



Punjab Urban Land Systems Enhancement (PULSE) Project

Labor Management Procedures

August 2023

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Executive Summary

The purpose of the Labor Management Procedures (LMP) is to facilitate planning and implementation of the project, identify the main labor requirements and risks associated with the project, and enable the Government of Punjab (GoPb) to determine the systems needed and the resources to be put in place to ensure that all labor issues are dealt with effectively. The overall objective of Punjab Urban Land Systems Enhancement (PULSE) Project is to provide beneficiaries in Punjab Province with improved land records and identification of land for development including housing programs. The project has five main components including: 1) Digital Land Records and Cadastral Maps for the Land Records Management Information System (LRMIS); 2) Land for Housing; 3) Integrated Land and Geospatial Information Systems and Services; and 4) Project Management and Institutional Strengthening and 5) Contingent Emergency Response Component (CERC).

The Board of Revenue (BOR) is responsible for project administration and government-wide implementation, and the main Project Management Unit (PMU) has been established in the BOR headquarters. The PMU takes on responsibility for project implementation activities that fall under the mandate of any of its departments – notably the Department of Land Records (DLR). The PMU coordinates across implementing departments, in addition to facilitating cooperation with other entities. It is also responsible for preparing and implementing all project-level safeguards instruments, grievance redress mechanisms (GRM), monitoring and evaluation of results indicators, public communications, and engaging a third-party auditor. The PMU-BOR has been staffed with a full-time Project Director, who reports to the Senior Member, BOR, and a number of technical specialists (who may be part-time or full-time). The PMU-BOR is supported by the Project Steering Committee, chaired by the Senior Member BOR and including representatives from other key stakeholders. A Project Implementation Unit (PIU) has been established within the Punjab Land Records Authority (PLRA). The PIU-PLRA is responsible for day-to-day project implementation and technical oversight. The exact number of project workers to be engaged for implementation of PULSE is being finalized.

In Year 1, key staff was hired for the PMU-BoR and PIU-PLRA, and for the implementation of pilots on the spatial framework for LRMIS. In Year 2, further pilots will be undertaken for registration of peri-urban and urban properties and mapping of tax records (this time in areas where the Urban Unit has not produced tax maps), while data from other government agencies will be added to the integrated urban land records. In Year 3, scale-ups will begin for most project activities, and the aim will be to complete work in Year 5.

Many of the people who will be working on the project at least in the initial stages will be civil servants, whose employment is governed by the Civil Servants Act 1973 (in case of federal civil servants) or the Punjab Civil Servants Act 1974 (provincial civil servants). Direct workers, or those engaged to work specifically on the project, will be recruited from the labor market for specific functions. The standard project hiring procedure will be followed in that the positions detailed in the project PC-1, which will be approved by the competent authority, along with

detailed terms of reference for each position. Posts will be advertised and interviews conducted. A selection committee will make the final decision. Individual consultants, or short-term workers, will be hired through a process of evaluation of relevant resumes, with a minimum of three CVs being considered for each position, as per World Bank procedures. The project is unlikely to have a steady stream of primary supply workers. The procedures for hiring community workers will be similar to those for contracted workers. In order to ensure that local communities are given preference, applicants will be asked to furnish evidence of domicile.

The project is unlikely to involve instances of forced labor or child labor, particularly as large-scale infrastructure works are not included in key activities. Nevertheless, to the extent that contractors or community workers are employed to carry out surveying works or other field activities, their contracts will include provisions to ensure that no instances of forced or child labor occur. Contractors will be overseen by government officials through the PMU/PIU framework, and will be similarly required to ensure that work conditions are safe for women. Survey work will be carried out in all instances under the occupational health and safety requirements of the government, and according to the requirements of the World Bank. Project labor would likely be vaccinated by the time the project commences, given the government's accelerated vaccination drive for all individuals 18 years and older. Regardless of that, project management will ensure adherence to all COVID Standard Operating Procedures in PMU and PIU and on-sites recommended by the National Command Operation Center (NCOC) at the time.

Since 2010, labor policy has been a provincial subject in Pakistan. The GoPb passed "The Punjab Occupational Safety and Health Act in 2019", which specifies that every employer is bound to take possible and "reasonably practicable" measures to ensure the health and safety of all employees. It is also the employer's responsibility to provide protective equipment and clothing to staff where needed, and to maintain a record of accidents and injuries at the workplace. The selection and hiring of contractors by the Government is governed by Public Procurement Regulatory Authority (PPRA) rules. The PPRA rules regarding the procurement of services cover most of the aspects of procurement, however certain areas such as Occupational Health and Safety (OHS), safety committees, and labor management, safety and health workers requirements are not part of the PPRA rules. In absence of guidelines from the government, the ESS2 paragraph 31 will be taken as a guideline and a benchmark. The paragraph states that: "The Borrower will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place labor management procedures applicable to the project that will allow them to operate in accordance with the requirements of this ESS."

A GRM system will be put in place for project workers once the PMU in the BOR is functional and the GRM system is developed. With regard to government servants, grievance redress takes place at two levels: departmental, and through service tribunals. Civil servants also have the option of taking any of their grievances to the High Courts for redress, after a decision from the Tribunal.

1. Introduction

This document constitutes the LMP for the Punjab Urban Land Systems Enhancement project, being prepared by the Government of Punjab in collaboration with the World Bank. The purpose of the LMP is to facilitate planning and implementation of the project, identify the main labor requirements and risks associated with the project, and enable the Government of Punjab to determine the systems needed and the resources to be put in place to ensure that all labor issues are dealt with effectively. The LMP is a living document, which is being initiated early in project preparation, but will be reviewed and updated throughout development and implementation of the project.

This LMP is based on components formulated as per the Project Appraisal Document and information on proposed actions provided by the Board of Revenue, the Punjab Disaster Management Authority, the Punjab Land Records Authority, the Directorate Land Records and other stakeholders.

The overall objective of PULSE is to provide beneficiaries in Punjab Province with improved land records and identification of land for development including housing programs. The project has five main components including: 1) Digital Land Records and Cadastral Maps for the Land Records Management Information System (LRMIS); 2) Land for Housing; 3) Integrated Land and Geospatial Information Systems and Services; and 4) Project Management and Institutional Strengthening and 5) Contingent Emergency Response Component (CERC). The first component will create a spatial framework for the LRMIS, in addition to creating systems to register peri-urban and urban property, and upgrading property tax records accordingly. The second component will develop an inventory of state lands asset and management strategy. The third component will integrate information from a variety of sources with the LRMIS to create an integrated land records portal. The component will also establish the infrastructure for maintenance of records on spatial data in the province. The fourth component will provide policy, legal and regulatory support to the project, carry out monitoring of project activities and disseminate information on the project, among other administrative functions. The last component has been created to provide an immediate response in case an eligible emergency occurs during project implementation.

The LMP outlines the policies, procedures, and strategies that will be employed to ensure that labor within the project is treated fairly and equitably, and that the project is implemented in accordance with local labor laws and regulations.

The key objectives of the Labor Management Plan are to promote safe working conditions, prevent discrimination and harassment, and ensure that all workers are provided with appropriate training and support. The plan also aims to enhance the productivity and efficiency of the workforce by

implementing measures such as performance-based incentives, capacity building, and skill development.

The LMP also outlines the mechanisms for resolving disputes and grievances that may arise between the workers, contractors, and project management. It establishes procedures for monitoring and reporting on labor-related issues, including labor standards compliance, working conditions, and worker welfare.

Overall, the LMP is a critical component of the Punjab Urban Land Enhancement Project, as it helps to ensure that the project is implemented in a socially responsible and sustainable manner, while also protecting the rights and welfare of workers involved in the project.

1.1. Overview of Labor Use on the Project

The sanctioned posts in the key Authorities of Board of Revenue affiliated institutions, which will be concerned with implementing the project are given in table 1.1 below. The table gives total staff strength in the implementing organizations, and thus indicates the total staff resources available that can be drawn on for project implementation. The project implementing units to be set up in the BOR/DLR, as well as in PLRA will have some staff from the parent organizations, in addition to specialist staff hired for the project. In addition, the GoPb may hire additional contract staff as and when needed to fulfill specific functions.

Table 1.1: Staff Strength in Key Offices

<i>Office</i>	<i>Sanctioned strength for officers (BPS-17 to 22)</i>	<i>Sanctioned strength for support staff (BPS-1 to 16)</i>
Board of Revenue Headquarters		
Directorate Land Records		
Punjab Land Records Authority (PLRA)	267	5,137

Box 1: Categories of Project Workers

For the purposes of the LMP, and as per requirements of ESS 2 of the World Bank’s Environmental and Social Framework (ESF), different categories of project workers are identified as follows.

Project Workers: These are people employed or engaged directly by the project, to work specifically in relation to the project (also known as **direct workers**); contracted workers employed/engaged through third parties to perform work related to core functions of the project (known as **contracted workers**); people employed/engaged by primary suppliers (**primary supply workers**); or those providing community labor (**community labor workers**).

1.1.1. Institutional Arrangements

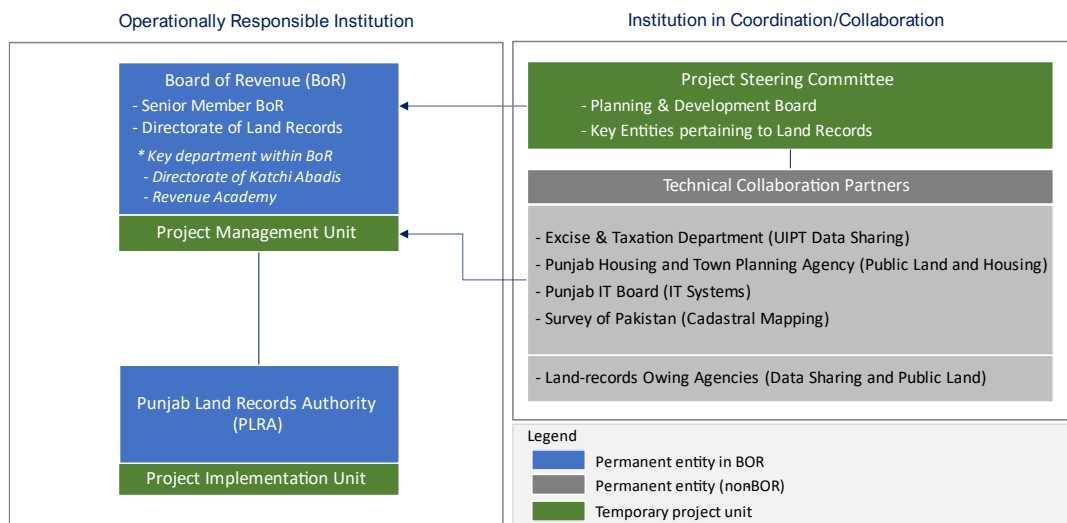
Before delineating the proposed number of project workers, the institutional arrangements of the PULSE program are briefly explained as follows. The BOR is responsible for project administration and government-wide implementation, and the PMU-BOR has been established in the BOR headquarters. The PMU-BOR takes on responsibility for project implementation activities that fall under the mandate of any of its departments – notably the Department of Land Records, or DLR¹. This PMU-BOR coordinates across implementing departments, in addition to facilitating cooperation with non-BOR entities such as the Survey of Pakistan (SOP), the Excise & Taxation Department, the Lahore Development Authority (LDA) and other government departments and agencies. It is also responsible for preparing and implementing all project-level safeguards instruments, GRM, monitoring and evaluation of results indicators, public communications and engaging a third-party monitoring and audits. The PMU-BOR has been staffed with a full-time Project Director, who reports to the Senior Member, BOR, and a number of technical specialists (who may be part-time or full-time). The PMU-BOR is supervised by the Project Steering Committee, chaired by the Senior Member BOR and including representatives from other key stakeholders.

The PIU has been established within PLRA. PLRA is an autonomous body of BoR, with distinct budget and fiduciary arrangements. The PIU-PLRA is responsible for day-to-day project implementation and technical oversight. In addition, the PIU-PLRA is responsible for the provincial spatial data infrastructure and upstream mapping activities, and aggregation / digitization of existing data from other land record-owning agencies. Furthermore, the PIU-PLRA is responsible for data cleansing, verification, and final registration in LRMIS, as well as recording transactions afterward. The PIU-PLRA will play important roles in building public awareness about the project and engaging with communities.

The PIU-PLRA has been staffed with a full-time Project Coordinator, who reports to the head of the department, plus relevant technical specialists (full-time or part-time). Technical specialists include survey and mapping specialists, geographic information systems (GIS), MIS, ICT, GRM, capacity development and outreach, etc. The PIU-PLRA will also contract directly with private contractors.

¹ The DLR will take primary responsibility for leading fieldwork and raw data collection and adjudication in rural and peri-urban areas where Patwaris have an established presence.

Implementation Arrangements



Number of Project Workers: The exact number of project workers to be engaged for implementation of PULSE is being finalized. The latest information is reproduced in the table below and will be updated if needed.

Table 1.2: Number of Project Workers

<i>Units/Components</i>	<i>Sub-components</i>	<i>Key Institution(s)</i>	<i>Number of Persons</i>
Project Steering Committee	-	P&D Board, BOR, DLR, PLRA, SOP, Lahore Development Authority (LDA), Excise and Taxation Department, Development Authorities	

Component 1: Digital Land Records and Cadastral Maps for LRMIS	Sub-component 1.1: Spatial framework for LRMIS Sub-component 1.2: Systematic registration of peri urban properties	BOR (Main PMU), DLR, PLRA PIU	PIU to include: (i) project coordinator; (ii) fiduciary assistant; (iii) monitoring and evaluation assistant; (iv) technical advisors (seconded temporarily from PIU as needed);
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<i>Units/Components</i>	<i>Sub-components</i>	<i>Key Institution(s)</i>	<i>Number of Persons</i>
	Sub-component 1.3: Upgrading tax records to urban land records Sub-component 1.4: Incorporation of existing urban records Sub-component 1.5: Systematic registration of urban property		and (v) support staff (government appointees).
Component 2: Land for Housing	Sub-component 2.1: Inventory of state lands asset Sub-component 2.2: State lands asset management strategy	BOR (Main PMU)	The PMU includes: (i) project director; (ii) procurement specialist; (iii) financial management specialist; (iv) Environment Specialist; (v) Social Specialist; (vi) monitoring & evaluation specialist; (vii) survey and mapping specialists; (viii) land administration (registration, revenue, valuation) specialists (government appointees); (ix) geographic information system (GIS) specialist; (x) information and communication technologies (ICT) specialist; (xi) capacity development, outreach and communications specialist; (xii) GRM specialist; and (xiii) support staff (government appointees)

Component 3: Integrated Land and Geospatial Information Systems and Services	Sub-component 3.1: ICT Infrastructure Upgrade Sub-component 3.2: LRMIS Improvement Sub-component 3.3: Integrated Land Portal Sub-component 3.4: Establishment of Provincial Spatial Data Infrastructure	BOR (main PMU), PLRA PIU, SOP	PIU to include: (i) project coordinator; (ii) fiduciary assistant; (iii) monitoring and evaluation assistant; (iv) technical advisors (seconded temporarily from PIU as needed); and (v) support staff (government appointees).
Component 4: Project Management and Institutional Strengthening	Sub-component 4.1: Project Management, Monitoring and Evaluation	BOR (Main PMU)	The PMU includes: (i) project director; (ii) procurement specialist; (iii) financial management specialist; (iv) Environment
<i>Units/Components</i>	<i>Sub-components</i>	<i>Key Institution(s)</i>	<i>Number of Persons</i>
	Sub-component 4.2: Legal and Regulatory Support Sub-component 4.3: Institutional Strengthening and Public Awareness		Specialist; (v) Social Specialist; (vi) monitoring & evaluation specialist; (vii) survey and mapping specialists; (viii) land administration (registration, revenue, valuation) specialists (government appointees); (ix) geographic information system (GIS) specialist; (x) information and communication technologies (ICT) specialist; (xi) capacity development, outreach and communications specialist; (xii) GRM specialist; and (xiii) support staff (government appointees).

Timing of Labor Requirements: The project will run over a period of 5 years, from March 2022 to June 2027. The first six months mainly consisted of policy and planning activities, and primarily technical personnel were engaged. As activities begin to be rolled out later in the first year and beyond, more staff will be deployed. Some activities will be outsourced to private sector contractors.

Broadly, staff requirements will proceed as follows. In Year 1, key staff has been hired for the PMU-BOR and PIU-PLRA. Staff will also be hired for the implementation of pilots on the spatial framework for LRMIS. These pilots will be undertaken by PIU-PLRA. At the same time, pilots for systematic registration in peri-urban areas, and mapping for tax records was undertaken by PLRA and BOR/DLR. In Year 2, further pilots will be undertaken for registration of peri-urban and urban properties and mapping of tax records (this time in areas where the Urban Unit has not produced tax maps), while data from other

government agencies will be added to the integrated urban land records. The scale-up of the spatial framework will also begin in Year 2. In Year 3, scale-ups will begin for most project activities, and the aim will be to complete work in Year 5. In short, key staff for PIU-PLRA and additional expertise for pilots (where required) will be brought on board in the first two years of the project, while from Year 2 onwards, as scale-ups begin, staff strength (from government departments as well as private sector) will substantially increase.

1.1.2. Characteristics of Project Workers

Direct Workers: The GoPb draws its officers or senior staff, from two broad cadres; the federal and provincial civil services respectively, and directly recruiting for some posts (all staff levels) through the Punjab Public Service Commission (PPSC) or direct hiring by notifying the Recruitment Committee as per the Government laws. Many of the people who will be working on the project at least in the initial stages will be civil servants, whose employment is governed by the Civil Servants Act 1973 (in case of federal civil servants) or the Punjab Civil Servants Act 1974 (provincial civil servants). ESS 2 is not applicable to civil servants, with the exception of provisions relating to child and forced labor and occupational health and safety. Recruitment to the civil service is through a competitive process, which does not allow for forced labor to exist. As per rules of the federal and provincial Public Services Commissions, the minimum age for recruitment is 21, and as such, restrictions on child labor cannot be violated.

However, direct workers, or those engaged to work specifically on the project, can also include persons who will be recruited from the labor market for specific functions. The standard project hiring procedure for core project staff will be followed in that the positions will be detailed in the project PC-1, which will be approved by the competent authority, along with detailed terms of reference for each position. Once this is done, advertisements for the positions will be placed in three national newspapers. Initial shortlisting of applications will be done by a recruitment committee constituted for the purpose, and tests (where required) and interviews will follow. A selection committee will make the final decision.

Contracted Workers: Individual consultants, or short-term workers, will be hired through a process of evaluation of relevant resumes, with a minimum of three CVs being considered for each position, as per World Bank procedures.

Primary Supply Workers: The project will not involve major physical infrastructure works except for refurbishment of existing government offices, provision of equipment for some new Arazi Record Centers (ARCs), and upgradation of equipment in the same under sub-component 2.5. The subcomponent will include the acquisition of IT equipment and possibly software. However, these materials are unlikely to be supplied on an ongoing basis. As such, the project is unlikely to have a steady stream of primary supply workers.

Community Labor: The project envisages hiring people from the communities or through field revenue staff to work as para surveyors. These workers will

also help to identify parcel boundaries on high resolution images or on the ground. The procedures for hiring of these workers will be similar to those for contracted workers. In effect, advertisements will be placed in at least three national newspapers, and then a process of shortlisting and interviews will take place. In order to ensure that local communities are given preference, applicants will be asked to furnish evidence of domicile. Interviews will be conducted in the districts to facilitate local applicants.

2. Assessment of Key Potential Labor Risks

The assessment of potential labor risks is based on an assessment of project activities. In this section, we first describe key activities, and then delineate possible labor risks.

2.1. Key Project Activities

Component 1: Digital Land Records and Cadastral Maps for LRMIS

This component is mainly concerned with developing a seamless cadastral map linked to digital land records in both rural and urban areas for the whole province. This will entail georeferencing revenue maps (*masawi*) to the national coordinate reference system, examining claims, and producing final rural parcel maps. Key activities include preparing the spatial framework for the LRMIS, registration of peri-urban and urban properties, and upgrading tax records to urban land records.

Component 2: Land for Housing

This component will support government agencies to identify and mobilize suitable public lands for development programs. This component will consolidate the state lands identified under Component 1 and the paper records kept by various government authorities. These state lands will be digitalized, georeferenced, and stored in a database in LRMIS to build an inventory of state lands asset. The project will finance the establishment of public lands asset management procedures and good governance with a monitoring system to ensure transparency and accountability.

Component 3: Integrated Land and Geospatial Information Systems and Services

This component will focus on establishing a modern Land Information System, unifying and integrating rural and urban land records. Key activities will include strengthening the new LRMIS with advanced GIS features for managing spatial information; and developing an integrated Land Information Portal, which will be used to provide a number of e-services. One of the key components of the portal will be a digital cadastre map of unified rural and urban land parcels. For the new, integrated system to function effectively, it will be crucial to strengthen existing Data Centers and other backup sites. The component will thus also invest in increasing data storage, power backups and server equipment, together with software licenses, required to run ICT infrastructure. Apart from the main Data Center upgrades, similar mirrored upgrades would be carried out in backup sites.

Component 3 will also support the mapping activity being carried out under Component 1 by working with SOP to establish a common reference system of all mapping products, thus contributing to developing a nationally consistent spatial framework in Pakistan. Lastly, the list of activities for this component also includes upgrading existing Arazi Record Centers and equipping new centers, by procurement and installation of equipment, hardware and software.

Component 4: Project Management and Institutional Strengthening

This Component will support effective project management, fiduciary support (financial management and procurement), monitoring and evaluation of project activities, establishment of a solid M&E framework, and compliance with social and environmental safeguards policies and processes. A grievance redress mechanism (GRM) will also be established for project workers, as well as the general public, who want to bring any project related issue to the notice of the provincial government. The policy, legal and regulatory framework for comprehensive land administration, systematic land registration, and unified land registry management will also be reviewed and further developed under this component, and a public awareness campaign will be launched to educate the public on the reforms.

2.2. Assessment of Potential Labor Risks

The project does not involve major civil works, and as such there is little likelihood of there being any large scale in-migration of labor on project sites. Having said that, possible labor risks are assessed below.

Forced Labor or Child Labor: The project is unlikely to involve instances of forced labor or child labor; particularly as large-scale infrastructure works are not included in key activities. Nevertheless, to the extent that contractors or community workers are employed to carry out surveying works or other field activities, their contracts will include provisions to ensure that no instances of forced or child labor occur.

The Punjab Restriction of Employment of Children Act 2016 is the key legislation to prohibit the employment of children and to restrict the employment of adolescents in certain occupations and processes.

Gender Based Violence (GBV)/Sexual Exploitation & Abuse (SEA)/Sexual Harassment Associated (SH) Risks:

In terms of female workforce, the PULSE project will broadly deal with two categories of women workers:

- Direct Project Workers
- Women Workers of the Project Contractors

Direct Project Workers:

The direct project workers are at low risk of GBV/SEA/SH given that the project activities will govern under the provincial legislation. The Provincial legislation recognizes women's right to participate in society and workforce with dignity

and provides protection against violence, exploitation and sexual harassment. A brief overview of key legislation is given below:

Sr.	Act	Description
1	Punjab Protection Against Harassment of Women at Workplace Act, 2010	Act to make provisions for the protection of women from harassment at the workplace and also provides a code of conduct for workplaces to ensure a work environment free of harassment and intimidation.
2	The Punjab Protection of Women Against Violence Act 2016	Constitution of the Islamic Republic of Pakistan, while guaranteeing gender equality, enables the State to make any special provision for the protection of women, it is necessary to protect women against violence including domestic violence, to establish a protection system for effective service delivery to women victims and to create an enabling environment to encourage and facilitate women freely to play their desired role in the society.
3	Punjab Women Development Policy, 2018	It envisions a gender-sensitive Punjab without any explicit or implicit discrimination.

In addition, the Punjab Commission on the Status of Women (PCSW) operates a helpline enabling women to register complaints of harassment and/or gender-based violence.² Such institutional mechanisms demonstrate the government's commitment to promote safe workspaces for women. The project will adhere to the same standards.

Training and Code of Conduct for Project Workers:

The Project staff will be sensitized on gender-related matters through training. The training will also include World Bank's guidelines and international best practices. The initial training, along with the Bank Environmental and Social (E&S) introductory session to the PMU and PIU staff, was provided, and a refresher training will be conducted annually.

The Punjab Protection Against Harassment of Women at Workplace Act, 2010 provides an elaborate Code of Conduct for workplaces (Annexure-A). This code of conduct will be circulated among the management and workforce.

GRM for GBV/SEA/SH Complaints

² See https://pcsw.punjab.gov.pk/inquiries_complaints

The project will operationalize GRM for project workers for recording and redressal of matters related to gender violence, exploitation and harassment. A committee will be constituted to redress such grievances. In light of the Punjab Protection Against Harassment of Women at Workplace Act, 2010 at least one member of a three-member committee will be a woman.

Women Workers of the Project Contractors:

The project will ensure that hired contractors adhere to World Bank Guidelines through effective contract management. All the relevant Environment and Social Safeguard instruments covering health, safety and gender related risks will be incorporated in the Environment, Social, Health and Safety Specifications (ESHS) of the procurement document. The ESHS will include a Code of Conduct for Service Provider's Personnel (Annexure-B). The purpose of this Code of Conduct is to outline the key principles of conduct expected from all potential, service providers, and contractors to ensure safe working conditions for all workers. This Code of Conduct puts emphasis on eliminating the risks of SEA/SH for female workforce. Contractors/sub-contractor will also sign and submit a SEA/SH Performance Declaration.

The E&S specialists and Gender specialist will impart training to the contractors prior to commencement of work. On field trainings will be conducted during quarterly monitoring. However, since the project does not envision large scale construction, there will not be a huge influx of labor in the community.

The performance of the contractors will be monitored throughout the project implementation by E&S specialists and Procurement Specialist.

Contractors will be overseen by government officials through the PMU and PIU framework, and will be similarly required to ensure that work conditions are safe for women.

Conduct of Hazardous Work: Field work for the project will mainly consist of land surveying, some of which may take place in hilly terrain or in otherwise physically challenging conditions. Survey work will be carried out in all instances under the occupational health and safety requirements of the government, and according to the requirements of the World Bank's ESS2 which relates to labor management. If contractors are hired for survey work, they will also be bound by the same legislation and requirements. In addition, their health and safety procedures will be reviewed by the relevant PMU or PIU staff before commencement of the work. The OHS measures applying to the project will be set out in the ESMF and ESCP. The main PMU will prepare detailed OHS plans specific to project activities in the inception phase.

Discrimination and Harassment: Project Workers may be subjected to discrimination and harassment based on their gender, ethnicity, religion, or other factors. This risk can be mitigated by implementing policies and procedures to prevent discrimination and harassment, and by ensuring that workers are aware of their rights and have access to reporting mechanisms.

Contractual Issues: Contractual issues such as unclear job descriptions, lack of clarity on responsibilities, and misunderstandings about expectations can lead

to disputes between workers and employers. This risk can be mitigated by ensuring that all contracts are clear, transparent, and well understood by all parties.

Possible Accidents or Emergencies: The bulk of project activities do not entail significant risk of accidents. There is a low risk of emergency situations arising during surveying activities in informal settlements (*katchi abadis*), where residents may not be aware of the purpose of the surveys, and may fear survey teams are identifying unauthorized houses. However, an advance communication and consultation process will be undertaken (described in the Stakeholder Engagement Plan) which should mitigate any untoward circumstances.

COVID-19 Related Risks: Project labor would likely be vaccinated by the time the project commences, given the government's accelerated vaccination drive for all individuals 18 years and older. Regardless of that, project management will ensure adherence to all COVID Standard Operating Procedures in PIUs and onsite recommended by the National Command Operation Center (NCOC) at the time.

It is important to identify and mitigate these labor risks to ensure that the project is implemented in a socially responsible and sustainable manner, while also protecting the rights and welfare of workers involved in the project.

3. Brief Overview of Labor Legislation: Terms and Conditions

For the purpose of this project, we are assuming that three categories of workers would be employed on the project: civil servants (or direct workers), consultants (on long or short-term contracts), and community working to be hired as para surveyors. The former is governed by the Civil Services Act 1973, or the Punjab Civil Servants Act 1974.

Civil Services Act 1973: The law governing the service matters of the federal government employees is the Civil Services Act 1973. Under this Act, a civil servant is defined as, "...a person who is a member of an All-Pakistan Service or of a civil service of the Federation, or who holds a civil post in connection with the affairs of the Federation, including any such post connected with defense..."

The Civil Services Act 1973 covers areas such as terms of employment, appointments, probation, confirmation of service, seniority, promotion, postings and transfers, termination of service, retirement, post retirement employment, conduct, discipline, pay and other monetary benefits, leave and pensions.

Punjab Civil Servants Act 1974: The Act lays out terms and conditions for the employment of civil servants through the GoPb. Its provisions are largely similar to the Civil Services Act of 1973.

Contractual staff: The government can hire consultants/sector experts to help improve its functioning, and help plug gaps in technical expertise within departments. The contracts of employment of such staff are governed under the specified terms. Top cadre long term contractual staff are normally hired according to the Management Position (MP) scales, which are generally equivalent in terms of seniority to officers in BPS 20 to 22.³ MP contracts are normally issued for a period of up to two years, and include medical cover and gratuity. Contracts can be terminated on one month's notice by either side. Community workers will be hired as short-term workers with contracts specifying daily labor rates and number of days to be worked, as well as remuneration.

4. Brief Overview of Labor Legislation: Occupational Health and Safety

Since 2010, labor policy has been a provincial subject in Pakistan, with provincial Departments of Labor mainly responsible for implementing health and safety regulations. The last labor policy approved for the country by the federal cabinet was in 2010, prior to the devolution of labor regulation to the provinces. The Labor Policy of 2010 recommends creation of a Tripartite Council on Health and Safety to identify health and safety hazards for workers of all economic sectors, and to make recommendations for safety measures on a continuous basis. The federal government did, however, develop a model OHS law for the provinces to adapt and enact. Subsequently, the GoPb passed The Punjab Occupational Safety and Health Act 2019.

Punjab Occupational Safety and Health Act 2019: Article 3 of the Act specifies that every employer is bound to take possible and “reasonably practicable” measures to ensure the health and safety of all employees. Employers are duty bound to identify existing and new hazards at the workplace from time to time, and if necessary, to arrange for health and safety training and vaccinations etc. for employees at their (the employer's) expense. It is also the employer's responsibility to provide protective equipment and clothing to staff where needed, and to maintain a record of accidents and injuries at the workplace. Similarly, it's up to employees to refrain from willful use of potentially hazardous equipment and materials. Equipment manufacturers are required to provide instructions for safe assembly, use and storage of machinery and equipment.

5. Responsible Staff

Project implementation entities, most notably the BOR, DLR, and PLRA through their respective PMU and PIU, will hold prime responsibility for:

- Engagement and Management of Project Workers
- Engagement and Management of Contractors/Subcontractors

³ MP-III is normally equivalent to BPS-20, MP-II to BPS-21 and MP-I to BPS-22.

- Occupational Health and Safety (OHS)
- Training of Workers
- Addressing Worker Grievances

However, to the extent that project workers are public servants, the service rules of the federal and provincial governments (as the case may be) will continue to be applicable to them, as will provisions of the Punjab Occupational Health and Safety Act 2019.

5.1. Policies and Procedures

This project does not carry the risk of forced labor, or of child labor being employed. Possible risks to labor have been discussed earlier.

5.2. Age of Employment

The bulk of project staff would be civil servants for whom the minimum age of recruitment is 21 years. The contractual staff would mostly be experts in their field, who would be required to have a significant number of years of experience in their respective fields and are unlikely to be underage. In any event, all new applicants would be required to provide evidence of educational qualifications, as well as computerized national identity cards (CNICs) which are sufficient to establish dates of birth.

5.3. Terms and Conditions

Project workers who are civil servants will work according to the government's service rules, following the timings, leave provisions etc. applicable to federal and provincial government employees. Consultants will be employed either on MP grades or on short term contracts on terms to be determined by the project implementation entities as per government rules.

6. Grievance Redress Mechanism

As per World Bank requirements, GRM systems are an integral component of the project administration. Paragraph 26 of ESS 10 says that, "the Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances."

A GRM system will be put in place for project workers once the main PMU in the BOR is functional and the GRM system is developed. The system will be designed such that concerns of project labor, regardless of which PMU and PIU hire them, are addressed promptly, processes employed are understandable and transparent, and proceedings are in a language that the complainant understands. One possible mechanism that will be considered is the establishment of a Staff Grievance Committee (SGC), headed by a representative from the BOR, and including representatives of the PLRA, and one or two staff

members who may be given additional charge to help the SGC members with grievance redress. GRM Specialist will be the Secretary of the SGC and is responsible for the notification of this committee at the start of the project once both PMU and PIU will be operational. The SGC will work mainly to redress grievances of all staff hired specifically for the project (project/contractual workers), including those hired on short term contracts (like community workers).

With the assistance from ICT a web portal will be set up for the purpose, and project/contractual staff will be able to log in, specify the nature of the grievance (choosing from a drop-down menu which will include the option of "Other") and also specify the department and division to which their grievance is addressed. GRM Specialist will arrange an orientation session for all project workers to make them understand the use of this web portal to launch their grievance. The member of the SGC from the specified department will then take up the grievance with the concerned officers or administration. In addition to the web portal, project/contractual workers will also be able to file grievances in writing through a simple letter sent to a member of the SGC. The member will then be obliged to have the complaint entered into the system through the web portal, and to maintain a record of how it is addressed.

Contracts will specify the maximum time for first response to the grievance, which should not be more than fifteen days. If the grievance cannot be addressed within fifteen days, the GRM Specialist will contact the contract employee and inform his/her of the reason, and will also decide on how the issue will be resolved and the timeframe required. This discussion will also be summarized in a message to be sent through the web portal, so as to maintain an electronic record of communication. Meetings of the SGC will be held at least once a month and all outstanding grievances (which cannot be resolved at first call) will be discussed and escalated to the relevant quarters. The ToRs of the SGC will be developed by the GRM Specialist once the PMU and PIU are fully functional.

With regard to government servants, grievance redress takes place at two levels: departmental, and through service tribunals. For the most part, grievances are recorded on personal files of the officers concerned, and any redress provided is also recorded on the file. As such, the process is transparent, and is generally understood by the complainant. If an employee is not satisfied with the process, he/she can take his/her complaint to a senior officer normally in the Administration Wing of the concerned department, who may deem fit to form an Enquiry Committee to investigate the issue. However, these processes do not follow set patterns and there are no specific requirements on how investigations must proceed.

The government employees also have the option of approaching Services Tribunals, at either the federal or provincial levels as appropriate, after exhausting the remedies available to them within their respective departments. They also have the option of taking any of their grievances to the High Courts for redress, after a decision from the Tribunal.

Grievances of government servants, private sector workers or the general public against government employees can also be taken up through institutions such as the Ombudsman's offices which are located in all four provinces and at the federal level. There is now also a functional Prime Minister's complaint cell in place, known as the Citizen's Portal, through which a complaint against a civil servant can be sent directly to the PM's Secretariat. A similar complaint cell also functions at the provincial level – the Chief Minister's Complaint Cell allows the general public to file complaints against government officials.⁴

7. Contractor Management

The selection and hiring of contractors by the Government is governed by Public Procurement Regulatory Authority (PPRA) rules. The PPRA rules regarding the procurement of services cover most of the aspects of procurement, however certain areas such as OHS, safety committees, and labor management, safety and health workers requirements are not part of the PPRA rules. In absence of guidelines from the government, the ESS2 paragraph 31 will be taken as a guideline and a benchmark. The paragraph states that: "The Borrower will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place labor management procedures applicable to the project that will allow them to operate in accordance with the requirements of this ESS." Thus, all firms contracted to work on the project will put in place appropriate human resource policies, as well as operational health and safety policies that comply with the requirements of the Punjab Occupational Safety and Health Act 2019.

Additional mechanisms will be placed to manage and monitor the performance of the third parties as per ESS2 paragraph 32 which states that, "The Borrower will establish procedures for managing and monitoring the performance of such third parties in relation to the requirements of this ESS. In addition, the Borrower will incorporate the requirements of this ESS into contractual agreements with such third parties, together with appropriate non-compliance remedies. In the case of subcontracting, the Borrower will require such third parties to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors."

8. Community Workers

As per ESS2 Section F, Borrowers are required to assess working conditions and occupational health and safety conditions for community workers to be hired by the project.

As noted earlier, the project will hire community workers as para surveyors. These appointments will be made on contractual basis, as short-term contracts to be issued by project offices. The process for hiring (advertisements, interviews, domicile requirements) have been explained earlier in this document. Contracts will be issued as per standard government short term contracts and will include details of work hours, remuneration, and

⁴ <http://www.cmpunjab.gov.pk/OCC/UI/OnlineComplaint.aspx>

compensation in case of injury or death. Since these are to be short term contracts, leave and benefits will not form part of the package. As with other contracts, the Government of Punjab will adhere to the requirements of the Punjab Occupational Safety and Health Act 2019. In addition, all community workers hired as para-surveyors will undergo a brief training on the requirements of the job, and the use of specialized equipment. This training will constitute a part of the contract and they will be compensated for attendance.

Community workers will have access to the same web portal for grievance redress as other contractual staff. Their contracts will specify that they will have access to the grievance redress system, and their training will include a demonstration on how to access the system. However, in addition to web access, their complaints will also be entertained if they approach PMU or PIU in person, or if they use simple means of communication such as a letter or phone call. In this case, the complaints will be logged into the web portal by staff assigned for the purpose at each PIU.

9. Primary Supply Workers

Not applicable.

ANNEXURES

Annexure A. Code of Conduct for Protection Against Harassment of Women at the Workplace

Whereas it is expedient to make the Code of Conduct at the Workplace etc. to provide protection and safety to women against harassment, it is hereby provided as under:-

(i) The Code provides a guideline for behavior of all employees, including management, and the owners of an organization to ensure a work environment free of harassment and intimidation;

(ii) "Harassment" means any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment;

The above is unacceptable behavior in the organization and at the workplace, including in any interaction or situation that is linked to official work or official activity outside the office.

Explanation.– There are three significant manifestations of harassment in the work environment–

(a) Abuse of authority

A demand by a person in authority, such as a supervisor, for sexual favors in order for the complainant to keep or obtain certain job benefits, be it a wage increase, a promotion, training opportunity, a transfer or the job itself.

(b) Creating a hostile environment

Any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature, which interferes with an individual's work performance or creates an intimidating, hostile, abusive or offensive work environment.

The typical "hostile environment" claim, in general, requires finding of a pattern of offensive conduct, however, in cases where the harassment is particularly severe, such as in cases involving physical contact, a single offensive incident will constitute a violation.

(c) Retaliation

The refusal to grant a sexual favor can result in retaliation, which may include limiting the employee's options for future promotions or training, distorting the evaluation reports, generating gossip against the employee or other ways of limiting access to his/her rights. Such behavior is also a part of the harassment.

(iii) An informal approach to resolve a complaint of harassment may be through mediation between the parties involved and by providing advice and counseling on a strictly confidential basis;

(iv) A complainant or a staff member designated by the complainant for the purpose may report an incident of harassment informally to her supervisor, or a member of the Inquiry Committee, in which case the supervisor or the Committee member may address the issue at her discretion in the spirit of this Code. The request may be made orally or in writing;

(v) If the case is taken up for investigation at an informal level, a senior manager from the office or the head office will conduct the investigation in a confidential manner. The alleged accused will be approached with the intention of resolving the matter in a confidential manner;

(vi) If the incident or the case reported does constitute harassment of a higher degree and the officer or a member reviewing the case feels that it needs to be pursued formally for a disciplinary action, with the consent of the complainant, the case can be taken as a formal complaint;

(vii) A complainant does not necessarily have to take a complaint of harassment through the informal channel. She can launch a formal complaint at any time;

(viii) The complainant may make formal complaint through her incharge, supervisor, CBA nominee or worker's representative, as the case may be, or directly to any member of the Inquiry Committee. The Committee member approached is obligated to initiate the process of investigation. The supervisor shall facilitate the process and is obligated not to cover up or obstruct the inquiry;

(ix) Assistance in the inquiry procedure can be sought from any member of the organization who should be contacted to assist in such a case;

(x) The employer shall do its best to temporarily make adjustments so that the accused and the complainant do not have to interact for official purposes during the investigation period. This would include temporarily changing the office, in case both sit in one office, or taking away any extra charge over and above their contract which may give one party excessive powers over the other's job conditions. The employer can also decide to send the accused on leave, or suspend the accused in accordance with the applicable procedures for dealing with the cases of misconduct, if required;

(xi) Retaliation from either party should be strictly monitored. During the process of the investigation work, evaluation, daily duties, reporting structure and any parallel inquiries initiated should be strictly monitored to avoid any retaliation from either side;

(xii) The harassment usually occurs between colleagues when they are alone, therefore usually it is difficult to produce evidence. It is strongly

recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to make a formal complaint at the time. Although not reporting immediately shall not affect the merits of the case; and

(xiii) The Code lays down the minimum standards of behavior regarding protection of women from harassment at workplace etc. but will not affect any better arrangement that an organization may have developed nor will it bar the grant of protection that employees working in an institute may secure from their employers through negotiation.

Annexure B. Code of Conduct for Contractors/Sub-contractors

Service Provider's Personnel employed for the execution of the Services at the locations in the Employer's country where the Services are provided shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Service Provider's Personnel and any other person;
3. maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
 - b. wearing required personal protective equipment;
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Service Provider's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
8. not engage in in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse, and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and

12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of applicable grievance mechanism for Service Provider's Personnel or the project's Grievance Redress Mechanism.

Section B:

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviors.

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

- A Service Provider's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.
- A Service Provider's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Service Provider's Personnel rapes, or otherwise sexually assaults a member of the community.
- A Service Provider's Personnel denies a person access to the locations where the Services are executed unless he/she performs a sexual favor.
- A Service Provider's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) Examples of sexual harassment in a work context

- A Service Provider's Personnel comment on the appearance of another Service Provider's Personnel (either positive or negative) and sexual desirability.
- When a Service Provider's Personnel complains about comments made by another Service Provider's Personnel on his/her appearance, the other Service Provider's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Service Provider's Personnel or Employer's Personnel by another Service Provider's Personnel.

A Service Provider's Personnel tells another Service Provider's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself