

**REPUBLIC OF LEBANON**  
**MINISTRY OF PUBLIC HEALTH**

**Strengthening Lebanon's Covid-19 Response**  
**((P178587))**

(Situations in Urgent Need of Assistance or Capacity Constraints)

**LABOR MANAGEMENT PROCEDURES**  
**(LMP)**

**BEIRUT**

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## Abbreviations and Acronyms

<b>CoC</b>	Code of Conduct
<b>COVID-19</b>	Corona Virus Disease
<b>EHS</b>	Environment, Health and Safety
<b>E&amp;S</b>	Environmental and Social
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>ESF</b>	Environment and Social Framework
<b>ESP</b>	Environmental and Social Policy
<b>ESS</b>	Environmental and Social Standard
<b>E&amp;SS</b>	Environmental and Social Specialist
<b>GBV</b>	Gender Based Violence
<b>GOL</b>	Government of Lebanon
<b>GM</b>	Grievance Mechanism
<b>ILO</b>	International Labour Organization
<b>IPC</b>	Infection Prevention and Control
<b>LMP</b>	Labour Management Procedures
<b>MoPH</b>	Ministry of Public Health
<b>NVDP</b>	National Vaccine Deployment Plan
<b>OHS</b>	Occupational Health and Safety
<b>PMU</b>	Project Management Unit
<b>PPE</b>	Personal Protective Equipment
<b>SEA/H</b>	Sexual Exploitation and Abuse/Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>TPM</b>	Third Party Monitoring
<b>VAC</b>	Vaccine Approval Criteria
<b>WB</b>	World Bank
<b>WHO</b>	World Health Organization

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## 1. Introduction

As required by the World Bank (WB), The Ministry of Public Health (MoPH) prepared an Environmental and Social Commitment Plan (ESCP)<sup>1</sup> and a Stakeholder Engagement Plan (SEP)<sup>2</sup> that were submitted and cleared in March 2022. The WB also required MoPH to prepare and implement Labor-Management Procedures (LMP).

Through the LMP, MoPH ensures that its activities comply with the Environmental and Social Standards (ESS) of the WB's Environmental and Social Framework (ESF), in particular ESS2 (Labor and Working Conditions) and the requirements of the national law. Under ESS2, borrowers are required to develop an LMP. The purpose of the LMP is to facilitate planning and implementation of the project related to labor. The LMP identify the main labour requirements and risks associated with the project, and help the borrower determine the resources necessary to address project labour issues. The LMP will enable different project-related parties, for example, staff of the MoPH, suppliers of vaccines and medical supplies, and medical staff, to have a clear understanding of what is required on a specific labour issue. The LMP also addresses the way in which MoPH will require third parties to manage their workers. In addition, and as depicted in section 10 "Grievance Mechanism" of the LMP, a specific grievance mechanism will be established upon project effectiveness tailored for identified workers.

The project's Labour-Management Procedures (LMP) is a living document, which will be initiated upon project Effective Date, and will be revised as relevant and when further information becomes available during project implementation as per the cleared and disclosed ESCP (link for disclosed ESCP available in footnote).

### **Project Development Objective (PDO):**

The Project Development Objective is to prevent, detect and respond to the threat posed by COVID-19 and strengthen Lebanon's national system for public health preparedness.

### **PDO level indicators:**

- Number of COVID-19 vaccine doses acquired through project financing.
- Percentage of residents of Lebanon who are fully vaccinated (2 doses or one dose depending on vaccine type Number of COVID-19 patients whose treatments were supported by the project.

### **Intermediate results indicators:**

- Percentage of non-Lebanese pre-registered on the national platform who are fully vaccinated
- Percentage of vaccination sites with functional cold chain.
- Percentage of reported serious Adverse Events Following Immunization (AEFI) cases for which investigations were initiated within 48 hours;
- Number of health workers who received training in vaccination with gender-based violence (GBV) related content.
- Percentage of feedback cases registered in the project's grievance mechanism (GM) in the last quarter addressed within a timeframe specified by the project;
- Number of communication initiatives supported by the project to address vaccine hesitancy.
- Percentage of vaccination sites visited by the project third-party monitoring agency (TPMA) in the last

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<sup>1</sup> <https://moph.gov.lb/userfiles/files/Programs%26Projects/Lebanon%20Health%20Resilience%20Project%20-LHR/Environment%20and%20Social%20Commitment%20Plan-clean.pdf>

<sup>2</sup> <https://moph.gov.lb/userfiles/files/Programs%26Projects/Lebanon%20Health%20Resilience%20Project%20-LHR/Stakeholder%20Engagement%20Plan.pdf>

quarter;

- Number of meetings/forums regularly discussing results of the TPMA
- Percentage of designated laboratories with COVID-19 diagnostic equipment, test kits and reagents (Percentage)
- Percentage of designated hospitals/quarantine centers fully equipped with commodities (e.g., PPE, infection control products and supplies/ventilators) (Percentage)
- Number of Non-Governmental Organizations (NGOs) representing communities that are engaged throughout the project (Number)
- Percentage of interviewed vaccine recipients reporting good satisfaction with the COVID-19 vaccination service that they received

### **Components:**

**Component 1 – Procurement of COVID-19 vaccines and deployment (US\$ 11.5M):** This component will support the purchase of COVID-19 vaccines and related deployment activities.

***Subcomponent 1.1: Procurement of Vaccines and Vaccines Supplies: (US\$ 10.20M):*** This subcomponent will support the procurement of (i) COVID-19 vaccine doses that meet the World Bank’s Vaccine Approval Criteria (VAC) and (ii) relevant vaccination consumables (diluent, syringes, etc.) to meet Lebanon’s vaccination needs, in accordance with the prioritization and eligibility criteria of the NDVP.

***Subcomponent 1.2: Vaccine deployment (US\$ 1.30M):*** This subcomponent will support the relevant deployment activities, including inter alia: (i) behavior change communications to increase vaccine awareness and reduce vaccine hesitancy; (ii) mobile vaccination units to vaccinate hard-to-reach populations (e.g., in remote areas) especially those climate-vulnerable; (iii) large-scale vaccination marathons to improve vaccine uptake; (iv) operational costs of vaccination sites; (v) support to energy-efficient cold chain equipment and other vaccine-related logistics. Activities under this component will include, when relevant, climate considerations in the development of Standard of Procedures and policy guidelines.

**Component 2- COVID-19 prevention, detection and case management (US\$ 11M):** This component will support other COVID-19 prevention, detection and case management activities. This may include, inter alia: (i) payment of COVID-19 and related health conditions treatment bills to eligible hospitals, using provider payment methods as agreed with the World Bank; (ii) procurement of pharmaceuticals, equipment and supplies needed for the prevention, detection and case management of COVID-19 and related health conditions; (iii) capacity building and technical assistance in COVID-19 prevention, detection and case management; and (iv) equipment such as solar panels to help ensure continued clean energy supply for functioning of equipment critical for the management of COVID-19 in public hospitals<sup>3</sup>. For COVID-19 treatment, the project can finance therapeutics which are recommended by WHO’s COVID-19 treatment guidelines.

**Component 3 – System Strengthening, Monitoring and Management (US\$ 6.5M):**

***Subcomponent 3.1: Monitoring and Project Management (US\$ 2.50M):*** This subcomponent will finance the project management unit, which includes at least: (i) financial management officers (FM), (ii) procurement and due diligence team; (iii) environmental and social officer; (iv) monitoring and evaluation officer and (v) Coordination. This component will also finance (i) the Vaccination Technical Audit to ensure transparent, fair

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<sup>3</sup> Approximately US\$ 3 million is planned for this.

and equitable vaccine deployment, with an emphasis on the WB financed vaccines as well as (ii) the Treatment Technical Audit to ensure the same for COVID-19 and related health conditions treatment bills. The technical auditors will be contracted by the MoPH in accordance with World Bank's procurement guidelines and procedures.

***Subcomponent 3.2: System Strengthening (US\$ 4.00 M):*** The subcomponent will support activities aimed at strengthening the health system in critical areas such as information systems, public health surveillance capacity, supply management/logistics, and expansion of primary health care settings.

The project is intended to start in August 2022 and be completed by December 2024

## 2. Overview of labor use on the Project

Based on available information, this section describes the Project workers, their characteristics, the timing of labor requirements, the anticipated or known contracting structure for the project, with numbers and types of suppliers and the likely number of project workers to be employed or engaged on the Project.

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 to the Project in the following manner and as per Table 1 of the report:

a. Direct Workers. People employed or engaged directly by MoPH (Implementing Agency, IA) which can be categorized as: (i) Project Management Unit (PMU) on behalf of the IA to work specifically in relation to the Project. The PMU will comprise about seven (7) workers, all local residents; These consultants will be mostly technical staff with skills in administrative, procurement, financial and environmental, and social fields; and (ii) Other Contracted Consultants: Under component 3, the project will employ consultants to engage and work in the existing Quality Assurance of Pharmaceutical Products (QAPP) Program at the Ministry of Public Health (MoPH) which aims to reinforce the implementation of quality standards relating to the safety of pharmaceutical products and to ensure that medicines and vaccines reach the patient in a safe, effective and acceptable manner. Four (4) local consultants working on the Pharmacovigilance Program have been identified, all of which are local staff.

b. Contracted Workers. People employed or engaged by a third-party agent Implementing Agency to perform work related to core function. Two TPMA's will be employed by the MoPH in accordance with World Bank's procurement guidelines as follows (i) the Treatment TPMA to ensure transparent, fair, and equitable for COVID-19 treatment bills. About sixteen (16) of the seventeen (17) skilled labour who will be engaged in the verification of inpatient hospital claims are local residents.

ii) the Vaccination TPMA to ensure transparent, fair, and equitable vaccine deployment, with an emphasis on the WB financed vaccines. About twenty-five (25) of the twenty-seven (27) skilled labour, who will be engaged in monitoring the deployment of vaccines are local residents. The other two workers are international (nationalities specified in ANNEX 2)

c. Details of Primary Supply workers under the Suppliers who will be contracted under the Project are not known at this stage (suppliers of vaccines, suppliers of vaccine accessories e.g. syringes, suppliers of equipment spare parts e.g. CT-scanners).

d. No community workers will be engaged under the Project.

Table 1: Overview of labor use in the SLCR project

Workers Type	Number of Workers	Local Residents	Imported/ Foreign Workers	Staff Under 18	Timing of Engagement	Type of Job or Skills
Total Direct Workers	11	11	0	0		
Project Management Unit (Annex 1-A)	7	7	0	0	Q2 2022- Q2 2024	Technical & Financial Staff including E&S specialist
Other Contracted Consultants (Annex 1-A) <sup>4</sup>	4	4	0	0	Q2 2022- Q2 2024	Technical Staff
Total Contracted Workers	44	41	3	0		
Third-Party Agent (Hospital Inpatient claims audit) (Annex 1-B)	17	16	1	0	Q2 2022- Q2 2024	Managerial & Technical staff
Third Party Monitoring (Covid-19 vaccination) (Annex 1-B)	27	25	2	0	Q2 2022- Q2 2024	Managerial & Technical staff
Primary Supply Workers						
Primary Supply Workers	Not identified** <sup>5</sup>	Not identified**	Not identified**	Not identified**	Not Applicable	Not identified**
Community Workers						
Community Workers	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

<sup>4</sup> This includes the Pharmacovigilance consultants identified and specified in section 3 “Assessment of key potential labor risks” and in Annex 1-A.

<sup>5</sup> \*\*: The LMP is a living document. Primary Supply Workers are not identified at this stage but will be added once identified.



### 3. Assessment of key potential labor risks

The project will only engage Direct Workers and Contracted Workers and Primary Supply Workers. It will not include Community Workers. The different activities the projects workers will carry out<sup>6</sup>:

i. Project Management Unit (PMU)

At the center of the project will be the PMU that mainly aims to implement and coordinate the management of the project to the highest professional standards. During the emergency conditions Lebanon is going through and the extensive need for financial and logistical support, five full-time consultants, delivered the vital support needed. Their knowledge, skills and motivation will play a crucial role in carrying out the required work by covering a wide spectrum of activities, including but not limited to following up with the inpatient hospital's payments, procuring the essential biomedical assets, and ensuring the proper implementation of the project as per the WB requirements. The consultants also underwent training on ESF to provide adequate monitoring and ensuring of implementation of the environmental and social safeguards related aspects of both projects and grievances. All of which will be done under the strategic management of the project manager responsible for the day-to-day management of the project activities and the tremendous support provided by the civil servant at MoPH and the handholding provided by the WB Task Team.

ii. Pharmacovigilance Program Consultants

- (i) Consultants collect data from different channels, clean the data and analyze it;
- (ii) Consultants analyze the cases and classify them as per the seriousness criteria issued by WHO:
  - a. Non-serious cases
  - b. Serious cases: This includes cases that resulted in death, hospitalization, disability, congenital abnormalities, or were life threatening
  - c. Medically important events: this includes unexpected AEFIs, local or systemic, that may be serious in their nature but did not require hospitalization nor resulted in death.
- (iii) After collecting all the available information, the investigation report is filled, and a causality assessment is performed by a group of experts to review the potential causal association between the AEFI and the vaccine. WHO forms and tools are used to carry out both the investigation and the causality assessment to determine whether the serious events are coincidental, indeterminate, or are related to the reception of vaccine.
- (iv) Findings are discussed with the Serious AEFI Special Committee at Ministry of Public Health which aims to examine cases and investigations' results, provide with a technical expertise on all AEFI cases requiring investigation, answer all technical scientific inquiries related to investigated cases, and suggest additional steps in the process of investigation in order to get further information and proposing risk minimization actions.

iii. Third Party Agent for Hospitalization

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<sup>6</sup> The administration of the vaccines materializes at the level of hospitals by qualified nurses; these nurses won't be subject to direct or indirect compensation by the project's funds and therefore they are not covered under the scope of this LMP.

The Third-Party Agent will be contracted under the project; the workers employed by the TPA will be working on the project and will have the following tasks:

Technical and financial verification of inpatient hospital bills both related to Covid-19 and non-Covid-19 admissions in both private and public hospitals. In detail, the consultants will be:

- a) Validating the hospitals identified by MoPH for the services rendered for Covid-19 and non-Covid-19 treatment;
- b) Validating the compliance with the admission process adopted for admitting patients covered by MoPH;
- c) Verifying the delivery of medical services to patients; and
- d) Reviewing and substantiating the bills that are charged according to the MoPH price list.

In addition, the consultants also will be verifying that hospitals that are being reimbursed for Covid-19 admissions are transferring the eligible payments to doctors as per the MoPH payment schedule and in a timely manner.

#### iv. Third Party Monitoring for vaccination

The workers contracted by the Third-Party Monitoring will be independently monitoring the compliance with standards/ guidelines and agreed deployment plan in terms of supply chain management and administration of COVID-19 vaccines at (i) the key points in the supply chain and (ii) all vaccination sites from the technical, environmental and social safeguards perspectives. In detail, the consultants will be:

- a) Assessing the storage and handling of vaccine supplies in line with WHO guidelines at the key points of the supply chain (including but not limited to: arrival point in Lebanon prior to custom clearance, centralized storage prior to distribution and vaccination sites).
- b) Assessing the temperature and stock maintenance of vaccine supplies at the key points of the supply chain
- c) Assessing the delivery of vaccination services at all vaccination sites in terms of processes, site requirements, eligibility of recipients as per NDVP, adherence to vaccination protocols (including protocols related to eligibility), infection prevention, record keeping and reporting, waste management.
- d) Assessing the perspectives and feedback of vaccine recipients and service providers at all vaccination sites, and through grievance mechanisms (GM) and on social media sites.
- e) Sharing the findings and suggested recommendations for action with the relevant parties

Given the nature of the Project intervention, the key labor risks which may be associated with the project include:

- **Risks on Project workers related to labor and working conditions** that are not compliant with either the Lebanese Labor Law or ESS2. For example, wages that are not proportionate with tasks performed or industry standards, discrimination towards women and workers with disabilities or other vulnerabilities, unlawful termination, withholding of benefit etc.,
- **Irregular payment of salaries:** the significance of this risk can also increase with the lack of an

efficient grievance mechanism (GM),

- Unfair and/or unclear contract terms and conditions including wages, overtime, compensation, benefits and working hours. In compliance with the Procurement regulations for this project, only time-based contracts can be issued for workers and therefore daily compensation for workers is unapplicable under this project.
- **Lack of understanding and implementation of Occupational Health and Safety (OHS)** requirements for the contracted workers including the special requirements in the context of COVID-19 outbreak that may lead to transmission of diseases and infections to the workers,
- **Inadequate Grievance Mechanism (GM)** to handle complaints and concerns for all the Project Workers,
- **Risk of unresolved complaints** which could be as a result of the lack or absence of a GM, or the presence of an inefficient and not properly designed GMM,
- **Discrimination and non-equal opportunities**:. The varying nature of work may increase the probability of discrimination and non-equal opportunities risks including abrupt termination of employment, and
- **Potential Sexual Exploitation and Abuse/Harassment (SEA/SH) risks and Gender-Based Violence (GBV)** among the Project workers.
- **Risks of handling vaccine waste**: It is necessary to comply with MOPH procedures regarding identifying first what constitutes a vaccine waste to ensure patient safety and vaccine effectiveness. Examples of waste include: vaccine vials with insufficient volume, spoiled or damaged vials, vials stored in a defective refrigerator where a temperature excursions was documented, expired vaccines, prefilled vaccine syringes... MOPH guidelines stipulate that vaccine waste is disposed off through regular medical waste channels.

#### 4. Brief overview of labor legislation: Terms and conditions

The national labor legislation is governed by **the Labor Law No.23 dated September 1946** and its modifications that will apply to all the Project workers. A brief overview of the legislation is summarized below:

##### **On employment of children:**

- It is absolutely forbidden to set to work adolescents who have not yet completed their thirteenth year of age. An adolescent may only begin to work after a medical examination to ascertain that he can carry out the work for which he was hired.
- It is forbidden to set adolescent to work in jobs too strenuous or detrimental to health before they have completed their fifteenth year of age. It is also forbidden to set work adolescents before they have completed their sixteenth year of age in jobs of a dangerous nature or which represent a threat to life, health or public morals of the circumstances in which they are carried out.
- Every adolescent employed in an establishment for at least one year shall be entitled to an annual holiday of 21 days with full pay.

A child over 14 and under 18 may be employed provided the following conditions apply:

- The work does not jeopardize the health, safety, or morals of the children.

- An appropriate risk assessment is conducted prior to the work commencing.
- The employer conducts regular monitoring of health, working conditions, and hours of work and other requirements of the ESS2.

**As per ESS2, the minimum age of employment or engagement in connection with the project shall be 14 but within the context of the COVID-19 pandemic, the minimum age that shall be required under the Strengthening Lebanon's Covid-19 Response Project (SLCRP) is 18 years.**

**On employment of women:**

- The employer may not discriminate between working men and women with regards to: type of work, amount of wage or salary, employment, promotion, professional qualification, and apparel.
- Pregnant women working in all categories are entitled to a delivery holiday of seven weeks, comprising the periods before and after delivery, on presentation of a medical certificate stating the presumed date of delivery. The wage or salary shall be paid in full during the delivery holiday.
- It is forbidden to dismiss or to serve notice of dismissal on an expectant woman and woman on maternity leave, unless she is convicted of having been employed elsewhere in the course of the maternity leave.

**On hours of works and overtime**

- The maximum duration of work per week is 48 hours (or equivalent to 8 hours per day based on 6 working days per week) except for agricultural corporations.
- In case of emergency, it is permissible to raise the duration of work to 12 hours per day on the condition that the wage or salary for the overtime provided by the wage-earner or salary-earner is 50% higher than the rate of normal hours.

**On Wages and benefits**

- The minimum pay must be sufficient to meet the essential needs of the wage-earner or salary-earner and his family. Pay is not to be less than the official minimum pay.

**On leaves and rest per week**

- Every wage-earner or salary-earner employed in an establishment for at least one year is entitled to an annual leave of 15 days with full pay.
- Every wage-earner or salary-earner is entitled to a sick leave in accordance with his period of service. The wage-earner or salary-earner may not be dismissed during sick leave.
- Whenever the duration of work exceeds six non-stop hours for men and five non-stop hours for women, the employer is required to allow these wage-earners and salary-earners in the middle of the day, a rest-time which is not to be under one hour. A rest-time of unbroken nine hours is to be allowed wage-earners and salary-earners every twenty-four hours, except in cases where the circumstances of work compel otherwise.
- All wage-earners and salary earners are to be granted a weekly rest which must not be under thirty-six unbroken hours. The employer is to select the day of this rest or distribute it among wage-earners and salary-earners in sympathy with the requirements of the work.

**On termination of employment**

- The employer and the worker shall each have a right to terminate at any time the work of unspecified duration concluded between them. The aggrieved party shall be entitled to claim indemnity.
- The dismissal notice may not be served on the expectant mother, the woman on delivery leave and any wage-earner or salary-earner on ordinary holiday or on sick leave.

### **On workers' organizations**

- In every category of professions, employers on one hand, and wage-earners or salary-earners may set up a special trade union. This trade union is of juridical entity and is qualified to initiate legal proceedings.
- Any employer or wage-earner is free to adhere to a trade union or not.
- The trade union management can be set up as indicated in the national Law

### **On prevention of sexual harassment**

- A standalone Law no. 205 criminalizing sexual harassment was passed in December 2020. This law targets all types of sexual harassment, in any setting, and especially in the workplace.
- Per the law, perpetrators can be sentenced to up to two years in prison and fined up to 20 times the value of the minimum wage, which stands at 675,000 Lebanese pounds, according to Lebanese rights group Legal Agenda.
- The punishment increases between six months and two years in prison and a fine of between 10 and 20 times the minimum wage if there is a "relationship of dependency" or work between the perpetrator and the victim; if the perpetrator uses their position of power over a colleague; or if the harassment occurs at a range of state institutions, universities, schools or on transport services.
- Maximum penalties are reserved for harassment in the workplace, public institutions or educational facilities.
- In additions, relevant measures as per the World Bank's Good Practice Note on addressing sexual exploitation and abuse and sexual harassment (SEA/SH)<sup>7</sup> will be implemented as per the provisions in the ESCP.

## **5. Brief overview of labor legislation: Occupational Health and Safety**

Decree No. 136 of 16 September 1983 pertaining to occupational health and safety: employment accident and occupational disease benefit. . It sets out the key aspects regulating occupational prevention, safety and Health in all enterprises subject to the Code of Labour. The said decree sets that the employer should:

- Install safety provisions and measures to prevent any risks to the health and safety of the workers and limits the maximum time allowed to workers' exposure to din, noise and vibrations and limit the period of exposure as per the limits set in the said Decree.
- The employer shall provide the workers with the appropriate personal prevention and protection uniforms and gears, ensure their maintenance and preserve them in good conditions for later use (if applicable), without the workers being liable to pay any costs.
- The employer shall take the general measures of health protection in the workplace, especially in relation to safety, lighting, ventilation, aeration, drinking water, lavatories, evacuation of dust and smoke, and hygiene measures to protect workers from pollution by pathological biological factors.
- Workers shall be given sufficient and appropriate information on the risks related to their work.

### **COVID-19 Specific OHS Measures**

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<sup>7</sup> World Bank Good Practice Note on Sexual Exploitation and Abuse and Sexual Harassment available at this [link](#)

These provisions will apply for all categories of project workers:

- The health conditions of the workers will be assessed prior to engaging them in the Project, and sick workers will be refused entry to the work places.
- Adherence to the most recent Government and WHO protocols guidelines related to COVID-19.
- Trainings for workers on hygiene and other preventative measures will be carried out, and a communication strategy for regular updates on COVID-19.
- Adjustments will be made to work practices to reduce the number of workers and increase social distancing following the government and WHO guidelines procedure if a worker becomes sick.
- Adequate supplies of Personal Protective Equipment (such as masks); hand washing facility, soap and/or alcohol-based sanitizer, will be made available at the worksites.

While preparing the OHS plans involving labor, the following World Health Organization (WHO) guidance materials will be used:

- WHO IPC interim guidance: For guidance on Infection Prevention and Control (IPC) strategies for use when COVID-19 is suspected. <https://www.who.int/publications/i/item/10665-331495>.
- WHO interim guidance on use of PPE for COVID-19: For rational use of Personal Protective Equipment (PPE). [https://www.who.int/publications/i/item/rational-use-of-personal-protective-equipment-for-coronavirus-disease-\(covid-19\)-and-considerations-during-severe-shortages](https://www.who.int/publications/i/item/rational-use-of-personal-protective-equipment-for-coronavirus-disease-(covid-19)-and-considerations-during-severe-shortages).
- WHO guidance getting your workplace ready for COVID-19: <https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf>.
- WHO interim guidance: For guidance on water, sanitation and health care waste relevant to viruses, including COVID-19. [https://apps.who.int/iris/bitstream/handle/10665/331846/WHO-2019-nCoV-IPC\\_WASH-2020.3-eng.pdf](https://apps.who.int/iris/bitstream/handle/10665/331846/WHO-2019-nCoV-IPC_WASH-2020.3-eng.pdf).

MoPH will ensure the day-to-day compliance with National OHS legislations, WB OHS requirements<sup>8</sup> and COVID-19 specific OHS measures (as per above) and notify the Bank within 48 hours after learning of the incident or accident. A report would be provided within a timeframe acceptable to the Bank, as requested (no more than 10 working days after incident notification). This notification/reporting system shall remain in place throughout Project as detailed in the cleared and disclosed ESCP.

## 6. Responsible Staff

This section identifies the functions and/or individuals within the project responsible for:

- Engagement and management of project workers,
- Engagement of contracted workers,
- OHS,
- Training of workers, and

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<sup>8</sup> <https://www.ifc.org/wps/wcm/connect/1d19c1ab-3ef8-42d4-bd6b-cb79648af3fe/2%2BOccupational%2BHealth%2Band%2BSafety.pdf?MOD=AJPERES&CVID=ls62x8l>

- Addressing worker grievances.
- MoPH will be responsible for the engagement of the Project Management Unit (PMU) staffing and MoPH's Consultants.
- The Project Management Unit (PMU) Project Manager will be responsible for the overall management of the PMU staff, their consultant's staff and coordination with the contracted workers.
- The consultant that will be recruited by the PMU MoPH to adopt the dual role of GM and E&S will oversee implementation of the OHS aspects of the Project including the relevant trainings and awareness sessions.
- The consultant that will be recruited by the PMU MoPH to adopt the dual role of GM and E&S will prepare, adopt, and implement a stand-alone Sexual Exploitation and Abuse/Sexual Harassment Prevention and Response Plan (SEA/SH Action Plan) before the start of project activities as set out in the disclosed ESCP.
- The manager or HR director or OHS officer (if available) of the participating vaccination centers will be responsible for the OHS of the workers.
- The manager or HR director or OHS officer (if available) of the participating hospitals will be responsible for the OHS of the workers.
- The general manager or HR director of the third party agent will be responsible of the OHS of the employees hired to work on the project.
- MoPH PMU E&S specialist and GM officer will be responsible for addressing Project Workers' grievances.

## 7. Policies and Procedures

This section sets out information on OHS, reporting and monitoring and other general project policies. Where relevant, it identifies applicable national legislation.

MoPH's PMU has the overall responsibility to oversee all aspects of the implementation and monitoring of the LMP. The MoPH PMU will also update and/or revise the LMP instrument as relevant and when further information becomes available during project implementation. The LMP will be implemented throughout the project and all updates will be reflected/documentedin the progress report as per the provisions of the disclosed ESCP.

MoPH's commitments include the following:

- Every employee and contractor working on behalf of MoPH or working under a contract signed with MoPH is expected to share MoPH's commitment to pursue the goal of not harming people. The following elements will be integrated into the planning process of the parties involved in the execution of the Project:
  - i. Environmental protection, occupational and community health and safety, gender equality, child protection and considerations for vulnerable people (including those with disabilities);
  - ii. Provision against SEA/SH, GBV;
  - iii. Provision for COVID-19 awareness and prevention, and;
  - iv. Broad-based, culturally appropriate stakeholder engagement on project activities (as detailed

in the cleared and disclosed SEP), thereby earning the confidence of society at large, being a good neighbor and contributing to sustainable development of Lebanon.

- **SEA/SH related procedures:** Many of the direct workers and contracted workers are anticipated to be women. Workers shall ensure adherence to Codes of conduct (CoC). The CoC commits all direct and contracted workers to acceptable standards of behavior. The CoC will include sanctions for non-compliance, including non-compliance with specific policies related to sexual exploitation and sexual harassment (e.g., termination). The CoC (refer to Annex 4 for the CoC template) will be written in plain and culturally appropriate language and signed by each worker to indicate that they have:
  - Received a copy of the CoC as part of their contract;
  - CoC has been explained to them as part of the induction process;
  - Acknowledged that adherence to CoC is a mandatory condition of employment;
  - Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.
  
- MoPH shall comply with all health, safety, security and environmental laws, rules and regulations, at a minimum
  - i. Follow MoPH procedures for handling vaccine and medical waste. Perform training on OHS risks related to the handling of vaccines and medical wastes by the Preventive Medicine Department.
  - ii. Apply good international industry practice to protect and conserve the natural environment and to minimize unavoidable impacts;
  - iii. Provide and maintain a healthy and safe work environment and safe systems of work;
  - iv. Protect the health and safety of local communities and users, with particular concern for those who are disabled, elderly, or otherwise vulnerable;
  - v. Ensure that the terms of employment and working conditions of all the Project workers meet the requirements of the labour legislation of Lebanon and the ILO conventions to which Lebanon is a signatory;
  - vi. Be intolerant of and enforce disciplinary measures for illegal activities.
  - vii. To be intolerant of, and enforce disciplinary measures for GBV, inhumane treatment, sexual activity with children, and sexual harassment;
  - viii. Incorporate a gender perspective and provide an enabling environment where women and men have equal opportunity to participate in, and benefit from, planning and development of the Works;
  - ix. Work co-operatively with participating hospitals and vaccination centers, suppliers, relevant authorities, and local communities;
  - x. Engage with and listen to affected persons and organizations and be responsive to their concerns, with special regard for vulnerable, disabled, and elderly people;
  - xi. Provide an environment that fosters the exchange of information, views, and ideas that are free of any fear of retaliation, and protects whistle-blowers;
  - xii. Minimize the risk of pandemic notably COVID-19 transmission and to mitigate the effects of COVID-19 associated with the execution of the Works;



- MoPH shall train their employees and require the hospitals and vaccination centers to be aware of and meet their responsibility for the protection of health, safety and the environment, and to achieve continuous performance improvement;
- MoPH actively identifies and manages risks to prevent or reduce possible adverse consequences from its activities;
- MoPH assesses and manages exposure of employees and participating hospitals and vaccination centers to EHS hazards in its operations;
- MoPH monitors participating hospitals and vaccination centers' environmental performance and undertakes a precautionary approach to environmental challenges;
- Employees, supervisors, operational managers or participating hospitals and vaccination centers who knowingly engage in or disregard environmental health or safety violations are subject to disciplinary action including suspension or termination;
- MoPH will continue to engage its leadership and resources to effectively and efficiently implement and execute the commitments above.

## 8. Age of Employment

The minimum age for employment on the project shall be 18 in view of the nature of works for the project which involves risk of Covid19 infections. The PMU and other direct workers that will be contracted will abide by the terms of employment and working conditions that meet the requirements of the labor legislation of Lebanon and the ILO conventions to which Lebanon is a signatory. These regulations prohibit underage citizens to be employed. This also applies to workers who will be employed under Third-Party Agents and Primary Suppliers. To also ensure the prevention of under-aged labor, the MoPH will ensure the contracts of the TPA and Primary suppliers' employees contain contractual provisions to comply with the minimum age requirements (CoC for Hospitalization TPA contracted under the LHRP attached to the document).

## 9. Terms and Conditions

The employments of workers shall follow the terms and conditions set by the Lebanese Labour Law No. 23 dated September 1946 described in section 4 above and the following conditions. In case of discrepancy, the following conditions will prevail, being more stringent. Where the national legislation diverges from ESS2, the Project shall abide by the requirement of ESS2 and by the terms and conditions provided below.

- All the contracted workers should have written contracts which is compliant with the World Bank's standard ESS2 and national law be informed on the hours of work per days and their wages before the start of their works. Provisions in any contract must be added that project workers should not be asked to work more than 48 hours per week, in line with Lebanese labour law.
- All the Project workers will be paid above the minimum wages under national law as per their respective qualifications and positions, including migrants and refugees.
- Any discrimination on the basis of personal characteristics unrelated to inherent job requirements, in particularly with regards to compensation, recruitment, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices is prohibited.
- Recruitment procedures will transparent, public and non-discriminatory with respect to ethnicity,

religion, sexual orientation, disability, and gender.

- Any discrimination on the basis of gender is prohibited and adopted measures on harassment include:
  - The adoption of a zero-harassment policy for all the Project workers. The zero-harassment policy can be part of the workers Code of Conduct developed by the project (Annex 4). This policy should be communicated to all workers through various mediums and formats.
  - A requirement that the project will provide extra induction for female workers to ensure they are aware of the project's policies on harassment and intimidation.
  - A requirement for the establishment of a GM and / or confidential advisor to be used specifically for allegations of sexual harassment.
- The Project will not restrict project workers who are not entitled to form unions under national law to form other committees to represent their interests.
- All project contracts with contractors and subcontractors will contain the requirement that all workers must be of the age of 18 or more.
- The Project will make sure a workers' GM is in place and it will include:
  - Procedure to receive grievances such as comment/complaint form, suggestion boxes, email, and telephone line,
  - Stipulated timeframes to respond to grievances,
  - A register to record and track the timely resolution of grievances, and
  - Responsible office/department to receive, record and track resolution of grievances.

All Project workers will be made aware of the grievance mechanism at the time that they are hired. All the above-mentioned requirements should be cascaded to participating hospitals and vaccination centers.

MoPH's E&S Specialist and GM officer will check on the proper implementation of the terms and conditions.

## **10. Grievance Mechanism**

A well-communicated and easily accessible grievance mechanism will be provided for all Direct, Contracted Project Workers, and Primary Supply Workers, to raise workplace concerns related to recruitment process and/or working environment and conditions. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. The Environmental and Social Specialist and GM officer will be responsible for managing direct workers' grievances respectively, and in the event of any complaints by the contracted workers and primary supply workers under the project, they will report directly to the internal GM established for the project.

The Environmental and Social Specialist and GM officer at the PMU will escalate to all the organizations and stakeholders including, MoPH General Director department and the relevant departments at the MoPH depending on the case and as deemed necessary, as well as service providers such as ABAAD, compile and ensure follow up, coordination and monitoring of the grievances as well as other commitments as per the provision of the cleared and disclosed ESCP.

Since projects receive a wide range of complaints, ranging from allegations of corruption to simple suggestions and queries, it is important to accurately categorize different types. In the SLCRP, the GM is designed to respond to four types of complaints:

- (a) comments, suggestions, or queries;
- (b) complaints relating to non-performance of project obligations;
- (c) complaints referring to violations of law and/or corruption; and
- (d) complaints against project staff or community members involved in project management.

### **10.1 Project direct workers:**

The project direct workers represent the Project Management Unit (PMU) consultants hired under the loan and managing the project. Below is a list of the direct workers:

- Project Manager
- Financial Officer
- Operations Assistant
- Administrative Assistant
- Financial Assistant
- Environmental and Social specialist and GM officer
- Senior Technical and Clinical Manager of the Ministry of Public Health Pharmacovigilance Program
- Clinical Pharmacovigilance Officer of the Ministry of Public Health Pharmacovigilance Program
- Data Operator of the Ministry of Public Health Pharmacovigilance Program
- Data Operator of the Ministry of Public Health Pharmacovigilance Program

The PMU will be responsible to set up this workplace GM. Adequate resources should be allocated for the workers GM to function effectively. The mandate for the GM, institutional arrangements, procedure for receiving complaints, time limits for redressal of complaints and escalation level for unresolved cases and resolution will be finalized before the start of project activities as set out in the cleared and disclosed ESCP. The workplace GM will also be responsible for tracking and resolving workers' grievances and maintaining records about grievances/complaints received, recommendations and resolutions made, and notice of resolution of grievance to the complainant. In addition, the GM will be sensitive to complaints related to SEA/H grievances and ensure implementation of the necessary referral pathways. In the event of any SEA/H-related concerns, the requirements for incident reporting as per Clause 4.3 under ESS4 of the Environmental and Social Commitment Plan (ESCP) will be adhered to.

Within the context of COVID-19, the nature of complaints will be particularly time-sensitive and sensitive in terms of confidentiality. Hence, the GM should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labour issues, lack of proper procedures, or unreasonable overtime, and allow the workers to freely report, respond and take necessary actions. All grievances will be clearly documented in a GM log.

The workplace grievance mechanism will be designed to be easily understandable, clear, and transparent

and to provide timely feedback. The policy of confidentiality and non-retribution will be reinforced, along with the ability to raise anonymous grievances.

The mechanism will include multiple communication channels dedicated for workplace complaints only, the project’s primary channels include:

- PMU official extension: 01 830 300 Ext:274
- Environmental and Social Specialist and GM Officer official email<sup>9</sup> which will be provided once available. The LHRP email is provided as a footnote and acts temporarily as an uptake channel
- Physical address for handling complaints and grievances in person: Ministry of Public Health premises, Bir Hassan, 3<sup>rd</sup> floor, PMU office

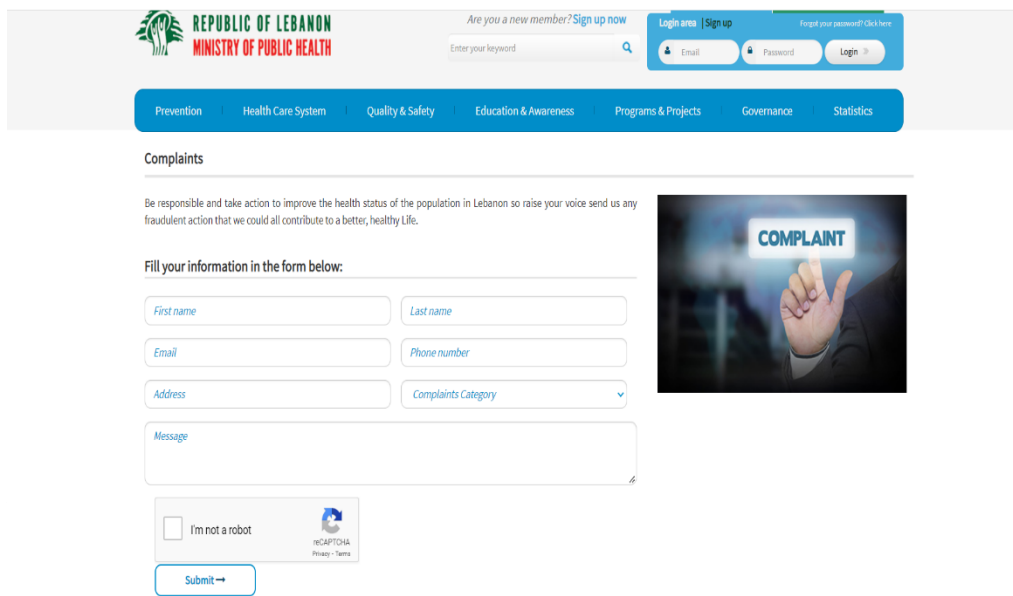
In case the complainant is not comfortable using the primary uptake channels, secondary channels dedicated for workplace complaints include:

- Complaints section on the MoPH official Website: <https://www.moph.gov.lb/en/complaints><sup>10</sup>

Workers will have the freedom to pick the uptake channel they are comfortable using. The workplace grievance mechanism will not impede access to other judicial or administrative remedies that are available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The project direct workers mentioned above and any new direct workers that will be appointed by the project will raise their grievances and complaints to the Environmental and Social specialist and GM officer who is responsible for handling these complaints and addressing them as deemed appropriate. In the case where the appointed officer was not able to address the grievance, he or she will transfer the complaint to the PMU Project Manager who shall take the necessary actions (see section 10.4 for detailed procedure).

In the case where a direct worker possesses a complaint against the Project Manager, the grievance can be submitted orally or in writing to the MoPH General Director or fill the complaint form on the MoPH official website.



**Figure 1- MoPH Complaint Form**

only, as well as anonymity in grievance submissions.

with the MoPH relevant object related complaints

## **10.2 Project's contracted workers:**

Project's contracted workers are employees working under the third-party consultancies i.e., TPA and TPMA. Workers under these agencies abide by the regulations of their contractors. Complaints and grievances raised by these workers are channelled through the grievance mechanisms established under the contracting organization.

In addition to the internal GM procedures of the contracted workers' respective organizations, the project's contracted workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use and will undergo the same existing GM channels as the project direct workers (stated under section 10.1).

## **10.3 Projects' coordinators:**

Project coordinators are MoPH staff assigned to the project on behalf of MoPH. Project coordinators are civil employees; thus, they abide by the laws and regulations of the Lebanese Government.

According to the staff rules<sup>11</sup>, employees should report their grievances in writing to their direct chief or in the complaint section of the MoPH official website. In the case where the grievance is not resolved, the employee has the right to report the grievance in writing to His Excellency, the Minister of Public Health, and to the Central Inspection who are responsible for following up on the grievance and resolving it as per the Lebanese laws.

In addition to the internal MoPH procedures that the project coordinators are subject to abide by, such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use and will undergo the same existing GM channels as the project direct workers (stated under section 10.1).

## **10.4 Primary Supply Workers:**

The project's primary supply workers are employees contracted under primary suppliers and working on the project. Workers under these agencies abide by the regulations of their contractors. Complaints and grievances raised by these workers are channelled through the grievance mechanisms established under the contracting organization.

In addition to the internal GM procedures of the primary supply workers' respective organizations, the project's primary supply workers will be informed of the grievance mechanism at the time of recruitment and

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<sup>11</sup><http://77.42.251.205/LawArticles.aspx?LawArticleID=985529&LawId=244640#:~:text=%D9%85%D8%A7%D8%AF%D8%A9%2014%3A%20%D9%88%D8%A7%D8%AC%D8%A8%D8%A7%D8%AA%20%D8%A7%D9%84%D9%85%D9%88%D8%B8%D9%81%20%D8%A7%D9%84%D8%B9%D8%A7%D9%85%D8%A9,%D8%A7%D9%84%D8%A7%D9%88%D8%A7%D9%85%D8%B1%20%D9%88%D8%A7%D9%84%D8%AA%D8%B9%D9%84%D9%8A%D9%85%D8%A7%D8%AA%20%D8%A7%D9%84%D8%AA%D9%8A%20%D9%8A%D8%B9%D8%B7%D9%8A%D9%87%D8%A7%20%D9%84%D9%85%D8%B1%D8%A4%D9%88%D8%B3%D9%8A%D9%87.>

the measures put in place to protect them against reprisal for its use and will undergo the same existing GM channels as the project direct workers (stated under section 10.1).

## **10.5 Procedures:**

Workers will be encouraged to discuss their grievances and complaints informally with the Environmental and Social Specialist and GM officer and the PMU Project Manager while ensuring principles of confidentiality and anonymity. In cases where the Project manager is related to the subject of the complaint, the employee may choose to directly submit a formal grievance which will be relayed to the MoPH General Director. For all cases where employees decide to submit a formal grievance, the following provide details about the step-by-step procedures they will be using:

### *1- Receipt, Acknowledgment and Registration*

- The worker will submit the grievance through one of the dedicated channels as mentioned above.
- The worker will be requested to use to the extent possible a grievance template which will be shared by the E&S specialist and GM officer with all workers in hard copies. In addition, in case the complainant is not comfortable using the primary uptake channels, figure 1 depicts the template for the secondary uptake channel; the MoPH website complaint form which will also be available for download.
- If the worker wishes to submit the grievance orally via phone or in person, the Environmental and Social Specialist and GM officer will lodge the complaint on their behalf, and it will be processed through the same channels.
- Under request of the person submitting the complaint, grievances can be lodged anonymously (unless submitted on the MoPH website which requires worker identification). This option shall be made clear to the complainant in the Grievance template and/or in cases of oral submissions.
- In case of anonymity opt-out, the worker will provide contact details or any other suitable means for him/her to be updated on the status of their complaints/grievances.
- All received grievances shall be logged into the workplace grievance log.
- In all cases, the Environmental and Social Specialist and GM officer should provide timely communication with the complainants, informing them that their grievance has been received, will be logged, and reviewed for eligibility. Clear and announced standards for the time frame of the response should be established, announced, and adhered to.

### *2- Grievance Verification and Assessment*

- In order to verify the grievance, it should be discussed with the worker, investigated and evidence gathered to the extent possible. This should include field inspections if needed in order to conduct interviews and gather information about the incident or the case.
- The Environmental and Social Specialist and GM officer will need to make a decision in coordination with the PMU project manager with regards to the eligibility of the grievance or whether it should be escalated.

### *3- Response and Feedback*

- The Environmental and Social Specialist and GM Officer shall acknowledge receipt of complaint

immediately upon receipt and inform the complainant of the eligibility results as well as all the steps being taken to address his concerns. This response shall be provided via a formal letter; an email; or a phone call.

- For eligible and straightforward grievances such as a delay in receiving the salary, the Environmental and Social Specialist and GM officer will provide a response without further investigation within 10 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- For eligible grievances that require further assessment, such as complaints related to workplace harassment, the Environmental and Social Specialist and GM officer will further engage with the complainant via a phone call or a formal meeting in order to collect further information. Based on this, they will provide within 14 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- In all the above-mentioned scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial or nonjudicial possibilities.
- In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance log with the date of grievance resolution.
- In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal within 14 working days. In such case, a second tier should be initiated where the Environmental and Social Specialist and GM officer will attempt to propose alternative options and carry out additional investigation in order to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. It will be preferred that the Project Manager attend/discuss the appeal with the employee. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint, in addition to worker representative(s) (upon the complainant consent) in order to help achieve a transparent process.
- The Environmental and Social Specialist and GM officer should send their response within 7 working days from the date of the appeal. The second-tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

#### *4- Agreement and Implementation of the Response*

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

them, as well as the number of unresolved cases.

## **10.6 World Bank Grievance Redress System**

Project workers who believe that they are adversely affected by a World Bank (WB) 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. 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 Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## **10.7 GBV related procedures**

About 60% of the direct workers and about 50% of the contracted workers are anticipated to be women. Primary supply workers are not identified at this stage, it is expected that between 30-50% of workers under primary suppliers are women. Workers shall ensure adherence to Codes of conduct (CoC). The CoC commits all contracted workers to acceptable standards of behavior. The CoC is developed and abides by the World Bank Good Practice Note (GPN) guidance<sup>12</sup>. The CoC includes sanctions for non-compliance (Accountability and Response Framework), including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination) (Annex 4). The code of conduct preventing SEA/SH will complement to the contractors/suppliers' existing company code of conduct (Template provided in Annex 3). The CoC will be written in plain and culturally appropriate language and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract;
- CoC has been explained to them as part of the induction process;
- Acknowledged that adherence to CoC is a mandatory condition of employment;
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

Handling grievances related to GBV: To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism will have a different and

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<sup>12</sup> <https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf>



sensitive approach to GBV related cases. Where such a case is reported, it will be immediately received by the E&S specialist and GM officer who will in turn refer the complainant through existing pathways to the appropriate service providers, such as medical and psychological support. The E&S specialist and GM officer can also, upon the request of the complainant, refer the case himself. The appropriate service provider with such services is ABAAD which is a UN ECOSOC accredited organization that aims to achieve gender equality as an essential condition to sustainable social and economic development in the MENA region.

The E&S specialist and GM officer will document the complaint related to SEA/SH, refer the complainant directly to the service provider, follow up to ensure that the complainant reached out to the relevant service provider and finally notify the Bank within 48 hours after learning of the incident or accident as per clause B of the disclosed ESCP.

If the worker wishes to submit the grievance orally via phone or in person, the GM coordinator will lodge the complaint on their behalf to the abovementioned organization. Data on GBV cases will be handled confidentially and follow the survivor-centered approach.

## **11. Contractor Management**

MoPH will make sure that contractual provisions related to the management of labor issues, including OHS are put in place for the participating hospitals and vaccination centers and that all Project workers are informed about MoPH GM.

MoPH's E&S Specialist will manage and monitor the implementation of E&S mitigation measures and the performance of the participating hospitals and vaccination centers in this regard.

## **12. Community Workers**

As community workers will not be involved in the project, this section is not relevant to the Project.

## **13. Primary Supply Workers**

MoPH will be responsible to include the same conditions on ESHS aspects to its primary suppliers. These conditions shall be added to their agreements with the MoPH. As part of the environmental and social assessment, the MoPH will identify potential risks of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers. The number of primary supply workers is undetermined at this stage and will be identified in the LMP once determined.

Where there is a significant risk of child labor or forced labor related to primary supply workers, the MoPH will identify those risks consistent with section B "Protecting the work force" of the WB ESF. The labor management procedures will set out roles and responsibilities for monitoring primary suppliers (signature of a pledge of commitment to abide by laws, audits, inspection by Labor authorities) If child labor or forced labor cases are identified, the Borrower will require the primary supplier to take appropriate steps to remedy them.

Additionally, where there is a significant risk of serious safety issues related to primary supply workers, the MoPH will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their

effectiveness.

The ability of the MoPH to address these risks will depend upon the Borrower’s level of control or influence over its primary suppliers. Where remedy is not possible, the MoPH will, within a reasonable period, shift the project’s primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements of the ESS2.

## ANNEX 1 Direct Workers

*Table 1- Project Management Unit of the current project (LHRP)*

<b>Staffing</b>	<b>Job Description</b>	<b>Number of employees</b>	<b>Nationality</b>
PMU	Project Manager	1	Lebanese
	Financial Officer	1	Lebanese
	Financial Assistant	1	Lebanese
	Administrative Assistant	1	Lebanese
	Operations Assistant	1	Lebanese
	GM and Social Safeguards Officer	1	To be contracted
MoPH staff assigned to project	Project Coordinator	1	Lebanese
Total		7	

*Table 2- Pharmacovigilance consultants contracted under the current project (LHRP)*

<b>Staffing</b>	<b>Job Description</b>	<b>Number of employees</b>	<b>Nationality</b>
MoPH staff assigned to project	Team Leader	1	Lebanese
	Senior Technical and Clinical Pharmacovigilance officer	1	Lebanese

Contracted Worker	Clinical Pharmacovigilance Officer	1	Lebanese
	Data Operator	2	Lebanese
Total		5	

## ANNEX 2 Contracted Workers

*Table 3- Contracted workers by TPA for on the current project (LHRP)*

Staffing	Job Description		Number of employees	Nationality
Key Experts	General Manager		1	Lebanese
	Project Manager		1	Palestinian
	Quality Excellence Manager		1	Lebanese
	Medical Director		1	Lebanese
	Team Leader		1	Lebanese
	Internal Auditor		1	Lebanese
Non-Key Experts	Adjusters	Medical Adjusters (Survey + Claims)	3	Lebanese
		Technical Adjusters (Invoices + Administrative)	3	Lebanese
Administrative	Human resources		1	Lebanese
	Accounting and administration		2	Lebanese
	IT		1	Lebanese
	Account administrator		1	Lebanese
Total			17	

*Table 4- Third- Party Monitoring currently employed to monitor vaccination campaign*

Staffing	Job Description	Number of employees	Nationality
Third-Party Monitoring	Consultant	25	Lebanese
	Consultant	1	Jordanian
	Consultant	1	Kenyan
Total		27	

**ANNEX 3**  
**Strengthening Lebanon's COVID-19 Response Project**  
**Code of Conduct Addressing Sexual Exploitation and Abuse and Sexual Harassment**

- **Review of code of conduct:** The attached code of conduct should be read aloud and reviewed with workers/suppliers/contractors assisting with the SLCRP activities to be implemented by the MoPH (expected to be between August and September 2022).
- **Who must sign:** Direct workers and employees under the contractors / suppliers contracted with the Ministry of Public Health to implement the Strengthening Lebanon's Covid-19 Response Project, in addition to project direct workers and coordinators working for the government agencies contracted to support this project with the World Bank, must sign the attached code of conduct that specifically addresses and prohibits sexual exploitation and abuse (SEA) and sexual harassment (SH).
- **World Bank policy concerning SEA/SH:** It is World Bank policy to address and prevent SEA and SH in all the projects that it finances. The Good Practice Note <sup>13</sup> on Addressing SEA/SH in Investment Project Financing instructs project teams on good practices that permit the project to manage risks and impacts associated with SEA and SH, which include the institution of codes of conduct for project personnel and implementing partners.

The World Bank's new Environmental and Social Standards (ESS) also set out specific requirements relating to the identification and assessment of environmental and social risks and impacts associated with projects financed by the World Bank. While the Environmental and Social Framework itself does not explicitly mention SEA/SH, various ESSs are in alignment with the recommendations of the Good Practice Note for addressing SEA/SH, including:

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;  
ESS 2: Labour and Working Conditions;  
ESS 3: Resource Efficiency and Pollution Prevention and Management;  
ESS 4: Community Health and Safety; and  
ESS 10: Stakeholder Engagement and Information Disclosure.

- **Key points to cover in the briefing** will be the following:
  - **Purpose of the code of conduct:** Create common understanding around SEA/SH and that such conduct will result in disciplinary action, and foster shared commitment to addressing SEA/SH in project implementation
  - **Definitions of key terms:** sexual exploitation and abuse, sexual harassment, and consent
  - Brief review of **listed examples for SEA/SH** to facilitate understanding
  - **Key distinction between SEA and SH:** SEA occurs between project beneficiaries and project personnel / vendors, and SH occurs between or among project personnel in a workplace environment
  - Review the **individual commitments** listed under the code of conduct
  - Review the **potential sanctions** for any code violations

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<sup>13</sup> <https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf>

# Strengthening Lebanon's COVID-19 Response Project

## Individual Code of Conduct

### Introduction

The project is committed to ensuring a work environment which minimizes any negative impacts on the local environment, communities, and its workers. The project also strongly commits to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company.

The purpose of this *Code of Conduct* is to:

1. Create a common understanding of what constitutes Sexual exploitation and abuse, and sexual harassment
2. Create a shared commitment to standard behaviors and guidelines for company employees to prevent, report, and respond to SEA and SH, and
3. Create understanding that breach of this code of conduct will result in disciplinary action.

### Definitions

#### **Sexual Exploitation and Abuse (SEA)**<sup>14</sup>

Is defined as 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<sup>15</sup>.

- **Sexual Abuse:** “The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”

#### **Sexual Harassment:**<sup>16</sup>

Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

#### **Sexual Harassment versus SEA**<sup>17</sup>

SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff training can include specific instruction on the procedures to report each.

**Consent** is the choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent.

**Under this Code of Conduct**<sup>18</sup> **consent cannot be given by anyone under the age of 18, regardless of the**

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<sup>14</sup> As defined in the UN Secretary's bulletin – Special Measures for protection from sexual exploitation and abuse October, 9, 2003 ST/SGB/2003/13

<sup>15</sup> In the context of World Bank Financed operations exploitation occurs when access to, or benefit from a World Bank Financed good or service is used to extract sexual gain.

<sup>16</sup> Inter-Agency Standing Committee *Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community based complaint mechanism. Global standard Operating Procedures.* May 2016

<sup>17</sup> Ibid

<sup>18</sup> In accordance with the United Nations Convention on the Rights of the Child.

**age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation
- the use of a threat to withhold a benefit to which the person is already entitled, or
- a promise is made to the person to provide a benefit.

**While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment which constitute gross misconduct, is grounds for termination or other consequences related to employment and employment status:**

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A project worker tells women in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
- A worker that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A project worker gets drunk after being paid and rapes a local woman.
- A project worker denies passage of a woman through the site that he is working on unless she performs a sexual favor.
- A manager tells a woman applying for a job that he will only hire her if she has sex with him.
- A worker begins a friendship with a 17-year-old girl who walks to and from school on the road where project related work is taking place. He gives her moto rides to school. He tells her that he loves her. They have sex.

(2) **Examples of sexual harassment in a work context** include, but are not limited to:

- Male staff comment on female staffs' appearances (both positive and negative) and sexual desirability.
- When a female staff member complains about comments male staff are making about her appearance, they say she is "asking for it" because of how she dresses.
- A male manager touches a female staff members' buttocks when he passes her at work.
- A male staff member tells a female staff member he will get her a raise if she sends him naked photographs of herself.

**Individual signed commitment:**

I, \_\_\_\_\_, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (*employee/contractor*) of (*contracted agency / sub-contracted agency*) in (*country*), I acknowledge that SEA and SH activities on the work site, the work site surroundings, at workers' camps, or the surrounding community constitute a violation of this *Code of Conduct*. I understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH may be pursued if appropriate.

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.

- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.
- **Not** participate in SEA and SH as defined by this *Code of Conduct* and as defined under *the Lebanese law*, specifically the Anti-Sexual Harassment Law No. 205 which does not limit the protections against sexual harassment to just the workplace, but also covers harassment in “any place.” The law also takes into consideration the dynamics of power and authority in social relations, and provides varying degrees of punishment based on the crime and the perpetrator’s status.
- **Not** use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Not** participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- **Not** solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, 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—such sexual activity is considered “non-consensual” under this Code.

**I commit to:**

- Adhere to the provisions of this code of conduct both on and off the project site.
- Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.

If I am aware of or suspect SEA and SH, at the project workplace or surrounding community, I understand that I am encouraged to report it to the Grievance Mechanism (GM) through the PMU’s Environmental and Social Specialist and GM officer or to my manager who should escalate the complaint to the E&S Specialist and GM officer. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

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

- Informal warning or formal warning
- Additional training.
- Loss of salary.
- Suspension of employment (with or without payment of salary)
- Termination of employment.
- Report to the police or other authorities as warranted.

*I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as SEA and SH. Any such actions will be a breach this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SH 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: \_\_\_\_\_