporting through the Grievance Redressing Mechanism (GRM) or to the manager any suspected or actual GBV or SEA by a fellow worker, whether employed by the Operation or not, or any breaches of this Code of Conduct.
- vii) Workers shall protect children/minors from any sexual activity or abuse and ensure their safety in Operation areas and avoid any unacceptable behavior towards children.
- viii) Workers shall not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).

- ix) Workers who are found engaged in SEA or GBV will be construed as misconduct that could lead to disciplinary action including but not limited to, dismissal or termination of employment, or referral to legal authorities, while providing service and referral to the survivor.

2.3. Alcohol, Drugs and Substances

- i) Workers shall not drink alcohol during working times and do so responsibly without compromising the health and safety of themselves and others during other times within the boundaries of the local laws and customs.
- ii) Workers shall not engage in the use or possession of alcohol, illegal drugs, narcotics or other controlled substances, which can always impair faculties, in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited. However, possession of prescription medication for medical treatment is permitted.
- iii) Workers shall not report for work under the influence of illicit drugs or alcohol. If a workplace participant is taking prescription medication, they are required to inform their manager. Workplace participants may be required to produce medical evidence to prove their medication does not affect their capacity to work and to work safely.
- iv) Workers must not have alcohol or illegal drugs in their possession while at work. The use, possession and/or trafficking of any illegal substances or drunkenness in company premises, workplaces or using company facilities will result in immediate dismissal.

Article 2: Conflicts of interest

- i) Workers must avoid conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection) i.e. each employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Operation.
- ii) Workers are advised not to engage in any other business, commercial, investment or any other activity (cultural, political, recreational, and social) that may conflict with the Company's interests and interfere with their ability to perform their duties to the Operation.
- iii) Workers must not use any of Operation's property, information or position, or opportunities arising from these for personal gains or to compete with or to tarnish the image of the Operation.
- iv) Workers do not offer or accept gifts, benefits or favors that may influence or be reasonably seen to influence decision making.
- v) Workers shall disclose any potential conflicts of interest that might arise during the performance of the Operation.

Article 3: Responsibility to Safe Environment

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising during work or because of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

- i) Workers should perform their duties in compliance with Environmental, Social, Health and Safety (ESHS) regulations and Occupational Health and Safety (OHS) requirements including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment.
- ii) Workers must take care or not put themselves or others at risk or reduce their ability to

- carry out their duties through unsafe practices, or inappropriate behaviors.
- iii) Workers shall promote the use of renewable and recyclable materials with the least use of natural resources, wherever possible,
- iv) Workers shall act in preventing, identifying and responding to workplace health and safety risks.
- v) Workers shall fulfill Sanitation requirements of the Operation
- vi) Workers shall drive cautiously in community roads as per the Operation traffic management plan,
- vii) Workers shall bring to the management's attention any workplace safety or health hazard issues immediately.

Article 4: Accountability

- i) Workers must comply with applicable laws, rules, and regulations,
- ii) Workers use equipment, facilities and funds for the primary purpose of undertaking organizational duties.
- iii) Workers shall provide services of a high quality that are technically correct, innovative and giving value for money.
- iv) Workers must respect reasonable work instructions (including regarding environmental and social norms).
- v) Workers must protect and properly use properties to be used for the execution of the Operation and prohibit theft, carelessness or waste.
- vi) Workers Employees maintain confidentiality of all organization and personal information obtained during employment and other formal engagement with the organization and utilize such information for the purposes of carrying out duties, and not for financial or other benefit, or to take advantage of another person or organization.
- vii) Workers shall avoid any deceitful and fraudulent conduct and act while carrying out their duties which are both dishonest and, in most cases, criminal based on the Operation's financial integrity policy.
- viii) Workers prevent and respond to nepotism and patronage.
- ix) Workers maintain organization and personal records in accordance with legislative and organizational policy requirements.
- x) Workers ensure all decisions made during their duties are transparent and align with organizational policy and procedures.
- xi) Workers understand and comply with organization policies and procedures.
- xii) Workers are responsible for seeking clarification where needed regarding any part of their employment, including details of this Code of Conduct.
- xiii) Workers take responsibility for reporting conduct by other employees, governing body members or volunteers which contravenes any law, organizational policy and procedures, or this Code of Conduct.

Article 5: Adherence and Disclosure

- i) Workers shall undertake to abide by the Codes of Conduct,
- ii) Workers have a duty to report violations of this Code of Conduct,
- iii) Non-observance, violations or breach of this Code of Conduct shall be construed as misconduct that could lead to disciplinary action including but not limited to, dismissal or termination of employment, or referral to legal authorities.

I, _____, have read, understand and agree to this Code of Conduct. I commit to the required standards of behavior and practice as outlined in the Code of Conduct.

Worker's signature

Date

GBV Case registration and referral Form

Registration Form

Date DD/MM/YY: ____/____/____ Location: _____ Reference Code: _____

| | | | |
|--|------------|--------------------------------|----------------------------------|
| Full Name: | | Age: | Date of Birth(DD/MM/YY):__/__/__ |
| Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female | | Place of Birth: | |
| Address: | | Previous Address if Displaced: | |
| | | | |
| Contact Details (if applicable) | | | |
| | | | |
| Protection Concerns Described at Point of Identification: reason for referral | | | |
| | | | |
| Risk Rating: High <input type="checkbox"/> Medium <input type="checkbox"/> Low <input type="checkbox"/> | | | |
| Action taken: (check all that apply): Enroll in case management: ____ Case worker assigned (name) _____ Referred to police: ____ Accompanied to police: ____ Referred to health post ____ or health center ____ Accompanied to health setting ____ Assessment to be done by: (date, DD/MM/YY) ____/____/____ Case worker (name) _____ | | | |
| Caseworker name: | Signature: | Date (DD/MM/YY): __/__/__ | |

Annex 6: GBV Prevention and Response Action Plan

1. Introduction

1.1. Project Background

The Ethiopian economy is increasingly reliant on human capital. Cognizant of this fact, the government's Pathway to Prosperity (10-Year Perspective Development Plan 2021-2030) emphasizes building human capital through equitable, quality education and health services. However, the multisectoral and concurrent crises facing the country have severely impacted Ethiopian human capital development. The Coronavirus Disease 2019 (COVID-19) pandemic and civil conflicts in different regions disrupted education and health services and risk eroding the investments made in children's well-being. Even before the crises, Ethiopian and refugee children suffered from poor nutrition and low learning outcomes. Ethiopia's human capital is also threatened by high inflation rates and the impacts of climate change (repeated locusts, drought, flooding, and food insecurity). The new inflow of refugees due to geopolitical instability such as the civil war in Sudan further threatens the development of human capital in host communities. Thus, the Human Capital Operation (HCO) is a response to help Ethiopia address the impact of multiple shocks on human development by focusing on improving nutrition and learning outcomes for children while building climate resilient service delivery system.

The HCO is designed as a hybrid Program-for-Result (PforR) and Investment Project Financing (IPF) operation. The IPF component will finance a package of interventions to improve human capital outcomes in the Special Purpose Grant (SPG) woredas and woredas affected by conflict, droughts, and high levels of refugees. The GBV Action Plan covers only the IPF component of the program.

1.2. Project Description

The objective of the operation (PDO) is to improve learning outcomes and nutrition services for girls and boys, and to strengthen service delivery and accountability, in all regions including areas affected by conflict, droughts, and high levels of refugees.

1.2.1. The IPF component of the program

The potential list of HCO related activities that should be financed by the Investment Project Financing (IPF) component includes eight sub-component activities. These are described as follows. *Sub-component 2.1.1* includes activities that support resilience and rebuilding of service delivery systems in areas affected by conflicts, drought, and high levels of refugees. *Sub-component 2.1.2* will finance HCO activities that support the education system in high-risk woredas affected the most by the conflict, droughts, and high levels of refugees to recover learning losses. *Sub-component 2.1.3* involves activities that support nutrition interventions in high-risk woredas affected the most by the conflict, droughts, and high levels of refugees. *Sub-component 2.2.1* finance activities that support to improve learning outcomes in the SPG woredas. *Sub-component 2.2.2* will undertake activities addressing stunting in the SPG woredas. *Sub-component 2.3.1* will implement activities strengthening capacity in multi-sector coordination and data measurement for improved service delivery. *Sub-component 2.3.2* will finance activities strengthening accountability, fiduciary and E&S management at sub-national levels to improve service delivery. *Sub-component 2.3.3* support creation of medium- to long-term development opportunities for both the refugees and.

1.2.2. Project beneficiaries

The project beneficiaries include different target groups. First, women, girls, children, students, and refugees in the SPG woredas as well as in areas affected by conflicts, drought, and high levels of refugees. The menu of interventions will vary according to the age groups and target areas of the activities, and some beneficiaries may receive benefits from one or more interventions. Efforts will be made to exclude double counting in estimating the total number of beneficiaries. For example, children ages 3 to 6 years could benefit from the interventions addressing stunting as well as interventions improving learning outcomes. Second, the staff of the respective project implementing agencies will be the beneficiaries, particularly from the project capacity building programs. The project beneficiaries range from the sector federal Human Capital Project Coordinating Units (HCPCUs) to the frontline staff at the target areas. Third, the project implementing agencies, particularly the service delivery centers/sites such as health centers, health posts, and schools will benefit from the provision of basic materials, equipment, and other logistics.

1.2.3. Project target regions and woredas

The IPF component will finance a package of interventions to improve human capital outcomes in areas affected by conflict, droughts, and high levels of refugees, and strengthen system capacity, including refugee integration and protection through technical assistance. Potential interventions will be drawn from a menu of services based on area specific priorities. Accordingly, in the first round, 42 SPG woredas were selected from all regions except Addis Ababa. The selection of the IPF component implementation areas in the second round included 23 woredas (10 drought affected, 10 conflict affected, and 3 refugee host community woredas) from 8 regions including Afar, Amhara, Oromia, Tigray, Somali, Benishangul-Gumuz, Gambella, and South Ethiopia. Thus, the project implementing areas included 65 woredas in total from all regions except Addis Ababa. Table 1 presents the number of the IPF Component target woredas by region and priority areas.

Table 1: Distribution of SPG Woredas, Drought, Conflict and High Level Refugee Affected Woredas by Region

| Region | SPG Woredas | Drought affected Woredas | Conflict affected Woredas | Refugee Host Community Woredas |
|--------------------|-------------|--------------------------|---------------------------|--------------------------------|
| Afar | 4 | 1 | 1 | |
| Amhara | 7 | 3 | 3 | |
| Oromia | 11 | 1 | 2 | |
| Somali | 5 | 2 | | 1 |
| South Ethiopia | 2 | | 1 | |
| Southwest Ethiopia | 2 | | | |
| Central Ethiopia | 2 | | | |
| Sidama | 2 | | | |
| Benishangul-Gumuz | 2 | | 1 | 1 |

| | | | | |
|--------------|-----------|-----------|-----------|----------|
| Gambella | 1 | | | 1 |
| Tigray | 2 | 3 | 2 | |
| Harari | 1 | | | |
| Dire Dawa | 1 | | | |
| Total | 42 | 10 | 10 | 3 |

1.3.Objectives of the Assessment

The purpose of a GBV risk assessment and action plan is to identify and mitigate the risks of GBV that may arise due to the implementation of the IPF sub-component activities described earlier. The specific objectives are to: (a) identify and assess GBV risks, particularly potential project-related Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) associated with the IPF sub-component activities; (b) based on the findings of the risk assessment, develop appropriate mitigation measures that outlines specific actions to prevent or respond to GBV; and (c) thereby ensures that the project complies with relevant World Bank policies and guidelines on GBV prevention and response⁵.

1.4 Methodology

The preparation of the GBV risk assessment and action plan employed different research methods and tools that allow for the collection of diverse, adequate, and valid data generation. The methods of data collection comprise both the secondary and primary sources as highlighted below.

The desk review: This comprised diverse secondary sources. First, HCO project-related documents including PAD were reviewed to provide project descriptions (background, PDO, components, and target areas). Second, the assessment of the country GBV Risk Screening depends on the review of national level statistics such as Ethiopian Demographic and Health Survey (2016). Third, the project-specific Risk Screening depends on available government assessments pertinent to the HCO project including PforRs, Ethiopia Damage and Need Assessment (EDNA) reported in 2022, Ethiopia Conflict Impact Assessment and Recovery and Rehabilitation Planning (CIARP) reported 2022, and Security Risk Assessment (SRA) for the HCO (reported October, 2024). Finally, previous assessments and empirical studies were reviewed to assess the contextual risk factors at the local/community level such as discriminatory gender norms and differential power relations that may interact with the project-related SEA/SH risks.

Stakeholder consultations: Besides using available assessments and reports, consultations were carried out with the stakeholders at the sampled regions, woredas and communities to assess the project context on the GBV risk factors. However, pertaining to safe and ethical GBV consultations, stakeholders were not directly asked about individual experiences of GBV. Rather, the focus was on gaining an understanding of the experiences of women and girls in the project-affected communities such as types of GBV and socio-cultural factors discriminating women and girls' decision making and access to basic resources, education, and health. To this end, the primary data was obtained through the following methods. First, the GBV risk

⁵ World Bank Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations (2022)

assessment included the analysis of the data from the consultation with relevant federal level stakeholders (including respective sector implementing ministries (HCPCUs). One of the key points raised from the federal level stakeholders was the issue of GBV risk assessed from the nature of the IPF sub-component activities to be implemented in each sector. Annex 2 provides details of the federal stakeholders consulted. Second, key informant interviews were conducted with the key informants from the sector offices and community representatives (such as clan leaders, elders, and religious leaders) in the sampled HCO project target woredas. This was aimed to obtain information pertinent to area-specific/community-specific gender norms and power relations. Third, separate interviews were arranged for the project-affected vulnerable groups such as women, people with disabilities, refugees, and female frontline staff to assess their views and ensure that their concerns are factored into the GBV mitigation measures. Finally, community consultations were held in the sampled woredas to assess the views of the project-affected communities in general including community awareness on GBV. Annex 3 provides the attendance of the participants while Annex 4 includes sample photos during the community consultations.

2. Assessment of Potential GBV that Impact the Project

There are multiple GBV risk factors at the country and local/community levels that can drive the project-related SEA/SH. The sub-sections to follow present the assessment of potential GBV that impacts the project in this regard.

2.1. Country GBV Context

The country context provides information on the overall environment with relation to GBV at a national level. The project-related SEA/SH risks is a form of GBV that shares risk factors with other forms of the country GBV context including, country-level GBV prevalence, legal context, gender norms and beliefs, and national-level capacity to respond to GBV. In screening project-related SEA/SH risks, these country contexts can serve as an entry point for exploring resources and interviewing key informants in the sampled HCO project target regions, woredas, and communities.

Country level GBV prevalence: Statistics and description of the country GBV prevalence indicators such as prevalence of intimate partner violence (IPV), prevalence of any form of sexual violence (SV), and prevalence of child marriage intended to give an overview of levels of GBV prevalence in the country. No direct correlation has been established between the project-related risks of SEA/SH and the national level of violence against women. However, this statistic is important for understanding the country context within which the project occurs.

Country legal context: This seeks to assess the legal climate in the country by reviewing the extent to which laws recognize different forms of GBV (including laws on domestic violence or intimate partner violence and laws on SEA/SH), provide penalties for those who commit them, and protect women and girls. While having a written law is not a guarantee of enforcement or changes in norms, this can still serve as an indicator of the country's commitment to addressing issues related to different manifestations of GBV against women and girls. The review on legal context of the country is documented for the reference in the GBV/SEA/SH action plan for the project.

Gender norms and beliefs: Attitudes, beliefs, norms, and structures that promote and/or condone gender-based discrimination and unequal power are among the root causes of GBV. There is evidence that social norms that limit the expected behavior of women and men based on their socially ascribed roles are associated with unequal opportunities for the participation in the development and accessing of basic services such as health, nutrition, and education. The project-related SEA/SH risks can emerge from gender norms and beliefs interaction with

multiple factors in the respective regions and local communities within which the project is to be implemented.

National-level capacity to respond to GBV: This context addresses the capacity of the country to respond to GBV, focusing on whether the country has an action plan on women, peace and security, an established and functional GBV working group and a national referral pathway protocol. Since these indicators reflect national institutional capacity and commitment to address GBV, this can contribute to creating an enabling environment for the successful implementation of the mitigation measures proposed in the project GBV/SEA/SH response and action plan.

2.2. Contextual GBV risk factors at the local/community level

The GBV risk assessment reveals that the contextual SEA/SH risk factors at the local level that significantly interplay with the project-related SEA/SH risk factors include the following.

Gender norms and differential power relations in the community: The findings of the social assessment show that gender is the key factor of social diversity all across the project areas. The discriminatory gender norms and differential power relations is more severe in the project areas with the underserved Communities(UCs). Economically, women often excluded from the ownership of basic resources and household assets. Because the system of property inheritance is patrilineal, particularly key resources such as land and livestock passed down from father to son. Socially, the UCs in the project areas practice a patrilineal kinship system, affiliation to family and clan is traced through the male line or the father's lineage. Politically, women are excluded from the decision making process both in the domestic and public spheres. Major household issues (e.g. household economic decisions such as sale of livestock) are often decided by the husband. Even sometimes, women do not involve in the decision making process regarding the issues (e.g. marriage) that concern their lives. In the public sphere, clan leaders and council of elders are the traditional authorities entrusted with the power to make decisions regarding critical issues in the community such as community leadership and control of access to and use of land and natural resources. Hence, the existing system of gender inequalities may reflect in the women's engagement in the project implementation and access to project services. This may exacerbate existing gender inequalities resulting in the project's disproportionate impacts for the women and girls.

Project areas with active conflict: Available government reports including Ethiopia Damage and Needs Assessment (2022) and assessment findings for the preparation of this GBV Action Plan show incidents and higher risks of GBV in the target woredas with active conflict or serious security threats. Similarly, the findings from stakeholder consultations show incidents and risks of the GBV to the female frontline staff such as health extension workers operating in the health posts, teachers serving in schools and female students. Such contextual GBV risk factors can drive or increase project-related SEA and SH.

Project areas with drought and high levels of refugees: Humanitarian needs such as prolonged drought and high levels of refugees create favorable conditions for GBV risks. These crises exacerbate existing gender inequalities, leading to heightened stress and chaos within households and communities, all of which can contribute to a rise in GBV. Specifically, dependence on humanitarian assistance due to food insecurity, lack of access to basic services, and displacement can create conditions that make women and girls more vulnerable to GBV. Also, situations of humanitarian crises such as prolonged drought and high influx of refugees can significantly increase the risk GBV by disrupting support systems, increasing vulnerability, and weakening structures that protect women and girls. Backdrop to such contextual GBV risk factors at the local level, the implementation of the project may exacerbate existing GBV risks

or may introduce new forms of GBV such as SEA due to power imbalance between the project implementing actors and service user women and girls.

Lack of community awareness on GBV: The project will be implemented in the communities where awareness on GBV is lacking. Also, the findings of the social assessment (SA) reveals that service providers such as health professionals have low awareness on GBV. Such contextual risk factors at the local level can drive the project related GBV risks from different perspectives. When people don't understand what constitutes GBV, the forms it takes, or the support services available, they are less likely to recognize and report it. This silence and lack of knowledge perpetuate the problem, leaving survivors vulnerable and potentially enabling perpetrators. Lack of awareness can prevent survivors from recognizing they are experiencing GBV or from knowing how to seek help. They might not understand their rights or the available support systems, leading them to endure violence silently. Insufficient knowledge among the service providers/professionals (e.g., healthcare workers, police) can lead to missed opportunities to intervene, provide adequate care, or ensure survivors receive appropriate support.

2.3. Project-Specific SEA/SH Risk Factors

The assessment of the *project context* is critical since no matter what the country and local contexts, the project in itself can exacerbate existing GBV risks or create new risks and vulnerabilities for SEA/SH in the project affected communities.

As stated in the project description, HCO project is the Human Development (HD) operation. That is, the IPF subprojects implements activities related to Health, Nutrition, Population, Education, Social Protection, and Jobs. SEA/SH risks manifest differently for Infrastructure Project (IP) and HD operations. Hence, the assessment of the project-related SEA/SH risk factors consider different contexts associated with the nature of the HD operations. Among others, the project-specific SEA/SH risk factors include:

- ◆ The diversity of HD operations in the HCO project, with a high level of person-to-person contact including with vulnerable groups (women, children, adolescent, young girls, people with disabilities, refugees, and UCs) can increase the risks of project-related SEA/SH.
- ◆ The HCO project focuses on the delivery of essential services (health, nutrition, education, social protection and Jobs) that need to be made available to every person in the project-affected communities. Household economic hardship (due to conflicts, prolonged drought, and high influx of refugees) and high demand for access to essential services by the project can create situations where individuals are more vulnerable, particularly women and girls may be forced into transactional sex to access the project services.
- ◆ There are many ways in which the risks and impacts of SEA/SH arise in the context of the HD operations in the project. These can vary by sector and setting of the project services. Generally, SEA/SH risks and impacts can be driven by the power dynamics, particularly the power imbalance between the project actors associated with the project service delivery and service users (women, children, adolescent, and young girls, people with disabilities, refugees) and local community in general.
- ◆ The HD operations in the project involve multiple layers of organizational hierarchy. This means that perpetrators of SEA/SH may be the sector management and frontline staff operating at the service delivery centers, contractors' workers involved in delivering services or products and perpetrators may also be members of the project-affected in general.

Given the aforesaid project-specific contexts, the findings of the SA explored that the project-related SEA/SH can arise in different ways including the following ones:

- ✓ The HD operation includes several subproject activities that primary targets services for women, children, and girls. For example, Provision of nutrition sensitive agricultural inputs under subproject 2.1.1; financial incentives to support transition of girls to secondary schools/their retention in lower levels and school health/nutrition (targeting adolescent girls under subproject 2.1.2; Reach Up and Learn (RUL). and Maternal support groups under subproject 2.1.3; and access to agricultural inputs, credit and financial services in subproject 2.2.2. Project workers or management may use access to or benefit from such project services for the sexual exploitation of women and girls.
- ✓ Project staff may use unequal power (poverty/income difference, low awareness/mental maturity of the young girls etc) to have a sexual relationship with an underage girl.
- ✓ There are subproject activities (provision of ABE in subproject 2.1.2 for instance) that create regular contacts between the project frontline staff (e.g.male teachers/trainers and supervisors) and young girls, increasing the risks of the SEA/SH in the UCs.
- ✓ Regular contacts of such instance may also facilitate the risk of SE, project worker befriends an underage child, supports her and/or her family in exchange of sexual favors, and. or commit acts of sexual assault against adolescent girls and women on a pedestrian rural road.

2.4. SEA/SH Screening Result for the Project

The SEA/SH screening for the project takes into consideration country-level GBV context and project-specific risk factors. The *country-level GBV context* provides information on the overall environment within which the HCO project operates. The risk screening regarding this assumes that the project-related SEA/SH risks are the form of GBV that shares risk factors with other forms of the country GBV context. Thus, the screening tools focus on country-level GBV prevalence, legal context, gender norms and beliefs, and national-level capacity to respond to GBV. The assessment of the *project-related HD operations* is critical since no matter what the country and local/community context, the project in itself can exacerbate existing GBV risks or create new risks and vulnerabilities for the SEA/SH in the affected communities. Thus, education, health and Social Protection and Jobs (SPJ) related screening tools were used to assess the project-related risk-level. A composite SEA/SH risk rating is then calculated based on aggregation of risk ratings for country and project level questions. The total screening result is corresponds to either a **Low (0-7)**, **Moderate (7.25-13)**, **Substantial Risk (13.25-16)**, or **High risk (16.25-25)** rating. Accordingly, the risk scoring for the project is calculated 15 rating the overall project-level SEA/SH risk as *substantial*.

3. Risk Management Systems

Given the overall SEA/SH risk rating for the project as high, risk management is proposed as a multi-pronged approach that comprehensively help to prevent or properly respond to SEA/SH in the project. The various risk management systems are proposed as follows:

- ◆ *SEA/SH Prevention and Response Action Plan*: The sector implementing agencies are required to prepare and implement the SEA/SH Prevention and Response Action Plan for the project. The Action Plan outlines operational measures to prevent, mitigate, and respond to SEA and SH risks associated with the project. It details procedures for reporting, responding to, and managing grievances related to these issues, ensuring a survivor-centric approach.
- ◆ *The Accountability and Response Framework*: The sector implementing agencies will ensure that the project has in place an Accountability and Response Framework, which consists of procedures that detail how to respond to allegations of SEA/SH in a safe, timely, and ethical manner.

- ◆ *Behavioral Standards, Codes of Conduct, and Disciplinary Measures:* Mechanisms to sensitize the project workers about SEA/SH and to hold them accountable for their actions are important system of the SEA/SH risk management in the project. The risk management system includes Behavioral Standards and Codes of Conduct that provide a basis for the sector implementing agencies and their contractors to implement disciplinary measures against the project actor/worker who perpetrates SEA/SH.
- ◆ *Sensitization and Training:* Sensitization and training programs are proposed as crucial GBV risk management tools in the project. They help the different parties, including project actors, project-affected people and others involved in service delivery understand GBV, its impacts, and how to identify and address it. They also equip service providers and community members with the skills and knowledge to respond appropriately to GBV cases, potentially preventing and mitigating risks.
- ◆ *Grievance Mechanisms and Referrals for Survivors:* The project will put in place Grievance Mechanisms (GMs) that follow good practice in receiving, recording, and referring all SEA/SH complaints. Because of the risk of stigmatization or backlash against persons reporting SEA/SH, it is important that the project GMs include multiple entry points and have clear protocols for recording SEA/SH complaints and providing referrals to existing quality GBV services.
- ◆ *GBV Service Provider Identification and Mapping:* For project GMs to be able to respond appropriately to incidents of SEA/SH, it is important that the sector implementing agencies identify in advance the available, quality GBV service providers to refer survivors for support. GBV service providers play an essential role in supporting survivors and mitigating the harm of SEA/SH including through health services; psycho-social care; and security, legal, and financial support.
- ◆ *Considerations for Recruitment of Staff:* The HD operations in the project may encourage gender-sensitive staffing or equitable recruitment in the project at all levels, including women in management/leadership positions. In addition to ensuring that individuals with required expertise are engaged, the project may consider how gender-sensitive staffing of the sector PIUs or of certain services or facilities can support SEA/SH mitigation measures. HD operations that include service delivery to children and vulnerable groups may take additional steps to recruit and screen workers for specific roles. Child- and student-safe recruitment refers to the use of procedures to screen/identify people who aim to work with children (teachers, principals, day care operators, etc.). Such procedures reduce the risk that a person who has or will exploit or abuse children/students will be hired. Some recruitment practices include undertaking background checks and checking professional references, whereby those who have committed any such offenses are not hired.
- ◆ *Creating Safe Spaces at the Facility-level:* The sector implementing agencies should consider how the physical facilities they use or develop can help to reduce the risk of SEA/SH. For instance HD operations that include rehabilitation or refurbishment of facilities, or subproject activities with higher SEA/SH risk levels, may assesses whether project facilities (schools, health centers, health posts, Farmers Training Centers (FTCs), etc) clinics, distribution follow good practices for reducing SEA/SH risks such as having separate, safe and easily accessible facilities (e.g., toilets, sleeping areas) for male and female users.
- ◆ *Monitoring:* Monitoring, as a GBV risk management approach, systematically collecting and analyzing data to track the effectiveness of prevention and response efforts, ensuring that interventions are addressing the needs of survivors and preventing further harm. This involves regular monitoring of the implementation of SEA/SH prevention and response measures.

4. SEA/SH Prevention and Response Action Plan

Taking the nature of the SEA/SH and overall risk rating level for the project on the one hand, the above proposed risk management system on the other, detailed outlines of the SEA/SH Prevention and Response Action Plan are given below.

SEA/SH Prevention and Response Action Plan Matrix

| Intention | | Implementation | | | | | | Impact | | | | |
|---------------|---|---|---|------------------------|----------------------|---------------------------|---|---|----------------------------|--|-----------------|--|
| Area of focus | Main SEA/SH risks | Key mitigation measures | Key mitigation action steps | Responsible party | Date to begin | Date due | Funding breakdown | Target | Responsible for monitoring | Supporting measure | Progress status | Progress notes |
| | SEA/SE risks by the project workers against project beneficiaries or members of local community | 1.1. Develop and implement Code of conduct for project personnel | Develop (and translate into appropriate language when applicable) Code of conduct for project personnel | Supervision Consultant | May 12, 2025 | Jun 01, 2025 | Part of the GBV Action Plan preparation | Code of conduct developed and available in appropriate languages | HCPCD | <i>Code of Conduct document and translated versions</i> | | Draft CoC Annexed HCPCD will Engage language translator |
| | | | Develop training plan for all project personnel on the Code of conduct | HCPCUs | Jul 01, 2025 | Aug 10, 2025 | 1 00,000\$ | Training plan with training activities, roles & respons., targets, calendar, budget developed | -HCPCD -HCPCUs | <i>Training Plan document</i> | Not started | Assume that the project disbursement conditions will be met beginning from the new budget year (July 01, 2025) |
| | | | Carry out Code of Conduct training | Supervision Consultant | Sep. 01, 2025 | Sep 30, 2025 | | Training plan targets achieved | -HCPCD -HCPCUs | <i>Short training report presenting an analysis of training' sex-disaggregated data and achievements</i> | Not started | |
| | | | Monitor the implementation of the Code of conduct | HCPCUs | Project commencement | Through the project life- | 500,000\$ | All project personnel have received a training and have signed the Code of conduct | -HCPCD -HCPCUs | <i>List of project personnel trained and who have signed the Code of conduct</i> | Not started | |

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| 1. ACCOUNTABILITY AND RESPONSE FRAMEWORK | Low institutional capacity to respond to SEA/SH | 1.2 Map GBV service providers in all areas of project implementation | Identify what services mapping exists in country | -HCPCUs -HCPCD | Jul 01, 2025 | Jul 30, 2025 | 10,000\$ | Desk review inc. collection of available services mapping completed | -HCPCD -HCPCUs | <i>Brief analysis of available GBV services mapping and data annexed</i> | Not started | |
| | | | Identify best-suited strategy, and develop TOR and methodology for services mapping | -HCPCUs -HCPCD | Jul 01, 2025 | Jul 30, 2025 | Simultaneous with GBV service mapping | ToRs for GBV services mapping developed | -HCPCUs -HCPCD | <i>ToRs for GBV services mapping</i> | Not started | |

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| | | | Carry out the services mapping | GBV Services Providers | Aug 01, 2025 | Aug 31, 2025 | 20,000\$ | GBV services mapping completed and accessible | -HCPCUs | <i>GBV services mapping results</i> | Not started | |
| | | | Regularly update the services mapping | GBV Services Providers | A year after commencement | Every year | 100,000\$ | GBV services mapping maintained up to date according to a regular timeframe (e.g. once a year) | GBV Services Providers | <i>GBV services mapping updates</i> | Not started | |
| | Ineffective GBV service referral pathways | 1.3. Establish GBV service referral pathways | Identify localized referral protocols and pathways to be integrated in the project GM | HCPCUs | Jul 01, 2025 | Aug 31, 2025 | 20,000\$ | Localized referral protocols and pathways are integrated in the SEA/SH GM manual inc. forms for safe and ethical referrals of SEA/SH survivors to GBV services | HCPCUs | <i>SEA/SH GM manual and annexes</i> | Not started | Assume that the project disbursement conditions will be met beginning from the new budget year (July 01, 2025) |
| | | | Update referral pathways regularly based on services mapping updates | HCPCUs | A year after commencement | Every year | 10,000\$ | Referral pathways maintained up to date with the GBV services mapping regular updates | -HCPCUs | <i>Referral pathways updates</i> | Not started | |
| | | | Develop SEA/SH sensitive GM including survivor-centered SOPs to receive, investigate, manage and respond to SEA/SH complaints | HCPCUs | Jul 01, 2025 | Aug 31, 2025 | Part of SEA/SH GM manual preparation | SEA/SH sensitive GM manual developed inc. annexes to support each stage of grievance management | -HCPCUs | <i>SEA/SH GM manual and annexes</i> | Not started | |

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| | Lack of GBV sensitive GRM | 1.4 Set up the GM as the response and management protocol to SEA/SH and GBV cases | Develop intake forms, referral protocols forms, information sharing tools, etc. | -HCPCUs | Jul 01, 2025 | Aug 31, 2025 | Part of SEA/SH GM manual preparation | Intake forms, referral protocols forms, and information sharing tools are available as Annexes to the SEA/SH sensitive GM manual | HUPCUs | <i>SEA/SH GM manual and annexes</i> | Not started | |
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| | | | Develop training plan for all stakeholders involved in management of SEA/SH complaints | HCPCUs | 01, 2025 | Aug 10, 2025 | Simultaneous with CoC training | Training plan with training activities, roles & respons., targets, calendar, budget developed | | <i>Training Plan document</i> | | |
| | | | Carry out GM training | Supervision Consultant | Sep 01, 2025 | Sep 30, 2025 | | Training plan targets achieved | -HCPCUs | <i>Brief analysis of trainings' sex-disaggregated data and achievements available</i> | Not started | |
| | | | Mobilize expertise as needed to provide TA to the operationalization of SEA/SH risks mitigation measures, including SEA/SH sensitive GM | HCPCUs | Jul 01, 2025 | Throughout the project implementation | 25,000\$ for TA throughout implementation as needed | Technical assistance mobilized and hired to deliver SEA/SH risks mitigating measures and GM training | HCPCUs | <i>ToRs for TA</i> | Not started | |
| | | | Roll out SEA/SH sensitive GM | -HCPCUs -Hire GBV expertise at WOFED level -Focal person at site level | Jun 01, 2025 | Aug 31, 2025 | 1,000,000 including salaries of 65 personnel X 5 years | SEA/SH sensitive GM is operational across all areas of project implementation | -HCPCUs | <i>Short narrative outlines SEA community-based complaint mechanisms at various geographical/administrative levels of the project implementation and explain their role in the management of SEA complaints.</i> | Not started | |
| | | | Monitor the SEA/SH GM rollout | -HCPCUs | Prior comm | Througho | 500,000\$ Lump | SEA/SH survivors whose case was disclosed and reported | -HCPCUs | <i>Case narrative report(s) with key non-identifiable data</i> | Not started | |

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| | | | | -Woreda level GBV personnel | ence ment | ut impl. | Sum of five years | through the project SEA/SH GM | -Woreda level GBV personnel | <i>points as per the Bank policy</i> | | |
| | Lack of SEA/SH prevention and response action plan by contractors | 1.5 Clearly define the SEA/SH requirements and expectations in bid documents and contracts | Add specific language and outline SEA/SH requirements and expectations in bid documents and contracts | HCPCUs | During bid announcement | Upon signing contract | | SEA/SH requirements and expectations are added in bid documents and contracts | HCPCUs | <i>Bid documents and contracts highlighting SEA/SH requirements</i> | Not started | |
| | | | Monitor the implementation of the SEA/SH requirements and expectations in bid documents and contracts | HCPCUs | During the bidding process | Upon signing contract | | SEA/SH requirements and expectations are available in bid documents and contracts | HCPCUs | <i>Bid documents and contracts highlighting SEA/SH requirements</i> | Not started | |
| | | | Equip the construction site with separate, secure, and easily accessible facilities for both women and men working on the site. | Contractors | Prior construction site work | Completion of construction site work | Cost to be covered by Contractors | All construction sites equipped with separate, secure, and easily accessible facilities for women and men. | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>Construction site plans to ensure that separate facilities for men and women are included in the design; on-site inspections prior construction work starts to verify the presence and adequacy of security measures in place (such as locks on doors, and proper lighting)</i> | Not started | |

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| | SEA/SH risks associated with the project civil works | 1.6 Develop and implement risks mitigation measures prior construction site work | Ensure that changing rooms and/or toilets are located in separate and well-lit areas, and can be locked from the inside. | Contractors | Prior construction site work | Completion of construction site work | Cost to be covered by Contractors | Changing rooms and/or toilets located in separate and well-lit areas and that can be locked from the inside are installed in all construction sites | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>Construction site plans to ensure that separate facilities for men and women are included in the design; on-site inspections prior construction work s</i> | | |
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| | | | Visibly install signs in appropriate language(s) around the project site (if applicable) indicating to workers and the local population that acts of Sexual Exploitation and Abuse/Harassment (EAS/HS) are prohibited on this site. | Contractors | Prior construction site work | Completion of construction site work | Cost to be covered by Contractors | All construction sites with signs indicating to workers and the local population the prohibition of Sexual Exploitation and Abuse (EAS) and Harassment (HS). | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>On-site inspections prior construction work starts to verify the presence and adequacy of signs in place informing about the prohibition of SEAH.</i> | Not started | |
| | | | Ensure, if applicable, that public spaces around the project site are well-lit. | Contractors | Prior construction site work | Completion of construction site work | Cost to be covered by Contractors | Lighting system in place in the project construction site adjacent areas | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>On-site inspections prior construction work starts to verify the presence and adequacy of lighting in the project construction site adjacent areas.</i> | Not started | |
| 2. TRAINING & COMMUNITY AWARENESS RAISING PLAN | Low awareness of the project workers on | 2.1 Develop and implement a training | Develop a training plan (inc. refresher/on-the-job training/awareness activities) with training/sensitization solutions for each category of project personnel and workers | -HCPCUs -Contractors | A year after project commencement | Every year | -250,000\$ Lump Sum of five year - Contractors cover costs for their workers | Training plan with training activities, roles & respons., targets, calendar, budget developed | -HCPCUs -Woreda level GBV personnel -Site focal person Contractors | <i>Training Plan document</i> | Not started | Assume that the project disbursement conditions will be met beginning from the new budget |
| | | | Ensure that SEA/SH requirements on training are included | HCPCUs | During | Up signing C- | Contractors cover the cost | Contracts with consultants/contractors include SEA/SH | HCPCUs | <i>Contracts with consultants/contractors highlighting</i> | Not started | |

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| | the GBV including SEA/SH | plan targeting all categories of project personnel and workers | in contracts with contractors | | bidding | ESM P | | requirements and expectations in training | | <i>SEA/SH requirements</i> | | year (July 01, 2025 |
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| | | | Mobilize expertise to ensure that project related training is of quality, survivor-centered | -HCPCUs -Contractors | Prior subproject commencement | Throughout the implementation period | -200,000\$ - Contractors cover their costs | Technical assistance mobilized and hired to deliver SEA/SH related training | -HCPCUs Contractors | Short training report presenting an analysis of trainings' sex-disaggregated data and achievements | Not started | |
| | | | Train all project personnel and workers before they start activities including sector frontline staff at service delivery schools, health facilities or sites | -HCPCUs -Contractors | A month prior project commencement | Prior engage in subproject activities | 200,000\$ | All project personnel have completed a training on SEA/SH risks and mitigation measures | -HCPCUs -Contractors | List of project personnel trained on SEA/SH risks and mitigating measures | Not started | |
| | | | Conduct refresher- or on-the-job training/awareness as part of project personnel, workers and civil servants ongoing training | HCPCUs | As needed | | Part of project capacity building | All project personnel have completed a refresher or on-the-job training/awareness on SEA/SH risks and mitigation measures in accordance with the training plan | HCPCUs | List of project personnel who participated in SEA/SH risks and mitigating measures refresher or on-the-job training/awareness | Not started | |
| | | | Monitor the rollout of the training plan | -HCPCUs -Woreda level GBV personnel -Site focal person | Upon subproject commencement | Throughout implementation period | Part of regular monitoring duties | All project personnel demonstrate awareness of project-related SEA/SH risks, of the prohibition of SEA/SH and related Code of conduct sanctions and have necessary knowledge about the | -HCPCUs -Woreda level GBV personnel -Site focal person | Short training report presenting an analysis of trainings' sex-disaggregated data and achievements | Not started | |

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| | | | | -Contractors | | | | SEA/SH GM procedures. | -Contractors | | | |
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| | Low awareness of the project affected community on SEA/SH | 2.2 Develop and implement a community awareness plan including various targeted community' groups | Develop and disseminate TORs to mobilize expertise to ensure that project related awareness raising is of quality and survivor-centered | -HCPCUs | Prior subproject commencement | Throughout the implementation period | | Technical assistance mobilized and hired to deliver SEA/SH related training | -HCPCD -HCPCUs | <i>ToRs for TA</i> | Not started | Assume that the project disbursement conditions will be met beginning from the new budget year (July 01, 2025) Assume that the project will begin in the new budget year (July 01, 2025) |
| | | | Community awareness-raising activities should include independent consultations with women in safe and confidential spaces. | -HCPCUs | Prior subproject commencement | Throughout the implementation period | | Independent consultations with women in safe and confidential spaces. | -HCPCD -HCPCUs | <i>Documentation of consultation process (such as antecedence with list and signature) showing the the number of consulted women</i> | | |
| | | | Develop and review awareness materials, messages, IEC, etc. regularly, based on community feedback, consultations and evolving understanding of risks | -HCPCUs -Woreda level GBV personnel -Site focal person -Contractors | Upon subproject commencement | Throughout the implementation period | | Awareness raising material regularly reviewed and maintained up to date | -HCPCUs -Woreda level GBV personnel -Site focal person -Contractors | <i>Awareness raising material and updates</i> | Not started | |
| | | | Monitor the rollout of the community awareness plan | -HCPCUs | Upon subproject commencement | Throughout the implementation period | | Community members participated in awareness activities demonstrate awareness | -HCPCUs | <i>Short community awareness activities report presenting an analysis of activities'</i> | Not started | |

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| | | | | -Woreda level GBV personnel -Site focal person -Contractors | ence ment | ment ation period | | of project-related SEA/SH risks, CoC and GM procedures. | -Woreda level GBV personnel -Site focal person -Contractors | <i>sex and age disaggregated data and achievements</i> | | |
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| 3. MOBILIZATION OF GBV EXPERIENCE | | 3.1 Recruit GBV services providers to facilitate access to timely, safe and confidential services for survivors in areas where these services are unavailable | Develop TOR and recruit a GBV services providers | HCPCUs | Jul 01, 2025 | Jul 30, 2025 | | Technical assistance mobilized and recruited to facilitate timely, safe and confidential access to GBV services for SEA/SH survivors | HCPCUs | ToRs for GBV services providers and contract arrangements | Not started | Assume that the project disbursement conditions will be met beginning from the new budget year (July 01, 2025) |
| | | | Facilitate coordination with project stakeholders responsible for survivor's timely, safe and confidential referral to GBV services | -HCPCUs -Woreda level GBV personnel -Site focal person -Contractors | Prior to Sub-project commencement | Throughout implementation period | | All project personnel responsible for survivor's timely, safe and confidential referral to GBV services demonstrate awareness of how to liaise/coordinate with GBV services providers recruited by the project in areas where these services are not available | -HCPCUs -Woreda level GBV personnel -Site focal person -Contractors | Short training report presenting an analysis of trainings' sex-disaggregated data and achievements | Not started | |
| | | 3.2 Mobilize GBV specialist in the supervising engineer's team with specific skills to supervise implementation of risks mitigating measures | Develop TOR and recruit a GBV specialist with SEA/SH monitoring tasks inc. supervision of signing of Code of conduct, on adequate rollout of SEA/SH sensitive GM mechanism, on liaison/coordination with GBV services providers. | HCPCUs | Within the first year of project implementation period | Throughout implementation period as needed | | Technical assistance mobilized and hired in the supervising engineering' team to supervise SEA/SH related tasks | HCPCUs | ToRs for GBV specialist | Not started | |
| | Lack of access to timely, safe and confidential | | | | | | | | | | | |

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| | GBV services for survivors | | | | | | | | | | | |
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| | | | Monitor the execution of the GBV specialist' SEA/SH related tasks | HCPCUs | Withi n the first year of projec t imple menta tion period | Thro ugh o ut imple ment ation period | | All engineering team personnel demonstrate awareness of project-related SEA/SH risks, of the prohibition of SEA/SH and related Code of conduct sanctions and have necessary knowledge about the SEA/SH GM procedures. | HCPCUs | <i>Quarterly report presenting GBV specialist' achievements</i> | | |
| Technical capacity gaps in the sector organizations to implement and monitor the SEA/SH risks mitigating activities | 3.3 Mobilize GBV specialist in the HCPCUs with specific skills to implement and monitor the SEA/SH risks mitigating activities | Develop TOR and recruit a GBV specialist with SEA/SH risks mitigating tasks as outlined in the GBV Action Plan | HCPCUs | Prior subproject commencement | Thro ugh o ut imple ment ation period as needed | 200,000\$ as Lump Sum of five years | Technical assistance mobilized and hired in the HCPCUs to implement and monitor SEA/SH related tasks | HCPCUs | <i>ToRs for GBV specialist</i> | Not started | Assume that the project disbursement conditions will be met beginning from the new budget year (July 01, 2025) | |
| | | Monitor the execution of the GBV specialist' SEA/SH related tasks | HCPCUs | Upon engaging GBV specialist | Thro ugh o ut imple ment ation period as needed | | All engineering team personnel demonstrate awareness of project-related SEA/SH risks, of the prohibition of SEA/SH and related Code of conduct sanctions and have necessary knowledge about the SEA/SH GM procedures. | HCPCUs | <i>Quarterly report presenting GBV specialist' achievements as set in the GBV Action Plan</i> | Not started | | |

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| 4. DIFFERENTIAL SEA/SH MITIGATION PLAN FOR VULNERABLE GROUPS | Increased SEA/SH risks for vulnerable groups within the UCs women, girls, people with disabilities, and refugees | 4.1 Develop and implement differential mitigation measures for the SEA/SH against the VGs including women, girls, people with disabilities, and refugees in the project areas with UCs | Develop and implement community-based strategies inc. Establish and work with clan leaders and elders addressing the gender norms and practices driving project-related SEA/SH in the UCs, outreach, or access to care as needed. | HCPCUs | Prior subproject commencement | Throughout implementation period | 100,000\$ as Lump Sum | Discriminatory gender norms and practices changed | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>Number of community-based working groups established, types and number of community awareness raising conducted appropriate to the local culture . . etc</i> | Not started | Assume that the project disbursement conditions will be met beginning from the new budget year (July 01, 2025) |
| | | | Develop and implement GBV related GM appropriate to the culture and specific needs of the women and girls in the UCs. | HCPCUs | Prior subproject commencement | Throughout implementation period | | Multiple GM channels established appropriate to the culture and specific needs of the women and girls within the UCs. | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>Types of GM channels established at service delivery centers (school, HC, HPs . . etc) and number of women and girls using the GM</i> | Not started | |
| | | | Monitor the execution of the differential SEA/SH mitigation measures in the project areas with the UCs | -HCPCUs -Woreda level GBV personnel -Site focal person | Upon subproject commencement | Throughout implementation period | | | | | | |

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| Increased SEA/SH risks for the vulnerable groups in the conflict-affected areas | 4.2 Develop and implement differential mitigation measures for the SEA/SH against the VGs including women, girls, people with disabilities, and refugees in the conflict-affected areas | Conduct site-specific SEA/SH risk assessment in high-risk woredas affected the most by the conflict, | HCPCUs | Prior subproject commencement | Throughout implementation period | 100,000\$ as Lump Sum | Differential SEA/SH risks assessment in the in high-risk woredas affected the most by the conflict | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>The SEA/SH assessment report</i> | Not started |
| | | Develop and implement appropriate mitigation measures based on the site-specific SEA/SH risks | HCPCUs | Prior subproject commencement | Throughout implementation | | Differential SEA/SH mitigation measures developed for high-risk woredas affected the most by the conflict. | -HCPCUs | Differential SEA/SH Action Plan | Not started |
| | | Monitor the execution of the differential SEA/SH mitigation measures in the high-risk areas affected the most by conflict | -HCPCUs -Woreda level GBV personnel -Site focal person | Upon subproject commencement | Throughout implementation period | | Differential SEA/SH measures roll out | -HCPCUs -Woreda level GBV personnel -Site focal person | <i>Monitoring reporting analyzing the implementation status on the proposed differential mitigation measures</i> | Not started |

5. Proposed Reporting During Implementation

Reporting of SEA/SH during the project implementation is crucial for ensuring accountability, protecting vulnerable individuals, and mitigating potential harm. It allows for timely intervention, prevents further harm, and provides a platform for survivors to seek support and redress. Table 2 proposes the reporting mechanisms for SEA/SH prevention monitoring. It should be emphasized that no reporting should have identifiable information on individual cases. It is essential that the confidentiality and safety of survivors be protected.

Table 2: Proposed Reporting of SEA/SH During Implementation

| Who | To whom | What | When | Objective |
|--|---|--|--------------------------|---|
| Site focal person | Respective Sector Woreda Human Capital Project Coordination Unit (WHCPCU) to Federal Human Capital Project Coordinating Unit (FHCPCU) in turn to the Bank | Reporting of SEA/SH allegations with four key data: <ul style="list-style-type: none"> ✓ Nature of the case; ✓ Project-related (Y/N); and ✓ Age and/or sex (if available). ✓ Whether the survivor was referred to services (Y/N) | As soon as becomes known | <ul style="list-style-type: none"> ● For IA to monitor response. ● For Bank to report to management in accordance with Environmental and Social Incident Response Toolkit (ESIRT) |
| GBV Service Provider (contracted to project) | FHCPCU in each Sector Ministry | Aggregate data on case load: <ul style="list-style-type: none"> ✓ Number of SEA/SH cases received/referred by the site focal person, disaggregated by age and sex; ✓ The number of cases open, and the average time they have been open; and ✓ The number of cases closed, and the average time they were open. | Monthly | To ensure accountability of GBV service provider particularly if financial support is being provided for survivor support |
| FHCPCUs | The Bank | <ul style="list-style-type: none"> ✓ Project SEA/SH indicators; and ✓ GM indicator | In accordance with ESCP | In accordance with the standard project Results Framework reporting |
| TPM, if applicable) | FHCPCUs which in turn furnish to Bank | <ul style="list-style-type: none"> ✓ The implementation of the SEA/SH Prevention and Response Action Plan; ✓ The functioning of an appropriate mechanism to address and resolve SEA/SH complaints; ✓ The functioning of the GBV service provider; and | Quarterly | Part of overall duty of TPM to monitor implementation of the CoC. |

| | | | | |
|--|--|--|--|--|
| | | ✓ The functioning of the GM and the status of GM indicators related to SEA/SH. | | |
|--|--|--|--|--|

Annexes

Annex 1: Sample Codes of Conduct for the Project Workers

1. Preamble

The GBC CoCs are written sets of principles or minimum standards of behavior. CoCs refers to commitments that are agreed to specifically in relation to the Bank IPF. It is a method that provides a basis for the respective Sector Organizations or their contractors to implement disciplinary measures against the project workers who perpetrate SEA/SH.

2. Responsibilities of the Project Implementing Agencies (IAs)

Among others, the responsibilities of the Project IAs include

- a) Have all employees of contractors (including sub-contractors), supervising Engineers and other consultants with a footprint on the ground in the project area sign codes of conduct (CoCs);
- b) Have an effective SEA/SH Action Plan so that workers understand behavior expectations and policies, as well as an effective Grievance Mechanism (GM). This Action Plan should include training and communication. It should also include plans to make the project-affected community aware of the CoC the project staff have just signed; and
- c) As part of the SEA/SH Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have violated SEA/SH policies.

3. Responsibilities of the Project Workers

Among others, the responsibilities of the project workers include

- a) All workers must understand and comply with CoC's requirements, which include prohibitions against GBV and SEA/SH.
- b) Workers are required to sign the CoC and attend GBV/SEA training to ensure they understand their responsibilities.

4. Scope of the CoC

The scope of this CoC applies to the project actors (school management, health management, frontline staff (teachers, health workers, agricultural extension workers or any other workers) operating to delivery the project related services and benefits.

5. Prohibition of SEA/SH Acts in the Project

There are many ways in which the risks and impacts of SEA/SH arise in the context of IPF, and these can vary by sector and setting. In general, the project prohibits any acts of SEA/SH by the project actors:

- a) **Sexual exploitation** occurs when a project actor conditions access to the project benefit, service, good, or employment-related benefit on extracting sexual favors.
- b) **Sexual abuse** occurs when the project actor uses force or unequal power relation visa-vis a beneficiary, community member, or colleague to perpetrate or threaten to perpetrate an unwanted sexual act
- c) **Sexual harassment** occurs when a project actor makes unwelcome sexual advances to, or requests sexual favors or acts of a sexual nature from other project actors
- d) A sexual relationship with an underage child. Not participate in sexual contact or activity with minors (defined as persons under the age of 18) — including grooming, or contact through digital media. Mistaken belief regarding the age of a minor is not a defense. Consent from the minor is also not a defense or excuse.

6. Consequences of Violating the CoC

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences:

- a) **Administrative measures:** As a separate matter, disciplinary sanctions for violation of a CoC or Behavioral Standards should form part of a process that is internal to the employer and is placed under the full control and responsibility of its managers (in contrast to criminal proceedings). Depending on the gravity of the offense, potential administrative disciplinary actions might include:
 - I. Written warnings or reprimands.
 - II. Suspensions from work or project activities.
 - III. Demotion or loss of privileges.
 - IV. Termination of employment or project participation.
- b) **Legal measures:** Some SEA/SH allegations may be referred to local or national authorities for the purposes of criminal investigation, in accordance with the wishes of the survivor or in compliance with mandatory reporting requirements in the relevant jurisdiction.

7. Reporting Protocol

If any person observes behavior that he/she believes may represent acts of SEA or SH, he/she can report intermediately. However, he/she follow the necessary reporting protocols including clear reporting mechanisms and procedures for addressing SEA/SH, including confidentiality, survivor protection, and safe reporting channels

8. Investigation Process

- a) The SEA/SH investigation process is guided by the necessary principles including: Conducting prompt and thorough investigations of any alleged GBV incidents in accordance with a survivor-centered approach.
- b) The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law.
- c) Disciplinary measures should not negatively impact survivors, and their confidentiality and safety should be prioritized throughout the process.

9. Signatories

I have read and understand this CoC, hereby confirm my agreement by signing this CoC.

Signature: _____

Date: (day month year): _____

Authorized Personnel:

Signature: _____

Date: (day month year): _____

Annex 2: Sample Individual Code of Conduct Implementing ESHS and OHS Standards Preventing Gender Based Violence

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) is important.

The Company considers that failure to follow ESHS and OHS standards, or to partake in activities constituting GBV—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV may be pursued if appropriate.

I agree that while working on the project I will:

1. Consent to Police background check.
2. Attend and actively partake in training courses related to ESHS, OHS, and GBV as requested by my employer.
3. Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
4. Take all practical steps to implement the contractor's environmental and social management plan (C-ESMP).
5. Implement the OHS Management Plan.
6. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
7. 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.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.
10. Not engage in sexual harassment of work personnel and staff—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited. E.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.
11. Not engage in sexual favors—for instance, making promises of favorable treatment (e.g. promotion), threats of unfavorable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
12. Not use prostitution in any form at any time.
13. Not participate in sexual contact or activity with children under the age of 18—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.

14. Unless there is the full consent⁶ by all parties involved, I will 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 (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.
15. Consider reporting through the GRM or to my manager any suspected or actual GBV by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

16. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
17. Wherever possible, ensure that another adult is present when working in the proximity of children.
18. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
19. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
20. Refrain from physical punishment or discipline of children.
21. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
22. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
23. Take appropriate caution when photographing or filming children (See Annex 2 for details).

Use of children's images for work related purposes

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

24. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
25. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
26. 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.
27. Ensure images are honest representations of the context and the facts.
28. Ensure file labels do not reveal identifying information about a child when sending images electronically.

⁶ **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 using 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 if 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.

Sanctions

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

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

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

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex 3 : List of Organizations and Stakeholders Consulted

| Name of Informant | Organization | Position | Phone |
|--------------------|---|---|-------------------|
| Getahun Desalegn | Ministry of Education | Project management, partnership and resource mobilization Senior Expert | +2519115669 75 |
| Dr. Wubshet Asnake | Ministry of Agriculture | Food Staff and Quality Desk Head | +2519210340 94 |
| Alemtsehay Sergawi | “ | Head, Food and Nutrition Office | +2519802235 00 |
| Fesseha Tekele | Ministry of Health | Senior Program Manager | +2519111043 39 |
| Kebede Mamo | “ | Senior M&E Advisor | |
| Siham Worku | Amhara Bureau of Finance | Channel One Programs Coordinator | +2529181349 89 |
| Hussein Ali | Afar Region Bureau of Finance | Channel One Programs Coordinator | +2519118099 51 |
| Obong Oboya | Gambella Region Bureau of Finance | Channel One Programs Coordinator | +2519179079 08 |
| Bikiltu Ketema | Oromia Bureau of Finance | Channel One Programs Coordinator | +2519118666 29 |
| Wubishet | South Ethiopia Region Bureau of Finance | Channel One Programs Coordinator | +2519136769 91 |

| | | | |
|----------------|-------------------------------------|----------------------------------|-------------------|
| Amare Zerihun | Tigray Region Bureau of Finance | Channel One Programs Coordinator | +2519253988 1 |
| Ismael | Tigray Bureau of Education | Vice Bureau Head | +2519248495 18 |
| Misganaw Amare | Amhara Bureau of Education | Expert | +2519121909 19 |
| Kishin Wolde | Amhara Bureau of Health | Vice Bureau Head | +2519757570 33 |
| Abatenaw Adane | Amhara Bureau of Agriculture | Expert | +2519243985 18 |
| Ebrahim Idris | Dallol Woreda, WOFED | Office Head | +2519293393 06 |
| Kadir | Dallol Woreda, Agriculture Office | Office Head | +2519200983 65 |
| Fatuma | Dallol Woreda, Women Affairs Office | Office Head | +2519215561 51 |
| Abdella | Dallol Woreda, Education Office | Office Head | +2519128381 18 |
| Abdu | Dallol Woreda, Health Office | Office Head | +2519141451 28 |
| Habtamu | Semen Ari Woreda, WOFED | Office Head | +2519317714 55 |

| | | | |
|---------------|---------------------------------------|-----------------------------------|-------------------|
| Metekiya | Semen Ari Woreda, Health Office | Health Planning Expert | +2519121230 18 |
| Dejene | Semen Ari Woreda, Agriculture Office | Agricultural Expert | +2519260058 13 |
| Melese | Semen Ari, Education Office | Education Planning Expert | +2519269055 22 |
| Dagnachew | Semen Ari, Women Affairs Office | Planning Expert | +2513653888 4 |
| Abebe | Itang Woreda, WOFED | Office Head | +2519627162 25 |
| Berhanu | Itang Woreda, RRS | Expert, Refugee Social Management | +2519139814 78 |
| Mohammed | Gablalu Woreda WoFED | Office Head | +2519150054 46 |
| Seid Ali | Ambassel Woreda, Agriculture Office | Office Head | +2519217909 72 |
| Wondu G/Maria | Ambassel Woreda, Health Office | Office Head | +2519143319 67 |
| Seid Ahimed | Ambassel Woreda, Education Office | Office Head | +2519137510 21 |
| Atsede Abate | Ambassel Woreda, Women Affairs Office | Office Head | +2519128609 77 |

Annex 4: Community Consultation Participants' Attendance

A. At Dallol Woreda

Community Consultation Participant Attendance

I. Composition of the Community Consultation Participants

The composition of the community consultation participants will include community representatives (clan leaders, community elders, and religious leaders), members of project-affected communities, women, IDPs, and People with Disabilities, and pastoral communities. The total number of participants per community consultation session is expected to be 15-20.

II. Basic Information

- Name of selected region: Afar
- Name of selected zone: Abala (2)
- Name of selected woreda: Dallol
- Name of selected kebele(s): 17 kebeles
- Date of consultation conducted: 11-8-2017
- Consultation start time: 2:00
- Consultation end time: 5:30
- Venue: _____
- Name of consultation moderator: _____

III. List of Participants

| S/No | Name | Sex | Social Status | Signature |
|------|--------------------|-----|---------------|-----------|
| 1 | Hussen Nur | M | | |
| 2 | Ahmed Mahamada | M | | |
| 3 | Darsa Ahmed | M | | |
| 4 | Usman Elorahim | M | | |
| 5 | Usman Aden | M | | |
| 6 | Darsa Edris | M | | |
| 7 | Husen Ebrahim | M | | |
| 8 | Ali Ahmed Ali | M | | |
| 9 | Anna Usman | M | | |
| 10 | Esmail Dattamawit | M | | |
| 11 | Fatuma Amete | F | | |
| 12 | Halima Husen | F | | |
| 13 | Fatuma Ahmed | F | | |
| 14 | Esmail Edris | M | | |
| 15 | Edris Amel | M | | |
| 16 | Husen Abdul | M | | |
| 17 | Esmail Ali Ehim | M | | |
| 18 | Ebrahim Edris Ehim | M | | |
| 19 | Abdulla Ali Ehim | M | | |
| 20 | Edris Mohammed | M | | |

Annex 5: Sample Minute with Community Consultation

Community Consultation Participant Attendance

I. Composition of the Community Consultation Participants

The composition of the community consultation participants will include community representatives (clan leaders, community elders, and religious leaders), members of project-affected communities, women, IDPs, and People with Disabilities, and pastoral communities. The total number of participants per community consultation session is expected to be 15-20.

II. Basic Information

- Name of selected region: 2 (Afar)
- Name of selected zone: 2 (kilbati Rasu)
- Name of selected woreda: Dallol
- Name of selected kebele(s): 17
- Date of consultation conducted: 11/08/2017
- Consultation start time: 2:00
- Consultation end time: 5:30
- Venue: fainance office
- Name of consultation moderator: Ibrahim Idriis Osman

Community Consultation Checklist

- ◆ Assess availability, problems and challenges of access to basic health service
- ◆ Availability, problems and challenges of access to education service.
- ◆ Availability, problems and challenges of access to water service.
- ◆ Assess availability, problems and challenges of access to agricultural extension service
- ◆ Impacts of unavailability or inaccessible basic services such as health, education and water on women, pregnant and lactating women, girls, children, the elderly, people with disability,

ለውይይት (እንደ አጀንዳ) በቀረቡ ነባራዊ ችግሮች ላይ የተሰጡ ዝርዝር (ተጨማሪ) ምክረ ሀሳቦች

❖ በ ጤና አገልግሎት:-

- ✓ ወረዳችን ካለው የ ህዝብ ቁጥር አንፃር እና ካለን መልክዓለም አቀፍ ስፋት አንፃር የ ጤና አገልግሎት የሚሰጡ ተቋማት በጣም አናሳ ነው።
- ✓ አገልግሎት እንዲሰጡ የተገነቡ የ ጤና ተቋማት ሙሉ በሙሉ (በአገዛዥነት) በውስጥ ግብአት (ማቴሪያል ፣ መድሀኒት) እና በሰው ሀይል (አስፈላጊ በሆኑ ባለሙያዎች) ችግር አለባቸው።
- ✓ የ ጤና አገልግሎት ልማግኘት ወደ ወረዳ ማእከል ይሁን ወደሌላ ጤና ተቋም ለመንቀሳቀስ በወረዳችን ያለው ወደ ተለያዩ አቅጣጫ የሚያስከፋ የመንገድ ችግር እና የ ትራንስፖርት አገልግሎት አለመኖር።



✓ በወረዳችን በሰው ሀይልም በማቴሪያልም ደረጃውን የጠበቀ የሀክምና አገልግሎት የሚሰጥ ተቋም ባለመኖሩ ቤቶች፣ እናቶች፣ሀፃናት፣አረጋውያን፣ አካል ጉዳተኞች እና ፅኑ ሀሙማን የተሸለ ሀክምና ወይም አገልግሎቱን ለማግኘት ወደ አጎራባች ወረዳ እና ወደ ተለያዩ ቦታዎች እንዲሄዱ ይገደዳሉ። ይህ ደግሞ ለታማሚው እና ማህበረሰቡ የ ኢኮኖሚ እና ማህበራዊ ቀውስን ያስከትላል።

✓ ሀብተሰባችን ያሉበትን የተለያዩ የጤና ችግሮች በወቅቱ ወደ ሀክምና ሰጪ ተቋማት በመሄድ አስፈላጊና ተገቢውን ሀክምና በጊዜው እንዲያገኝ ለሀብተሰቡ አስፈላጊ የሆኑትን የግንዛቤ እና የ ምክር እና የውይይት መድረኮችን በመፍጠር ስልጠናዎችን መስጠት ።

❖ በ ትምህርት አገልግሎት:-

✓ አገልግሎት እንዲሰጡ የተገነቡ ትምህርት ቤቶች ሙሉ በሙሉ (በአብዛኛው) በውስጥ ግብአት (ወንበር፣ብላክበርድ ችክ እና ሌሎችም....) እና በሰው ሀይል (መምህራን) እጥረት ችግር አለባቸው።

✓ በወረዳችላ ተገንብተው የነበሩ አብዛኞች ትምህርት ቤቶች በውስጥ ማቴሪያል እጥረት፣ ግድግዳ እና ጣሪያቸው በመፍረሱ ምክንያት አገልግሎት እየሰጡ አይደሉም።

✓ የማቴሪያል እጥረት ላለባቸው ትምህርት ቤቶች የማቴሪያል ድጋፍ ቢደረግላቸው ፤ እና የወደሙ(የፈራረሱ) ትምህርት ቤቶች እድሳት እና ጥገና ስለሚያስፈልጋቸው በአፋጣኝ ጥገና ቢደረግላቸው።

✓ አብዛኛው ማህበረሰባችን አቅመ ደክማ እና ኢኮኖሚ ችግር ያለበት ስለሆነ በዚህም ችግር ምክንያት ልጆቹን ለማስተማር ስለሚችገር ለተማሪዎች የመማሪያ (የትምህርት ቁሳቁስ) እና የምግብ ድጋፍ ቢደረግ።

✓ ማህበረሰባችን በተለያዩ ችግሮች ምክልያት እራሱ ለመማር አንዲሁም ልጆቹን ወደ ትምህርት ለመላክ ያለው ምልክታ እና ግንዛቤ እንዲስተካከል የንቅናቄ እና ግንዛቤ ፕሮግራሞች ያስፈልጋሉ

❖ በ ውሃ አገልግሎት:-

✓ በወረዳችን የመጠጥ ውሃ ተደራሽነት በጣም አናሳ ነው።

✓ ካለን የውሃ ችግር አንጣር ለጥራትም ለተደራሽነትም በብዙ ቦታዎች ጥልቅ የውሃ ጉድጓድ ቁፋሮች ያስፈልጋሉ

✓ አሁን ካለው የነዳጅ አቅርቦት እና የ ዋጋ ውድነት አንፃር እንዲሁም ለተሻለ አገልግሎት የ ውሃ መሰባሰቢያ ሞተሮች በ ታዳሽ ሀይል (ሶላር) ቢቀየሩልን።

❖ በ ግብርና ዘርፍ አገልግሎት :-

✓ ለ እርሻ ስራዎች የሚሆኑ የእርሻ መሳሪያ እቃዎች (አካፋ፣ዶማ፣ዛቢያ፣ማለሻ ፣) ድጋፍ ቢደረግልን።

✓ በወረዳችን በአጠቃላይ ማለት ይቻላል በጎርፍ ችግር ምክንያት የመሬት መሸርሸር፣ የመንገዶች መበላሸት(መቆረጥ)፣የእርሻ ቦታዎች በጎርፍ መወሰድ እና ሌሎችም በዚህም ምክንያት ለጎርፍ መከላከል እና አፍርናውሃ ጥበቃ ስራ የ ሚሆን የ ጋቢዮን እገዛና ድጋፍ በጣም ያስፈልገናል።

✓ አርብቶ አደር ማህበረሰብ እንደመሆናችን የ እንስሳት ሀክምና ተቋማት በስፋት ያስፈልጉናል።

✓ የ አካባቢያችን የ አየር ንብረት እና የ መሬት(አፈር) ሁኔታ ያማከለ ለ እርሻ የሚሆኑ ግብአቶች (ምርጥ ዘር፣ ኬሚካል) እገዛና ድጋፍ ያስፈልገናል።



Annex 6: Sample Photos During Community Consultation At Dallol Woreda



At Semen Ari Woreda

