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Palestinian Authority
Ministry of Finance

FINANCE FOR JOBS III PROJECT

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“The Finance for Jobs (F4J) Series of Projects (SOP)”



Labor Management Procedures (LMP)

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Contents

EXECUTIVE SUMMARY	4
INTRODUCTION.....	7
1.1. Project Background	7
1.2. Scope and Rationale of the Labor Management Procedures.....	7
1.3. Stakeholder Engagement for the Preparation of the LMP	9
1.4. F4J III: Project Components.....	10
2. OVERVIEW OF LABOR USE ON F4J III PROJECT.....	11
3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS.....	16
3.1. Project Activities	16
3.2. Key Labor Risks.....	18
3.2.1. Occupational health and safety (OHS)	18
3.2.2. Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)	20
3.2.3. Child Labor/forced labor Risk	21
3.2.4. Labor Rights and working conditions.....	22
3.2.5. Spread of communicable diseases.....	23
3.2.6. Discrimination and exclusion of vulnerable/disadvantaged groups	24
4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS.....	24
4.1. Terms and Conditions	25
4.2. ESS2 and the Palestinian national Labor law	29
5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY (OHS).....	29
5.1. National OHS Legislations	29
5.2. World Bank Group’s Environment, Health, and Safety Guidelines.....	33
6. RESPONSIBLE STAFF.....	33
7. POLICIES AND PROCEDURES.....	35
7.1. Occupational Health and Safety	35
7.2. Gender Based Violence (GBV) including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)	37
7.3. Labor Disputes over Terms and Conditions of Employment	38
7.4. Discrimination and Exclusion of Vulnerable/Disadvantaged Groups.....	38
8. AGE OF EMPLOYMENT	39
9. TERMS AND CONDITIONS.....	40
10. GRIEVANCE MECHANISM (GM).....	41
10.1. Workers’ GM.....	42
10.1.1. GM Process.....	42

F4J III – Labor Management Procedures

10.1.2. Receipt of Grievances	42
10.1.3. Contact Person to Respond to Complaints.....	43
.10.1.4 Notifying the complainant and closing the complaint.....	43
10.1.5. Additional Dispute Resolution Schemes.....	44
10.1.6. Complaints Log	44
10.2. Gender Based Violence (GBV) complaints	44
10.2.1. Receiving the GBV complaints	45
10.2.2. GBV Grievances Referral.....	45
10.2.3. Closing GBV complaint	45
.10.3 GRM Reports	45
10.4. World Bank Grievance Redress Service	46
11. CONTRACTOR MANAGEMENT.....	46
12. PRIMARY SUPPLY WORKERS	47
Annex I: Code of Conduct	48
Annex II: Workers’ GM Forms.....	53
Annex III: Summary of LMP Stakeholder Consultation Meeting.....	57
Annex IV: Industry-Specific & Geopolitical Potential OHS risks	68

LIST OF ACRONYMS

ARA	Access Restricted Area
APIs	Active Pharmaceutical Ingredients
CAP	Corrective Action Plan
CoC	Code of Conduct
DIB	Development Impact Bond
EA	Environmental Assessment
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESRC	Environmental and Social Risk Classification
ESS	Environmental and Social Standards
ESO	Environmental and Social Officer
EQA	Environment Quality Authority
F4J	Finance for Jobs
FCV	Fragility, Conflict, and Violence
GBV	Gender-Based Violence
GM	Grievance Mechanism
ICF	Investment t Co-Financing Facility
ICT	Information and Communication Technology
ILO	International Labor Organization
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MENA	Middle East and North Africa
MoF	Ministry of Finance
MoH	Ministry of Health
MoL	Ministry of Labor
MSDs	Musculoskeletal Disorders
NGO	Non-Governmental Organizations
OHS	Occupational Health and Safety
PA	Palestinian Authority
PDO	Project Development Objective (s)
PIA	Project Implementation Agent
PPAB	Public-Private Advisory Board of the F4J
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOP	Series of Projects
SPD	Standard Procurement Documents
TVET	Technical, Vocational, Education, and Training
UNFPA	United Nations Population Fund
WB	World Bank

EXECUTIVE SUMMARY

In 2017, the Palestinian Authority, led by the Ministry of Finance, launched the Finance for Jobs (F4J) Series of Projects (SOP), supported by the World Bank and executed through a dedicated Project Implementing Agency (PIA). The series has been instrumental in driving private investments and fostering employment in the West Bank and Gaza. The latest in this initiative, the Finance for Jobs III (F4J III) project, is designed to build on the successes of its predecessors. It aims to expand the innovative financial instruments previously introduced, with a keen focus on incentivizing private investment and job creation. F4J III has a Project Development Objective (PDO) of: “to sustain and expand the scope of the innovative financial instruments tested under F4J I & II, to incentivize private investment mobilization and job creation”.

The F4J III comprises three main components; (i) “Development Impact Bond (DIB) for Skill Development for Employment”, known as DIB 2.0, is an evolution of DIB 1.0, focusing on leveraging private sector resources to enhance skills and employment among youth and women, facilitated by "F4J Consulting." (ii) “Investment Co-Financing Facility (ICF)”, Provides risk-sharing grants to support commercially viable private investments in the West Bank and Gaza, addressing market failures and heightened risks. And (iii) “Project Management”, entrusted to the PIA for ensuring efficient execution and management of the F4J project.

The Labor Management Procedures (LMP) for the F4J III project outlines the project's alignment with national standards and the World Bank's Environmental and Social Framework (ESF). With the ESF's introduction in 2016, F4J III became the first in its series to adopt its 10 Environmental and Social Standards (ESSs), specifically adhering to ESS2 on "Labor and Working Conditions". The LMP during its preparation has been consulted on during a stakeholder engagement meeting that took place on the 24th of July.

The LMP's core objective is to identify and manage labor-related risks within F4J III. It sets labor standards in compliance with relevant laws, especially the Bank's ESS2. The document provides a thorough analysis of labor use, assessing potential risks like Occupational Health and Safety (OHS) and Gender Based Violence (GBV), and offers tailored mitigation strategies.

Additionally, the LMP details national labor laws, the World Bank's Environment, Health, and Safety (EHS) Guidelines, and the roles for its implementation. It emphasizes safeguarding measures, including policies to mitigate risks such as OHS, GBV, and discrimination. The LMP also introduces a structured Grievance Mechanism (GM) and elaborates on employment age criteria and terms of employment as per the Palestinian Labor Law.

At this stage of the Project's implementation, it is difficult to have a total estimation of the workers of the project's life period of 5 years. Nevertheless, as the LMP identified the types of workers associated with the project, i.e., Direct, Contracted, and Primary Supply workers, the numbers for Direct Workers could be estimated and are around 34 workers who are directly employed by the PIA, while for contracted workers and primary supply workers, these numbers are difficult to estimate until the locations of the DIB activities, and subproject locations under the ICF are identified. Where chapter 2 of this LMP provides a detailed description of the types and characteristics of labor expected to be engaged within the F4J III Project that range from full-time, part-time, seasonal, consultants, skilled, unskilled, national, international, males, and females.

Additionally, the LMP in its 3rd chapter identifies the key potential labor risks associated with each project component, the chapter identifies various labor risks, including Occupational Health and Safety (OHS), Gender-Based Violence (GBV), Child Labor, Labor Rights, the spread of communicable diseases, and issues

F4J III – Labor Management Procedures

concerning discrimination and exclusion of vulnerable groups. These risks are evaluated in relation to each project component, ensuring a comprehensive understanding of potential challenges and the necessary mitigation measures.

Moreover, under chapter 4, the LMP provides a comprehensive overview of Palestinian labor legislations, particularly governing the terms and conditions of employment, the chapter focuses on two main laws of the Palestinian Authority (PA), the Palestinian Labor Law (PLL), and the Cabinet Decision Considering the minimum wage of 2021. The PLL establishes foundational employment conditions, emphasizing workers' rights to unionize, detailing working hours, wages, leaves, and other labor rights. This law replaced previous labor laws from Jordan and Egypt in the West Bank and Gaza Strip, respectively. The PLL is further supplemented by about 30 bylaws ratified between 2003 and 2006. The Cabinet Act No.4 of 2021 specifically addresses minimum wages in the Palestinian territories. The chapter also highlights key aspects of the PLL, such as individual work contracts, wage regulations, insurance and compensation, working hours, rest breaks, overtime work, leaves, women's rights in the workplace, labor disputes, and contract termination. A comparison between ESS2 and the Palestinian national Labor law reveals certain gaps, notably in areas like forced labor, discrimination, and contracted and primary supply labor. The chapter underscores the project's commitment to bridging these gaps and ensuring compliance with both national and international labor standards.

Chapter 5 focuses on Occupational Health and Safety (OHS) standards in Palestine as governed by the Palestinian Labor Law (PLL) and various Council of Ministers' decisions. The PLL mandates the maintenance and cleanliness of worker areas and equipment, ensuring the provision of drinking water, sanitation facilities, and the necessity of medical examinations for workers. It also emphasizes the importance of first aid equipment, safety measures in construction sites, and the protection against chemical and biological hazards, among other measures detailed in the chapter. However, there are notable gaps between the Palestinian Labor Law and the World Bank's ESS2, particularly concerning grievance mechanisms for contracted workers. The enforcement of these OHS regulations remains a challenge due to limited inspections and oversight, leading to potential safety concerns in workplaces. The chapter also references the World Bank Group's Environment, Health, and Safety Guidelines (EHS Guidelines). These guidelines, which offer both general and industry-specific standards, are designed to identify and mitigate OHS risks across various sectors. Each sub-project under the F4J III Project will be assessed against these guidelines to ensure comprehensive safety measures are in place.

Furthermore, the LMP outlines the duties and responsibilities of responsible staff for the implementation of the LMP, The F4J III will be spearheaded by the PIA. The PIA's role involves appointing an ESO to manage the Labor Management Procedures (LMP) and liaise with the Bank, in accordance with the Project's ESCP. The overarching responsibility for enforcing labor standards, as outlined in the Palestinian Labor Law (PLL), rests with the Ministry of Labor. The PLL has set up a Labor Inspection Commission, which conducts regular checks on businesses and factories to ensure compliance with labor standards.

In the project's first component, F4J Consulting will manage the DIB component, in terms of E&S matters including labor and the implementation of the LMP, F4J Consulting will designate an E&S focal point and oversee the commitment of service providers to the LMP. For the second component, the PIA staff, primarily the ESO, will evaluate potential labor risks for each subproject under the ICF and collaborate with other experts to ensure the LMP's provisions are implemented. The chapter provides a clear demarcation of responsibilities for the ESO, F4J Consulting, focal points, service providers, and subproject proponents.

F4J III – Labor Management Procedures

In chapter 7, The LMP presents the policies and procedures that will be in place to ensure that the risks identified in this LMP are addressed during the project implementation. The F4J III project adheres to the Palestinian Labor Law and other national standards, ensuring all project workers receive fair treatment, equal opportunities, and protection from harassment, including sexual abuse. Emphasizing Occupational Health and Safety (OHS), the project mandates training, equipment maintenance, and risk assessments across sectors like ICT and agriculture. A strict code of conduct is in place to combat gender-based violence, with mechanisms to address grievances confidentially. To prevent labor disputes, clear contracts are provided, respecting workers' rights to unions and freedom of association. The project champions non-discrimination, ensuring provisions like maternity leaves and safe workplaces.

Chapters 8 and 9 deal with employment age and terms and conditions, where In alignment with the Palestinian Labor Law No. 7 of 2000 and ESS2 requirements, the F4J III project prohibits the employment of anyone under 18, with specific exceptions for those aged 15-18 in certain sectors, provided they meet conditions set by local decrees. Age verification is mandatory, and any violations result in immediate contract termination and other remedial actions. Regarding terms and conditions, the project ensures transparent, non-discriminatory recruitment processes, clear job descriptions, health assessments, written contracts detailing work conditions, and adherence to maximum working hours as per the Palestinian Labor Law. Workers are insured against labor incidents, entitled to breaks, and informed in advance about contract terminations. Hiring fees, if any, are borne by the contractor. Contracts are primarily in Arabic, but English may be used if both parties agree. An internal system will address issues of sexual exploitation and abuse, and adherence to health protocols is mandatory. Service providers and subproject proponents must demonstrate their capability to manage occupational health and safety risks and labor rights. All involved parties will use a Code of Conduct (CoC), which includes provisions related to sexual exploitation and abuse, and every worker is required to sign it after understanding its details.

The Grievance Mechanism (GM), particularly the Workers' GM is detailed under chapter 10, where based on ESS2, the project will establish a GM specifically to receive workplace concerns and grievances from project workers. The mechanism will be accessible to all the project workers without any discrimination. Information relating to the availability of GM without any retribution, its institutional set-up, timings, and procedure for receiving complaints, mechanism of handling complaints, and maximum time limits for redressal of complaints, and escalation level for unresolved cases and resolution thereof will be disseminated to the workers regularly.

Chapters 11 and 12 discuss contractor management and primary suppliers consecutively; where the F4J III will use the Bank's 2017 Standard Procurement Documents, emphasizing labor and OHS standards. The PIA will oversee DIB and ICF activities, ensuring providers comply with the LMP and national laws. Key documents, such as safety records and worker certifications, will be reviewed during service provider selection. The MoF and PIA will monitor provider performance, with contractors submitting labor management reports. Primary suppliers, mainly expected to be local, will undergo checks to prevent child or forced labor exploitation. If foreign suppliers are involved, their history regarding labor issues will be scrutinized, and any identified risks will prompt the PIA to reconsider their engagement.

Moreover, in its annexes, the LMP provides a suggested Project template for the Code of Conduct to be utilized by the involved labor as identified, additionally, it provides the forms and templates for the Workers' GM, a summary of the LMP stakeholder engagement meeting conducted to consult on the preparation of the LMP, and a detailed analysis of industry-specific and geopolitical OHS risks associated with the project.

INTRODUCTION

I.1. Project Background

In 2017, the Palestinian Authority (PA), namely the Ministry of Finance (MoF), has initiated the Finance for Jobs (F4J) series of Projects (SOP) with funding from the World Bank and implementation through a Project Implementing Agency (PIA). The F4J SOP entails an overarching objective of mobilizing private investments and creating employment opportunities in the West Bank and Gaza.

The first project within the series (F4J I; PI51089) closed satisfactorily on January 31, 2022, which was followed by a second project (F4J II; PI59337) that is currently under implementation with satisfactory results. The first project (F4J I) with an amount of US\$5 million, primarily undertook the upstream detailed design, capacity building, and beginning of the testing of selected innovative financial instruments, along with generating initial lessons learned. The second project (F4J II) is financing full testing and implementation of the selected financial instruments. It amounts to US\$24.5 million and includes two Additional Financings aimed at COVID-19 recovery.

The Finance for Jobs III (F4J III) project, being the third project within the F4J Series of Projects (SOP), has been designed within a programmatic approach that aims to optimize impact and effectiveness by leveraging the successes and lessons learned from the preceding projects in the series. The F4J III Project Development Objective (PDO) is to sustain and expand the scope of the innovative financial instruments tested under F4J I & II, to incentivize private investment mobilization and job creation.

I.2. Scope and Rationale of the Labor Management Procedures

The LMP lays out the project's approach in meeting national requirements, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), where on August 4th, 2016, the World Bank's Board approved the adoption of the "Environmental and Social Framework (ESF)" to replace the previous Operational Policies (O.Ps) which were used in the previous projects within the series (i.e., F4J I & F4J II). Therefore, F4J III is the first project in the series to apply the ESF along with its 10 Environmental and Social Standards (ESSs). The Labor Management Procedures (LMP) were created as a World Bank requirement for the F4J III Project, aligning with ESS2¹ on "Labor and Working Conditions." The LMP aims to mitigate employment-related risks, allocate necessary resources, and outline the project's approach to meeting national requirements and the World Bank's ESF objectives, especially those within ESS2 concerning labor rights, working conditions, and occupational health and safety. This dynamic document is initiated during project preparation and continuously reviewed and updated throughout development and implementation.

The objective of preparing this LMP is to identify and manage risks associated with labor and working conditions under the F4J III Project. It identifies labor requirements in line with applicable laws, standards and sets out the procedures for addressing labor conditions and risks related with the F4J III in line with the Bank's Environmental and Social Standard 2 (ESS2).

¹ <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=45&zoom=80>

F4J III – Labor Management Procedures

An overview of labor use and characterization on the project is provided in the LMP. The LMP evaluates the potential labor risks associated with the project based on type of work and workers anticipated in relation to the F4J III project that include aspects relevant to Occupational Health and Safety (OHS), Gender Based Violence (GBV) including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), labor rights and working conditions, spread of communicable diseases, discrimination and exclusion of vulnerable and disadvantaged groups, as well as assessing child labor and forced labor risks relevant to the project. Based on this risk assessment, the LMP presents relevant mitigation measures tailored to the identified risks and labor characteristics of the F4J III Project.

Additionally, the LMP provides a comprehensive overview of relevant national laws and legislations relevant to labor as well as ESS2's provisions. The LMP provides a detailed description of national OHS laws and regulations, and provides a description of the World Bank's Environment, Health and Safety (EHS) Guidelines, both the general one that applies to all investment projects and the industry-Specific EHSGs.

The roles and responsibilities for the implementation of the LMP has also been documented in line with the project structure for implementing the F4J III. The LMP additionally describes the required policies and procedures to safeguard and ensure appropriate mitigation of the identified risks through measures relevant to the identified aspects including OHS, GBV (SEA / SH), labor rights and terms of employment, and discrimination and exclusion of vulnerable and disadvantaged groups.

To ensure adequate understanding and compliance with the relevant national laws and regulations as well as ESS2 and the EHSGs, the LMP describes the age of employment for the activities associated with the project, and its mitigation measures, as well as a presentation of the requirements of the Palestinian Labor Law and relevant legislations on terms and conditions of employment under the F4J III project.

The LMP recognizes the need for establishing a Grievance Mechanism (GM) for workers and a procedure has been provided to guide the inclusion of the project's LMP contractors and in bidding documents. As well as providing measures relevant to primary supply workers as they arise during the project's implementation.

Moreover, in its annexes the LMP presents a detailed description of potential labor risks that are relevant to specific industries that might be included in the project, either in the ICF component or through the DIB's capacity building and training activities.

As such, the LMP sets out policies and procedures that govern the following:

- The Bank's ESS2: on Labor and Working Conditions
- National Labor Legislations including terms and conditions, and OHS
- Overview of labor use on the Project
- Labor Risks and Impacts
- Overview of Labor Legislations
- Responsible Staff
- Policies and Procedures

F4J III – Labor Management Procedures

- Age of Employment
- Terms and Conditions of Employment
- Grievance Mechanism (GM)
- Contract Management
- Primary Supply Workers
- Code of Conduct
- LMP Stakeholder Consultation
- Business and Industry-Specific Potential OHS risks

1.3. Stakeholder Engagement for the Preparation of the LMP

On July 24th, 2023, a stakeholder engagement meeting took place to present the LMP to stakeholders and to discuss the labor aspects of the project. The public consultation workshop was carried out virtually (Online) at 10:00 am via MS Teams. The invitation list contained 219 invitees including Governmental Ministries and Institutes chaired by MoL who had an opening keynote at the consultation meeting, as well as other ministries such as the Ministry of Health, Ministry of Finance, Ministry of Agriculture, and Ministry of Education. The invitees list also included Private Sector Entities (e.g., Palestinian Businessmen association, Palestinian Businesswomen Forum, Association of Banks, ICF previous Beneficiaries, Paltrade) and Companies, the Public Private Advisory Board (PPAB), Trade Unions, Associations, Palestinian Employment Funds, Service Providers of the DIB component, NGOs, educational and training institutes.

The attendance included around 61 representatives of the various invited stakeholders of which around 26% (16 attendees) were women, further details are available in Annex III. The session included a description of the Finance for Jobs (F4J) Series of Projects, previous activities under the F4J I& II, an overview of the financial instruments developed under the F4J SOP and to be used in the F4J III, in addition to an overview of applicable environmental and social laws and standards, applicable ESSs, overview of anticipated labor types to be involved in the implementation of the project's activities, expected potential labor risks, mitigation measures, relevant labor laws, standards and legislations, demarcation of responsibilities for labor management, Project and Workers' GM, and an open discussion session.

The session included various input from the participating stakeholders as well as remarks and recommendations that have been recorded and discussed throughout the session. The session included a keynote introduction by the Ministry of Labor and Closing Remarks from the International Labor Organization (ILO). Attendees raised questions and remarks mainly regarding the engagement of the local society in the project and the integration of the national employment strategy² in the project, particularly its third strategic objective, in addition to questions regarding the inclusion of vulnerable and marginalized groups in access to employment and training opportunities, including persons with disability. Remarks raised included the Workers' GM and the resolution timeline as well as the referral procedures for the management of GBV (SEA / SH) grievances. The project team provided a description of potential OHS

² <http://psm-nes.mol.pna.ps/docs/%D8%A7%D9%84%D8%A7%D8%B3%D8%AA%D8%B1%D8%A7%D8%AA%D9%8A%D8%AC%D9%8A%D8%A9%20%D8%A7%D9%84%D9%88%D8%B7%D9%86%D9%8A%D8%A9%20%D9%84%D9%84%D8%AA%D8%B4%D8%BA%D9%8A%D9%84%20en.pdf>

F4J III – Labor Management Procedures

risks and mitigation measures as detailed in this LMP, where attendees did not have any comments and stated that they do not have any additional remarks to add.

The project team provided a detailed description of raised points and questions including the non-discrimination and equal opportunity procedures within the project, the SEP and stakeholder engagement under the F4J III, the workers' GM in addition to the GBV grievances referral mechanism. All of the questions and concerns discussed in the workshop have been documented and have been considered and addressed in the LMP. A detailed summary of the engagement session is available in Annex III.

1.4. F4J III: Project Components

The F4J III project will build on the implementation of two innovative financing instruments that seek to address the constraints that have a significant impact on private investment and the generation of job opportunities, both from the demand and the supply sides of the jobs challenge. The financing instruments have been devised as the F4J III Project components, which are:

- **Component 1: Development Impact Bond (DIB) for Skills Development for Employment.** Component 1 builds on DIB 1.0 which was prepared under F4J I and launched and implemented under F4J II. DIB 1.0 is the first DIB in the MENA Region and one of the first DIBs in the World Bank and it mobilizes private sector financing and technical and management expertise to enhance skills development and employment outcomes among youth and women. DIB 1.0 aimed to accept about 1,240 young beneficiaries, of which at least 30% women, and to connect 520 youth to job openings, using flexible training, internships/apprenticeships, coaching and mentoring, job placement and in-work support, and other employment services based on market demand. Skills development, training, internships, coaching and job placement among other activities are conducted through independent service providers contracted by the DIB implementing company, the “F4J Consulting”.
- **Component 2: Investment Co-Financing Facility (ICF).** This component will continue financing a risk-sharing grant in support of commercially sound, job-creating private sector investments (ICF subprojects) through the Investment Co-Financing Facility (ICF). The rationale behind the ICF is that there are fundamentally sound private investments in the West Bank and Gaza that are unable to move forward due to the exceptional risks, FCV environment, and market failures such as the limited financing options, including lack of long-term debt financing. Nevertheless, these investments shown the potential to generate significant social and economic benefits by creating formal jobs in remote and rural areas, mitigating negative climate effects, or providing services to underserved segments of the population.
- **Component 3: Project Management.** The implementation of F4J is carried out by a private sector firm that was competitively recruited as a Project Implementation Agency (PIA) by the Ministry of Finance (MOF). The PIA is fully operational with key staff on board, including a project manager, finance and investments officers, financial management (FM), procurement specialists, M&E specialists, and Communication specialists in addition to an ESO that will be hired. This component entails providing financing to the PIA in support of project management expenses.

2. OVERVIEW OF LABOR USE ON F4J III PROJECT

The project activities will include different categories of workers depending on the nature and complexity of subprojects under the ICF, and training and capacity building under the DIB. ESS2 categorizes the workers into (i) direct workers, (ii) contracted workers, (iii) primary supply workers, and (iv) community workers. As indicated in the Appraisal Environment and Social Review Summary (ESRS) prepared for the Project, the Project's workforce will include direct workers (directly employed by PMU), contracted workers (recruited by third parties such as contractors or as consultants), and primary supply workers. The project is not likely to engage community workers. The LMP applies to the identified labor types whether full-time, part-time, temporary, and / or seasonal.

The sections below provide a description of the expected numbers and types of labor to be involved in the project. While for direct workers, estimation of labor number is possible and is provided, for contracted and primary supply workers it is rather difficult and unclear at this moment in the project's implementation, and as such, the LMP will be updated throughout the lifetime of the project to reflect recent findings in terms of employment numbers and characteristics.

The following provides a description of the type of labor to be engaged throughout the project's life cycle:

Direct Workers:

F4J III will be implemented by the PIA (private sector firm), which will include: Project Manager, 2 Project and Investment Officers, 2 Finance and Investment Officers, Financial Management Specialist, Procurement Specialist, Monitoring and Evaluation (M&E) Specialist, Communication Specialist, Environmental and Social Officer (ESO), and a coordinator for Gaza Operations (Gaza Office Coordinator). Hence, a total of 11 direct workers involved in the PIA.

Moreover, F4J Consulting's service provider workers will be responsible for implementing DIB 2.0 under F4J III. Their current staff includes; 1 Executive Director, 2 M&E and Performance Management Specialists, 1 Administrative & Operations Specialist, 1 Financial Officer, and 1 Data Analyst. For DIB 2.0, new hiring of direct workers is expected to include the hiring of a Deputy DIB Executive Director. All workers are expected to be full-time workers and no part type workers are envisaged in the project design. Hence, a total of 8 direct workers involved in F4J Consulting. For the DIB component the number of consultants is expected to range around 7 consultants.

In addition, project direct workers will include different consultants, who will work directly with the PIA and F4J Consulting to assist in planning and managing the project activities and safeguards (e.g., E&S Safeguards, M&E) . Those consultants will be hired under individual contracts, or on full time or part-time basis, with specific definition of the assigned tasks and responsibilities in line with ESS2 and the Palestinian Labor Law (PLL). All national laws and requirements of ESS2 as stipulated in this LMP apply to the PIA workers and consultants. These consultants will be professionals with task-based duties to assist the PIA and F4J Consulting in different aspects such as legal support, auditing, ICT, E&S safeguards, and others as required. PIA could expect to engage around 8 consultants.

The expected number of direct workers is 34 workers.

Contracted Workers: These include workers employed by the PIA through a contract, as well as workers employed or engaged by contractors directly contracted by the PIA, if any. In addition to other third party's workers engaged to perform work related to the project components, and the workers of subprojects receiving in-kind grants through the ICF:

For Component 1- DIB: the F4J Consulting Services firm will contract with service providers to implement the training programs under DIB. The employees of these service providers and their consultants/trainers are contracted workers. F4J Consulting estimates that the numbers of trainings to take place under DIB 2.0 could reach 70 training sessions through potentially contracting with 10 service providers, each conducting around 7 trainings. It is hard to exactly estimate the numbers of contracted workers under this component, however typically and based on previous experience through implementing DIB 1.0, service providers' teams usually consist of; a General Manager, a Project Manager / Coordinator, a M&E Officer, 2 field (training / employment) coordinators, an administrative and/or procurement officer, a financial officer, and a communication officer. With a total expected number of contracted workers of around 8. Additionally, service providers typically contract consultants and trainers to provide specific training activities these could include 2-6 trainers depending on the type of training. As such, considering around 7 service providers, each with around 8 employees, the total of Service providers staff is around 56 contracted workers as well as 14 – 42 consultants as contracted workers as well. With a total of 70 – 98 contracted workers under DIB 2.0.

For Component 2 - ICF: A number of subprojects from different sectors will be selected to be supported under ICF component, through signing ICF financing grants, the beneficiary subprojects under the ICF of F4J III are expected to be about 10 Companies / Subprojects. The PIA will also sign In-Kind Grant Agreements with ICF potential Subprojects to provide technical assistance and business development services as needed. Therefore, the employees of the subprojects, either full-time, part-time, or consultants directly engaged with the subproject's beneficiary firm / company will be considered as contracted workers. each subproject might need the engagement of subcontractors (e.g., Civil Contractor for the expansion of factories). Hence. the sub-contractors' workforce will be also considered as contracted workers. All national regulations and the requirements of ESS2 apply for the contracted workers. Where the PIA is responsible for enforcing them by reviewing the terms of contracts, along with remedies for non-compliance. For the ICF, the numbers, locations, sizes, and workforce of beneficiary firms and subprojects is hard to estimate. Therefore, the expected number of contracted workers will be determined later once the sub-projects are identified and approved.

Primary supply workers: The project will directly source goods, trainings, or promoting materials essential for the project from primary suppliers. Additionally, suppliers of goods for subprojects such as farmers providing produce for food processing, or raw material suppliers for light manufacturing facilities under the ICF are also considered Primary Suppliers. According to ESS2 the workers of suppliers who, on an ongoing basis provide directly to the project goods or materials essential for the core functions of the project, are the "Primary Supply Workers". The PIA will ensure that the primary supply contracts will include legal provision on; forced labor, child labor, and sexual exploitation and abuse/sexual harassment (SEA/SH) and any other serious safety and/ or security issues pertaining to their work environment.

The number and type of primary suppliers will be determined at project implementation stage once the exact needs for consistent supplies and goods are determined under both project components.

Community workers: Community workers will not be employed in relation to this Project

Government Workers (Civil Servants): The borrower for this project is MoF, hence there is a number of government civil servants, who work in the Ministry and are working in relation to the project, whether in complete connection or as a portion of their duties and responsibilities. Their responsibilities range from the management of the grant agreement with the World Bank, review and follow up with the PIA and its operations, monitoring and evaluation, financial management, and reporting. These civil servants in accordance with national laws and ESS2 will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement. Nevertheless, the provisions of ESS2 related to protection in the work force (e.g., minimum age and forced labor) as well as Occupational Health and Safety (OHS) will apply to them.

Number of those employees is 4 working at MoF.

Characteristics of Project Workers: The direct employees/workers, either male or female, will be local skilled workers and they will be engaged according to the work needs. The contracted workers for the ICF, will be local semi-skilled and skilled laborers determined based on the type of the subprojects and their respective activities. Under DIB, skilled workers and professional trainers will be engaged to carry out the trainings and capacity building activities. All types of labor will come from local communities including the vulnerable communities such as the people living in Area C³, the people living in ARA in

³ Over 60 percent of the West Bank is considered Area C, where Israel retains near exclusive control, including over law enforcement, planning and construction. An estimated 300,000 Palestinians live in Area C in about 530 residential areas. Some 341,000 Israeli settlers live in some 135 settlements and about 100 outposts in Area C, in contravention of

F4J III – Labor Management Procedures

Gaza⁴ and the Bedouin Communities. Project workers will include women (at least 30% from the total contracted workers should be women).

Timing of Labor Requirements: Direct workers will have direct contracts with the PIA, most of the direct workers will be engaged as full time project staff, while it is expected that a number will be contracted as part-time employees and consultants until project completion, where the project is expected to run for 5 years from project effectiveness expected in Q4 2023 or Q1 2024. Additionally, contracted workers will be engaged during the implementation period of the project, both through the ICF beneficiaries and the DIB service providers, where the exact contracting period will depend on the activity or the subproject that they will accomplish, this will be defined later on as soon as the trainings or the subprojects will be identified and approved.

Migrant Workers: it is not expected that the project under any of its components and neither through any type of expected labor to engage or result in migrant workers to be part of the project.

Table I below summarizes the types of labor engaged through the project, expected known numbers at the current project stage if known, employment type as well as the timing of employment.

Table I: Types of Labor Expected to be Engaged in the F4J III Project

No.	Workers' Category	Description of Their Activities	Estimated Numbers	Type of Employment	Timing
I	<u>Direct Workers</u>				
I.1	PIA and F4j Consulting employees	- Overall management of project activities including fiduciary and safeguards. These include procurement, financial management, M&E and other aspects of the project for both components.	19	- Full-time - Part-time - Skilled national workers and professionals in various disciplines - both male and female	Maximum by project effectiveness and to be maintained throughout project implementation.
	PIA and F4j Consulting Consultants	- To Assist the PIA and its staff in technical and specialized aspects of project management such as M&E,	15	- Skilled workers and professionals in various disciplines	- During project implementation

international law. Palestinian construction in 29% of Area C is heavily restricted; only approximately 1% of Area C has been planned for Palestinian development (UN OCHA, 2014). As such most Palestinian owned lands are used for agriculture since construction and urban development is restricted. People residing in area C are heavily underserved due to the inability to connect adequate infrastructure, and hence development for the area, this results in impacts on private sector activities, and as such, employment opportunities.

⁴ Since September 2000, Israel has tightened restrictions on Palestinian access to land located near the fence with Israel, citing security concerns. Up to 35% of Gaza's agricultural land and as much as 85% of its fishing waters have been affected at various points. Currently, access to farming land within 300 meters of the perimeter fence separating Gaza from Israel is largely prohibited, while presence for several hundred meters beyond this distance is risky (UN OCHA 2013).

F4J III – Labor Management Procedures

		<p>preparation of site-specific E&S safeguard documents, technical advice and other aspects.</p> <ul style="list-style-type: none"> - external financial and technical auditors 		<ul style="list-style-type: none"> - Could be national or international - both male and female 	
2	<u>Contracted Workers</u>				
2.1	DIB Contracted Workers – Service Providers’ Workers	<ul style="list-style-type: none"> - Assist the F4J consulting in providing trainings and capacity building programs in targeted topics and specializations - Mediate employment opportunities and programs for DIB graduates 	<p>Expected to range between 70- 98 contracted workers, comprising of the 7 expected service providers’ staff as well as contracted trainers and consultants.</p>	<ul style="list-style-type: none"> - Skilled national workers and professionals in various technical disciplines - Males and females - Full-time service providers’ employees - Consultants contracted to provide specialized trainings - Part-time service providers’ employees 	<ul style="list-style-type: none"> - During project implementation
2.2	ICF Beneficiaries’ Workers – Subproject Firms and Companies’ Workers	<ul style="list-style-type: none"> - Manual Labor (e.g., civil works in expansion phases / production in operations) - Administrative services (e.g., financial, logistics, procurement) - Specialized workers (e.g., OHS, E&S, Quality Engineer) - Consultants providing technical and specialized services to subproject proponents. 	<p>The number of ICF contracted workers cannot be determined until the number of subprojects is clear. Beneficiary subprojects could include varying numbers of workers depending on locations, sector, operations, and activities, ranging between 10s and 100s per each subproject.</p>	<ul style="list-style-type: none"> - Unskilled, Semi-skilled, and Skilled - Casual and Seasonal - Full-time and Part-time - National - Females and males 	<ul style="list-style-type: none"> - During project implementation
3	<u>Primary Supply Workers</u>				
3.1	Primary Supply Workers	<ul style="list-style-type: none"> - source goods, trainings, or promoting materials essential for the project - providing goods and raw materials needed for the continuous operations of the project, its components, activities, and subprojects 	<p>The number of primary supply workers needed for the project activities cannot be determined until project operations are initiated.</p>	<ul style="list-style-type: none"> - Unskilled, semi-skilled, and skilled - Casual, full-time - National - Males and females 	<ul style="list-style-type: none"> - Throughout project implementation
4	<u>Government Workers (Civil Servants)</u>				

4.1	Civil Servants of MoF	<ul style="list-style-type: none"> - management of the grant agreement with the World Bank, review and follow up with the PIA and its operations, monitoring and evaluation, financial management, and reporting - Ensuring compliance with the Environmental and Social Commitment Plan (ESCP) of the project, and the E&S instruments. 	4	<ul style="list-style-type: none"> - Full time - National - Skilled workers and professionals in various disciplines - Males and females 	<ul style="list-style-type: none"> - Expected to be involved in the project preparation prior to effectiveness and to be maintained throughout project implementation.
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3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

This LMP has classified the labor risks based on the project’s three components. Labor risks would be identified according to the components’ activities (DIB, ICF, and Project Management Component), in addition to the typology of workers to be engaged in each activity, the labor requirements, and the location of subprojects and training activities. Since the exact activities for the subprojects are unknown yet, this LMP will assess the key potential labor risks for the expected sectors to be supported under F4J III. Under the project’s ESMF⁵, an overview of potential sectors to be supported under the F4J III was conducted as the F4J III will not have priority sectors unlike the F4J II which has designated 5 main priority sectors (i.e., tourism, ICT, agribusiness, renewable energy, and light manufacturing). The F4J III however does not have a priority list and rather could support any sector excluding trade, construction, real estate, and retail. Hence, this LMP overviews the labor risks associated with the most prominent sectors identified in the ESMF.

3.1. Project Activities

Component I: Development Impact Bond (DIB) for Skills Development for Employment:

DIB 2 will aim to implement capacity building and training of young beneficiaries consisting of youth (ages 18-29) where DIB 2 will aim to surpass the numbers of beneficiaries established under the DIB I of F4J II by 5-10%, where DIB I included around 1,240 young beneficiaries, of which at least 30% women, and connected 520 youth to job openings. The DIB component will be expanded under its 2nd iteration to include Gaza Strip as well as the West Bank, the locations of the trainings are yet to be determined based on the types of activities, where these trainings take place at the Service Providers’ premises, or halls and venues rented by the Service Providers for the trainings such as hotels conference rooms, and universities’ training centers.

DIB aims at mobilizing private sector financing and technical and management expertise to enhance skills development and employment outcomes among youth and women, using flexible training, internships/apprenticeships, coaching and mentoring, job placement and in-work support, and other employment services based on market demand. The trainings will fall within but not limited to the following sectors: Health sector, education sector, business and finance, TVET, ICT. The type of institutions will

⁵ https://www.f4j.ps/cached_uploads/download/2023/03/19/f4j-iii-esmf-first-draft-1679219145.pdf

F4J III – Labor Management Procedures

include, but not be limited to, Polytechnics, other technical institutes, Associations (e.g., Engineers, Medical, etc.), TVET Institutes, continuous learning institutes, and some local NGOs.

The key activities will include:

- Inviting young people to submit applications for trainings and inviting the related institutions to submit their proposals.
- Selecting the service providers and approval of trainees.
- Preparation and approval of training materials.
- Preparing the required logistics and equipment for trainings.
- Liaison for the training venues and labs.
- Conducting the trainings.
- Selecting beneficiaries for the jobs available based on local market needs and the project's criteria.
- Provide on job consultations and follow up activities.

Component 2: Investment Co-Financing Facility (ICF): The F4J III ICF will focus on all economic sectors including but not limited to agri-business, manufacturing, food processing, Greentech and recycling, tourism, plastic manufacturing, pharmaceuticals and other business sectors except trade, construction, real estate, and retail, and will emphasize investments in green and circular economies and improving economic inclusion and social cohesion. Some subprojects aim to establish new processes (e.g., introduction of new products) while others aim to expand production capacities for existing products by procuring new machinery and production lines. In terms of subproject locations to be supported under the ICF, this cannot be determined at this stage of the F4J III implementation as the project targets the entirety of the West Bank as well as Gaza Strip, as such the determination of the locations of these subprojects will be based on shortlisting the pool of applicants that will submit to the Call for Proposals under the F4J III, and based on the shortlisting, awarded subprojects will be selected. As such, these could include any locality within the West Bank and Gaza Strip.

The key activities will include:

1. **For PIA:** The main activities, will include; Inviting the private sector to apply to the ICF, evaluating the applications, shortlisting the most promising proposals, selecting the most appropriate and feasible according to the approved selection criteria, and then signing In-Kind Grant agreements with the selected beneficiaries. Once subproject beneficiaries are selected, the PIA will assist the beneficiaries to prepare, oversee, and review the project documents (legal document, financial, business plans, designs, ESMPs, operation plans, etc..). Additionally, the PIA will follow up on the implementation process for the subproject throughout its different phases including designs, expansion and installation, and operations. The PIA throughout the operational phase will conduct independent monitoring and evaluation of E&S aspects and the commitment to the site-specific E&S management tools (e.g., ESMPs).

2. **For the subprojects:** Subproject proponents and beneficiaries will apply to the ICF when invited and/ or when the applications are announced. Despite the sector and industry of the proposed subproject, various potential labor risks will be present, and the most prominent and frequent ones encountered through the F4J SOP has been listed in this LMP. The Project's ESO will screen and review subprojects' proposals and documents to assess the relevant and potential labor risks for each subproject.

Component 3: Project Management: will include all of overall project management activities during the entire project cycle that will be implemented by the PIA.

3.2. Key Labor Risks

Drawing upon the experiences and lessons learned from the F4J SOP and other similar projects, the primary labor risks under this project relate to (but not limited to) occupational hazards related to civil works, on-the-job/vocational training activities, and the operation of the industrial facilities, working terms and conditions, equal opportunity, and SEA/SH. Risks of child and forced labor are not anticipated under the project, but could arise in the suppliers' labor force, . The following are key labor risks anticipated and assessed during the implementation of the F4J III

3.2.1. Occupational health and safety (OHS)

3.2.1.1. Component I - DIB

Under **component I** of the project (DIB), vocational training could be of various types and will include training on the use of tools and equipment which could pose an injury risk, repeated movements that could cause physical injuries, use of electrical equipment or training involving electrical works pose electrocution risks. Other injury risks include, but are not limited to, cuts, bruises, abrasions, rotatory equipment risks, fire risks, communicable diseases exposure, and slip and fall.

The following constitutes a list of some predicted OHS risks that workers may be exposed to during different type of trainings:

- **Potential labor risks for TVET trainings:**
 - **Manual Handling and Ergonomic Risks:** Depending on the nature of the training, trainers and participants may be involved in manual handling tasks, such as lifting heavy objects, using hand tools, or operating machinery. Improper lifting techniques, repetitive motions, or working in awkward postures can lead to musculoskeletal disorders (MSDs) and other ergonomic-related injuries.
 - **Slips and Falls:** Training environments, such as workshops, laboratories, or simulated work settings, may have uneven surfaces, wet floors, or obstructions that can pose slip, trip, and fall hazards.
 - **Machinery and Equipment Hazards:** TVET programs often involve hands-on training with machinery, equipment, or tools. Inadequate training, lack of safety guards, or improper use of equipment can lead to injuries, including cuts, burns, entanglement, or impact-related accidents.
 - **Electrical Hazards:** Training in electrical trades or fields may expose trainers and participants to electrical hazards. Working with live circuits, faulty wiring, or improper grounding can result in electric shock, burns, or electrical fires.
 - **Chemical and Hazardous Substances:** Some TVET programs may involve training in industries that use or handle hazardous substances, such as chemicals, solvents, or welding fumes. Exposure to these substances without proper ventilation, personal protective equipment, or safe handling procedures can lead to respiratory problems, skin irritation, or long-term health effects.
 - **Fire and Emergency Preparedness:** TVET trainings carry risks of fire associated with the use of machinery, equipment, or material that could lead to accidental fires.
 - **Working at Heights:** Certain TVET programs, or on-job trainings such as construction or maintenance trades, may involve working at heights. Falls from ladders, scaffolds, or elevated platforms can result in severe injuries or fatalities.
 - **Noise and Vibration:** Training programs related to industries such as construction or manufacturing may expose trainers and participants to high levels of noise and vibrations. Prolonged exposure to excessive noise especially when trainers conduct consecutive training sessions can result in hearing loss, while vibrations from equipment or tools can cause hand-arm vibration syndrome or whole-body vibration effects.

It is essential for TVET programs to prioritize OHS by integrating safety training, risk assessments, and practical safety protocols into the curriculum. Providing adequate supervision, ensuring proper maintenance. Depending on the training activities, participants may need to use PPE such as safety glasses, gloves, helmets, or respiratory protection. Inadequate or improper use of PPE can compromise the effectiveness of protection and increase the risk of injuries or exposure to hazards. Detailed list of potential OHS risks associated with each “Business Sector” that could be included under the DIB is available in Annex IV – Part I.

3.2.1.2. Component 2 - ICF

Under **component 2**, Potential impacts associated with occupational health and safety vary depending on the types and sectors of supported subprojects under the ICF, in addition to the different phases of the supported subprojects (i.e., Pre-construction “design”, Expansion and Installation, as well as Operation) as outlined in the F4J III’s ESMF. General OHS risks include physical injury, rotating equipment, use of heavy machinery, exposure to noise, exposure to dust, exposure to chemicals, fire risks, electrocution, traffic incidents, slip and fall, exposure to communicable diseases, and heat strokes among others. Following are general potential OHS risks associated with the implementation of subprojects under the ICF component. more specific description for the OHS risks specific to expected sectors to be supported under the ICF is available in Annex IV – Part 2.

- **General Potential labor risks for ICF Subprojects:**
 - **Machinery and Equipment Hazards:** Working with heavy machinery and equipment such as tractors, combines, chainsaws, and power tools can lead to injuries if not used properly. Risks include entanglement, falls, collisions, and crush injuries.
 - **Falls and Slips:** Uneven terrain, wet or slippery surfaces, and working at heights (e.g., ladders, rooftops) can result in falls and slips, leading to fractures, sprains, or more severe injuries.
 - **Chemical Exposure:** Pesticides, paints, and other chemicals used in different industries can pose health risks if not handled, stored, and used correctly. Exposure to these substances can cause skin irritation, respiratory problems, poisoning, or long-term health effects.
 - **Manual Handling and Ergonomics:** Frequent lifting, carrying, and manual handling of heavy loads can lead to musculoskeletal disorders (MSDs) such as back pain, strains, and sprains. Poor ergonomics, repetitive motions, and long hours of physical labor can exacerbate these risks.
 - **Heat and Cold Exposure:** Working outdoors or close to heat generating machinery exposes workers to extreme temperatures. Heat stress, heat stroke, dehydration, and sunburn can occur during hot weather, while cold weather can lead to hypothermia, frostbite, and reduced dexterity.
 - **Noise and Vibration:** operating machinery and equipment can generate high levels of noise, leading to hearing loss if adequate hearing protection is not used. Vibrations from machinery can also cause long-term health issues.
 - **Electrical Hazards:** buildings, equipment, and different machinery involve electrical components. Poorly maintained or faulty electrical systems increase the risk of electric shocks, burns, fires, and explosions.
 - **Fatigue and Stress:** Long work hours and labor-intensive jobs can result in fatigue and increased stress levels, which can compromise worker safety and health.
 - **Biological Hazards:** industries such as pharmaceuticals or food processing might require handling raw or perishable biological agents or food products, which can present biological hazards such as bacteria, viruses, or fungi.

F4J III – Labor Management Procedures

- **Fire and Explosion Hazards:** Light manufacturing may involve flammable materials, combustible dust, or processes that generate heat or sparks. Insufficient fire prevention measures, poor storage practices, or inadequate training can increase the risk of fires and explosions.
- **Waste Management and Hazards:** manufacturing often generates waste materials, including, solid waste or hazard wastes. Workers involved in waste management or recycling activities may face risks such as exposure to hazardous substances, cuts, or injuries from handling sharp objects.
- **Transportation and Logistics Risks:** Moving and transporting products and equipment can involve risks such as collisions, falls, or injuries during loading and unloading.
- **Struck-by and Caught-in/Between Hazards:** Construction / Expansion sites involve moving vehicles, heavy machinery, and falling objects. Workers can be struck by vehicles, equipment, or materials, leading to serious injuries. There is also a risk of being caught in or between equipment or structures, such as trenches or machinery. Implementing safety protocols, providing visible signage, and enforcing restricted areas can help mitigate these risks.
- **OHS Risks Due to Israeli Occupation:** The Israeli occupation introduces OHS challenges for Palestinian workers, including movement restrictions, exposure to violence, access restrictions, and limited medical access.

3.2.1.3. Component 3 – Project Management

For **component 3 (project management):** The PIA and the F4J consulting staff may be exposed to the risk of stress, fatigue, and improper ergonomics, eye strains, lack of physical movement, and long hours due to overworking to manage the excessive demand and large numbers of applicants.

To mitigate these OHS risks, project workers should be provided with an orientation and overview of potential OHS risks at the workplace. The ESO should ensure safe work environment and equipment. Collectively, the PIA should promote a safety culture, healthy work environment and compliance with relevant national regulations as well as ESS2.

3.2.2. Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)

This type of labor risks is applicable to the three components of F4J III. The Project will not require establishing labor camps or experience any labor influx or issues related to the presence of migrant workers. Most subprojects' activities will be implemented through employing relatively small numbers of local workers. The Project's SEA/SH rating has been determined as 'moderate' using the Bank's SEA/SH risk screening tools.

For **component 1 (DIB)**, training and capacity building will be provided to support employment opportunities, particularly for vulnerable and marginalized groups such as women and youth. The project will target that women will comprise around 30% of the beneficiaries. As such, having these groups, particularly women, exposes them to GBV (SEA / SH) risks. Unfair and unclear recruitment/employment and selection practices before training. Discrimination during recruitment and employment is expected after the training. Trainees, trainers and staff may encounter situations involving aggressive or violent behavior, harassment, exploitation, and / or abuse during the DIB activities.

For **component 2 (ICF)**, vulnerable groups are exposed to GBV risks throughout the sub-projects' lifecycle, during rehabilitation and expansion activities the local community is at risk especially if works are

F4J III – Labor Management Procedures

conducted near sensitive areas such as schools or universities, and at the project site itself between workers or management. During operations, interactions with the public or at the workplace itself present risks of GBV. Unequal payments and wages for equal work for men and women is expected in some subprojects (related to unskilled or semi-skilled workers). Unfair and unclear recruitment/employment and selection practices could reflect GBV risks.

For component 3 (project management): The PIA and F4J Consulting staff will be committed to the Code of Conduct (CoC) attached to their contracts and the workplace will be adapted to women needs and requirements for safe and comfortable working environment. Yet, GBV (SEA / SH) risks persist during recruitment, between staff, between management and staff, and between staff and the beneficiaries or the public.

The project will ensure that gender sensitive interventions are mainstreamed across all project components and the subprojects, creating pathways for employment and participation in society and playing a key role in building resilience to shocks, improving livelihoods and mitigating social constraints. The risks of SEA/SH will be assessed, and mitigation measures put in place during the screening of each sub-activity. General project mitigation measures include;

- The project's GM and Workers' GM will include special referral pathways for the GBV complaints and grievances, including grievances on SEA and SH. Channels to accept and respond to GBV grievances, while maintaining high confidentiality, will be communicated to the project's affected parties during the consultation meetings and throughout the project implementation.
- Project direct contracted, and primary suppliers' workers will be requested to sign the CoC which contains required conduct and adherence to the prevention and report of GBV incidents.
- Workers' GM highlighted in the LMP will also include measures and referral pathways for reporting GBV grievances.
- Include awareness clauses and sessions on gender equality, respectful behavior, and preventing GBV, SEA, and SH in the training curriculum. Provide participants with information on their rights and responsibilities, as well as on reporting mechanisms and support services available to them. Such clauses should be an integral part of the introduction of all training activities within the DIB.
- Ensuring that stakeholders, including the community and workers are properly engaged throughout the planning and implementation of subprojects' activities and that their concerns are heard and addressed, as well as maintaining open and continuous feedback channels.
- Create a safe and inclusive environment that promotes respect, equality, and dignity. Ensure that project and subprojects facilities have adequate lighting, secure entry points, and separate restrooms or changing areas for participants of different genders. Foster a culture of trust and open communication where participants feel comfortable reporting any incidents or concerns

3.2.3. Child Labor/forced labor Risk

With respect to child labor, it is assessed that the risk of child or forced labor is negligible for the project, particularly under Component 1 – DIB, since the targeted beneficiaries should be between 18- 29 years old. All of the engaged training institutes and service providers will be examined before contracting to prevent the child labor (under 18 years old).

For component 2 - ICF, there is a minimal risk that children as defined in the national labor law (15 years of age) and the Ministerial Decisions regulating the labor of minors under 18 years of age, may be used to provide labor in some subprojects. Since the subprojects may hire local sub-contractors, who may have

workers under the legally permitted age. Also, subprojects in remote and inaccessible areas might entail risks of child labor, child labor risks could be present in primary suppliers' workforce through the supply chain. According to the labor laws in West Bank and Gaza, children under 18 years old are prevented to work in dangerous or hazard works and children from 15 years old can work in light works and safe environment. While improbable, but to combat and control this issue if may arise, the contractors should provide a list of their workers and sub-workers with their ages and copies of identification documents for verification. To ensure that child labor is prevented by contractors, the regulation of project labor ages will be incorporated into contract bidding documents as a basis for E &S compliance monitoring during the project implementation.

The MoL will be involved and engaged throughout the project implementation and subproject preparation to introduce them to new project and ensure that their requirements under the PLL and relevant ministerial decrees are being met. Monitoring systems will be put in place particularly for remote and inaccessible areas in liaison with MoL to ensure that workers are within the legal age limit and adherence to age limit per industry type is being committed to in line with Ministerial decision (No.1) of 2004 on hazardous occupations where minor's labor is prohibited

3.2.4. Labor Rights and working conditions

This type of labor risks is applicable to the three components of F4J III. Main and common issues relevant to labor and working conditions under the F4J III could include;

- Inadequate or non-existent OHS policies and procedures that can increase labor risks. Without clear guidelines and measures in place, workers may face hazards without proper safeguards, training, or access to necessary protective equipment.
- Inconsistency and non-compliance with the Palestinian Labor Law (PLL), minimum wage act No.4 of 2021, unpaid overtime, workmen's' compensation insurance, and other labor rights and working conditions as defined in the national laws and ESS2.
- Risks relevant to discrimination and equal employment opportunities, and discrimination relevant to benefits.
- Poor sanitation facilities, lack of clean water, and improper waste management can affect workers' health and increase the risk of infectious diseases, respiratory problems, and other health issues.
- Poor working conditions can contribute to psychosocial hazards, which include excessive workload, long working hours, work-related stress, lack of control over work, bullying, harassment, and violence in the workplace. These hazards can lead to mental health issues, such as anxiety, depression, and burnout, as well as reduced job satisfaction and productivity.
- Poor ergonomic conditions, such as uncomfortable workstations, improper seating, repetitive tasks, and awkward postures, can result in musculoskeletal disorders and physical discomfort for workers. Lack of ergonomic considerations can lead to injuries and decreased productivity.
- Imbalanced work-life situations, including long working hours, shift work, and irregular schedules, can impact workers' physical and mental health. High levels of work-related stress and limited time for personal life can lead to decreased job satisfaction and work-life conflicts.
- Inadequate availability or functionality of training equipment, such as computers, projectors, audiovisual aids, and training materials, can limit the effectiveness of training. Participants may struggle to engage fully and comprehend the material without the necessary resources.

F4J III – Labor Management Procedures

- High noise levels and distractions in the working environment can disrupt concentration and impair the works. External noises from nearby construction, office activities, or inadequate soundproofing can make it challenging for workers and trainees.
- Inaccessible training facilities can exclude individuals with disabilities or impairments, preventing their full participation. The lack of ramps, elevators, accessible restrooms, or assistive technologies can create barriers and hinder inclusive learning opportunities
- Limited or inadequate spaces for breaks and relaxation can impact the well-being and stress levels of project team members. The absence of designated areas for rest, refreshments, or social interaction can lead to decreased morale and productivity.
- Insufficient resources, such as technology, software, equipment, or budget, can impede the works. Inadequate access to necessary tools and resources can result in delays, errors, and decreased overall working performance.
- Ineffective communication infrastructure, including unreliable or outdated technology, slow internet connectivity, or insufficient communication channels, can hinder timely and effective communication among workers. This can lead to miscommunication, delays in decision-making, and coordination challenges.
- Lack of Privacy: Open-plan office layouts without sufficient privacy can impact the concentration and confidentiality required for workers who need private space for their tasks. The absence of private workspaces or meeting rooms can hinder sensitive discussions, confidential information handling, and individual focus.

To address these issues, it is important for the PIA, F4J Consulting, the training institutes, service providers, beneficiaries from ICF, contractors and subcontractors, to prioritize creating a conducive and safe working environment. This may involve ensuring adequate facilities, equipment, and resources, addressing noise and distraction concerns, improving ventilation and air quality, implementing safety measures, promoting accessibility, providing ergonomic seating, offering suitable break areas, ensuring privacy when needed, and maintaining proper hygiene and sanitation standards. Creating a positive and supportive working environment enhances participants' learning experience and contributes to their overall well-being during training programs. The ESO will review contracts to ensure that the terms and conditions of to mitigate the labor and working environment risks are existed in the contracts, as well as the adherence of such contracts to the labor rights stated in ESS2, the PLL, and other national legislations. Workers will be encouraged to submit their complaints and concerns in the workers' GM.

3.2.5. Spread of communicable diseases

This type of labor risks is applicable to the three components of F4J III. Despite easing COVID-19 restrictions, the risk of the spread of the virus and other communicable diseases is still persistent and requires adequate mitigation and preventive measures to ensure the safety and health of project workers, trainees, and staff.

There is a risk of spread of communicable diseases among project workers, who will be engaged either in DIB or ICF activities. At such times, the ESO of the project, should ensure that all of the contracted service providers, contractors, subcontractors, and all of the workers are contractually obliged to review the country COVID-19 spread situation as well as any other communicable diseases in the project area, and to abide by the restrictions put in place by the government to contain virus spread, and the following mitigations can be applied:

F4J III – Labor Management Procedures

- communicable diseases safety measures and required PPEs to be included in the site-specific OHS measures and/ or OHS plan.
- PPEs have to be provided to trainees under the DIB program.
- Strict adherence to Ministry of Health measures relevant to communicable diseases and the guidelines and recommendations of the WHO.
- Adequate hand-washing facilities shall be available at training venues for the DIB and for workers at sub-projects under the ICF. If this is not possible, especially during the expansion/rehabilitation phases, hand sanitizers and temporary washrooms shall be provided.
- Be sure that all project workers articulate and express their understandings on social behavior (by understanding, signing, and practicing the CoC terms and requirements) and good hygiene practices.

3.2.6. Discrimination and exclusion of vulnerable/disadvantaged groups

While the project aims to benefit vulnerable groups, including women and youth; there is a possibility that certain sub-groups within these categories, such as persons with disabilities, women-headed households, the poor, people in Area C, Bedouin communities, communities in Access Restricted Areas, and those residing in rural or remote locations, may face social exclusion or unequal access to project benefits in terms of labor and employment. This risk could result from a lack of focus on these groups in the design of training activities under **component I** of the project, inadequate consultation with vulnerable groups, and limited availability of information in user-friendly or contextually appropriate formats about the nature, availability, and means of accessing project benefits and services under **Components I and 2**, such as skills development training, co-financing grants, and job opportunities. Given that the project anticipates financial support to enterprises under the **ICF component**, risks of biased grant management or exclusion of some areas from financing could arise.

An operational manual to be developed will describe the eligibility criteria for sub-projects, public outreach tools, application selection, and evaluation process, and awarding and contracting procedures for a diverse range of applicants. The Stakeholder engagement plan (SEP) shall be implemented to ensure that adequate consultation is conducted with stakeholders before and during calls to allow for transparent dissemination of information and understanding of the evaluation criteria. PIA established a GM under the previous phases of the F4J projects and this GM will also be used for F4JIII. The project's GM will be effective and accessible to allow stakeholders and applicants to raise any concerns or complaints they may have regarding the project's selection processes or any project-related concern they may have.

3.2.7 Labor influx

The risk associated with labor influx has been assessed to be minimal. The project will not involve labor influx as project activities will be carried out with local labor or workers from nearby towns and communities. There will be no labor camps. Influx of foreign labor is also difficult in the Palestinian Territories due to political challenges.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Two major legislations in Palestine govern the rights of the labors and the terms and conditions of the employment are: the Palestinian Labor Law (PLL) No. (7) of (2000) and the Council of Ministers Act No.4, 2021 regarding the minimum wage.

F4J III – Labor Management Procedures

The PLL provides the basic conditions of employment with a view of improving the status of employees in Palestine. It provides workers with the right to form unions on a professional basis and sets minimum requirements for workers' rights and contractual agreements which may not be waived. The Law explains the working hours, overtime, breaks, wages, leaves, the reward of work end, work contracts, and other labor rights and working conditions aspects.

The Palestinian Labor Law was ratified in 2000 and replaced the 1960 Jordanian Labor Law in the West Bank and the 1964 Egyptian Labor Law in the Gaza Strip. Labor Law No. 7 is organized into 10 sections covering number of issues:

- General Provisions and Principles section: Makes work a right for each workable citizen;
- Employment, Occupational Training and Guidance;
- The Individual Work Contract section covers the various methods of agreement, the composition of the contract, its duration, expiration and termination;
- Collective Labor Relations are summarized in the Labor Unions section;
- Requirements and Conditions of Work section covers working hours and weekly holidays, leave, salaries and occupational safety and health;
- Regulation of the Work of Minors (from 15 to 18 years old) which covers and prohibits child labor
- Regulation of the Work of Women section;
- The Labor Inspection section authorizes members of The Commission of Labor. Inspection to enter the workplace, make inquiries with employers and/or workers;
- Work Injuries and Occupational Diseases;
- Penalties and Conclusive Provisions;

The Labor Law No. 7 is supplemented with about 30 bylaws that were ratified during 2003, 2004, 2005 and 2006.

Furthermore, the Cabinet Act No.4 of 2021 deals specifically with the minimum wages and sets the value of hourly, daily, and monthly wages in the Palestinian Authorities' mandate locations.

4.1. Terms and Conditions

The following sections present an overview of the key aspects in the PLL, the Council of Ministers Act No.4 of 2021, and the terms and conditions of work as to ESS2, paragraph 11.

• **The Individual Work Contract**

The individual work contract is an explicit or implicit written agreement, which had been concluded between an employer and a worker for a limited or unlimited period of time or for the accomplishment of a certain work, in accordance with which the worker shall undertake to perform a work for the benefit of the employer and under his/her management and supervision, and in which the employer shall undertake to pay the wage agreed upon to the worker.

• **Wages**

The minimum wage limit is regulated by the PLL and is set by the Council of Ministers' resolution No.4 of 2021. Decree No.4 establishes the specific minimum wage for workers at 85 ILS/day (25\$US), 10.5 ILS/hr. (3.15\$US) and the minimum wage for employees is 1880 ILS/month (565\$). A labor agreement will determine the form and amount of remuneration. Remuneration will be paid at least once a month.

F4J III – Labor Management Procedures

The insurance made by contractors for the contracted workers will compensate contracted workers for work-related impacts to the employee's health and will cover the subsequent, necessary treatment costs. Deductions from payment of wages will only be made as allowed by the national law, and project workers will be informed of the conditions under which such deductions will be made.

- **Payment Regularity**

In terms of payment regularity and in accordance to Article (82) of the PLL:

1. The wage shall be paid to the worker using the circulated legal currency, provided that the payment is conducted according to the following:
 - a) On the working days and in the workplace.
 - b) At the end of each month in relation to workers paid based on a monthly wage.
 - c) At the end of each week in relation to workers, working on unit production or hourly or daily or weekly basis.
2. The worker's wage payment may not be delayed for a period exceeding five days from the wage regular payment date.

- **Deduction from Payment of Wages**

According to Article (83) of the PLL:

1. With the exception of the following, no amounts may be deducted from the worker's wage:
 - a) In pursuance of a final judicial judgement.
 - b) For any loan due for the employer, provided that each deduction does not exceed (10%) of the related worker's basic wage.
 - c) fines imposed upon the worker in pursuance to the provisions of this Law or the regulations issued according to it.
2. The total of deductions made under subparagraphs (b and c) in Paragraph (1) above may not exceed (15%) of the worker's basic wage.

The provisions of Article (83) of the PLL complies with the ESS2 (Paragraph 11) requirement that states” *Deductions from payment of wages will only be made as allowed by national law or the labor management procedures, and project workers will be informed of the conditions under which such deductions will be made*”.

- **Insurance and Compensation**

According to Articles (116) through (130) of the PLL: “The employer/ contractor must insure all his/her workers against work injuries at licensed insurance providers in Palestine”.

The insurance made by contractors for the contracted workers will pay compensation to the contracted workers for work-related damage that caused any deterioration to the employee's health and will cover the subsequent, necessary treatment and give compensations as illustrated in Articles (116) through (130).

According to PPL, if the work injury prevented the worker from performing his/her work, he/she shall be entitled to (75%) of his/her daily wage starting from the date such injury took place and during the whole period of his/her temporary disability, provided that such disability to work does not exceed (180) days.

F4J III – Labor Management Procedures

If the work injury resulted in the death or in a permanent total disability, the heirs in the first instance and the injured worker in the second one shall be entitled to a cash compensation that is equal to the wage of (3500) working days or (80%) of his/her basic wage for the remaining period until he/she reaches the age of sixty years, whichever is greater.

- **Working hours**

According to Articles (68) through (73) of the PLL: The actual working hours shall be forty-five hours per one week. The daily working hours shall include one or more resting period/s, the total of such period/s shall not exceed one hour, taking into consideration that the worker shall not work for more than five consecutive hours.

For Direct workers the maximum number of hours per day that workers are required to perform in accordance with the PLL is 8 hours; (Sunday through Thursday).

- **Rest breaks**

The workers will have one-hour meal break each workday not included as part of the working hours, taking into consideration that the worker shall not work for more than five consecutive hours. The duration of rest between working days is one day on Friday for contracted workers and two days for direct workers.

- **Overtime Work**

The two parties (employer and project workers) may agree to extra working hours (overtime work) provided that the total number of such hours does not exceed twelve hours a week. The worker shall be paid the wage of one and a half hour for each extra working hour he/she works.

- **Leaves**

According to Articles (74) through (80) of the PLL: An employee will have the right to enjoy paid leave for at least 14 days, sick leave of 14 days, additional sick leave of another 14 days with half of salary/wage. This is also in accordance with bylaw No. (10) of 2021. Leave does not include maternity leave which is 70 days.

The worker is entitled to a paid annual leave of 21 days (3 weeks) if he/she spends at the same work five years or more as well as for workers in hazardous or health damaging occupations. The worker may not waive his/her right in the annual leave.

The worker shall have the right to paid leave on religious and official holidays, which is not considered or counted as annual leaves. Employees have the right to enjoy paid national and religious holidays. Workers working according to limited period work contracts, including those working according to occasional work contracts or seasonal work contracts shall enjoy the same rights and be under the same obligations, which the workers working according to unlimited work contracts are subject to in the same work conditions, taking into consideration the special provisions related to the work for a limited, occasional and seasonal period.

- **Women**

The PLL in Articles (2) and (16) states that work is a right for each citizen who is capable of working, and that the National Authority shall provide work to citizens on equal opportunities basis and without any

kind of discrimination, where also discrimination in relation to the work conditions and circumstances between workers in Palestine shall be forbidden. According to Articles (74) through (80) and article (100) of the PLL: Palestinian Labor Law includes provisions for prohibition of discrimination between men and women. Employment of women is prohibited in the following jobs or under the following conditions: dangerous or hard works, extra working hours during pregnancy and during the first six months after delivery, and during night hours except for the works defined by the Council of Ministers.

The working woman who had spent a period of one hundred and eighty days at work prior to each delivery, she shall have the right to a paid maternity leave for a period of ten weeks, including at least six weeks after the delivery. The working woman may not be dismissed from her work because of the maternity leave unless it is proven that she worked in another work during such leave. The breastfeeding mother shall be entitled to a period or periods for breast feeding during work hours, the total of which shall not be less than one hour per day for a period of one year from the date of delivery. The breastfeeding hour, mentioned above, shall be counted as part of the daily working hours. According to the work interest, the working woman may obtain an unpaid leave to foster her child or accompany her husband.

- **Labor disputes**

According to Articles (60) through (67) of the PLL: The Law includes provision for worker's exemption from legal fees arising from work-related disputes and allows to unionize. A bipartite committee nominated by the worker/employee and employer will settle any disputes that may arise from the implementation of agreement.

The court has jurisdiction over labor related disputes. The PLL applies to direct workers and contracted workers, who are employed on full time basis. Terms and conditions of direct/contracted workers hired on part-time basis are determined in their individual employment contracts.

- **Termination of Contract**

According to Article (46) of the PLL:

1. Any of the two parties to the indefinite period work contract may terminate such contract by sending with a receipt of delivery to the other party a month prior to the termination of the work.
2. The worker who receives a notice of termination of the work contract from the employer, shall have the right to be absent from work during the second half of the notice's duration. His/her absence shall be deemed to constitute actual work at the installation.
3. It shall be considered as an arbitrary termination of the contract if it is terminated without the presence of due causes for its termination.

According to Article (39) of the PLL: The following instances in particular shall not be considered to be from among the real causes which justify the termination of work by the employer:

1. Affiliation with a union or participating in a union's activities after working hours, or during working hours in case the employer gives his/her consent.
2. The worker's request that he/she represents the workers or his/her current or past representation of such workers.
3. The worker's bringing a lawsuit against the employer or his/her participation in proceedings against the employer claiming his/her violation of the Law, in addition to the worker's filling a complaint before the competent administrative bodies.

4.2. ESS2 and the Palestinian national Labor law⁶

The Palestinian Labor Law applies to direct workers, contracted workers, and primary supply workers who are employed on full-time basis. Terms and conditions of direct/contracted workers hired on part-time basis are determined in their individual employment contracts.

The following are key gaps between ESS2 and the Palestinian national Labor law include:

The West Bank and Gaza, as designated occupied territories, are unable to be a member of the ILO, and as such they have not ratified any ILO Conventions. Not all labor laws are fully aligned with ESS2. Important areas for consideration relate to:

- **Forced labor:** Forced, involuntary, bonded labor etc. are not addressed by the Labor Law No. 7 of 2000. There is no specific provision in national legislation punishing the exaction of forced labor.
- **Discrimination:** Gender discrimination in the different aspects of the employment relationship, including in recruitment, promotion and terms and conditions of employment, is not expressly prohibited. Discrimination to a number of personal characteristics is not expressly prohibited under the Labor Code, including race, political belief, language, sexual orientation or gender identity. Sexual harassment is not expressly prohibited by law.
- **Contracted and primary supply labor:** National law does not contain specific requirements on the use of contracted labor or on the use of primary supply labor. An essential mitigation measure to address the gaps in the Palestinian National Labor law regarding labor dispute issues and to provide the workers with a non-judicial procedure, the project has established a Workers' Grievance Mechanism that is described under this LMP.

5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY (OHS)

5.1. National OHS Legislations

In terms of Occupational Health and Safety, articles 90, 91, and 92 set the OHS requirements that the employer must respect and a commitment to the regulations related to OHS issued based on the Labor Law.

The following provides a summary of the PLL, Cabinet of Ministers' Decrees, and Labor Ministerial Decisions on OHS, and Law No. (3) of 2019 on OHS inspectors and committees in work facilities.;

- Decree No.15 contains articles on the maintenance of areas and equipment used by workers and ensuring their cleanness, as well as providing adequate and sufficient drinking water and the requirements of supply and storage, article 15 also includes requirements on providing separate washrooms for men and women, maintaining their hygiene and specifies that washrooms should be provided one for each 15 male worker and 12 female worker, in addition to other design, accessibility, and servicing requirements. Article 15 includes provisions on providing dining areas and locker rooms and their specifications.
- Decision of Council of Ministers No. (22) of 2003 relates to Initial medical examinations of workers, where it requires hiring workers after conducting a preliminary medical exam, it includes specifications for these exams considering their occupation, gender, age and other aspects. The

⁶ World Bank ESS2 Country Briefing- West Bank & Gaza, ERGON, August 2020.

F4J III – Labor Management Procedures

Decision includes types of exams based on their occupation (e.g., hearing test for workers exposed to noise, and stool and mouth sampling for workers involved in food industries).

- Decision of Council of Ministers No. (24) of 2003 relates to conducting periodic medical check-ups for workers at least once every 6 months for specific industries and once annually for other specified industries. For workers not mentioned in either one before, periodic check-ups are conducted every two years.
- Decision of Council of Ministers No. (17) of 2003 contains provisions on the requirements of having first aid equipment and kits on facility. It provides accessibility requirements and content minimum requirements as well as labelling and responsibility demarcation for refurnishing and ensuring knowledge of use.
- The Decision of the Council of Ministers No. (49) of 2004 concerning the preventive list of work hazards and career diseases and work accidents. Which contains provisions on the protection of workers' health, providing needed PPEs, training workers on occupational risks and safety measures and designates inspection authority to MoL. The decree provides specifications and requirements for OHS on usage and installation of equipment and machinery as well as their operation. It further includes requirements on temperature of the workplace, ventilation, radiation, noise and vibrations and electricity. The decision is very extensive and provides technical requirements on ventilation requirements, control of fumes and gases including volume of clean air circulation per person as well as the ventilation speed among other technical requirements for air, noise, radiation, and electricity. The decision includes other provisions on labelling of chemicals, their handling, management, and storage as well as other aspects related to chemical use and OHS. Additionally, it contains provision on protection from biological hazards, including mitigation measures such as vaccination, and technical safety measures. The decision deals with waste storage, collection, management and disposal in relation to OHS.
- The Decision of the Council of Ministers No. (21) of 2003 on buildings' safety. This includes measures to ensure safety of buildings and mitigating risks related to workers OHS relevant to falls, distance from inhabited areas, machinery usage, noise and aspects related to design and planning of buildings and facilities.
- The Decision of Minister of Labor No. (1) of 2004 on hazardous occupations in which children under the age of 18 are prohibited to be employed. These include hazardous industries and activities which could affect the health, safety, and wellbeing of children.
- The Decision of the Council of Ministers No. (47) of 2004 related to occupational diseases and occupational injuries, which includes reporting requirements to MoL as well as notification timeline depending on specified cases in the decision. It also provides periodic reporting requirements with statistics related to each facility on occupational diseases and injuries and provides a standardized reporting form.
- Instructions by the Minister of Labor no. (1) of 2005 concerning the precautions to protect workers in construction sites. Which includes safety measures and equipment use related to different aspects in construction sites such as scaffolding, ladder use, inspection of equipment, walking boards, fencing, fall protection equipment, helmets and other PPEs. In addition to measures on lighting, noise, electrical hazards and others.
Instructions by the Minister of Labor no. 2-6 of 2005, define the range of chemical exposure limits and standards, exposure to ionizing radiation, noise, and safe levels of brightness of light and temperature at the workplaces.
- Law No. (3) of 2019 on OHS inspectors and committees in work facilities. This law aims to enhance internal commitment and inspection of facilities to OHS measures and ensuring safe working environments as well as limiting the occurrence of occupational injuries and sicknesses and ensuring the availability of OHS requirements per the PLL. This law includes the accreditation of safety

F4J III – Labor Management Procedures

supervisors and the instatement of safety committee. Where facilities shall appoint OHS supervisors that are either accredited or will be accredited by the Ministry. The law provides the availability requirements and hours of OHS supervisors on site as well as the accreditation process of OHS supervisors, including their training requirements and certification. The law specifies the roles and duties of safety supervisors. As well as the assignment of OHS committees for facilities that have over 40 workers.

The Palestinian Labor Law No. 07 of 2000, the Council of Ministers Act 4, 2021, bylaw No. (10) for the year 2021 provide provisions on OHS and applies to all workers, as well as Law No. (3) of 2019 on OHS inspectors and committees in work facilities. The OHS measures will take into account the General Environmental Health and Safety Guidelines (EHSGs) and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP).

The integration of the World Bank General EHSGs and industry-specific EHSGs⁷ aims to provide a wide and comprehensive coverage of labor and OHS topics for the project, where General EHSGs provide a foundational framework applicable across various sectors, while industry-specific EHSGs address the unique hazards and challenges specific to certain industries, ensuring that no sector is overlooked. As such, the EHSGs also aim to cover gaps relevant to labor rights and working conditions, that in instances are industry-specific, in the existing Palestinian laws and legislations aforementioned.

Furthermore, Industry-specific EHSGs adds legal clarity, making it easier for the PIA, employers, and employees to understand and comply with safety regulations tailored to their sector. This clarity reduces ambiguity resulting from having laws and regulations that are general, and promotes better adherence to safety standards.

The following points among others set out in ESS2 will be ensured. These measures aim to address labor rights and working conditions, including OHS, in different phases of supported activities and subprojects (i.e., Design/ Pre-Construction Stage, construction / installation stage, operational stage, and PIA monitoring post-operations):

I. Design / Pre-Construction Stage:

- All potential risks to project workers' health and safety will be identified by all parties who employ workers and develop and implement procedures to establish and maintain a safe working environment, including workplaces, machinery, equipment and processes under their control.
- For subprojects with anticipated substantial OHS risks, the E&S management tools (e.g., E&S audits, CAP, ESMP, and ESIA) and the standard procurement documents (SPD) will entail requesting subproject proponents, contractors, and service providers to prepare a detailed OHS plan for their correspondent contracts including risk assessment, mitigation measures, method statements, training, and system of monitoring and reporting in accordance with WBG EHS Guidelines.
- Industrial facilities shall have at least an OHS policy or an OHS plan as well as emergency preparedness response plan for the operation of the facility in accordance with national laws and the WB industry specific EHS Guidelines.
- OHS measures and working conditions shall be an integral part of the design stage of the project, including developing sufficient facilities to ensure adequate health and safety in the workplace.

II. Construction/ Installation Stage:

⁷ The following IFC website contains General and Industry Specific EHSGs:
<https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines>

F4J III – Labor Management Procedures

- OHS officers shall be present from the contractors' team during construction works in line with the Palestinian Labor Law and the OHS guidelines in construction projects issued by MoL and Engineers Union.
- Appropriate protective measures will be provided. These measures include providing adequate PPE at no cost to the Project workers;

III. Operational Stage

- OHS Officers shall be present at supported industrial facilities according to Law No. (3) of 2019 on OHS inspectors and committees in work facilities. For smaller companies, presence of OHS focal point would suffice.
- Appropriate protective measures will be provided. These measures include providing adequate PPE at no cost to the Project workers;
- The ESO will receive an advanced OHS training along with the project's E&S focal points. While subproject proponents' workers (contracted workers) will receive OHS trainings to be given by specialized OHS consultant will cover the relevant aspects of OHS associated with daily work, including the ability to stop work without imminent danger and respond to emergency situations. The indicative training requirements and budget is highlighted in the project's ESMF. Training records will be kept on file. These records will include a description of the training, the number of hours of training provided, training attendance records, and results of evaluations;
- Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest.

IV. PIA Monitoring / Post- Operations:

- Service providers, contractors and subproject proponents will develop and implement reporting systems for any accidents, diseases, incidents, and near-miss situations. Every accident will be reported to the PIA, investigated and relevant measures will be designed to avoid the accident in the future. Also remedies for adverse impacts such as occupational injuries, disabilities and diseases will be provided. Any incident or accident shall be notified immediately by the involved parties, and the PIA shall notify the Bank after occurrence.

The Palestinian Labor Law does not include provisions of contractor's grievance mechanism for contracted workers. This can be considered as a gap between Palestinian Labor Law and ESS2. As per the standard procurement document; the contractor will develop and implement grievance mechanism through which workers are able communicate their complaints to the employer/contractor. The GM is further discussed in this document (see section II).

Furthermore, and despite MoL's efforts to update the laws and regulations related to OHS, especially with the issuance of the new Law No.3 of 2019 on OHS supervisors and committees at the workplace, other regulations and legislations remain outdated and in need of update to ensure adequate coverage of OHS topics at different workplaces and industries. Additionally, while these laws are expected to be enforced, the enforcement is weak, where there are not enough inspectors and site visits conducted to verify adherence to the various laws and regulations, leading to a lack of accountability, and hence unsafe working conditions. Moreover, trainings on OHS and capacity building are not typically conducted unless at large scale institutions. So, the project should ensure the proper mitigations through separate LMP for each subproject and monitor the implementation.

5.2. World Bank Group’s Environment, Health, and Safety Guidelines

The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) and are referred to in the World Bank’s Environmental and Social Framework and in IFC’s Performance Standards.

The EHS Guidelines contain the performance levels and measures that are normally acceptable to the World Bank Group, and that is generally considered to be achievable in new facilities at reasonable costs by existing technology.

The EHSGs both the General and Industry-specific include an identification of common OHS risks relevant to the subproject’s sector as well as recommended mitigation measures and guidelines. As the F4J III Project under its ICF component will potentially finance investment sub-projects in various industries, it cannot be determined at this stage which of the EHSGs will be applicable to the project and the respective sub-projects. As such, a detailed assessment of each sub-project will be carried out during sub-project preparation and relevant industry EHSGs will be considered when identifying labor risks including OHS. Nevertheless, all sub-projects will consider the General EHS Guidelines, which contain information on community and occupational health and safety issues potentially applicable to all industry sectors. This document should be used together with the relevant Industry Sector Guideline(s).

Further information on General and industry-specific EHSGs is available through the following link: <https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines>

6. RESPONSIBLE STAFF

F4J III will be implemented by the PIA, which is a private firm that will be contracted by the Borrower (MoF). The MoF will continue to provide strategic oversight to the project, and engage with key reform agendas. The ministry of Finance approves the budget and workplan for the project on annual basis, additionally, the MoF provides the support needed to facilitate project activities such as announcements, engagement and others, they also review and receive progress reports on quarterly and annual basis.

The PIA will hire an ESO, who will be responsible for the overall implementation of this LMP, as well as reporting back to the Bank, including incident reporting. On the other hand, the overall responsibility for the enforcement of the PLL and national labor legislations is the Ministry of Labor’s. According to the PLL, the overall responsibility on labor aspects and enforcement of the labor law lies on the Palestinian Ministry of Labor, where the PLL has instated a Labor Inspection Commission whose duties are to follow up on the enforcement of the provisions of the PLL and the regulations issued according to it. The commission comprises of qualified inspectors at the offices of the MoL at each governorate who regularly visit establishments, business, and factories to inspect working conditions, environment, and arrangements. In accordance with MoL’s official hierarchy, labor inspection is under the General Directorate of Inspection and Labor Protection.

For component I, F4J Consulting (a private firm) will have the overall responsibility of the management of the DIB component, this firm will follow the instructions of the PIA's ESO for proper implementation of LMP and will assign qualified personnel to act as the E&S focal point. Also, F4J Consulting will be responsible to monitor and report about the commitment of the service providers including incident reporting and the training institutions regarding the LMP.

For Component 2, PIA staff mainly the ESO, will be responsible to assess and identify potential OHS and labor risks for each subproject under ICF, and to cooperate with the E&S consultants, E&S focal points, or OHS officers at the subprojects’ level to implement the provisions of the LMP for each subproject.

Table 2: Demarcation of Responsibilities for the Implementation of the LMP

<p><u>The main responsibilities of the ESO:</u></p>	<p><u>The main responsibilities of service providers / Subproject Proponents under DIB or ICF:</u></p>
<p>Make sure that this LMP and its provisions are being applied to all project workers.</p>	<p>Appoint qualified E&S focal points to implement this LMP, OHS plans, and to manage subcontractor performance.</p>
<p>Liaise with Gaza E&S focal point, DIB E&S focal point, and E&S focal points at subprojects' level to implement the provisions of the LMP.</p>	<p>Adopt the LMP as well as labor rights, working conditions, and OHS provisions, and OHS plans (where applicable per the E&S results and the site-specific E&S management tools), which will apply to contracted and subcontracted workers. These procedures and plans will be submitted to the project's ESO for review and approval before the contractors mobilize the works at the subprojects.</p>
<p>Ensure that service providers, subproject proponents, and contractors under DIB and ICF will be responsible to adopt and implement this LMP and to implement OHS mitigation measures as per the result of the E&S screening for each activity / subproject through the site-specific E&S management tools (e.g., ESMPs, ESAs, and OHS management plans). And that such tools include the provisions required per the LMP.</p>	<p>Subproject proponents will supervise the implementation of their contractors / suppliers of the LMP to their respective workers.</p>
<p>Monitor that the service providers, subproject proponents, and contractors under DIB and ICF are meeting obligations towards contracted and sub-contracted workers in line with ESS2 and the PLL.</p>	<p>Maintain records of recruitment and employment process of contracted workers.</p>
<p>Monitor that OHS standards and mitigation measures are being implemented and met in line with national requirements, ESS2, EHSGs, and GIIPs.</p>	<p>Communicate clear job descriptions and employment conditions to contracted workers.</p>
<p>Conduct and liaise trainings on labor rights, working conditions, and OHS to the project's direct and contracted workers in line with the ESMF and the LMP.</p>	<p>Develop and implement Workers' GM and address the grievances received from contracted workers. Service providers and subproject proponents shall report to the ESO regarding their Workers' GM;</p>
<p>Monitor the implementation of GBV (SEA / SH) mitigation measures as well as the inclusion of GBV referral pathways in the Workers' GM, inclusion of</p>	<p>Integrate GBV (SEA / SH) referral pathways in the site-specific Workers' GM, include GBV issues in training and awareness sessions, and</p>

F4J III – Labor Management Procedures

GBV in CoCs, and inclusion of gender equality, GBV prevention and other mitigation measures as stated in the LMP and the F4J III instruments in stakeholder engagement activities and trainings	include GBV prevention in the site-specific CoC.
Ensure that primary suppliers are implementing the relevant provisions of the LMP in relation to primary supply workers in accordance with ESS2.	Provide OHS trainings and E&S orientation sessions on labor rights and working conditions in coordination with the ESO.
Ensure that the Workers' GM for each subproject is established and effective. The ESO should monitor its implementation.	Ensure that all contracted workers understand and sign the CoC prior to the initiation of the work
Monitor the circulation and signature of the workers' CoC.	
Provide periodic reporting to the Bank in line with the ESCP summarizing performance of implementing the LMP.	
incident reporting to the World Bank and conducting the investigation and report on the agreed action plan in line with the ESCP.	Report to the ESO any occurrences of incidents in line with the agreed upon timeframe and in line with the project's ESCP and site-specific management instruments and tools.

7. POLICIES AND PROCEDURES

F4J III applies the PLL (No. 7 of 2000), the Council of Ministers Act No. 4, 2021 and other national labor regulations and policies, ESS2, EHSGs, and GIIPs relevant to labor rights and working conditions, including OHS. These Laws, legislations, and standards will apply to all project workers. This section aims to set out the mitigation measures that will be adopted by the project to address the risks mentioned in section 4.

Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination 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. All service providers and subproject proponents are encouraged to take a sensitive approach and make reasonable accommodation to make it possible for persons with disabilities to take part in the project. All workers are entitled to fair treatment and protection from harassment and sexual harassment and abuse at work.

7.1. Occupational Health and Safety

Pursuant to the relevant provisions of the PLL, Cabinet and Ministerial Decision on OHS as detailed in section 6, ESS2, EHSGs, the Project's ESMF, and the World Bank's SPDs, the obligations of the project in relation to OHS include the following:

F4J III – Labor Management Procedures

- Ensure that service providers and subproject proponents manage their work in a way that project workers and the surrounding community within the project's area of influence are properly protected against possible OHS risks.
- Compliance with all national associated legislation (PLL and MoH procedures for OHS) as well as relevant OHS measures detailed in the World Bank's General and Industry-Specific EHSs.
- Compliance with the ESSs of the World Bank and the project's ESMF.
- Protection of the health and safety of all project workers.
- Update the LMP as necessary to ensure that all recent findings are incorporated.
- Ensure that Proper housekeeping, appropriate footwear, and clear signage are implemented and available on site to prevent OHS injuries such as slips and falls.
- Conduct proper training on electrical safety practices, lockout/tagout procedures, and the use of personal protective equipment (PPE).
- Ensure the existence of proper ventilation, personal protective equipment, and safe handling procedures for when transporting or using chemical material where unsafe usage and handling can lead to respiratory problems, skin irritation, or long-term health effects.
- Ensure the integration of Proper fall protection systems, training on working at heights, and adherence to safety regulations.
- Ensure proper engineering controls, use of hearing protection, and monitoring to mitigate noise and vibrations risks.
- For nursing and health trainings, it is important to prioritize OHS during designing and preparing the nursing and health training programs, by incorporating safety training, infection control measures, and appropriate use of PPE into the curriculum. Providing adequate supervision, ensuring proper maintenance of equipment and facilities, and promoting a culture of safety are essential in such trainings.
- for ICT training programs, it is important to prioritize OHS by integrating safety training, ergonomic assessments, and regular evaluation of the training environment. Providing adequate supervision, promoting healthy work practices, and addressing potential risks proactively can ensure a safe and productive training environment.
- In agricultural and agribusiness' subprojects, proponents should implement safety measures, including comprehensive training programs, proper maintenance of machinery and equipment, regular risk assessments, the use of PPEs, and the promotion of a safety culture among workers. Compliance with local health and safety regulations and seeking professional advice can further enhance workplace safety in agriculture.
- In food processing subprojects, proponents should implement comprehensive safety programs, including risk assessments, employee training, regular equipment maintenance, and the use of PPEs. Compliance with relevant safety regulations, adherence to Good International Industry Practices (GIIPs), and proper hygiene protocols are essential to ensure the safety and well-being of workers in food processing facilities.
- In light manufacturing subprojects, proponents should implement comprehensive safety programs, including risk assessments, employee training, regular equipment maintenance, and the use of PPEs. Compliance with relevant safety regulations, regular inspections, and continuous monitoring of working conditions can help ensure a safe and healthy work environment for manufacturing workers. Manufacturing facilities should have proper emergency preparedness plans in place to address potential accidents, fires, or other emergencies. This includes evacuation plans, fire suppression systems, and training programs to ensure workers are aware of emergency procedures.

F4J III – Labor Management Procedures

- In Greentech subprojects, it is important to provide comprehensive training programs, ensure compliance with relevant safety regulations, and promote a safety culture among workers. Additionally, regular inspections, proper maintenance of equipment, and continuous monitoring of working conditions are vital to ensure a safe and healthy work environment. Greentech subprojects should have proper emergency preparedness plans in place, including procedures for dealing with electrical emergencies, fires, chemical spills, or other incidents. Adequate training, communication systems, and emergency response protocols are crucial for worker safety.
- To mitigate OHS risks in pharmaceutical subprojects, it is important to conduct thorough risk assessments, implement safety programs, provide comprehensive training, and ensure compliance with relevant safety regulations and quality standards (GIIPs). Regular inspections, proper maintenance of equipment, and continuous monitoring of working conditions are vital to ensure a safe and healthy work environment in pharmaceutical manufacturing.
- To mitigate OHS risks in the expansion / installation phase of subprojects' development, a comprehensive risk assessment should be undertaken before starting this phase of any subproject, particularly during the pre-construction (design) phase. Consecutively, there should be proper Identification of potential hazards, assessment of their severity and likelihood, and development of adequate site-specific E&S management tools and methods (e.g., E&S Audits, Corrective Action Plans, ESMPs, and ESIAs). These tools should provide adequate training and awareness to all workers on OHS practices and procedures, ensuring that appropriate PPEs are provided to workers based on the specific hazards they may encounter. Additionally, measures should be Implemented for fall prevention measures such as guardrails, safety nets, and personal fall arrest systems (PFAS) to protect workers. Regular inspections of scaffolding, ladders, and other elevated work platforms to ensure their safety and stability should be continuously implemented and records of inspections should be documented. A log should be created of equipment and machinery maintenance schedules, and a log of incidents, accidents, and near-miss situations should be developed and recorded.
- For the management component of the project (i.e., Component 3), project workers should be provided with an orientation and overview of potential OHS risks at the workplace. The ESO should ensure safe work environment and equipment. Collectively, the PIA should promote a safety culture, healthy work environment and compliance with relevant national regulations as well as ESS2.

Key elements of OHS measures should include (a) identification of potential hazards to workers; (b) provision of preventive and protective measures; (c) training of workers and maintenance of training records; (d) documentation and reporting of occupational accidents and incidents; (e) emergency preparedness; and (f) remedies for occupational injuries and fatalities.

Employees at all levels have the authority to stop any activity they consider to be a danger to themselves or other workers, the public or the environment, and there will be no reprisal for it.

7.2. Gender Based Violence (GBV) including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

The PIA, F4J Consulting, Service Providers, and subproject proponents, as well as any involved contractors, and primary suppliers will maintain labor relations with local communities through a code of conduct (CoC). The CoC commits all persons engaged by any stakeholder, including sub-contractors and suppliers, to acceptable standards of behavior. The CoC shall include sanctions for noncompliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual

harassment (e.g., termination). The CoC shall be written in Arabic in a reader-friendly style and signed by each worker to indicate that they have:

- i. received a copy of the CoC as part of their contract;
- ii. had the CoC explained to them as part of induction process;
- iii. acknowledged that adherence to this CoC is a mandatory condition of employment;
- iv. understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people.

Additionally, the project's public and workers' GM will include adequate uptake mechanisms and effective resolution schemes in addition to referral mechanisms for GBV grievances that guarantee survivor's confidentiality and anonymity in line with ESS2, ESS4, and ESS10.

7.3. Labor Disputes over Terms and Conditions of Employment

To avoid labor disputes, fair terms and conditions will be applied for project workers. The project will have GMs for direct workers. Service providers and subproject proponents will be required to have a GM for contracted workers, to promptly address their workplace grievances. Furthermore, the project will respect the project workers' right of labor unions and freedom of association.

Particularly;

- All workers will be provided with contracts with clear terms as per the Palestinian Labor law including information regarding their terms and conditions of employment including hours of work, wages, overtime, compensation and benefits, holidays, leaves, etc.
- Service providers, subproject proponents, contractors, and consulting firms shall provide the PIA with a list of contracted workers to be employed by them, with evidence of employment including contract.
- As per the provisions of the employment, all contracted workers will be above the legal age determined by the PLL and Ministerial Decisions related to hazardous occupations where the labor of minors (above the age of 15 and under 18) is not permitted. Proof of age (e.g., IDs) will be provided to the PIA.
- Maximum working hours for workers will be in accordance with Palestinian Labor Law.

7.4. Discrimination and Exclusion of Vulnerable/Disadvantaged Groups

The employment of project workers under the F4J III project 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, terms of employment (including wages and benefits), termination and access to trainings. The project will comply with the PLL and Ministerial Decrees on provisions of maternity leaves, nursing breaks, sufficient and suitable toilets and washing facilities, among others. Service providers and subproject proponents will be also required to enable safety in the workplace to address potential sexual exploitation, abuse or harassment in recruitment, and potential discrimination along vulnerable and disadvantaged groups under the project.

8. AGE OF EMPLOYMENT

In accordance with the Palestinian Labor Law No. 7 of 2000, article No. 93; and ESS2 requirements, a child under the age of 18 will not be employed or engaged in connection with the F4J III components. Exemptions are related to minors between the ages of 15-18 where for specified sectors and industries in line with the Minister of Labor Decision No.1 of 2004 are allowed to be engaged in and in accordance with Cabinet of Ministers' Decision No.167 of 2004 on the conditions and system of work for minors (15-18), which regulates working hours, durations, requirements prior to employment, wages, and other conditions. Similarly, ESS2 (para 19) sets out further conditions on the minimum age, stating that a child over the minimum age and under the age of 18 will not be employed or engaged in connection with the Bank-financed project in a manner that is likely to hazardous or interfere with the child's education or be harmful to the child's health or physical, mental and any other relevant development.

A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions:

- a. The work does not fall within paragraph 19 of ESS2⁸.
- b. An appropriate risk assessment is conducted prior to work commencement.
- c. The subproject proponents conduct regular monitoring of health, working conditions, hours of work and the other requirements of ESS2 and national legislations.

To verify the age of the workers, all subproject proponents will be asked to show verify IDs of the contracted workers that also include any contractors or subcontractors workers employed by the subproject proponent, that are acceptable in local laws. Subproject proponents shall keep the records/documents which will be checked on sites by the project ESO. Subproject proponents shall declare to the ESO and PIA if they employ any minors under the age of 18 given that they are not violating the terms and conditions laid out allowing minors' work per Minister of Labor Decision No. 1 of 2004, and Cabinet of Ministers' Decree No.167 of 2004.

If illegal underage workers are found working on the project, the following actions will be undertaken:

- Termination of the contract and services agreement immediately.
- Terminate the employment or engagement of the child in a responsible manner.
- Contact the child's custodian and refer the child to other support services including the Ministry of Social Development and the Ministry of Education.
- Leverage the services of non-government and Community Based Organizations to assist the child.
- Consider employing another adult member of the family, if the child's family is determined to be vulnerable or in dire circumstances.

⁸ ESS2, Paragraph 19: "A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous,13 interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral, or social development."

Where ESS2 defines work hazardous work for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work: (a) with exposure to physical, psychological, or sexual abuse; (b) underground, underwater, or working at heights or in confined spaces; (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise, or vibration damaging to health; or (e) under difficult conditions such as working for long hours, during the night, or in confinement on the premises of the employer.

9. TERMS AND CONDITIONS

The terms and conditions applying to direct workers of the PIA and F4J Consulting will adhere to their HR regulations and the respective institutions terms and conditions of employment, that are in-line with national legislation and the requirements of ESS2. Part-time employees and consultants' terms and conditions of employment will be determined by their individual contracts. All recruitment processes shall be well documented and filed, wages to be paid in due time and in respect of the minimum wage act, working hours to be in line with the PLL, as well as leaves, breaks, and overtime to be compensated accordingly, all terms and conditions of full-time employment to adhere to the PLL's terms of conditions as a minimum as described in section 5.

For direct and contracted workers, the following measures will be developed and will be monitored by the PIA to ensure fair treatment of all workers:

- The recruitment procedures will be transparent, public and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, and gender.
- Clear job descriptions will be provided in advance of recruitment under the project's three components and will explain the skills required for each post.
- The health conditions of the workers will be assessed prior to engaging in accordance with national legislations.
- All workers will have written contracts describing terms and conditions of work, including hours of work, wages, overtime, compensation and benefits, holidays, leaves, etc. The contents of the contracts will be explained to workers.
- Maximum working hours for workers will not exceed 45 hours a week, unless otherwise stated in their employment contract and in accordance with the Palestinian Labor Law.
- All project workers will be provided with insurance against labor incidents.
- All workers will be entitled to breaks from work of one-hour meal break each workday taking into consideration that the worker shall not work for more than five consecutive hours. The duration of rest between working days is two days on Friday and Saturday. They will also be provided with the entitled leaves under the Labor Law.
- Employees will be informed at least one month before their expected release date of the coming termination.
- The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by contractor.
- The contracts will be developed in Arabic language or in English Language for direct workers if both parties agree to;
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulties with understanding the documentation.
- The contracts under the project components, should ensure that the workers are above the age of 18 years.
- An internal transparent and accountable system will be established within the contractors to tackle issues of SEA/SH. Details of this system will be shared with PIA prior to signing any contracts.
- Adherence to the Government and WHO protocols guidelines related to communicable diseases.
- The existence and accessibility to an effective and transparent Workers' GM with adequate uptake channels and procedures for anonymous complaints, and GBV referral pathways in line with ESS2.

Service providers and subproject proponents bidding for work / grants under DIB and ICF, will have to demonstrate capability to manage OHS risks, labor rights, and working conditions and to be able to provide corresponding documentation.

Both service providers and subproject proponents shall use the CoC for all sub-projects and activities. The CoC shall be explained/oriented and know the details of CoC for each worker who will be requested to sign it. The CoC shall be written in Arabic CoC and provisions related to SEA/SH will be incorporated into the CoC. A sample Project CoC can be found in Annex I.

10. GRIEVANCE MECHANISM (GM)

A grievance is a concern or complaint raised by an individual or group affected by F4J III subprojects/activities. Both concerns and complaints can result from either real or perceived impacts of operations and may be filed in the same manner and handled with the same procedure.

The PIA which is responsible for working with related institutions to implement the project activities, has established a GM to provide stakeholders with a transparent, effective, and timely mechanism to provide feedback and voice their concerns. This GM has different channels to receive the complaints from the different types of stakeholders. The PIA advises people on their rights and GM process before and during the project implementation.

The project's GM manual has been updated in November 2020 to include complaints' filing measures to minimize risk of exposure to COVID-19, channels for accepting GBV and Sexual Harassment (SH) complaints and anonymous complaints. The F4J GM can be accessed through the following link: <https://www.f4j.ps/publish/38>.

Currently, the PIA's communication officer is responsible for managing the GM. The GM may still undergo further updates depending on the requirements under ESS10 as the F4J III project is the first one in the SOP to implement the newly adopted ESF. Any updates will be communicated to stakeholders during engagement activities and will be announced on the website and media streams.

During the last phase of F4J project, PIA has communicated the complaints procedure manual and templates with the beneficiary of the ICF and the potential investment beneficiaries. The ICF beneficiary has created GM systems on the sub-project level using the manual and templates provided by the PIA and appointed a focal point/person to monitor and report on GRM. In F4J III, PIA will ensure that each subproject will include a GM system with accessible channels and effective procedures, to be linked with their parent GM system. Additionally, through the stakeholder engagement and consultation activities undertaken for the preparation of the F4J III, which namely included stakeholder engagement sessions for the ESMF, and SEP in relation to vulnerable and marginalized groups, the project's GM was discussed and communicated to the stakeholders. Through the engagement undertaken for the preparation of this LMP, the project's workers' GM was also disclosed and discussed.

The GM system shall include additional codes and procedure to manage anonymous related grievances. Channels to accept and respond to anonymous grievances will be communicated to project affected parties during the consultation meetings and throughout project implementation.

Anonymous complaints should provide factual details and specific allegations of misconduct or serious wrongdoing related to any of the project activities. The complaints Staff shall ask the complainant about the preferable way to inform him/her of the solution.

F4J III – Labor Management Procedures

A detailed description of the Project level GM is included in the SEP available through the following link: https://www.f4j.ps/cached_uploads/download/2023/04/17/f4j-iii-sep-final-version-1681731786.pdf. The PIA has assigned a GM telephone number, email address and website, the ESO, once hired, will communicate GM details to project affected parties during stakeholder engagement activities and through appropriate methods. The following uptake procedures and mechanisms will be available to the public to lodge any concern or grievances;

10.1. Workers' GM

The F4J III's GM is based on two parallel mechanisms, the first is a community level GM that handles the registration, uptake, verification, resolution, and closure of the public's grievances against the project. The second is with respect to the project's workers. For the direct workers, the project has an existing Workers' GM that governs and provides mechanisms for handling the project's direct workers complaints and grievances, as for contracted workers, service providers and subproject proponents under the DIB and ICF of F4J III will be required to furnish a contracted workers' GM based on the project's Workers' GM Manual to be prepared and disclosed. As such, a new Workers' GM is to be prepared prior to engaging project workers and thereafter to be maintained and operated throughout the F4J III Project implementation.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. Additionally, the Workers' GM will be updated to be in line with the ESF and the ESSs as the F4J III is the first project within the SOP to adopt the ESF. Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed. PIA will monitor the service providers and subproject proponents' recording and resolution of grievances, and report these to MoF and to the Bank in their progress reports.

The following procedures are expected to be followed through the implementation of the F4J III, in terms of workers' GM.

10.1.1. GM Process

The grievance, in order to be filed, should be related to the project components and/or to its implementation and management. Each Service Provider / Subproject proponent will assign a focal point for the management and uptake of their Workers' GM. These focal points shall establish workers' GM at their firm / business's level in line with the project workers' GM manual and should include information on their grievance matrices in the periodic reports to be submitted.

10.1.2. Receipt of Grievances

Direct workers and contracted workers can submit their grievances through the Workers' GM. At service providers / subproject's level, GM focal points shall notify the ESO of the receipt of workers grievances within 1 business day of their receipt.

- The complainant should submit full details and any relevant supporting documents related to their complaint.
- Anonymous complaints are allowed in the Workers' GM system, it will be handled according to the Workers' GM manual. Where the Workers GM manual will include procedures for the uptake and processing of anonymous complaints.
- Direct workers' grievances are submitted through different communication channels:

- **Electronically** by filling out the complaint form and attaching all the related supporting documents to the following link: <http://www.f4j.ps/publish/38>
 - **Verbally** by calling the F4J Office at +970 2 296 4840 to file a complaint with the F4J's Communications Officer. The uptake will later on be by the ESO once hired.
 - **In person** by visiting the F4J offices in Ramallah and/or Gaza where complainants can complete the complaint form and sign it in person.
 - **Social Media by sending messages to the project's Facebook page:** <https://www.facebook.com/F4Jproject>.
- For contracted workers of subprojects supported under the ICF, the uptake mechanisms will be determined at a later stage and adequate and effective uptake channels (phone number, email, webpage, etc.) will be determined once the subprojects have been selected and identified, where site-specific channels will be selected and disclosed.

10.1.3. Contact Person to Respond to Complaints

For Direct workers, the ESO will be the focal point to receive, register, refer and examine complaints and grievances. However, at subproject and activity levels, it will be the service provider / subproject proponent's responsibility through their GM focal points to assess and resolve complaints in accordance with the procedures stated in the project's Workers' GM and to report on grievances received through periodic reporting. Reports should only include basic information such as the number of grievances, gender, description of case, status of case, resolution mechanism, without the need to submit personal identifying information unless requested to and if anonymity was not requested.

Timely Response: PIA / service providers / subproject proponents will send an initial response, that acknowledges receipt of the complaint within 3 working days. and a final response will be provided within two working weeks after receiving the complaint. Where the complaint is unlikely to be resolved within the estimated duration, the receiving party must promptly contact the complainant to request additional time and explain the delay. If the complaint is not resolved, receiving party if not the PIA will refer the complaint to the ESO to liaise on its resolution.

Then the receiving party will follow the steps below:

- Verify the validity of the information and documents enclosed.
- Ask the complainant to provide further information if necessary.
- Refer the complaint to the relevant party depending on the nature of the complaint (e.g., to the subproject proponent if its relevant to a subproject under the ICF, or to F4J Consulting and service provider if relevant to a training under the DIB) .
- The receiving party shall register the decision and actions taken in the GRM log/database.

10.1.4. Notifying the complainant and closing the complaint

Notifying the complainant

The receiving party will notify the complainant of the decision/solution/action immediately either in writing, or by calling or sending the complainant a text message. When providing a response to the complainant, the receiving party must include the following information:

- A summary of issues raised in the initial complaint;
- Reason for the decision.

In case of anonymous insensitive complaints, the receiving party will find a suitable way to announce about the solution as a lesson learned during the regular consultation sessions.

Closing the complaint

A complaint will be closed in the following cases:

- Where the decision/solution of complaint is accepted by the complainant.
- The complaint that is not related to the project or any of its components.
- The complaint that is being heard by the judiciary.
- A malicious complaint.

10.1.5. Additional Dispute Resolution Schemes

Where the complainant is not satisfied with the outcome of his/her complaint, the following escalation procedures shall be considered, noting that complainants shall be made aware the earliest of their right to resort to the judiciary:

Internal Dispute Resolution Scheme

- If the complainant is not satisfied with the resolution, the ESO shall review the complaint and the complainant may readdress the issue with the PIA's Director and request further review or consideration.
- Where the complainants are not satisfied with the resolution provided by the PIA's Director, the ESO shall advise the complainant to readdress the issue with the MoF, the ESO and Project Director shall assist the complainant in submitting their complaint to the MoF.

External Dispute Resolution Scheme

In case the complainants are not satisfied with the internal procedures for handling complaints, the outcomes of the complaints or for any unhandled complaints, the ESO shall provide information on the complainant's right to refer their complaint to any external dispute resolution party including the judiciary and arbitration.

10.1.6. Complaints Log

The complaints received will be recorded in a log, which details information such as:

- The date the complaint was received,
- the date on which the complaint was responded to,
- reason for the complaint,
- how the complaint was resolved,
- when it was resolved, etc.

10.2. Gender Based Violence (GBV) complaints

Due to the high sensitivity of SEA/SH/GBV, the project's GRM will ensure confidentiality and survivor centered approach for SEA/SH grievances. Information about the existence of the GBV grievance mechanism and of channels to accept and respond to anonymous grievances will be communicated to all stakeholders, including project workers throughout project implementation.

To ensure the confidentiality and privacy for such complaints there will be a separate mechanism to deal with the submitted complaints, and this mechanism will be managed by PIA only, according to the following procedures:

10.2.1. Receiving the GBV complaints

As soon as PIA receives any complaint related to GBV or sexual harassment, via any complaint channel or through being notified by service providers and subproject proponents. The complaint will be registered using separate ID system and all the personal and contact details of the complainant will be encrypted.

Depending on the complaint and the referral and support needed, the project shall consult with the relevant parties in accordance with the GBV Service Directory⁹ of Palestine which includes contact information for health, psychosocial, legal, security and protection, as well as social and economic empowerment services. The directory is organized by West Bank governorates as well as one section for services in the Gaza Strip. This directory was prepared and developed by UNFPA and the GBV Sub-cluster and was updated by UN Women through the HAYA Joint Programme. Then, the most appropriate partner will be decided on and the mechanism referring GBV grievances will be agreed with them. A dedicated focal point will also be allocated, and their details and referral mechanism will be detailed in the project's GM Manual.

10.2.2. GBV Grievances Referral

The ESO, upon the agreement of the survivor, will seek a GBV service provider based on the UNFPA GBV Service providers directory. The ESO shall ask the victim for their consent to be contacted for follow up to ensure that they are provided with the required support and services as required. A GBV accountability and Response Framework shall be developed for the project which shall include referral mechanism, confidentiality requirements, responsibility demarcation, notification procedures, and accountability protocols. The GBV accountability and response framework shall be developed by the PIA for the F4J III Project prior to any DIB activity and ICF selection of subprojects.

10.2.3. Closing GBV complaint

The GBV complaint would be closed regards the following conditions:

- If the case referred and registered at the gender referral agency case management system.
- If the complainant withdraws the complaint, before closing it the ESO, or the gender focal point if different, should ensure that there wasn't any pressure or threat on the case.
- This kind of complaints will be reported in the GM report without details, only the complaints numbers will be mentioned at the report, in addition to the number of cases referred to gender referral agencies.

10.3. GRM Reports

Workers' GM will be a part of the GM reports which will be prepared and disclosed every 6 months (semiannual reports) according to the ESS10. The report will include a separate section to highlight workers' GM, including most frequent cases, their causes, and information aiming to enhance the implementation of subprojects. The following indicators will be presented at these reports:

9

<https://palestine.unwomen.org/sites/default/files/Field%20Office%20Palestine/Attachments/Pages/2020/08/HAYA%20GBV%20Service%20DirectoryFinal.pdf>

F4J III – Labor Management Procedures

- 1- Number of received grievances, their type, and the used channel.
- 2- Number of solved complaints.
- 3- Number of unsolved complaints mentioning the reasons.
- 4- Evaluation results of the complaint system (analyses of the used questioners).
- 5- Number of the GBV/SEA/SH complaints.
- 6- The recommendations and lessons learned to enhance the GM.

10.4. World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaint directly to the Bank through the Bank's Grievance Redress Service (GRS):

(<http://projectsbeta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>).

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018,1818 H Street Northwest, Washington, DC 20433, USA

II. CONTRACTOR MANAGEMENT

F4J III will use the Bank's 2017 Standard Procurement Documents for solicitations and contracts which include labor and OHS requirements. For contracting the PIA, the MoF will be responsible to prepare the SPDs and ensure the inclusion of Labor rights and OHS requirements. Once the PIA is contracted, then it will be its responsibility to manage this role to the other contracts to implement DIB and ICF activities. The PIA through contracting under the DIB and ICF will make substantial efforts to ascertain that service providers and subproject proponents comply with the requirements under the LMP and national legislation, and as such, relevant requirements of the LMP to be included in the bidding documents.

The Project's environmental and social instruments; ESMF, SEP, and this LMP form and integral part of the bidding documents to be issued to under the DIB and Calls for the ICF, and shall also be part of the awarded contracts.

During the process of selecting service providers and awarding of subproject proponents who will engage contracted workers, the following information will be reviewed:

- Business licenses, registrations, permits, and approvals;
- Records of safety and health violations, and responses;
- Documents relating to a labor management system, including OHS issues;
- Workers' certifications/permits/training to perform required work;
- Accident and fatality records and notifications to authorities;
- Proof of workers' experience and enrolment in related projects;
- Worker payroll records, including hours worked and pay received;
- Enrolment of safety members and records of meetings; and
- Copies of previous contracts, showing inclusion of provisions and terms reflecting ESS2.

F4J III – Labor Management Procedures

Performance of service providers and subproject proponents in relation to contracted workers, focusing on compliance with their contractual agreements (obligations, representations, and warranties) will be managed and monitored by the MoF and PIA. Regular supervision check-ups will be conducted to ensure environmental and social compliance with the ESMF, SEP, LMP, and reports compiled by contractors. Contractor's labor management reports may include:

- A representative sample of employment contracts.
- Records relating to grievances received and their resolution.
- Reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions.
- Records relating to incidents of noncompliance with national law.
- Records of training provided for contracted workers to explain labor and working conditions and OHS guidelines and procedures.

12. PRIMARY SUPPLY WORKERS

It is expected that the primary suppliers to subprojects and activities are local suppliers and manufactures.

Primary suppliers shall be required to carry out due diligence procedure to identify if there are significant risks that the suppliers are exploiting child or forced Labor or exposing worker to serious safety issues.

In instances where foreign suppliers are likely to be contracted. the service provider / subproject proponent will be required to inquire during their procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety in addition, the service provider / subproject proponent will sign a letter indicating that they commit not to use child labor, and/or forced labor. The service provider / subproject proponent will inquire about this during the procurement process whether the supplier has been accused or sanctioned for any issues related to child and/or forced labor.

If there are any risks related to child and forced labor, and safety identified, the service provider / subproject proponent will notify PIA. PIA will prepare the procedures to address these risks and shall avoid contracting such suppliers, where possible

Annex I: Code of Conduct

مدونة قواعد السلوك وأخلاقيات العمل

مقدمة

يأتي الاهتمام بمواثيق سلوك وأخلاقيات العمل والتشغيل كأحد مداخل تطوير الاداء للعاملين وأصحاب العمل. إن إعداد مدونة قواعد السلوك وأخلاقيات العمل من شأنه تعزيز قيم والممارسات الايجابية في العمل، وتعد مدونة السلوك إطاراً عاماً يجب على العاملين في المشروع، سواء من العمال المباشرين او غير المباشرين، التقيد بها والعمل بمقتضاها، فهي مدونة تلقي الضوء على المعايير والأخلاق والقيم التي يجب أن يتحلى بها العامل أثناء أداء واجباته، ومن ثم فهي قواعد ستسهم على نحو فاعل في الارتقاء بمستوى جودة الاداء والارتقاء به. إن هذه المدونة تشكل جزءاً من مقتضيات العمل في المشروع، ويجب تطبيقها في كل اوقات العمل وطوال فترة التشغيل، وسوف يتم تزويد كل عامل بنسخة منها، ليقرأها ويعمل بموجبها.

تعريفات مهمة

• **العنف الجنسي والعنف القائم على النوع الاجتماعي:** مصطلح شامل لأي فعل ضار يُرتكب ضد إرادة الشخص ويستند إلى الفروق المنسوبة اجتماعياً بين الذكور والإناث (أي الجنس). ويشمل الأفعال التي تلحق الأذى، أو المعاناة الجسدية، أو الجنسية، أو العقلية، والتهديد بمثل هذه الأفعال، والإكراه، وغير ذلك من أشكال الحرمان من الحرية .

• **الاستغلال والاعتداء الجنسيان (SEA):** يُعرّف بأنه أي إساءة فعلية أو محاولة إساءة استغلال لموقف ضعف أو قوة تفاضلية أو ثقة لأغراض جنسية ، بما في ذلك، على سبيل المثال لا الحصر، تحقيق الربح المادي أو الاجتماعي أو السياسي من الاستغلال الجنسي من جانب اخر.

• **الاعتداء الجنسي:** "التدخل الجسدي الفعلي أو المهدّد بطابع جنسي ، سواء بالقوة أو في ظل ظروف غير متكافئة أو قسرية."

• **التحرش الجنسي (SH):** التحرش الجنسي غير المرغوب فيه ، وطلب خدمات جنسية ، وغير ذلك من السلوك اللفظي أو الجسدي ذي الطبيعة الجنسية.

• **التحرش الجنسي مقابل الاستغلال والانتهاك الجنسيين:** يحدث الاستغلال الجنسي ضد مستفيد أو فرد من المجتمع. ويحدث التحرش الجنسي بين أفراد / موظفي مؤسسة أو شركة وينطوي على أي تقدم جنسي غير مرغوب فيه أو سلوك لفظي أو جسدي غير مرغوب فيه ذي طبيعة جنسية. يعد التمييز بين الاثنين أمراً مهماً بحيث يمكن أن تتضمن في سياسات الشركة وتدريب الموظفين على تعليمات محددة حول إجراءات الإبلاغ عن كل منهما.

• **الموافقة:** هي الاختيار الكامن وراء قرار الشخص الطوعي بفعل شيء ما. يجب منح الموافقة على أي نشاط جنسي بحرية، وموافقة على الانسحاب، وتتخذ مع أكبر قدر ممكن من المعرفة، ومحددة للموقف. إذا تم الحصول على اتفاق باستخدام التهديدات، أو الأكاذيب، أو الإكراه، أو استغلال اختلال توازن القوى، فهذه لا تعتبر موافقة.

• **عمالة الأطفال:** يشير مفهوم "عمالة الأطفال" إلى كل عمل يضر بصحة الطفل أو بنموه أو رفاهيته؛ إذا لم يكن هذا العمل من الأعمال النافعة التي تتناسب مع عمر الطفل، ويساعد على تطوره الجسدي والعقلي والروحي والأخلاقي والاجتماعي، دون أن يؤثر على دراسته أو راحته أو متعته. ويحدد قانون العمل السن القانوني المسموح به حسب نوع العمل ومخاطره. حيث ان الحد الأدنى هو 15 عام. اما في الاعمال الخطرة والتي تحتوي على مخاطر صحية او الاعمال الليلية او في المناطق النائية الغير مأهولة فإن السن القانوني هو 18 عام. وبناء عليه وحسب طبيعة الاعمال، فإن السن القانوني لهذا المشروع يجب ان لا يقل عن 18 عام.

أولاً: المبادئ الأساسية لمدونة السلوك واخلاقيات العمل

إن جودة الاداء ونجاح العمل تتوقف على الالتزام بقواعد السوك العامة واخلاقيات العمل، والتصرف بطريقة عادلة وصادقة كأفراد مسؤولين اجتماعيا انطلاقا من ايماننا الراسخ بمسؤوليتنا الاجتماعية التي لها أثرا إيجابيا كبيرا على المشاريع التي نعمل بها. ولتحقيق هذا، يجب علينا احترام هذه المبادئ الأساسية:

النزاهة والامانة: الأيمان بتعزيز التصرف بأمانة في جميع العلاقات مع التقيد الصارم بجميع القوانين المعمول بها، احترام كرامة كل شخص والحفاظ على سلامتهم.

الشفافية: الاحترام المتبادل والحوار والشفافية هي أساس العلاقة مع اصحاب العمل والسلطات ذات العلاقة، والتي تتوافق مع مبادئ التعاون والصدق والانفتاح.

الموضوعية والاستقلالية: العمل بموضوعية واستقلالية وتجنب أي نوع من أنواع الفساد أو تضارب المصالح الذي قد يؤثر على اتخاذ القرارات المتعلقة بالعمل.

المسؤولية: توفير بيئة عمل آمنة وصحية للعمال، واحترام الحقوق والتقيد بالواجبات من مقتضى المسؤولية، واحترام المجتمعات التي نعمل فيها.

ثانياً: قواعد السلوك واخلاقيات العمل

القسم الاول: الحقوق العامة

- يلتزم العامل بتأدية عمله بإخلاص وأمانة وبالمحافظة على أسرار العمل وأدواته، ويعتبر مسؤولاً عن الأدوات التي في عهدهه وعليه الحفاظ عليها، وفي حالة وجود ظرف خارج عن ارادته او قوة قاهرة، فان العامل لا يعتبر مسؤولاً عن خلل الأدوات أو ضياعها.
- على العامل أن يلتزم بأخلاقيات العمل والحفاظ على خصوصية السكان والعمال في منطقة العمل، دون الاشتباك معهم أو التسبب بأي أذى لهم بأي شكل كان. ويجب الامتناع عن المشاركة في أي عنف بدني او لفظي لأي من العاملين أو السكان.
- على العامل التقيد بساعات العمل المطلوبة، وكذلك التقيد والامتثال بالمهام المكلف بها من قبل صاحب العمل.
- على العامل التبليغ في حال الشك بوجود عمالة أطفال في موقع العمل
- على العامل الالتزام بإجراءات السلامة المتبعة في الموقع، خاصة عند استخدام الآلات الخطرة، وأي إجراءات إضافية يتم طلبها من قبل اصحاب العمل.
- يجب على العامل الإبلاغ فورا عن أي أمراض مزمنة يعاني منها أو عند الشعور بالإعياء، وعن أي عقاقير يتلقاها العامل.
- الامتناع عن التسبب بأي نوع من المضايقات سواء اللفظية المباشرة او غير المباشرة لأي شخص أثناء فترة العمل، وخاصة من فئة النساء والأطفال وذوي الاحتياجات الخاصة.
- من حق العامل أن يوقع عقد عمل مع صاحب العمل على أن يكون باللغة العربية، وذلك لحفظ حقوق العامل، علما بأن عقد العمل يجب أن يتضمن: الأجر، نوع العمل، مكانه ومدته، ساعات وأوقات العمل، كما ويجب ان يتضمن العقد الاجراءات الصحية وشروط الوقاية المتعلقة كوفيد 19، والتي اقرتها وزارة الصحة الفلسطينية، ويجب أن يوقع العقد من قبل صاحب العمل والعامل بحيث يحتفظ العامل بنسخة أصلية من العقد.
- علي صاحب العمل أن يلتزم بالتأمين على جميع عماله عن إصابات العمل لدي الجهات المرخصة في فلسطين.
- يلتزم صاحب العمل بعدم توظيف او تشغيل الأطفال ما دون السن القانوني الذي تم تحديده في هذه المدونة ويلتزم بتوفير بيانات العمال من أسماء واعداد وأرقام هويات الى صاحب المشروع
- يجب أن تتخلل ساعات العمل اليومي فترة أو أكثر لراحة العامل لا تزيد في مجموعها عن ساعة مع مراعاة ألا يعمل العامل أكثر من خمس ساعات متصلة دون تخصيص وقت للراحة.
- التقيد بأوقات العمل وتكريس اوقات العمل للقيام بالمهام والواجبات المتعلقة بطبيعة العقد، كما نص عليها عقد العمل.
- ضمان حق العامل في التظلم او الشكوى من اي انتهاك لحقه او من اتخاذ قرار خاطئ بحقه.
- تعتبر مدونة السلوك هذه جزءاً لا يتجزأ من العقد والاتفاق القانوني المبرم ما بين العامل وصاحب العمل.

القسم الثاني: حماية حقوق النساء

- معاملة النساء باحترام بغض النظر عن العرق، أو اللون، أو اللغة، أو الدين، أو الرأي السياسي، أو غير السياسي، أو الأصل، أو الإعاقة، أو أي وضع آخر.
- عندما يكون لدى المرأة العاملة مخاوف أو شكوك فيما يتعلق بأعمال العنف القائم على النوع الاجتماعي من قبل اصحاب العمل أو أي طرف ذو علاقة بالعمل، يجب عليها الإبلاغ عن هذه المخاوف وفقاً لإجراءات الشكاوى المعتمدة في المشروع. على ان يتم التعامل مع هذه الشكاوى بخصوصية كبيرة للحفاظ على كرامة المشتكية.
- يجب توفير الحماية للنساء وتهيئة أماكن آمنة في العمل للنساء وخاصة الحوامل والتأكد من عدم نقل أي امرأة حامل بشكل غير صحيح، والعمل على إزالة أو منع تعرض النساء الحوامل للمخاطر.
- يجب توفير أماكن للنظافة الشخصية لاستخدامها من قبل النساء العاملات بعد الانتهاء من العمل. وايضا توفير مرافق صحية (دورات مياه خاصة بالنساء في أماكن العمل، ويجب أن يتم تعقيم هذه الأماكن بشكل يومي).
- يجب تنفيذ لقاءات توجيهية قبل بدء العمل في الموقع للتأكد من أن الجميع على دراية بقواعد السلوك الخاصة بالعنف القائم على النوع الاجتماعي.

القسم الثالث: حماية حقوق ذوي الاعاقات

- يلتزم اصحاب العمل بتهيئة البيئة الملائمة لاحتياجات ذوي الاحتياجات الخاصة وتوفير تسهيلات الحركة والتنقل في أماكن العمل.
- عدم التمييز بحق المعاقين والمعاقات في العمل، واحترام حقهم / هن في اختيار نوعية الاعمال التي تناسب قدراتهم /تهن، واهتماماتهم/هن واحتياجاتهم/هن.
- الالتزام بتوفير خدمات ومرافق صحية مواءمة لاستخدامات ذوي الاعاقة الحركية في مواقع العمل.

القسم الرابع: الصحة والسلامة المهنية

- على العامل التقيد بتطبيق شروط واجراءات الصحة والسلامة العامة الصادرة عن وزارة الصحة الفلسطينية، والالتزام بقواعد السلامة والصحة المهنية في العمل.
- على صاحب العمل تقديم الإسعافات الأولية اللازمة للعامل في حال الاصابة ونقله إلى أقرب مركز للعلاج
- الالتزام بإجراءات ومتطلبات السلامة والصحة العامة المتعلقة بكوفيد 19 بما فيها التباعد الجسدي واللبس الواقي وكل ما ينص عليه البروتوكول الصحي.

القسم الخامس: التبليغ:

إذا لاحظ أي شخص سلوكًا يعتقد أنه قد يمثل انتهاكًا لمدونة قواعد السلوك هذه، أو للتبليغ عن سلوك يتعلق بشخصه / شخصها، فيجب عليه / عليها إثارة المشكلة على الفور إلى الإدارة التابع/ة لها.

سيتم الحفاظ على سرية هوية الشخص، ما لم يكن الإبلاغ عن الادعاءات مكلّفًا بموجب قانون الدولة. يمكن أيضًا تقديم شكاوى أو ادعاءات مجهولة المصدر وشكاوى متعلقة بالعنف القائم على النوع الاجتماعي والتحرش الجنسي وسيتم أخذها في الاعتبار. نحن نتعامل بجدية مع جميع التقارير المتعلقة بسوء السلوك المحتمل و سنحقق وتتخذ الإجراءات المناسب. سنقدم توصيات لمقدمي الخدمة الذين قد يساعدون في دعم الشخص الذي تعرض للحادث المزعوم، حسب الاقتضاء.

لن يكون هناك أي تبعات أو عواقب لأي شخص يثير مخاوف بحسن نية بشأن أي سلوك محظور بموجب مدونة قواعد السلوك هذه. مثل هذا الانتقام أو أي عواقب ستكون انتهاكًا لمدونة قواعد السلوك هذه.

القسم السادس: عواقب انتهاك مدونة السلوك

قد يؤدي أي انتهاك لقواعد السلوك هذه من قبل الموظفين والعمال إلى عواقب وخيمة، بما في ذلك الإنهاء والإحالة المحتملة إلى السلطات القانونية.

استمارة استلام

لقد تلقيت نسخة من مدونة قواعد السلوك مكتوبة بلغة أفهمها. أفهم أنه إذا كان لدي أي أسئلة حول مدونة قواعد السلوك هذه، فيمكنني الاتصال بالشؤون الإدارية في الشركة التي اعمل لديها لمزيد من التوضيح

اسم الموظف \ العامل _____ :

التوقيع _____ :

التاريخ _____ :

التوقيع بالتصديق – مدير الشركة (اسم الشركة) _____ (

الاسم والتوقيع _____ :

التاريخ _____ :

المرفق 1: السلوكيات التي تشكل الاستغلال والاعتداء الجنسيين (SEA) والسلوكيات التي تشكل تحرشًا جنسيًا (SH)

المرفق | لمدونة قواعد السلوك

السلوكيات التي تشكل الاستغلال والاعتداء الجنسيين (SEA) والسلوكيات التي تشكل تحرشًا جنسيًا

(SH)

تهدف القائمة غير الشاملة التالية إلى توضيح أنواع السلوكيات المحظورة، تشمل أمثلة الاستغلال والاعتداء الجنسيين، على سبيل المثال لا الحصر:

• يخبر عامل المشروع أحد أفراد المجتمع أنه يمكنه الحصول على وظائف متعلقة بموقع العمل (مثل الطهي والتنظيف) مقابل ممارسة الجنس.

• يقول أحد العاملين في المشروع أنه يمكنهم تقديم أجهزة أو خدمات أو تفضيلات للنساء مقابل ممارسة الجنس.

• يقوم أحد العاملين في المشروع باغتصاب أحد أفراد المجتمع أو الاعتداء عليه جنسيًا

• يمنع عامل المشروع أي شخص من الوصول إلى الموقع / الخدمات ما لم يقدم خدمة جنسية

• يخبر عامل المشروع الشخص الذي يتقدم للحصول على عمل بموجب العقد أنه لن يقوم بتوظيفه إلا إذا مارس الجنس معه.

أمثلة على التحرش الجنسي في سياق العمل

• تعليق عامل المشروع على مظهر عامل أو طاقم مشروع آخر (سواء كان إيجابياً أو سلبياً) والرغبة الجنسية.

• عندما يشكو عامل المشروع من التعليقات التي أدلى بها عامل آخر على مظهره / مظهرها ، يعلق العامل الآخر في المشروع بأنه "يأطلب ذلك" بسبب طريقة لبسه|ها.

• اللمس غير المرغوب فيه للعامل / الموظفين من قبل عامل آخر في المشروع

• يخبر عامل المشروع عامل آخر في المشروع أنه سيحصل له / لها على زيادة في الراتب، أو ترقية إذا أرسل له / لها صورًا عارية لنفسه.

Annex II: Workers' GM Forms

Complaint Submission Form

مشروع التمويل بهدف خلق فرص عمل

طلب تقديم شكوى

التاريخ:

رقم الشكوى:

القسم الأول: حول المشتكي/ة

اسم مقدم/ة الشكوى الرباعي:

رقم الهوية:

انثى

الجنس: ذكر

تاريخ الميلاد: / /

العمر:

رقم الهاتف:

البريد الإلكتروني:

إذا كان مقدم الشكوى مؤسسة:

اسم المؤسسة مقدمة الشكوى:

رقم الهاتف:

البريد الإلكتروني:

القسم الثاني: حول الشكوى

اختر الجهة المقدم بحقها الشكوى

.....

.....

موضوع الشكوى

.....

.....

.....

.....

لا

هل الشكوى منظورة أمام القضاء: نعم

لا

هل تقدمت بشكوى في ذات الموضوع سابقا:

- اسم الجهة المقدم بحقها الشكوى سابقا: تاريخ التقديم: /...../.....

لا

- هل تلقيت ردا على الشكوى السابقة: نعم، تاريخ الرد:/...../.....

وقائع الشكوى:

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

القسم الثالث: مرفقات الشكوى (وثائق ومستندات)

- 1-
- 2-
- 3-
- 4-
- 5-

أقر وأصرح انا مقدم/ة الشكوى..... بأن المعلومات والبيانات والمرفقات الواردة أعلاه هي معلومات وبيانات ومرفقات صحيحة وحقيقية والتزم واتفهد بتحمل كامل المسؤولية القانونية فيما لو تبين خلاف ذلك في أي وقت من الأوقات أو إذا تبين أن الشكوى المقدمة من قبلي كيدية.

وعليه أوقع

توقيع و/أو بصمة مقدم/ة الشكوى: تاريخ تقديم الشكوى: / /

توقيع و/أو بصمة الشخص الذي استعان به مقدم الشكوى في كتابة الشكوى:

اسم الموظف/ة مستلم/ة الشكوى:

توقيع الموظف/ة مستلم/ة الشكوى: تاريخ استلام الشكوى: / /

Receipt and Follow Up Card

مشروع التمويل بهدف خلق فرص عمل

بطاقة مراجعة

نشكر لكم تواصلكم مع مشروع التمويل بهدف خلق فرص عمل والمنفذ من قبل شركة البدائل التطويرية DAI لصالح وزارة المالية والتخطيط وبدعم من البنك الدولي.

نرجو منكم الاحتفاظ برقم الشكوى، حيث سيتم متابعة شكاكم كتابيا او من خلال الاتصال الهاتفي في أقرب فرصة ممكنة.

بطاقة مراجعة

اسم مقدم الشكوى الرباعي.....:

العنوان.....:

رقم الشكوى.....:

موضوع الشكوى.....:

تاريخ تقديم الشكوى.....:

تاريخ المراجعة: التاريخ..... الساعة.....

اسم الموظف/ة المسؤول/ة.....:

توقيع الموظف/ة المسؤول/ة.....:

الختم ان وجد:

Annex III: Summary of LMP Stakeholder Consultation Meeting

A public consultation meeting was carried out virtually (Online) on the 24th of July 2023 at 10:00 am via MS Teams. The session aimed to introduce the stakeholders to the Labor Management Procedures (LMP) suggested for the F4J III. The aim of the meeting was to obtain feedback that will assist the PIA in drafting the LMP, identifying additional potential labor risks and impacts, types of labor to be engaged, mitigation measures, remarks and feedback on the Workers' GM, as well as discussing the national E&S requirements in line with the project's applicable standards. The session introduced the attendees to the new project within the F4J series of projects, the proposed components, and expected activities to be included.

The invitation list contained 219 representatives of various private sector companies, private sector associations and representative bodies, the Public Private Advisory board, all of the commercial chambers in the West Bank and Gaza, Ministries, public sector institutions, associations, unions, universities, service providers, training and educational centers, applicants to the F4J II ICF, previous beneficiaries of the F4J Project, Federations of chambers of commerce, industry, agriculture and other sectors, as well as the investors and partners involved in the DIB component. Of the invited attendees around 61 attended the session (attendance sheet in the annexes).

The session included a description of the Finance for Jobs (F4J) Series of Projects, previous activities under the F4J I& II, an overview of the financial instruments developed under the F4J SOP and to be used in the F4J III, in addition to an overview of applicable environmental and social laws and standards, applicable ESSs, potential E&S risks and impacts, mitigation measures, and E&S instruments.

The session included various input from the participating stakeholders as well as remarks and recommendations that have been recorded and discussed throughout the session.

The workshop agenda was divided into four main sections as follows:

Section One: Introduction and Presentation – The Finance for Jobs Series of Projects and the Finance for Jobs III Project. By

- **Mazen Asad, Project Manager;**
- **Mohammad Zeiter from MoL**
- **Jalil Hazboun, General Manager of F4J Consulting**

The first section included welcoming remarks, registration, and overview of the F4J SOP, the new project within the series; F4J III, and its components. This section of the workshop constituted the following points;

F4J III – Labor Management Procedures

- The project manager provided an introduction about the F4J Series of Projects, their objective, and the institutional arrangements of their implementation.
- The innovative financial instruments that have been designed, experimented with, and applied under the F4J I&II have been explained.
- The DIB component of the project was explained, with its objectives, working mechanisms and activities.
- The ICF component of the project was explained, with examples of financed activities under F4J II, the process and mechanisms of support, types of projects that are supported under the ICF and the objectives of creating employment through the private sector mobilization.
- The Project Development Objective of the F4J III was discussed with the attendees and the objectives of the project in terms of employment creation through the DIB and the ICF was overviewed.

The Representative of the Ministry of Labor provided remarks on the national employment strategy and the alignment of the F4J SOP with its goals, particularly the third one. The MoL stressed on incorporating the lessons learned from the previous project within the series as well as lessons from the MoL and similar projects into the project design. The MoL representative provided a brief on the current labor market and the legal framework governing labor in Palestine.

Additionally, Mr. Jalil Hazboun from F4J Consulting provided a brief on the DIB activities under F4J II and the prospective trainings and DIB activities to be included under F4J III.



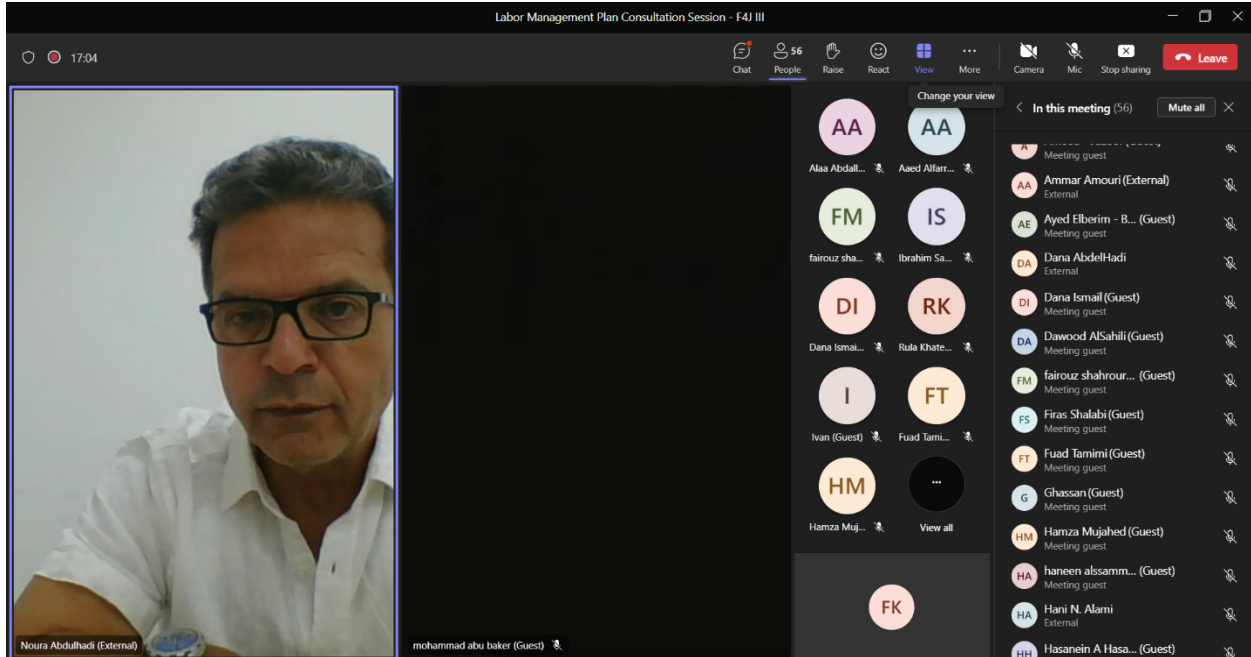
مشروع التمويل يهدف خلق فرص عمل – المرحلة الثالثة

FINANCE FOR JOBS III (F4J III)

Labor Management Procedures (LMP) Consultation Meeting

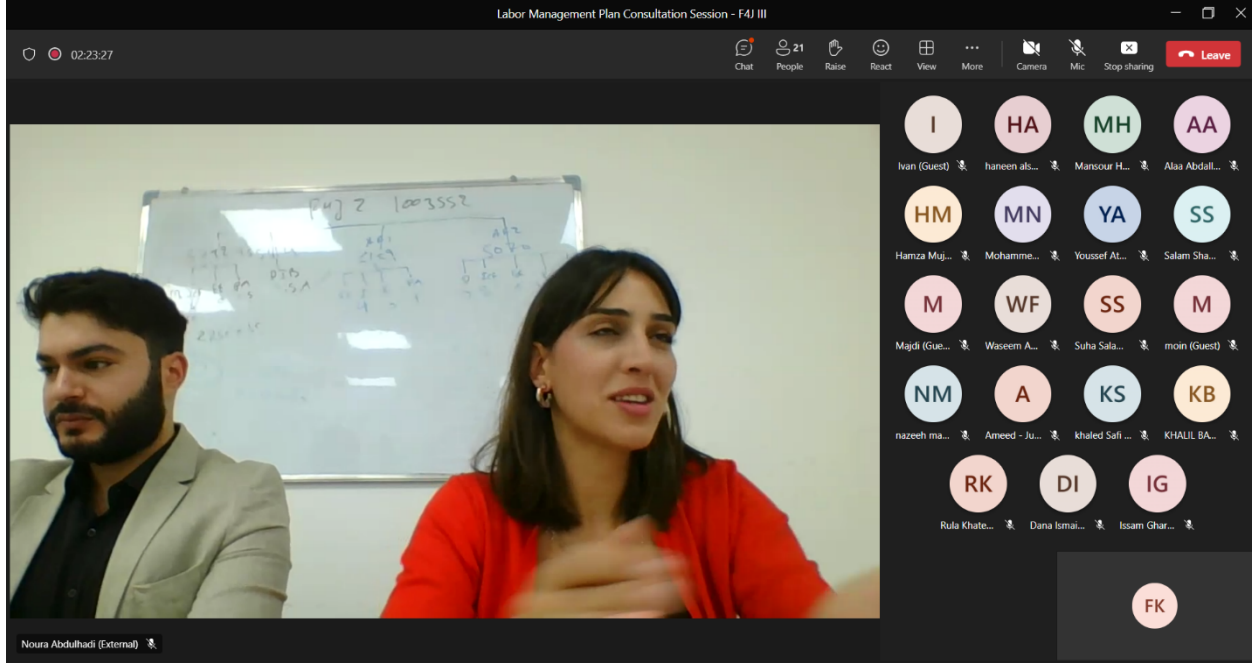
لقاء تشاوري لمناقشة إجراءات إدارة العمالة





Section Two: Overview of the LMP and Labor Aspects of the F4J III – By Faisal Kilani Environmental and Social Specialist

- This section of the meeting included an overview of the potential labor to be engaged in the project, including direct, contracted, primary supply and government workers. The session included an overview of the types of workers, their characteristics, expected numbers and timing of expected labor.
- The session included an overview of potential labor risks that could arise through the implementation of the project. As well as mitigation measures relevant to the identified labor risks.
- The session introduced the relevant legal framework governing the project in terms of national laws and legislations as well as the World Bank's ESF, ESSs, and EHSGs.
- The session introduced the project relevant ESSs and particularly ESS2.
- The session also included a review of the responsibility demarcation of the project and the role of the ESO as well as the beneficiaries of the subprojects under the ICF and the service providers under the DIB.



تقييم مخاطر العمل الرئيسية المحتملة

- يتم تحديد مخاطر العمل الرئيسية وفقاً لطبيعة النشاط، نوعية العمال وطبيعتهم، موقع العمل.
- خلال الخطة الحالية تم تقييم مخاطر العمل الرئيسية المحتملة لمكونات المشروع الثلاثة، وتشمل:
 - الصحة والسلامة المهنية.
 - العنف القائم على النوع الاجتماعي (الاستغلال والاعتداء الجنسي/ التحرش الجنسي).
 - الحقوق العمالية وظروف العمل.
 - المخاطر المرتبطة بالأمراض المعدية
 - التمييز وحرمان الفئات الضعيفة من الوصول والاستفادة من المشروع.

Section Three: the F4J III Grievance Redress Mechanism. By – Faisal Kilani, Environmental and Social Consultant & Noura Abdelhadi, Communication Officer and GRM Focal Point

- This section involved briefing the attendees about the current GRM system implemented at the project level for the previous F4J Projects in the series, especially the F4J II that is still under implementation.
- The session involved an overview of the Workers' GM, the relevant uptake mechanisms, the incorporation of workers' GM procedures at subproject and beneficiary levels, the selection of appropriate uptake mechanisms, resolution schemes and other aspects.
- The discussion included an overview of the GRM that will be implemented for the F4J III including a clear documentation of the system, the procedures, timelines, uptake mechanisms.
- The process of uptake, recording, review, resolution, and closure of grievances has been reviewed. In addition to the types of grievances the GRM allows for uptake.
- The specific measures that are implemented and will be implemented for the F4J III in relation to GBV grievances, anonymity, and referral of GBV cases have been reviewed.
- The existing uptake mechanisms have been shared with the attendees as well as the location on the F4J.ps website for disclosure of the GRM and other project documents.
- The workers' GRM has been discussed with the attendees including its requirements, applicability scope and its association with the GRMs that will be created for each sub-project under the ICF.
- The World Bank's GRS has been disclosed with the attendees as well.
- The session reviewed the forms of the GM, follow up card, and GM log.

F4J FINANCE FOR JOBS استثمار وقصر عمل Who We Are What We Do Media Center Resou.

Complaints

F4J > Submit Complaint

Guidelines for Submitting a Complaint
In order for a complaint to be considered by the F4J project team, it is necessary to follow the below guidelines:

1. The complaint should be directly related to the project's components and/or to the project's implementation or management.
2. The complainant should submit full details and any relevant supporting documents related to their complaint.
3. Complaints shall be filed using one of the following methods:

- **Electronically** by filling out the complaint form and attaching all the related supporting documents to the following
- **Verbally** by calling the F4J Office at +970 2 296 4840 to file a complaint with an F4J staff member.
- **In person** by visiting the F4J offices in Ramallah and/or Gaza where you can complete the complaint form and

Section One: About the complainant

Complainant Name (Full Name)

Identification

نظام شكاوى العمال

- يقدم الدليل الاجرائي التابع لمشروع التمويل بهدف خلق فرص عمل نبذة مختصرة عن نظام استقبال ومعالجة الشكاوى المتعلقة بمكونات المشروع واليات تنفيذه والتي من المتوقع ورودها خلال فترة تنفيذ المشروع. ومن أجل أن يكون هذا النظام فعال، لا بد من اتباع اجراءات سلسلة مقترنة بنماذج واضحة من اجل ضمان الانجاز الأمثل للشكاوى ابتداء من استقبالها وانتهاء الى انجازها او اغلاقها بشكل نهائي.

Section Four: Questions and Open Discussion

In this section, the discussion was opened for all attendees to provide any feedback, questions, suggestions, and inquiries. The project's team also asked questions to the attendees regarding harmonizing the project's labor management with the national requirements. attendee's questions/comments and associated replies are illustrated in the following points:

- **Q1. The first comment addressed the following points;**
 - how the support of the private sector and the inclusion of the national strategy within the project.
 - How will the role of civil society be enhanced, and their participation increased in the project?
 - How is civil society's contribution ensured in the project?

A1. The project team explained that the project is being designed through the contributions of various key stakeholders, amongst whom is the Ministry of Labor which is a key stakeholder in the advisory board of the project. The project's design took into consideration the various feedback received from engagements and consultations with different stakeholders in various sectors. Additionally, the team explained that the role of these meetings is to enhance the civil society's awareness and engagement in the project and engagements will be continuous in line with the Project's SEP throughout the project's life cycle. Engagements will also take place at subproject and activity levels once identified.

- **Q2. How does the project ensure the involvement of vulnerable and marginalized groups especially people with disability. And how will non-discrimination in terms of employment opportunities be ensured?**

A2. The project will implement various methods and tools to ensure equal access to the employment rights as well as benefiting from the project's opportunities, either for employment and access to financing under the ICF or through training and employment opportunities under the DIB. The project's E&S management instruments including the ESMF, SEP, and LMP identified risks associated with the access and inclusion of vulnerable and marginalized groups in the project and presented mitigation measures and follow up and monitoring actions to ensure continuous evaluation of project's interventions. Additionally, the subproject screening methodology allows for the identification of site-specific risks and the monitoring of implementation of activities by service providers and ICF beneficiaries. The M&E activities will ensure the review of employment and procurement processes to mitigate risks relevant to discrimination and inequitable access.

- **Q3. The Third Questions and comments received included;**
 - Can cooperatives apply for the ICF?
 - Could projects and companies apply and the measures introduced for lowering the investment equity for women-led projects apply if the manager or chairperson is a woman?
 - Is there an advisory board for the project?
 - There should be a standard resolution timeline for grievances

- Could you provide further description on the measures in the GM relevant to SEA / SH?

A3. As the project is directed towards benefiting SMEs, cooperatives could apply if they form a company in partnership with the private sector, additionally, women's lowered ticket applies for women headed businesses as chairperson or major shareholder. The team provided an overview of the project's advisory board (PPAB), their roles and the entities forming it. The resolution schemes of the workers' GM were discussed included the timeline and process for resolution as well as the additional resolution schemes. The GBV (SEA / SH) referral mechanism including the roles of the GBV service providers was covered.

- **Q4. A contribution from the International Labor Organization (ILO) representative included;**

- The importance of ensuring that local competencies and skills are preserved and provided with opportunities in the local Palestinian market.
- The importance of stakeholder engagement sessions to raise awareness and ensure local community's participation and constant engagement in the project
- The importance of involving beneficiaries and stakeholders in the engagement sessions
- Essentiality of providing awareness and orientation trainings to workers and beneficiaries as well as the employers on work and labor related aspects
- Workers' GM is critical for the success of projects and to ensure successful and productive processes in the local economy, where the high number of labor related grievances and juridical cases affect the efficiency of the market
- The ILO stated that they will launch an application called (TAWQ) which will allow workers to report and submit grievances on any labor malpractices in the workplace.

A4. The team thanked these remarks and requested to conduct further engagement with the ILO to discuss their new project and the possibility of integrating its use or lessons from it in the F4J III.

Conclusion

In conclusion, the engagement meeting for the F4J III project's Labor Management Procedures (LMP) proved to be highly significant in achieving its objectives. The meeting served as a platform to reinforce the attendees' comprehension of the LMP, offering a comprehensive overview of the project's anticipated activities, expected labor requirements, associated risks, mitigation measures, management arrangements, relevant laws and legislations, and the Workers' GM. The discussions primarily revolved around clarifications and points addressed in the LMP. The raised remarks and feedback indulged the existing topics as included in this LMP, there have not been any additional remarks that required inclusion to the LMP or revision of existing provisions as

F4J III – Labor Management Procedures

the raised questions and remarks were to obtain further information and discuss the raised aspects in further depth.

Overall, the engagement meeting successfully fostered a shared understanding among the stakeholders, laying the foundation for effective cooperation and communication throughout the F4J III project. The inclusive nature of the discussions ensures that all parties are well-informed and aligned with the project's objectives and strategies and have a shared understanding of the provisions of labor management procedures under the F4J III project. Having official ministries, NGOs, INGOs, civil society organizations, private sector entities, service providers and other key stakeholders ensures their understanding of the proposed procedures and their involvement in the project from an early stage.

Appendix I. Invitation of the virtual workshop

تحياتنا لكم.

ضمن سلسلة مشاريع وزارة المالية "التمويل بهدف خلق فرص عمل (F4J)" التي تنفذ من خلال شركة البدائل التطويرية DAI وتمويل من البنك الدولي، يسرنا دعوتكم لورشة عمل تشاورية بهدف مناقشة المشروع الجديد ضمن السلسلة مشروع التمويل بهدف خلق فرص عمل (F4J) III. سوف يعتمد مشروع F4J III على الدروس المستفادة والأدوات المالية المبتكرة التي تم إنشاؤها. وسيضمن المشروع كلاً من سندات الاثر الائتماني والصندوق الاستثماري للتمويل المشترك.

وبناء عليه، ووفقاً لمبادئ مشاركة أصحاب المصلحة في المشروع، ندعوكم للمشاركة في جلسة تشاورية ستناقش جوانب إدارة العمل والعمالة في المشروع وسيتم عرض المسودة الأولية لإجراءات إدارة العمالة الخاصة بالمشروع.

حيث سيعقد الاجتماع يوم الخميس الموافق ل 20 - 07 - 2023 في تمام الساعة ال 10:00 عبر تقنية ال **Microsoft Teams**. كما نرجو تأكيد حضوركم/ حضور ممثلكم بالرد على هذه الرسالة من خلال الرابط: <https://forms.office.com/r/f9ZWVBJmKn>

استقبال وترحيب	10:00 – 10:15
تقديم عام عن مشروع التمويل بهدف خلق فرص عمل F4J Project	10:15 – 10:30
عرض مسودة إجراءات إدارة العمالة لمشروع F4J III	10:30 – 11:00
عرض المخاطر المحتملة المتعلقة بالعمالة ضمن المشروع	11:00 – 11:15
عرض آلية الشكاوى الخاصة بالمشروع ومن ضمنها آلية شكاوى العمال	11:15 – 11:30
حوار وتناقش	11:30 – 11:45
ختام الورشة	11:45 – 12:00

Dear All,

On behalf of the Palestinian Ministry of Finance (MoF), DAI through the Finance for Jobs (F4J) Series of Projects is pleased to invite you to participate in a Consultation Meeting for the new project within the series of the Finance for Jobs (F4J) Projects. The F4J III will build upon the lessons learnt and the innovative financial instruments created and will include both the Development Impact Bond (DIB) and Investment Co-Financing Facility (ICF).

Therefore, and in accordance with the Stakeholder Engagement Principles for the project, you are cordially invited to a consultation session that will discuss the **Labor Management Procedures (LMP)** of the project, aiming to discuss the project's labor aspects including labor rights, working conditions, occupational health and safety, and other labor topics under the F4J III Project.

The meeting will take place on Thursday, July 20, 2023, at 10:00 am via Microsoft Teams. Looking forward to confirming your attendance through the following form:

<https://forms.office.com/r/f9ZWVBJmKn>

10:00 - 10:15	Welcoming and registration
10:15 - 10:30	F4J Project General Overview
10:30 - 11:00	Overview of the Labor Management Procedures (LMP)
11:00 - 11:15	Overview of Potential Labor Risks
11:15 - 11:30	Overview of the Grievance Mechanism (GM) including Workers' GM
11:30 - 11:45	Open Discussion
11:45 - 12:00	Closing Remarks

Appendix 2: List of attendees (registration online)

List of attendees (not all of attendees registered the online form)

ID	الاسم	المؤسسة	المسمى الوظيفي
1	Murad Abu Mwis	BD Specialist	F4JCS
2	Khaled Shanaa	Community Development and Continuing Education Institute "CDCE-I"	Executive Director
3	Amjad Qasas	Pal Professionals Consulting and Investment Services Co.	CEO
4	باسم ابو عيطة	شركة سيف الدين ابو عيطة وأولاده	مدير تنفيذي
5	Alice	The civic forum institute	Consultant
6	Samah Hamad	Business Women Forum	Board Chairwoman
7	Hani Alami	Coolnet Broadband Solutions	CEO
8	Ameed	Juzoor For Health & Social Development	Program Training Officer
9	Ahmed Zidan	Palestine for Development Foundation	Senior Programs Manager
10	Aaed Alfarra	Khan Yunis Chamber of Commerce and Industry	Financial Manager
11	Nancy Morrar	massader	investment manager
12	Rabab Sabbah	Palestine Capital Market Authority	Financial Inclusion Manager
13	فاطمة أحمد شراب	غرفة تجارة وصناعة وزراعة المحافظة الوسطى	مسؤول مالي / موظف تطوير أعمال
14	Jalil A. Hazboun	Finance for Jobs Consulting Services	Executive Director
15	mahmoud maher abu ghosh	TOOPOPTECH	CEO
16	Israa Hamoudeh	ASAL TEchnologies	Service Operations Engineer
17	Mahmoud Yasin	experts turnkey solutions	deputy CEO/CFO
18	Rose Atout	ASAL company	Operations Manager
19	Mohammed Jalal AlBanna	Dash	CTO
20	Ayman Arandi	Iris Solutions	Managing Director

F4J III – Labor Management Procedures

21	Dawood AlSahili	Business Alliance	Head of Partnerships
22	Moin Mohamed zomlot	Tweet Tec Company	Genral Manger
23	Khaled Sabri	Sabri for computer	G M
24	Khalil Saleem	Developers plus	Ceo
25	مجدي المحتسب	المجلس الاهلي للتنمية	رئيس مجلس الاداره
26	Rassem Mushtaha	Modern Tech Corp (MTC) (2 Staff will attend)	General Manager
27	Mohammed Swidan	Modern Tech Corporation (MTC)	Administrative manager
28	Basam Naser	Telellink	Operation Manager
29	Samar Baidas	Palestine Red Cresent society	Acting Director General
30	Ashwaq Dawoud	MTC	Admin/Financial Officer
31	Ivan G. Carmi	Juzoor for Health and Social Development	Programme Manager
32	KHALED SAFI	Palestinian Construction Industries Union	Executive Manager
33	لؤي الحسيني	الغرفة التجارية	المدير العام
34	Muhannad	shalabim@ilo.org	National projects officer
35	Nasib Naser, PhD	Orion VLSI Technologies	CEO & Technical Director
36	Jameel Khudairi	Orion VLSI Technologies	HR & Admin Officer
37	Walid Irshaid	Orion VLSI Technologies	Business Development
38	عماد نعيم الغول	غرفة تجارة وصناعة محافظة شمال غزة	مدير عام الغرفة التجارية
39	Mohammed Fsifes	Hexa	CEO
40	Alaa Abdallah	Education for Employment-Palestine	Program & Business Development Manager
41	Tamer shurrb	Maf	HR
42	Waseem Abu Filat	Center of Excellence and Continuing Education - Palestine Polytechnic University (CECE-PPU)	Head of Projects
43	Ibrahim Sawalhi	WorldLinks Co. For ICT	Marketing Manager
44	mohammad abu baker	MOF	ESO
45	باسم سيف الدين ابو عيطة	مصنع ابو عيطة للالبان	0599463502

F4J III – Labor Management Procedures

46	NAZEEH	federation of Palestinian chambers	Director/Information Dept.
47	Ayed Elberim	Bayader for Environment & Development Association	Executive Director
48	Mansour Habaibeh	Bnet BCI	Commercial Director
49	Amjad Qasas	Pal Professionals Consulting and Investment Services	CEO
50	Dana Mazen Ismail	Ministry of Labour	The Minister' Technical Advisor
51	FAIROUZ SHAHROUR	MOF	Head of WB-PCU
52	Haneen ALSammak	Basma for culture and Arts	Project Advisor
53	Ghassan	NGO Development Center	Director
54	رامي ابو ريده	غرفة تجارة وصناعة محافظة خان يونس	اداري
55	Dana Mazen Ismail	Ministry of Labour	The Minister' Technical Advisor
56	Issam Gharayba	PITC	Acting Manager
57	Mohammed Tamimi	BCI Group	BCI COO
58	محمد محمود ابو زعيتر	الصندوق الفلسطيني للتشغيل	نائب المدير التنفيذي
59	Majdi Shawar	MOF	RERP Project Coordinator
60	Alaa Doudin	South Hebron Chamber Of commerce and Industry	TVET Unit
61	مجدي المحتسب	المجلس الاهلي للتنمية	رئيس مجلس الاداره

Annex IV: Industry-Specific & Geopolitical Potential OHS risks

PART I: DIB COMPONENT

I. Potential labor risks for nursing and health trainings:

Nursing and health training programs aim to prepare individuals for careers in the healthcare industry, including nursing and medical assisting. These programs involve practical trainings in healthcare settings, and as such, there are specific OHS risks associated with them. Some common risks in nursing and health training programs include;

- **Biological Hazards:** Healthcare settings expose both trainers and trainees to various biological hazards, including exposure to infectious diseases, bloodborne pathogens, or other potentially harmful biological materials. Proper infection control measures, including hand hygiene, Personal Protective Equipment (PPEs), and immunizations, are crucial to prevent the spread of infections.
- **Needlestick and Sharps Injuries:** trainers and trainees may be at risk of needlestick injuries or cuts from sharp instruments, such as needles, lancets, or scalpels. Safe handling, disposal of sharps, and the use of safety-engineered devices can reduce the risk of such injuries.
- **Chemical Exposure:** Healthcare settings may involve the use of various chemicals, such as disinfectants, cleaning agents, or medications. Improper handling, inadequate ventilation, or lack of appropriate PPE can lead to chemical exposures and related health risks. Proper storage, handling, and use of chemicals, along with training on chemical safety, are necessary to minimize these risks.
- **Radiation Hazards:** radiology or certain medical imaging programs may cause exposure to ionizing radiation. Proper training, adherence to radiation safety protocols, and the use of shielding devices are crucial to minimize radiation exposure.
- **Infectious Waste Management:** Proper management and disposal of infectious waste, including sharps, contaminated linens, or biomedical waste, are crucial in preventing the spread of infections.
- **Allergens and Sensitizing Substances:** Some individuals may have allergies or sensitivities to certain substances found in healthcare settings, such as latex, chemicals, or medications. Awareness of potential allergens, proper labeling, and alternative options can help prevent allergic reactions.

To mitigate the risks, it is important to prioritize the OHS during designing and preparing the nursing and health training programs, by incorporating safety training, infection control measures, and appropriate use of PPE into the curriculum. Providing adequate supervision, ensuring proper maintenance of equipment and facilities, and promoting a culture of safety are essential in such trainings.

5. Potential labor risks for ICT trainings:

ICT (Information and Communication Technology) training programs focus on developing skills related to computer systems, software applications, networking, cybersecurity, and other technology-related fields. While ICT training programs may vary in their specific content and delivery methods, there are some common OHS risks associated with them.

- **Ergonomic Risks:** Prolonged computer use, and improper workstation ergonomics can lead to Musculoskeletal Disorders (MSDs), such as back pain, neck strain, or carpal tunnel syndrome.
- **Eye Strain and Visual Discomfort:** Constant exposure to computer screens and inadequate lighting conditions can cause eye strain, fatigue, and visual discomfort.

- **Repetitive Strain Injuries:** Frequent and repetitive use of keyboards, mice, or other input devices can result in repetitive strain injuries (RSIs), such as tendonitis or bursitis.
- **Electrical Safety:** ICT training programs often involve working with electronic devices, including computers, servers, or networking equipment. Electrical safety practices, including proper grounding, safe handling of power cables, and the use of surge protectors should be ensured to reduce the risk of electrical accidents.
- **Fire and Electrical Hazards:** ICT training environments often house a significant amount of electrical equipment, which can increase the risk of electrical fires. Proper wiring, adherence to fire safety codes, and regular inspection of electrical systems are crucial in preventing fires and ensuring the safety of trainees.
- **Environmental Factors:** ICT training programs may be conducted in various settings, such as classrooms, labs, or data centers. Factors such as poor indoor air quality, inadequate ventilation, excessive noise levels, or improper temperature and humidity control can impact the health and comfort of trainees. Maintaining a suitable environment with proper ventilation, noise control measures, and comfortable temperatures is important.
- **Psychological Well-being:** The fast-paced nature of ICT training, coupled with high-pressure deadlines and intense workloads, can lead to stress, anxiety, and mental health issues. Promoting a supportive learning environment, providing resources for stress management is crucial for a healthy training environment.

To mitigate the above risks, it is essential for ICT training programs to prioritize OHS by integrating safety training, ergonomic assessments, and regular evaluation of the training environment. Providing adequate supervision, promoting healthy work practices, and addressing potential risks proactively can ensure a safe and productive training environment.

PART 2: ICF COMPONENT

I. Potential labor risks for agri-business subprojects:

Workers in the agri-business industry are exposed to OHS risks that can impact their well-being and safety. Industry-specific OHS risks include;

- **Machinery and Equipment Hazards:** Working with heavy machinery and equipment such as tractors, combines, chainsaws, and power tools can lead to injuries if not used properly. Risks include entanglement, falls, collisions, and crush injuries.
- **Falls and Slips:** Uneven terrain, wet or slippery surfaces, and working at heights (e.g., ladders, rooftops) can result in falls and slips, leading to fractures, sprains, or more severe injuries.
- **Chemical Exposure:** Pesticides, fertilizers, and other chemicals used in agriculture can pose health risks if not handled, stored, and used correctly. Exposure to these substances can cause skin irritation, respiratory problems, poisoning, or long-term health effects.
- **Manual Handling and Ergonomics:** Frequent lifting, carrying, and manual handling of heavy loads can lead to musculoskeletal disorders (MSDs) such as back pain, strains, and sprains. Poor ergonomics, repetitive motions, and long hours of physical labor can exacerbate these risks.
- **Livestock Handling:** Working with animals involves risks such as kicks, bites, scratches, and crushing injuries. Additionally, zoonotic diseases can be transmitted from animals to humans, highlighting the importance of proper hygiene practices and vaccination protocols.

- **Heat and Cold Exposure:** Outdoor agricultural work exposes workers to extreme temperatures. Heat stress, heat stroke, dehydration, and sunburn can occur during hot weather, while cold weather can lead to hypothermia, frostbite, and reduced dexterity.
- **Noise and Vibration:** Farming activities, such as operating machinery and equipment, can generate high levels of noise, leading to hearing loss if adequate hearing protection is not used. Vibrations from machinery can also cause long-term health issues.
- **Electrical Hazards:** Farm buildings, equipment, and irrigation systems involve electrical components. Poorly maintained or faulty electrical systems increase the risk of electric shocks, burns, fires, and explosions.
- **Confined Spaces:** Silos, grain bins, and manure pits are examples of confined spaces commonly found in agriculture. These spaces can present risks such as suffocation, toxic gas exposure, and entrapment.
- **Fatigue and Stress:** Long work hours, especially during peak seasons, can result in fatigue and increased stress levels, which can compromise worker safety and health.

To mitigate these risks, owners of the agri-business's subprojects should implement safety measures, including comprehensive training programs, proper maintenance of machinery and equipment, regular risk assessments, the use of PPEs, and the promotion of a safety culture among workers. Compliance with local health and safety regulations and seeking professional advice can further enhance workplace safety in agriculture.

II. Potential labor risks for the food processing subprojects:

- **Machinery and Equipment Hazards:** Food processing often requires the use of machinery and equipment such as slicers, grinders, mixers, ovens, and conveyors. Workers can be at risk of entanglement, cuts, burns, and injuries from moving parts if proper safety measures, guarding, and training are not in place.
- **Ergonomic Hazards:** Repetitive tasks, prolonged standing, and awkward postures can contribute to ergonomic hazards in food processing facilities. These risks may lead to MSDs, such as strains, sprains, and repetitive strain injuries.
- **Slips and Falls:** Wet floors, spills, and cluttered work areas can increase the risk of slips and falls. Workers in food processing plants may encounter slippery surfaces due to food residues, oils, or cleaning agents. Adequate housekeeping, proper footwear, and warning signs are essential to prevent these incidents.
- **Chemical Exposure:** Food processing may involve the use of cleaning materials, sanitizers, and chemicals for food preservation or processing. Workers can be exposed to hazardous substances that may cause skin irritation, respiratory problems, or long-term health effects. Proper handling, storage, and PPE usage are necessary to minimize chemical risks.
- **Thermal Hazards:** Food processing often involves exposure to high temperatures, hot surfaces, steam, and hot liquids. Workers can face burn injuries if precautions are not taken, such as wearing heat-resistant gloves, using proper equipment, and implementing effective heat stress management strategies.
- **Biological Hazards:** Food processing facilities may handle raw or perishable food products, which can present biological hazards such as bacteria, viruses, or fungi. Workers should follow proper hygiene practices, including handwashing, wearing protective clothing, and adhering to food safety protocols to prevent contamination and foodborne illnesses.

- **Manual Material Handling:** Lifting, carrying, and moving heavy loads of ingredients, packaging materials, or finished products can lead to strains, sprains, and back injuries if not done with proper techniques or assistance. Implementing mechanical aids, providing training on safe lifting practices, and optimizing workflow can help reduce these risks.
- **Allergens and Food Sensitivities:** Food processing plants may handle allergenic ingredients that can cause severe allergic reactions in sensitive individuals. Workers should be trained in proper handling procedures, allergen control, and labeling requirements to prevent cross-contamination and protect both themselves and consumers.
- **Electrical Hazards:** Electrical equipment, wiring, and installations pose risks of electric shock, burns, and fires. Proper maintenance, grounding, and adherence to electrical safety protocols are crucial in food processing facilities.
- **Occupational Exposure to Dust:** Certain food processing operations can generate airborne dust particles, such as flour dust or spice powders, which can pose respiratory hazards. Dust control measures, including ventilation systems and personal protective equipment (such as respiratory masks), should be in place to minimize exposure.

To mitigate these OHS risks, food processing subprojects should implement comprehensive safety programs, including risk assessments, employee training, regular equipment maintenance, and the use of PPEs. Compliance with relevant safety regulations, adherence to Good International Industry Practices (GIIPs), and proper hygiene protocols are essential to ensure the safety and well-being of workers in food processing facilities.

III. Potential labor risks for manufacturing subprojects:

Light manufacturing subprojects can involve various OHS risks. While the specific risks may vary depending on the nature of the manufacturing activities, their sector, industry, and scale of operations. The following constitute general and common OHS risks associated with light manufacturing;

- **Machinery and Equipment Hazards:** Light manufacturing often involves the use of machinery, tools, and equipment such as cutting machines, presses, assembly lines, and conveyor belts. Risks include entanglement, cuts, crush injuries, and contact with moving parts.
- **Ergonomic Hazards:** Poorly designed workstations, repetitive motions, and manual handling of materials can contribute to ergonomic hazards. These risks may lead to musculoskeletal disorders (MSDs), such as strains, sprains, and repetitive strain injuries.
- **Chemical Exposure:** Depending on the type of manufacturing process, workers may be exposed to hazardous substances, including solvents, paints, adhesives, or cleaning agents. Exposure to these chemicals can result in respiratory problems, skin irritation, and long-term health effects if not properly controlled.
- **Electrical Hazards:** Electrical equipment, wiring, and installations pose risks of electric shock, burns, and fires. Manufacturing operations may involve electrical machinery, high voltage systems, or faulty wiring, necessitating proper maintenance and adherence to electrical safety protocols.
- **Noise and Vibration:** Manufacturing processes often generate high noise levels and vibrations. Prolonged exposure to excessive noise can lead to hearing loss, while prolonged exposure to vibration from machinery can cause hand-arm vibration syndrome or whole-body vibration effects.
- **Falls and Slips:** Slippery surfaces, uneven floors, cluttered work areas, and inadequate lighting can contribute to slips and falls. These incidents can result in fractures, sprains, and other injuries.

- **Falling Objects:** Particularly during expansion works, loading and unloading, and operations involving moving objects between heights, workers are exposed to falling objects injuries which are of the most common and severe types of injuries in the work place.
- **Fire and Explosion Hazards:** Light manufacturing may involve flammable materials, combustible dust, or processes that generate heat or sparks. Insufficient fire prevention measures, poor storage practices, or inadequate training can increase the risk of fires and explosions.
- **Thermal Hazards:** Some manufacturing processes may involve exposure to high temperatures, hot surfaces, or molten some materials. Workers can be at risk of burns or scalds if they come into contact with hot machinery, equipment, or materials. Proper heat-resistant clothing, training, and effective heat stress management strategies are essential to minimize these risks.
- **Manual Material Handling:** Lifting, carrying, and moving materials manually can lead to strains, sprains, and back injuries if not done with proper techniques or assistance. Inadequate training, heavy loads, and repetitive tasks can exacerbate the risks.
- **Occupational Exposure to Dust and Particles:** Certain manufacturing processes may generate dust, fibers, or particles, which can pose respiratory hazards if inhaled. Adequate ventilation, respiratory protection, and dust control measures are essential to mitigate these risks.
- **Confined Spaces:** Some manufacturing plants may have confined spaces, such as storage tanks, silos, or molds. Working in these spaces can present risks of asphyxiation, toxic gas exposure, or entrapment. Proper safety protocols, training, and effective communication are necessary when working in confined spaces.
- **Waste Management and Hazards:** manufacturing often generates waste materials, including, solid waste or hazard wastes. Workers involved in waste management or recycling activities may face risks such as exposure to hazardous substances, cuts, or injuries from handling sharp objects. Proper waste management procedures, personal protective equipment, and training are crucial to minimize these risks.

To mitigate these occupational health and safety risks, light manufacturing subprojects should implement comprehensive safety programs, including risk assessments, employee training, regular equipment maintenance, and the use of PPEs. Compliance with relevant safety regulations, regular inspections, and continuous monitoring of working conditions can help ensure a safe and healthy work environment for manufacturing workers. Manufacturing facilities should have proper emergency preparedness plans in place to address potential accidents, fires, or other emergencies. This includes evacuation plans, fire suppression systems, and training programs to ensure workers are aware of emergency procedures.

IV. Potential labor risks for Greentech subprojects:

Green technology, or Greentech, subprojects aim to promote environmentally sustainable practices and technologies. While these projects contribute to a cleaner and more sustainable future, they still involve certain OHS risks;

- **Installation and Maintenance Hazards:** Installing and maintaining green technologies such as solar panels, energy efficient equipment, or other related systems can involve working at heights, handling heavy equipment, and electrical hazards. Risks include falls, electrocution, and injuries from lifting, handling, or assembling components.
- **Electrical Hazards:** Green technologies often involve working with electrical systems, wiring, and power generation equipment. Improper grounding, exposure to live wires, and working on energized systems can pose electrical hazards, leading to electric shock, burns, or electrocution.

- **Chemical and Hazardous Substances:** Greentech projects may involve the use of chemicals or hazardous substances such as batteries, oils and solvents, cleaning materials, or maintenance fluids. Improper handling, storage, or accidental exposure to these substances can result in chemical burns, respiratory problems, or other health effects if proper safety measures are not in place.
- **Working in Confined Spaces:** Some Greentech installations, such as underground energy storage facilities or biogas digesters, may involve working in confined spaces. These spaces can pose risks of asphyxiation, toxic gas exposure, or entrapment if proper safety protocols are not followed.
- **Ergonomic Hazards:** Greentech projects may involve repetitive tasks, awkward postures, or manual handling of heavy components or equipment. These activities can lead to MSDs, including strains, sprains, and repetitive strain injuries if proper ergonomic controls and practices are not implemented.
- **Thermal and Fire Hazards:** Certain Greentech installations, can involve exposure to high temperatures, hot surfaces, or flammable materials. Workers need to be trained in heat stress management, fire safety protocols, and the use of appropriate PPE to mitigate these risks.
- **Noise and Vibration:** Some Greentech projects, can generate high levels of noise and vibrations. Prolonged exposure to excessive noise can lead to hearing loss, while vibrations from equipment can cause hand-arm vibration syndrome or whole-body vibration effects if proper controls and protective measures are not in place.
- **Transportation and Logistics Risks:** Moving and transporting large components or equipment for Greentech projects can involve risks such as collisions, falls, or injuries during loading and unloading. Adequate training, proper lifting equipment, and secure transportation methods are essential to mitigate these risks.
- **Working with New Technologies:** Greentech projects often involve innovative or emerging technologies. Workers may require specialized training to safely operate, maintain, or troubleshoot these technologies. Lack of familiarity or training can increase the risk of accidents or errors.

To mitigate the OHS risks in Greentech subprojects, it is important to provide comprehensive training programs, ensure compliance with relevant safety regulations, and promote a safety culture among workers. Additionally, regular inspections, proper maintenance of equipment, and continuous monitoring of working conditions are vital to ensure a safe and healthy work environment. Greentech subprojects should have proper emergency preparedness plans in place, including procedures for dealing with electrical emergencies, fires, chemical spills, or other incidents. Adequate training, communication systems, and emergency response protocols are crucial for worker safety.

V. Potential labor risks for tourism subprojects:

Tourism subprojects involve rehabilitation and operation of hotels, restaurants and any other hospitality business. The workers in tourism sector face the exposure to various OHS risks, most of which are common to general workplace OHS risks, however most prominently:

- **Transportation-Related Risks:** Workers involved in transportation services for tourists, such as drivers, or guides face specific risks. These risks can include road accidents, fatigue, exposure to extreme weather conditions, or inadequate maintenance of vehicles or equipment. Adhering to transportation safety regulations, conducting regular vehicle inspections, and providing driver training are essential to minimize these risks.
- **Food and Water Safety:** Workers in the tourism industry involved in food services, such as restaurants or catering, should follow strict food safety protocols to prevent foodborne illnesses.

Ensuring proper food handling, storage, and hygiene practices are crucial to protect both workers and guests.

- **Burns and Scalds:** The presence of hot cooking equipment, open flames, hot liquids, and steam in restaurant kitchens poses a risk of burns and scalds. Adequate training on safe handling of hot objects, use of protective equipment (e.g., gloves, aprons), and implementing proper controls (e.g., splash guards, temperature controls) can minimize the risk of burns and scalds.
- **Cuts and Lacerations:** Restaurant workers, particularly those involved in food preparation, can be exposed to sharp objects such as knives, slicers, or broken glass. Inadequate training, improper handling, or lack of proper tools can lead to cuts and lacerations. Providing training on safe knife handling techniques, using cut-resistant gloves, and maintaining sharp tools can reduce the risk of injuries.
- **Chemical and Cleaning Hazards:** The use of cleaning chemicals, sanitizers, and disinfectants is common in the hotel and restaurant industry. Workers may be exposed to hazardous substances through inhalation, skin contact, or ingestion. Ensuring proper labeling, providing safety data sheets (SDS), promoting good ventilation, and offering training on safe handling and use of chemicals can minimize the risks associated with hazardous substances.
- **Outdoor and Adventure Activities:** Tourism subprojects involving outdoor or adventure activities, such as hiking, water sports, or zip-lining, come with inherent risks. These can include falls, drowning, equipment failure, or adverse weather conditions. Employers should ensure proper training, safety equipment, risk assessments, and supervision for these activities.
- **Slips and Falls:** In tourism facilities such as hotels, resorts, or tourist attractions, there can be risks of slips, and falls due to uneven surfaces, wet floors, inadequate lighting, or obstacles. Proper maintenance, regular inspections, and signage are important to prevent these incidents.
- **Violence and Security Risks:** Tourism workers, especially those in customer service roles, may encounter situations that involve unruly or aggressive individuals, theft, or other security risks. Adequate training, security measures, and effective communication protocols can help mitigate these risks.
- **Fire and Emergency Preparedness:** Tourism facilities such as hotels, restaurants, or entertainment venues should have fire prevention measures, emergency evacuation plans, and proper training in place. Regular drills, adequate firefighting equipment, and well-defined emergency procedures are crucial for worker and guest safety.
- **Psychological and Mental Health Risks:** The tourism industry can be demanding, with long working hours, high-pressure situations, or exposure to challenging customer interactions. These factors can contribute to stress, fatigue, and mental health issues among employees. Implementing employee support programs, promoting work-life balance, and providing training on stress management can help address these risks.

VI. Potential labor risks for pharmaceutical subprojects:

Pharmaceutical subprojects involve the manufacturing, packaging, and distribution of pharmaceutical products. These activities present various OHS risks. Here are some common risks associated with pharmaceutical subprojects:

- **Chemical Exposure:** Pharmaceutical manufacturing involves handling various chemicals, including active pharmaceutical ingredients (APIs), solvents, reagents, and cleaning agents. Workers can be exposed to hazardous substances through inhalation, skin contact, or ingestion. This can lead to

- respiratory problems, skin irritation, chemical burns, or long-term health effects if proper handling, ventilation, and PPE usage are not implemented.
- **Contamination and Cross-Contamination:** Maintaining product purity is crucial in pharmaceutical manufacturing. Contamination can occur due to inadequate hygiene practices, equipment cleaning procedures, or improper segregation of materials. Cross-contamination can lead to the presence of unintended ingredients or impurities, posing risks to both workers and consumers.
 - **Machinery and Equipment Hazards:** Pharmaceutical manufacturing processes involve the use of various machinery and equipment, such as mixers, blenders, granulators, tablet presses, and packaging machines. Workers can be at risk of entanglement, cuts, crush injuries, or electrocution if proper safety measures, guarding, and training are not in place.
 - **Thermal and Cryogenic Hazards:** Pharmaceutical subprojects may involve exposure to high temperatures during processes such as sterilization or drying, as well as working with cryogenic materials like liquid nitrogen. Improper handling or inadequate personal protective equipment can lead to burns, frostbite, or thermal injuries.
 - **Dust and Airborne Particles:** Pharmaceutical manufacturing processes can generate dust, airborne particles, or aerosols, particularly during milling, grinding, or packaging operations. Workers may be at risk of respiratory problems or exposure to hazardous substances. Proper ventilation, dust control measures, and respiratory protection are essential to mitigate these risks.
 - **Biological Hazards:** In some pharmaceutical subprojects, workers may handle live organisms, biological samples, or work in laboratories where exposure to pathogens, toxins, or allergens is possible. Adequate training, proper handling procedures, and the use of appropriate containment measures are essential to minimize the risk of infections or allergic reactions.
 - **Radiation Hazards:** Some pharmaceutical subprojects involve working with radioactive materials or radiation-emitting devices. Workers need proper training, monitoring, and adherence to radiation safety protocols to minimize the risks associated with ionizing radiation exposure.
 - **Waste Management:** Pharmaceutical manufacturing generates waste materials, including chemicals, solvents, packaging, or expired products. Improper handling or disposal of these wastes can pose risks to workers, the environment, and public health. Implementing proper waste management procedures, including segregation, storage, and disposal, is crucial to minimize these risks.
 - **Occupational Exposure in Laboratories:** Pharmaceutical subprojects often include laboratory work, which can involve exposure to chemicals, biological materials, or hazardous substances. Proper personal protective equipment, safety protocols, and training are necessary to protect workers from laboratory-specific hazards.

To mitigate those risks in pharmaceutical subprojects, it is important to conduct thorough risk assessments, implement safety programs, provide comprehensive training, and ensure compliance with relevant safety regulations and quality standards (GIPs). Regular inspections, proper maintenance of equipment, and continuous monitoring of working conditions are vital to ensure a safe and healthy work environment in pharmaceutical manufacturing.

VII. Potential labor risks for Expansion Phases of subprojects Entailing Civil Works:

Expansion, rehabilitation, and installation phases of subprojects involve various activities and processes that can present OHS risks. These risks can vary depending on the nature, scale, and complexity of the

subproject. The following constitute the most common and prominent OHS risks during this phase of subproject implementation;

- **Falls from Heights:** Working at heights is one of the most significant risks in this phase. It includes working on scaffolding, ladders, roofs, or elevated platforms. Falls can result in severe injuries or fatalities. Implementing fall protection measures, such as guardrails, safety harnesses, and proper training on working at heights is essential.
- **Struck-by and Caught-in/Between Hazards:** Construction / Expansion sites involve moving vehicles, heavy machinery, and falling objects. Workers can be struck by vehicles, equipment, or materials, leading to serious injuries. There is also a risk of being caught in or between equipment or structures, such as trenches or machinery. Implementing safety protocols, providing visible signage, and enforcing restricted areas can help mitigate these risks.
- **Electrocution and Electrical Hazards:** Such sites often have electrical systems, wiring, and equipment which are still under installation or are still exposed. Workers can be exposed to electrical hazards, such as electric shocks or arc flashes, if proper precautions are not followed. Ensuring proper grounding, identifying and marking electrical hazards, and providing adequate training on electrical safety are crucial. Only trained and qualified workers should be allowed to conduct electrical works.
- **Hazardous Materials and Chemical Exposure:** Expansion phase of subprojects may involve the use, handling, or removal of hazardous materials, such as asbestos, lead, or chemicals. Workers can be exposed to harmful substances through inhalation, skin contact, or ingestion, leading to respiratory issues, poisoning, or long-term health effects. Implementing proper handling, storage, and disposal procedures, as well as providing PPE and training, are important to minimize exposure.
- **Strains, Sprains, and Overexertion:** Construction work often requires manual lifting, carrying heavy objects, repetitive motions, or working in awkward positions. These activities can lead to strains, sprains, or overexertion injuries. Providing mechanical aids, ergonomic training, and encouraging proper lifting techniques can help prevent these injuries.
- **Machinery and Equipment Hazards:** Expansion and installation works usually involve the use of a wide range of machinery and equipment, such as excavators, cranes, power tools, and welding equipment. Improper use, lack of maintenance, or malfunctioning equipment can result in accidents, amputations, or injuries. Regular inspections, proper training, and adherence to safety guidelines are critical to mitigate equipment-related risks.
- **Structural Collapse and Trenching Hazards:** Some expansion subprojects may involve working with or near excavations, trenches, or temporary structures. Collapses of trenches or structures can lead to burial, entrapment, or crushing injuries. Adequate shoring, trenching safety measures, and proper training on excavation safety are essential to prevent such incidents.
- **Noise and Vibrations:** Construction sites can expose workers to high noise levels and vibrations, which can result in hearing loss, fatigue, or musculoskeletal disorders. Providing hearing protection, maintaining equipment in good condition, and implementing measures to reduce vibrations can help protect workers' health.
- **Heat and Cold Stress:** Civil works often takes place in outdoor environments, exposing workers to extreme temperatures, especially when subprojects' expansion activities include working on new facilities that are still not finished. Heat stress can lead to heat exhaustion, heat stroke, or dehydration, while cold stress can result in hypothermia or frostbite. Implementing measures such as proper hydration, shade provision, appropriate clothing, and regular breaks can help manage heat and cold stress.

- **Long Term Risks:** In addition to immediate safety hazards, construction workers may face long-term occupational health risks, such as respiratory diseases from dust inhalation, skin disorders from chemical exposure, or musculoskeletal disorders from repetitive tasks. Implementing proper ventilation, PPE, hygiene practices.

To mitigate OHS risks in the expansion / installation phase, a comprehensive risk assessment should be undertaken before starting this phase of the project, particularly during the pre-construction (design) phase. Consecutively, there should be proper Identification of potential hazards, assessment of their severity and likelihood, and development of adequate site-specific E&S management tools and methods (e.g., E&S Audits, Corrective Action Plans, ESMPs, and ESIAAs). These tools should provide adequate training and awareness to all workers on OHS practices and procedures, ensuring that appropriate PPEs are provided to workers based on the specific hazards they may encounter. Additionally, measures should be implemented for fall prevention measures such as guardrails, safety nets, and personal fall arrest systems (PFAS) to protect workers. Regular inspections of scaffolding, ladders, and other elevated work platforms to ensure their safety and stability should be continuously implemented and records of inspections should be documented. A log should be created of equipment and machinery maintenance schedules, and a log of incidents, accidents, and near-miss situations should be developed and recorded.

PART III: POTENTIAL OHS IMPACTS RESULTING FROM CONFLICT

impacts that could arise from Israeli occupation on the OHS of Palestinian workers could entail;

- **Restrictions on Movement:** The presence of numerous checkpoints, roadblocks, and the separation barrier can significantly hinder the movement of Palestinian workers. Workers may experience prolonged travel hours to reach or leave their workplaces. Such delays can result in extended working hours, leading to increased fatigue, reduced alertness, and a higher likelihood of work-related accidents or mistakes.
- **Exposure to Violence:** Workers, particularly those involved in construction activities near the separation barrier or in Area C, are at heightened risk of encountering violence. Direct confrontations or proximity to clashes can lead to physical injuries. Additionally, the constant threat of violence can result in long-term psychological trauma, affecting workers' mental well-being and job performance.
- **Limited Access to Medical Care:** The occupation-related movement restrictions and prolonged processes for medical referrals can hinder timely medical attention. Delays in receiving medical care can exacerbate OHS injuries, leading to prolonged recovery times or permanent disabilities. This can also result in increased absenteeism and reduced workforce productivity.
- **Psychological Stress:** The ongoing conflict and various occupation-related stressors contribute to a heightened state of psychological stress among Palestinian workers. Chronic stress can lead to mental health issues such as anxiety, depression, and post-traumatic stress disorder (PTSD). These conditions can affect workers' concentration, decision-making abilities, and overall job performance.
- **Unsafe Working Environments:** During peaks of clashes and conflict, especially in areas like the Gaza Strip that witness frequent bombardments and aggression, the working environment becomes inherently unsafe. The immediate threat to life and property can lead to work disruptions. Additionally, the aftermath of such events can leave workplaces structurally compromised, posing physical risks to workers.

F4J III – Labor Management Procedures

- **Agricultural Risks:** Farmers working in Access Restricted Areas (ARAs), such as in Gaza and parts of the Jordan Valley, face unique challenges, especially when working in Area C lands. These lands may be exposed to unexploded ordnance or other remnants of conflict. Additionally, farmers might experience harassment or threats, leading to rushed work processes that increase the risk of accidents. The unpredictability of access to these lands can also result in inconsistent agricultural practices, affecting crop yield and quality.