



THE REPUBLIC OF UGANDA
MINISTRY OF EDUCATION AND SPORTS

UGANDA COVID-19 EDUCATION RESPONSE (GPE) PROJECT (P174033)

LABOUR MANAGEMENT PLAN (LMP)

AUGUST 2021

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LIST OF ACRONYMS

AIDS	Acquired Immune Deficiency Virus
ARSDP	Albertine Region Skills Development Project
BoGs	Board of Governors
C/HRM	Commissioner Human Resource Management
CAE	Child Abuse and exploitation
CCT	Center Coordinating Tutor
CERP	COVID-19 Emergency Education Response Project
CoC	Code of Conduct
DCDO	District Community Development Officer
DEO	District Education officer
DHO	District Health Officer
DIS	District Inspector of Schools
DLD	District Labour Officer
DPO	District Personnel Officer
DSA	Daily Subsistence Allowance
EFA-FTI	Education for All - Fast Track Initiative Fast Track Initiative
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GoU	Government of Uganda
GPE	Global Partnership for Education
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HIV	Human Immunodeficiency Virus
HSE	Health Safety and Environment
IFC	International Finance Corporation
ILO	International Labour Organization
IPC	Infection Prevention and Control
LMP	Labor Management Plan
M&E	Monitoring and Evaluation
MGLGD	Ministry of Gender Labour and Social Development

MoES	Ministry of Education and Sports
MoH	Ministry of Health
MoPS	Ministry of Public Service
NCDC	National Curriculum Development Centre
NSSF	National Social Security Fund
OHS	Occupational Health and Safety
PAP	Project Affected Persons
PCU	Project Coordination Unit
PIM	Project Implementation Manual
POM	Project Operation Manual
PPEs	Personal Protective Equipment's
SEA	Sexual Exploitation and Abuse
SMCs	School Management Committees
SMT	Senior Woman Teacher
SoPs	Standard Operating Procedures
SPD	Standard Procurement Document
SWT	Senior Woman Teacher
USDP	Uganda Skills Development Project
VRC	Voters Registration Card
WB	World Bank
WHO	World Health Organizations

1.0 INTRODUCTION

1.1 Background to Project

In response to the danger posed by the COVID-19 pandemic to Uganda students, the Government on March 18, 2020, announced the closure of all schools from March 20, 2020 in a bid to avoid the possible rapid spread of COVID-19. School closure resulted in a learning crisis affecting more than 15,100,000 students and 548,000 teachers. Prolonged school closures are expected to lead to a loss in learning. Households will face increasing economic difficulties with raising unemployment and income losses. This could impact the likelihood of children staying in school and transitioning to secondary education, thus increasing the number of out-of-school children. Parents' ability to contribute to educational inputs may also be more limited, impacting the quality of schooling. Government expenditures on education, already at a low level, will face additional pressure and any cuts in spending could further worsen the quality.

As part of the response to the COVID-19 outbreak, the Government of Uganda (GoU) with funding from Global Partnership for Education (GPE) through the World Bank Group EFA-FTI Education Program Development Fund is implementing the Uganda COVID-19 Emergency Education Response (GPE) Project-P174033. The project is implemented by Ministry of Education and Sports (MoES). The GPE has allocated US\$14.7 million to Uganda, from the GPE COVID-19 accelerated funding window designed to capacitate governments to mitigate the impact of COVID-19 on their education systems and help recovery.

1.1.1 Project Development objective

The project development objective (PDO) statement is to support students learning (pre-primary, primary and lower secondary) during school closures associated with the COVID-19 pandemic and ensure a safe reopening and student re-entry.

1.1.2 Project Components

The Uganda COVID-19 Emergency Education Response (GPE) Project-P174033 is national in scope although it will focus on supporting students learning in pre-primary, primary and lower secondary during school closures associated with the COVID-19 pandemic and ensure a safe reopening and student re-entry. The project will also focus on strengthening the capacity of the education system and also building resilience to respond to this and other emergencies in the future. The Project will comprise three components namely:

1. Ensure learning during school closure
2. Support safe re-opening, student re-entry and capacity building for resilience
3. Project Management and Monitoring & Evaluation

1.2 Labour Management Plan (LMP)

The purpose of this Labor Management Plan (LMP) by MoES is to manage the risks under the Uganda COVID-19 Emergency Education Response project from Global Partnership for Education (GPE) through the World Bank Group. The LMP sets out the Project's approach to meeting national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2: Labor and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4).

The World Bank has rated the risks and impact associated with workers as well as community health and safety, and the risk associated with Labor impact as moderate due to the nature of minimal construction activities which are well understood and expected to have limited impacts as they can largely be avoided, minimized or managed through procedures, including procedures set out in this LMP. The LMP is a living document to facilitate project planning, preparation, and implementation. The LMP will be reviewed continually during project implementation and adequate measures and procedures to manage negative impacts will be put in place.

1.2.1 Objectives

The LMP has been prepared to comply with the minimum Government of Uganda and International Labour Standards. Among the key objectives for which it is prepared include:

- To protect project workers including vulnerable workers such as women and girls, persons with disabilities, children of working age, migrant workers and others.
- To promote safety and health at work.
- To promote the fair treatment and non-discrimination of workers.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

1.3 Scope of the LMP

This LMP describes the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labor and working conditions. The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP as per ESS2 is applicable to (i) People employed or engaged directly by MoES to work specifically in relation to the Project, (ii) People employed or engaged by contractors to perform work related to core function of the project, regardless of location, and (iii) People employed or engaged by MoE's primary suppliers.

2.0 OVERVIEW OF LABOR USE ON THE PROJECT

This LMP applies to all project workers whether full-time, part-time, temporary, seasonal, skilled or unskilled, or migrant. The LMP is applicable, as per ESS2, to the project in the following manner;

- a) Persons employed or engaged directly by the PCU to work specifically in relation to the project¹.
- b) Persons employed or engaged by contractors or subcontractors to perform work related to core functions of the project, regardless of location².
- c) Persons employed or engaged by the project's primary suppliers³.

2.1 Number of Project Workers

The total number of workers to be employed on the project is not known, except for the Project Coordination Unit (PCU) staff. There will be different types of workers: (i) direct workers include the PCU staff which are hired under contract to the project for the duration of the project implementation. There will be 5 PCU staff financed under the project; (ii) contracted workers including firms or companies that will be contracted to design and print home study materials (iii) short-term consultants who will be contracted to undertake several kinds of short period assignments; and (iv) community workers who will contribute to this project through their voluntary service.

2.2 Type of Workers

ESS2 categorizes the workers into direct workers, contracted workers and primary supply workers. The categories for which the CERP workers have been defined are provided below.

A) Direct Project Workers: Direct project workers will be eligible to work full-time for the duration of project implementation.

¹The project will not engage community labor as identified under ESS2 Section F.

²The government civil servants will maintain their existing work arrangements governed by a set of public service rules.

³See ESS2, footnote 5 of paragraph 2 (c). Primary suppliers "are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project."

MoES has established a Project Coordinating Unit (PCU) to oversee the Project. The Unit is composed of the Project Coordinator, Procurement Specialist, two Social Development Specialists, a Monitoring and Evaluation Specialist and a Financial Management Specialist. These will implement day-to-day coordination, management and monitoring of the project components as follows;

- The Project Coordinator will oversee the project team on the overall day-to-day management and coordination and implementation of the subcomponents of the project while liaising with the Task Team from the World Bank and other stakeholders.
- The Procurement Specialist will lead the procurement activities of the project and coordinate with the technical teams and stakeholders assigned to implement the sub-components. Specifically, the Procurement Specialist will work with the Environment and Social specialists to ensure that all the procurement documents adequately reflect environment and social issues, where relevant.
- The Financial Management Specialist will assist the project team to lead the financial management activities of the project and coordinate with the technical teams and stakeholders assigned to implement the sub-components.
- The Monitoring and Evaluation (M&E) Specialist will lead the monitoring and evaluation activities of the project and coordinate with the technical teams and stakeholders assigned to implement the sub-components. The M&E Specialist will also collect, process and manage data, including those relating to social and environment issues associated with the project, as appropriate, from various sources including health management information system, official documents, etc.
- The Social Development Specialist will lead the social activities of the project and coordinate with the technical teams and stakeholders assigned to implement the sub-components. With support from the Environment and Social Safeguard Specialist (USDP& ARSDP), the Social Development Specialist will primarily be responsible for ensuring that project activities avoid or minimize negative social impacts; and where they cannot be avoided, impacts are identified and the necessary mitigation measures are developed and implemented following the relevant laws as well as the World Bank policies.

Timing of labour requirements: Direct Project workers are eligible to work on fulltime fixed renewable contracts for the duration of the entire project implementation. The duration of contracts will vary by assignment.

B) Contracted Workers: This category will include all workers deployed as technical consultants (full and part-time) by the PCU under the project. The designing, printing and distribution of home study materials will be executed through a third-party firm or firms with the capacity to deliver to all project implementation districts. Supporting remote self- learning on radio and TV will also require services of third party media firms contracted to support the implementation. These contracts will be advertised and will seek firms with specific technical expertise. The terms and conditions of these contracts will adhere to the national labour legislations and regulations and be guided by the Project Implementation Manual (PIM).

Timing of labour requirements: Contracted workers timing and labour requirements will vary by assignment.

C) The Short-Term consultants: These will be engaged by the Project to undertake several kinds of short period assignments including providing specific technical expertise or to undertake specialized assignments such as development of study materials, designing feedback information systems, development of key messages among others.

D) Primary Supply workers: As per the ESS2, Primary suppliers “are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.” During project implementation, many schools will engage primary suppliers in procurement of a substantial amount of materials, including sanitizer, face masks, hand washing facilities, soap and among others. This category will include all people employed or engaged by project’s primary suppliers of goods and materials for its core function.

E) Community Workers: As per the Project Operation Manual (POM), the project will not directly employ community workers but rather use the existing district community engagement systems to reach out to stakeholders within the community.

The MoES staff at both national and district level will directly participate in planning, implementing and monitoring of the project. The government civil servants will maintain their existing work arrangements governed by a set of public service rules.

3.0 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

3.1 Project activities:

The CERP project contains three components; (i) Ensuring continuous learning during school closure; (ii) Supporting safe re-opening, student re-entry and capacity building for resilience; and (iii) Implementation management, monitoring and evaluation.

The different activities the project workers will carry out under each project component include:

3.1.1 Component ONE Activities

- Development, printing and distribution of home-study materials for continuity of learning,
- Supporting remote self- learning through procurement of airtime on radio and TV,
- Providing printing equipment for the National Curriculum Development Centre (NCDC)
- Adopting self-study home packages for students with special needs
- Procurement of equipment for learners with special needs

3.1.2 Component TWO Activities:

- Supporting safe re-opening, student re-entry and capacity building for resilience
- Carrying out back-to-school awareness campaigns,
- Provision of conditional school grants to ensure effective implementation of the SoPs as stipulated by MoH prior to reopening of schools,
- Conducting an assessment on the effects of Covid-19 on education
- Designing and implementing a customized E-platform for tracking of learning,
- Developing guidelines for re-opening of schools and the re-entry of students, and
- Conducting capacity building for district officers, Head teachers and the community.

3.1.3 Component THREE Activities:

This component will support the project in:

- Monitoring of project results
- Supporting project operational activities
- Conducting project financial management
- Supporting project procurement management; and
- Implementing Environmental and social safeguards

3.2 Key Labour Risks:

The labor risks for the project can be defined based on the nature and location where project activities will be carried out. Labor risks, including COVID-19 specific risks, in relation to the activities being carried out by the workers, Are Described Below:

Table 1: Labour Risk Identification by project activity

PROJECT ACTIVITY	KEY LABOUR RISKS
Development, Printing and distribution of home-study materials for continuity of learning,	<ul style="list-style-type: none">▪ Failure for contracted staff to meet the terms and conditions of their employment contracts▪ Project staff, suppliers and other stakeholders becoming vectors of the corona virus leading to increased COVID-19 infections in the project.▪ Loss of human lives or sustaining of injuries due to motor accidents in the distribution of materials
Supporting remote self-learning on radio and TV	<ul style="list-style-type: none">▪ Staff working overtime in preparation for teaching content and materials
Adopting self-study home packages for students with special needs	<ul style="list-style-type: none">▪ Failure for contracted staff to meet the terms and conditions of their employment contracts▪ Project staff transmitting and contracting COVID-19 as a result of human interaction i.e. within special needs experts
Procurement of equipment for learners with special needs.	<ul style="list-style-type: none">▪ Project staff and suppliers contracting COVID-19 as a result of human interaction during the procurement process
Carrying out back-to-school awareness	<ul style="list-style-type: none">▪ Project stakeholders like MoES, project and school staff contracting COVID-19 during the campaigns

PROJECT ACTIVITY	KEY LABOUR RISKS
campaigns to ensure all children resume school, re-enter, enrol and re-integrate into the formal schooling system	<ul style="list-style-type: none"> ▪ Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders. ▪ Project stakeholders like MoES, project and school staff contracting other communicable diseases like malaria, typhoid etc. ▪ Exposure of stakeholders to sexual, psychological and physical harassment by the public. ▪ Hostility and security threats from communities. ▪ Stigmatization and exclusion of staff who have previously contracted COVID-19 while on the project ▪ Trauma resulting from interacting with marginalized and/or impoverished people from communities ▪ Exposure of project staff and other stakeholders to different forms of cyber bullying/harassment by listeners/viewers
Provision of conditional school grants to ensure effective implementation of the SoPs as stipulated by MoH prior to reopening of schools	<ul style="list-style-type: none"> ▪ Project stakeholders like school-level suppliers and school staff contracting COVID-19 during the procurement and enacting of SoPs-related equipment and materials
Conducting an assessment on the effects of Covid-19 on education,	<ul style="list-style-type: none"> ▪ Project stakeholders like MoES, project and school staff contracting COVID-19 during the assessment ▪ Loss of human lives or sustaining of injuries due to motor accidents in the assessment ▪ Untenable overtime, psychological distress, fatigue, occupational burnout among project staff, data collectors and other stakeholders. ▪ Project stakeholders like MoES, project and school staff contracting other communicable diseases like malaria, typhoid etc. during the assessment. ▪ Exposure of data collecting staff and other stakeholders to sexual, psychological and physical harassment by the public during the assessment

PROJECT ACTIVITY	KEY LABOUR RISKS
	<ul style="list-style-type: none"> ▪ Hostility and security threats from communities ▪ Stigmatization and exclusion of staff who have previously contracted COVID-19 while on the project ▪ Trauma resulting from interacting with marginalized and/or impoverished people from communities
Designing and implementing a customized E-platform for tracking of learning,	<ul style="list-style-type: none"> ▪ Project staff and other stakeholders transmitting and contracting COVID-19 as a result of human interaction i.e. within system developers, administrators and users
Developing guidelines for re-opening of schools and the re-entry of students	<ul style="list-style-type: none"> ▪ Project staff and other stakeholders contracting COVID-19 as a result of human interaction during meetings ▪ Failure for contracted staff to meet the terms and conditions of their employment contracts
Conducting capacity building for district officers, Head teachers and the community.	<ul style="list-style-type: none"> ▪ Project stakeholders like MoES, project and school staff contracting COVID-19 during the trainings ▪ Loss of human lives or sustaining of injuries due to motor accidents ▪ Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders. ▪ Project stakeholders like MoES, project and school staff contracting other communicable diseases like malaria, typhoid etc. ▪ Exposure of project stakeholders to sexual, psychological and physical harassment by the public ▪ Stigmatization and exclusion of staff who have previously contracted COVID-19 while on the project ▪ Trauma resulting from interacting with marginalized and/or impoverished people from communities
Project Management, Monitoring and Evaluation	<ul style="list-style-type: none"> ▪ Discrimination in relation to recruitment, hiring, compensation of project staff and partners ▪ Abuse of human and workers' rights ▪ Interpersonal conflicts between workers. ▪ Gender Based Violence (GBV)/Sexual Exploitation

PROJECT ACTIVITY	KEY LABOUR RISKS
	<p>and Abuse (SEA/SH) and Sexually Transmitted Diseases, including HIV/AIDS</p> <ul style="list-style-type: none"> ▪ Forced labour ▪ Perception that some employees are treated better and receive better wages, salaries and conditions of employment than others. ▪ No grievance redress channel for workers ▪ Poor work safety culture, accidents/incidents, Lack of provision of PPEs ▪ Project staff contracting communicable diseases like malaria, typhoid etc. ▪ Stigmatization and exclusion of staff who have previously contracted COVID-19 while on the project ▪ Project stakeholders like MoES, project and school staff contracting COVID-19 during the trainings ▪ Loss of human lives or sustaining of injuries due to motor accidents ▪ Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders.

4.0 LABOUR LEGISLATION, ESS AND BEST PRACTICE REQUIREMENTS

4.1 National Labor Legislation: Terms and Conditions

Over the last decade or so, the Government of Uganda has enacted several laws and policies relating to working conditions, fair treatment and non-discrimination, prevention of forced labor and child labor and protection of vulnerable workers. Key among these include: -

- 1995 Constitution of the Republic of Uganda,
- The Employment Act, No. 6 of 2006,
- Labor Union Arbitration and Settlement Act 2006,
- The Labour Unions Act No. 7 of 2006
- The Labour Disputes (Arbitrations and Settlement) Act No. 8 of 2006
- The National Social Security Fund Act 1985,
- The Pensions Act,
- The Local Governments Act that provides for Pension of civil servants,
- The Public Service Act, 2008,
- The Public Service standing Orders,
- Whistle Blowers Protection Act, 2010
- The Minimum Wages Advisory Board and Wages Council Act, 1957
- Common Law and the doctrines of equity by virtue of Section 14 of the Judicature Act, e.t.c.

4.1.1 The Constitution of the Republic of Uganda (1995)

Article 30 of the 1995 Constitution of Uganda gives every Ugandan a right to Education where the state shall guarantee, regulate and fulfill the right to Education. Article 31(b) of 1995 Constitution of Uganda guarantees (inter alia) gender equality and labor rights, and equal opportunity in political, economic, and social activities, including through affirmative action. The Constitution guarantees, in its Objective XIV (a), the right of all Ugandans to (inter alia) freedom of association, the right to collective bargaining, and paid vacation (Chapter Four).

4.1.2 Employment Act, (2006)

The Employment is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, management and compensation of workers. This Act spells out general principles regarding forced labour, discrimination in employment, sexual harassment and provisions to settle grievances. It also provides for matters governing individual employment relationships in terms of circumstances of provision of labor.

The Employment Act provides for the basic conditions of employment with a view of improving the status of employees in Uganda. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. It further mandates the Ministry responsible to issue Wages Regulations on a regular basis which deals with worker's terms and conditions of each industry. It is in this legislation where you will find provisions regulating.

- Contracts of employment
- Leave entitlements, i.e. annual leave, sick leave, maternity leave and compassionate leave
- The protection of wages (prohibition against unlawful deductions)
- Retrenchment procedures
- Discrimination of employees
- Fair and unfair reasons for termination of employment

The above terms and conditions apply to all employees employed by an employer under a contract of service. The **2012 Regulations of the 2006 Employment Act** also prohibit sexual harassment in the workplace.

The Employment Act applies to all workers employed by an employer under a contract of service. However, it does not apply to: (a) the Uganda Peoples' Defense Forces other than their civilian employees and (b) employers and their dependent relatives when dependent relatives are the only employees in a family undertaking where the total number of dependent relatives does not exceed five.

4.1.3 Labour Disputes (Arbitrations and Settlement) Act (2006)

The Act provides for arbitration in labor related grievances and is emphasized during project planning and implementation. The Act seeks to promote social dialogue, facilitate collective bargaining, and modernize procedures to address unresolved or mismanaged labor disputes that may have adverse effects. The **2011 Employment Regulations** deter employers from the casualization of labor by granting contractual/permanent rights to any worker exceeding four (4) months of service.

4.1.4 National Social Security Fund Act

The NSSF Act that obliges employers to deduct 5% of an employee's salary and make a 10% contribution towards the Employee's savings with NSSF.

4.2 National Labor Legislation: Occupational Health and Safety

4.2.1 The Constitution of the Republic of Uganda (1995)

The supreme law of the country provides a basis for promotion of Occupational Health and safety at work the workplace in the country. Article 39 of the 1995 Constitution of Uganda provides for citizens to maintain clean and healthy environment without endangering human health and the environment.

4.2.2 Occupational Safety and Health Act (2006)

The Act provides for the prevention and protection of persons at all workplaces from injuries, diseases, death and damage to property. The act makes provisions for the health, safety, welfare and appropriate training of persons employed in workplaces, which are consistent with a range of safeguards policies such as ILO Core Labour Standards, IFC PS 2, 3 and 4.

Occupational Safety and Health Act imposes an obligation on employers to ensure the safety of employees at work. They are thus required to put in place measures for the achievement of this purpose e.g. provision of protective gear against the effect of pollution, to monitor and control the release of dangerous substances into the environment, to supervise the health of workers who are

exposed to dangerous hazards due to pollution and other harmful agents e.g. through periodic medical examination, keeping medical records of workers, ensuring that work premises remain safe and without risk to health, displaying safety precautions etc.

The Act requires workplaces to be kept in a clean state to have suitable lighting to ensure that buildings at a work place are of sound construction, to have adequate supply of wholesome drinking water accessible to by all workers, adequate facilities for taking meals, a first aid room etc. The administration and enforcement of the provisions of the Act is entrusted to the Commissioner for Occupational Health and Safety and inspectors.

Their role is, with the assistance and cooperation of the occupier of the workplace to enter work premises to ensure that employers are implementing the requirements of the Act. Orientation provides employees with necessary safety information about their job and tasks, informs them of specific details about workplace hazards and provides an opportunity to learn about the company and their colleagues, ask questions and to clarify new or confusing information. New employees starting with any entity will have expectations about the workplace culture and the emphasis on the safety orientation they receive will be reflected in their work performance, their eagerness to learn and their willingness to contribute to a safe and healthy workplace.

Obligations of the Employers: All employers or supervisors are obligated under the Act to take measures for the safety and protection of their employees or supervisee's, without any charge. These measures include:

- Provide a safe workplace environment and procuring of secure tools and machinery for carrying out work, and ensuring the continued safety of the same
- Provide necessary Personal Protective Equipment's (PPEs) and other protective gear as required
- Provide resources necessary to carry out the work with safety
- Provide protective attire and equipment if the nature of work is such that it is not possible to eliminate or control health hazards arising out of work
- Provide education and training to employees on the use of protective gears and safety equipment, and disseminate information to employees on all issues of related concern

- Conduct regular health checks for employees involved in any work that may cause physical ill health or for employees working with chemical or biological materials that may pose a threat to their health
- Provide or arrange for appropriate medical care for employees injured during the course of their employment
- Facilitate first aid to employees who are involved in emergencies or accidents
- Provide or facilitate with transport facilities to minimize the exposure risk.

Obligations of Employees: Employees or supervisees are required to:

- Maintain safe practices at work to avoid danger to the safety and wellbeing of the employee and co-workers, which may be caused by inattentiveness to safety and security measures
- Assist the employer and co-workers in maintenance of measures designed to ensure health and safety in the workplace
- Use safety equipment and protective gear as instructed in accordance with the training and education provided for use of such equipment and gear
- Report to the employer any damage, loss of or destruction of protective gear or safety equipment
- Inform the employer or his designated supervisor immediately of the occurrence of any incident which the employee believes may cause danger and which the employee is unable to resolve;
- Inform the employer or his designated supervisor of any accidents or damage sustained at work or related to work
- Employees may have the opportunity to abstain from work where there is serious threat to health or life but under the notification/ approval from the supervisor.

4.2.3 Workers Compensation Act (2000)

Workers Compensation Act 2000 entitles employees to automatic compensation for any personal injury from an accident arising out and in the course of his employment even if the injury results from the employee's negligence. The Act further details that, for an injury that leads to death, the compensation should be equivalent to an employer's monthly pay multiplied by

60 months. An employee must report any work-related injury or illness to the supervisor immediately or other personnel of the organization.

The Act applies to all employment within Uganda and to workers employed by or under the Uganda Government in the same way and to the same extent as if the employer were a private person, but not to active members of the armed forces. It also defines an employer as the Government of Uganda, any person incorporated or unincorporated, association or partnership, which directly engages a worker or which, in respect of any worker, carries on the business of hiring out his or her services.

4.3 COVID-Specific Policies, Regulations and Procedures

There are several legislations relating to occupational health and safety and management that are relevant to the COVID-19 context and would also impact workers in specific activities.

Some of these include: Guidelines for Prevention of Covid-19 when Conducting Meetings At Work Places, National health sector guidelines for COVID-19 prevention (Do's and Don'ts on Corona virus Disease), Technical guides on prevention of Social and Institutional spread of COVID-19, MGLGD Standard operating procedures for prevention and Response to GBV, Guidelines for Use of Public Transportation during the Covid-19 Pandemic; Guidelines on Covid-19 Self Quarantine; Guidelines on Institutional Quarantine for COVID-19; PUC Guidelines on Preventive Measures Against COVID-19; COVID-19 Infection prevention guidelines in Health Care Facilities; Use of PPE guidelines under COVID-19 pandemic; Guidelines on disinfection; Medical waste management guidelines for COVID-19; Guidelines on social distancing and isolation and among others, which could also be helpful in the process.

Ministry of Education and Sports (MoES) together with Ministry of Health (MoH) with the aid of World Health Organizations (WHO) policy have also developed guidelines to address COVID-19 pandemic in schools and Institutions which could also re-direct occupational health and safety management during project Implementation.

4.4 The World Bank Environmental and Social Standard (ESS2)

4.4.1 ESS2: Labour and Working Conditions

The World Bank's stipulations related to labour are outlined in its ESS2. Implementing agency promotes sound worker-management relationships and provides safe and healthy working conditions. The key objectives of the World Bank's ESS2 are to:

- Promote safety and health at work.
- Promote fair treatment, non-discrimination and equal opportunity for project workers.
- Secure protection of project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- Prevent the use of all forms of forced labour and child labour.
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- Provide project workers with accessible means to raise workplace concerns.

ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers. Where government civil servants are working in connection with the project (whether fulltime or part-time), they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to government civil servants.

Working conditions and management of worker relationships: The Implementing Agency will develop and implement internal labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and contract workers.

Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labour law and ESS requirements (which will include collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits. This information will be provided at the beginning of the working relationship and when material changes occur.

For more details on the WB Environmental and Social Standards, please follow the below links: www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards and <http://projects-beta.vsemirnyjbank.org/ru/projects-operations/environmental-and-socialframework/brief/environmental-and-social-standards>

5.0 RESPONSIBLE STAFF

The MoES, which is the coordinating sector for the CERP project will assume overall responsibility for management and oversight of workers in the project in line with a mechanism described further in details in the Project ESMP. The PCU has the overall responsibility to oversee all aspects of the implementation of the LMP, to ensure that project sub-components comply with the Labour Procedures.

However, implementation of the project will be done in collaboration with several other stakeholders at national, district, school and community Level who will also be expected to assist in management of workers within their areas of jurisdiction in the project. Thus, successful management of project workers requires clear definition of roles and responsibilities of key players and stakeholders at school, community, district and national levels.

5.1 National Level

The MoES in collaboration with PCU will be responsible for:

- a) Preparing necessary guidelines and all forms needed,
- b) Implementing this labor management procedure, including allocating for adequate budget for implementation of these requirements.
- a) Ensuring that the contracts with the contracted parties are developed in line with the provisions of this LMP and the project's ESMF, as detailed in the Project Operations Manual (POM).
- b) Maintaining records of recruitment and employment of contracted workers as provided in their contracts.
- c) Providing expert advice on labour management,
- d) Train project workers, ministry and district level staff on OHS, workplace policies and specific measures for mitigating work related risks.
- e) Carrying out routine monitoring and support supervisions on the project labour management-related issues at district level.
- f) Monitor contractors and subcontractors' implementation of labor management procedures.
- g) Providing funding for implementation of Labour Management Procedures at district level

- h) Ensure that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it.
- i) Have a system for regular monitoring and reporting on labor and occupational safety and health performance.
- j) Provide periodic reports to WB promptly about any incident or accident related to the project which has, or is likely to have a significant adverse effect on the environment, the affected communities, the public or workers (labor, health and safety, or security incident, accident or circumstance).

5.2 District Level

The CERP project is mainstreamed in the existing district structures. The District Education officer (DEO) will play the coordination role for all the district project stakeholders. The DEO will also play the management and oversight role for the project at the school and community level. In collaboration with the District Personnel Officers, the DEO will take the lead in coordination of labour management issues in the project at district level. Among other roles, their responsibilities will include:

- a) In collaboration with CERP Safeguards Specialists, conduct Training and awareness building of school and community level staff on labor protection requirements, including training on their rights on safe labour under Uganda's laws, on the risks of their jobs, and on measures to reduce risks to acceptable levels.
- b) Monitoring and supervising school and community workers to ensure compliance with Labour Management Procedures and SOPs prevention of COVID-19.
- c) Administration of relevant tools and preparation of periodic status reports
- d) Addressing worker's grievances referred from school and community level.

5.3 School Level

The school level administrators (e.g. SMCs/BoGS and head teachers) are responsible for day-to-day management of staff to ensure effective implementation.

- a) Creating awareness on labour management practices and safety procedures amongst school workers.
- b) Conducting Routine inspection and supervision for implementation of labour management procedures at school level.
- c) Preparation and submission of periodic monitoring reports on labour management issues at school level.
- d) Addressing worker's grievances at school level.

5.4 Key Staff Responsible

Since the project is meant to respond specifically to COVID-19, there will be specialized staff for enhanced monitoring and supervision, to conduct training of workers in mitigating the spread of COVID-19.

Table 2: Proposed specialized staff for implementation of the LMP

Activity	Responsible staff/party
National Level	
Engagement and management of project workers	MoES-C/HRM, Project Coordinator, Social Development Specialist, Environmental Specialist,
Occupational health and safety (OHS)	MoES-C/HRM, MoH, Project Coordinator, Social Development Specialist, Environment Specialist,
Training of workers, including raising awareness and training of workers in mitigating the spread of COVID-19	MoH, MoES, Project Coordinator, Social Development Specialist, Environment Specialist,
Engagement and management of suppliers and service providers	Project Director, Procurement Specialist, Social Development Specialist, Environment Specialist,
Monitoring, supervising, and reporting on health and safety issues relating to labor management issues related to the project	MoES-C/HRM, MoH, Social Development Specialist, Environment Specialist, Monitoring and Evaluation Specialist
Provide periodic reports to WB	Project Coordinator, Social Development Specialist, Environment Specialist,

Assessment and treatment of workers infected with COVID-19	MoH, MoES, PCU
Addressing worker grievances	Social Specialist, PCU,GRC
District Level	
Training of workers, including raising awareness and training of school level workers in labor management issues related to the project	DEO, District Community Development Officer (DCDO), District Labour Officer (DLO), Center Coordinating Tutor (CCT), District Health Officer (DHO), District Personnel Officer (DPO) and the District Inspector of Schools (DIS).
Monitoring and supervising school to ensure compliance with Labour Management Procedures, health and safety concerns and SOPs for prevention of COVID-19.	DIS & DHO, DLO, DCDO
Preparation and submission of periodic monitoring reports on labour management, health and safety issues at district level.	DEO, DHO, DLO.
Addressing worker's grievances referred from school and community level.	GRC, DLO
School Level	
Conducting routine awareness on labour management practices and safety procedures amongst school workers.	Head teacher, SMC/BOG, CCT, SWT&SMT
Conducting routine school level inspection and supervision for implementation of labour management procedures at school level	Head teachers, SWT&SMT, SMC/BOG,
Addressing worker's grievances at school level.	GRC
Preparation and submission of periodic reports on labour management issues at school level.	Head teacher& SMC/BOG

6.0 POLICIES AND PROCEDURES FOR MANAGEMENT OF LABOR ISSUES

This section sets out the mitigation measures that will be adopted by the project to address the risks mentioned in section four, including those responding to the specific risks to workers posed by COVID-19.

6.1 Conditions for Hiring

6.1.1 Terms of Employment: Direct Workers

- a) Recruitment procedures will be transparent, public and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability or gender.
- b) Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- c) 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
- d) All project staff will be provided with an employment contract as per the requirements of Section 25 of the Employment Act (2006).
- e) All direct project staff employed for the purpose of the project will be above 18 years.
- f) Maximum working hours for staff will not exceed the maximum limit set in Sec. 53 of the Employment Act, i.e. 48 hours a week.
- g) Equal training opportunity will be available to all staff working in the project without discrimination, based on gender or otherwise, as specified in the Employment Act. It is responsibility of the Project Director to ensure that such discrimination does not exist.
- h) All staff will be entitled to breaks from work of 30 (thirty) minutes after every 05 (five) hours during working hours as per the Employment Act. They will also be provided with the entitled leaves under section 54 of the Employment Act, in addition to paid maternity and paternity leaves as section 56 of the Employment Act.
- i) Staff will be provided a pension contribution and deductions will be made from their salaries for their contribution in accordance with the Pension Act.
- j) A daily subsistence allowance (DSA) will be provided to all project staff covering lodging, meals, gratuities and transport costs when travelling in field. The rate of DSA will be determined based on the rates at locations where project is implemented and will be revised based on changes to rates.

- k) All staff will be made aware of GRM available for the staff as specified under this LMP. The PCU shall provide oversight to ensure effective implementation of the GRM.

To ensure enforcement of these aspects highlighted in the LMP, these provisions will be included in the employment contracts of all direct workers. If workers are allowed (or required) to work longer hours than normal because of the COVID-19 emergency, this should be documented alongside measures taken to protect such workers (e.g. mandatory rest breaks).

6.1.2 Terms of Employment: Contracted Workers

MoES will incorporate standardized environmental and social clauses in the tender documentation and contract documents, in order for potential bidders to be aware of environmental and social performance requirements that shall be expected from them, are able to reflect that in their bids, and required to implement the clauses for the duration of the contract. The following measures will also be followed.

- a) A consent section will be part of the employee signed employment contract. The project will also ensure that all workers are not subject to coercion and forced Labor conditions.
- b) As per the provisions of the employment, all parties employed by any contracted party will be above 18 years of age.
- c) Maximum working hours for staff will not exceed the maximum limit set in the employment act, i.e. 48 hours a week.
- d) All foreign parties employed by all contractors/investors will have valid work permit. The work permit details will be shared with PCU.
- e) All vehicles used by any contractor/investor for the purpose of the project will have valid registration, insurance and road worthiness.
- f) All contracted staff will be made aware of grievance redress mechanism available for the staff specified under this LMP.

If workers are allowed or required to work longer hours than normal because of the COVID-19 emergency, this should be documented alongside measures taken to protect such workers (e.g. mandatory rest breaks).

6.2 Working Conditions: Direct Workers and Contracted Workers

The project will be required under the Environmental and Social Management Plan (ESMP) to ensure workers will use basic safety gears, receive basic safety training and other preventive actions as provided in the Project's Environmental and Social Management Framework (ESMF). Among the mitigation measures that will be adopted by the project to improve the working conditions of workers include:

- i. Entry and exit from workplace will be strictly controlled.
- ii. A workstation with computer will be provided to all staff, at the project offices, including software essential for functioning of the assigned tasks.
- iii. Separate male and female toilet facilities will be provided at all project offices, field/construction sites.
- iv. Potable drinking water and hand washing facilities will be available at all project offices and field/construction sites.
- v. All provisions that are required under Occupational Safety and Health Act (2006) will be strictly adhered to.
- vi. Working environment will be clean, hygienic and safe
 - All project offices will be free of pests. Where pests are detected pest control measures will be taken immediately.
 - Fire detection and firefighting equipment will be available at all project offices.
 - Emergency evacuation plan will be established for all project offices and staff will be made aware of the plan and periodic simulation exercises that need to be implemented.
 - Adequate safety signs will be installed at the work site giving clear direction.
- vii. Adequate Personal protective Equipment (PPE) will be provided at the workplace, including.
 - Facemasks, gloves, etc., if possible, to prevent COVID-19 spread
 - Foot operated hand washing facilities (tip tap) including a Basin/Bucket and a Jerry can at all critical control points,
 - Well calibrated working temperature guns,
 - Backpack plastic spray pumps
 - Disinfectants liquid (JIK)
 - Hand washing soap/liquid soap,
 - Hand sanitizers with at least 60-80% alcohol for staff.

6.3 Code of Conduct

The Code of Conduct (CoC) will commit all persons engaged by the project, including sub-contractors and suppliers, to acceptable standards of behavior. The CoC will include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, violence against children in School, sexual exploitation and sexual harassment (e.g., termination).

The CoC will be written in plain language (*please refer to the draft in annex III*) and signed by each worker to indicate that they have:

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

A copy of the CoC shall be displayed in a location easily accessible to the project affected people. It shall be provided in English.

6.4 Gender Based Violence & Sexual Exploitation and Abuse

The wide diversity and distinct socio-economic, cultural and political contexts that reinforces unequal power relations between males and females across Uganda's results in different gender related vulnerabilities especially for women at their workplaces. These can only be addressed through a critical focus on the Gender Based Violence (GBV) status at organizational or project level.

There is a substantial risk that workers involved in distribution of learning materials and other project activities might engage in transactional sex and/or sexual exploitation of the adolescent girls and women in the project intervention districts. The problem of GBV/Sexual exploitation and abuse can facilitate the transmission of Sexually Transmitted Diseases (STDs) including HIV/AIDS and foment domestic conflicts within households of project affected communities. Women in all project employment categories may also face sexual harassment, including demands for sexual favors as a condition of employment. When employed, women may face continuous and/or unwanted demands for sexual

favors under threat of dismissal or exclusion of overtime or other work benefits or opportunities. In addition, female workers may face verbal harassment of a sexual nature and sexual assault by male colleagues.

PCU will address the risk of gender-based violence and through:

- Incorporate GBV//SEA/SH Requirements and expectations in the contractor/suppliers/consultants' contracts.
- Conduct mandatory training and awareness raising for the workforce about (i) the importance of addressing SEA/SH on the project, (II) HR policies on SEA/SH, (II) CoC on SEA/SH, SEA/SH reporting and allegation procedures and the mechanisms that will be implemented
- Implementing a Code of Conduct (CoC) for all project workers, that will Develop/Review sensitive channels for GBV/SEA/SH reporting in GRM established specifically for the project workforce and for the project.
- Include provisions related to GBV/SEA/SH, and which all project staff both direct hires and those hired through contractors/subcontractors will agree to abide by as a condition of contract and implement a GBV Action Plan to be established in accordance with the project ESMF.
- Inform project affected communities about GBV/SEA/SH risks
- Review the IA's capacity to prevent and respond to SEA/SH
- Map out GBV/SEA prevention and response service providers
- Strengthen Institutional capacity for SEA/SH risk mitigation and response
- Integrate GBV/SEA/SH risk management in Contractors' Environment and Social Management Plan (ESMP)
- Adopt a policy to cooperate with law enforcement agencies in investigating complaints about GBV/SEA/SH.
- Ensuring that all project workers, both direct hires and those hired through contractors/subcontractors, have access to the grievance mechanism established specifically for the project workforce or the grievance redress mechanism established generally for the project, to address concerns relating to GBV/SEA/SH.

This process will be under the portfolio of the SDS under the PCU who shall identify and engage the relevant stakeholders on GBV, SEA, VAC and HIV and AIDS issues.

A stand-alone GBV assessment has been prepared for the project with defined action plans and the Government will ensure that funds are made available timely for implementation of such action plans.

6.5 Non-discrimination in Recruitment and Employment

The Employment Act of Uganda, , Part two, section 6 prohibits workplace discrimination, directly or indirectly, against a worker based on disability, HIV/AIDs status, gender, pregnancy, marital status or family responsibility, color, nationality, tribe, or place of origin, race, national extraction, social origin, political opinion or religion. However, due to deeply rooted patriarchal systems, women in Uganda continue to face gender-based employment discrimination, including in relation to recruitment, wages and other benefits, promotions, and other terms of employment. This discrimination includes bullying and sexual harassment, at times involving demands for sexual favors in return for job placement or advancement.

There is also substantial work-related discrimination based on race, nationality, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

In light to above, PCU will address the risk

- Ensuring that there is no discrimination in recruitment or employment relating to project workers based on any personal characteristics unrelated to inherent work requirements
- Ensuring that this requirement of non-discrimination in recruitment and terms of employment is applied and strictly adhered to by project contractors and subcontractors, as well as primary suppliers, wherever possible
- Ensuring that all project workers, both direct hires and those hired through contractors/subcontractors, have access to the grievance mechanism established specifically for the project workforce or the grievance redress mechanism established generally for the project, to address concerns relating to workers discrimination.

6.6 Forced labour

The CARP PCU will ensure that no person is employed or engaged in relation to the project under circumstances that would constitute forced labor or the result of labor trafficking. To this end, the PCU will maintain records of the recruitment circumstances as well as the written employment contracts of all project workers, including direct hires, as well as persons engaged through contractors, subcontractors and primary suppliers.

Where forced labor is identified in relation to a primary supplier or consultancy firm, the PCU will require the primary supplier or consultant to report the situation to the police and other relevant government authorities. Depending on the circumstances, the PCU will discontinue use of that primary supplier or consultant and instead use primary suppliers that can demonstrate they are meeting the relevant requirements of Ugandan law relating to forced labor.

6.7 COVID-19 Specific Measures for All Workers

All employments or recruitments made will ensure adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and provisions when a worker gets sick. This following measure will be considered:

- a) The characteristics of the workers will be assessed prior to engaging them in any project works, including those with underlying health issues or who may be otherwise at risk. This will be done by conducting pre-employment health checks.
- b) Assessment and Confirming of whether workers are fit for work, to include temperature testing and refusing entry to sick workers
- c) Entry/exit to site or the workplace will be minimized, and measures will be put in place to limit contact between workers and the community/general public
- d) Training workers on hygiene and other preventative measures and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected workers; will be carried out.
- e) Treatment of workers who are or should be self-isolating and/or are displaying symptoms

- f) Reduction, storage and disposal of medical waste, will be duly carried out taking into consideration workers' health and safety
- g) Where possible, adjust work practices, to reduce the number of workers in line with MoPS COVID-19 guidelines and increase social distancing.
- h) Networking and developing relationships with local health care facilities and organize for the treatment of sick workers.
- i) Establishing a procedure to follow if a worker becomes sick (following MoES, MoH and WHO guidelines on management of Covid-19)
- j) Implementing a communication strategy with the implementing stakeholders in relation to COVID-19 issues at the workplace and within the surrounding community.
- k) Establish clear systems for Access to psychosocial support based on the needs and availability of such services

7.0 AGE OF EMPLOYMENT

The project will employ workers 18 years and older. Age of workers will be verified during the employment process using tools like Voters Registration Card (VRC), and National Identification Cards in the circumstances where these documents are not available the Affidavit of Birth will be used.

Awareness raising sessions will be regularly conducted to the communities to sensitize on prohibition and negative impacts of Child and forced Labor as well as procedures for preventing abuse of child Labour.

If anyone below the age of 18 is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the worker in a responsible manner, considering the best interest of the worker.

8.0 TERMS AND CONDITIONS

The terms and conditions of employment for the Project workers are governed by the provisions of Uganda's Employment Act 2006, and other Ugandan Labor Laws as Amended. Government staff that will be deployed to the project will be seconded from MoES. The Civil service sector (both national and district level) in Uganda is guided by terms and conditions stipulated in the Public service Act (2008).

The Project staff is guided by Terms and Conditions of their contractual agreements with MoES. All workers in the project shall be engaged through negotiated contracts with generally accepted standards and terms and conditions of services applicable to the nature of project activities. The general employment terms and conditions under this project will be further elaborated in the PIM as approved.

The contracts will be guided by the principle of collective bargaining is applicable and where there is no minimum wage or rates established in the country, the guiding principle will be of fair wages and reasonable rates commensurate with governmental minimum wage and similar established rates and conditions.

9.0 GRIEVANCE REDRESS MECHANISM

9.1 Introduction

Besides the grievance mechanism for the overall project, a separate Grievance Redress Mechanism (GRM) will be established for project workers. Workers will be able to lodge their complaints relating to their work environment or conditions through the set Worker's GRM

9.2 Grievance Redress Mechanism Guidelines

The mechanism for workers' GRM will be based on the following principles:

- Handling of grievances will be objective, prompt and responsive to the needs and concerns of the aggrieved workers.
- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances.
- All grievances will be treated confidentially, and individuals who submit their comments or grievances may request that their name be kept confidential.
- Anonymous grievances will be considered, and anonymous grievances will be treated equally as other grievances, whose origin is known.
- The GRM will be accessible by all project staff.

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", websites, brochures, emails, messages and other means as needed.

Grievances raised by workers at all project levels and actions taken will be documented by the Social Development Specialist (SDS) under the PCU. The periodic summary of grievance cases will be reported to the PCU and will form part of the project periodic reports. Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the PCU.

9.3 Grievance Redress Committee

Workers Grievance Redress Committees (GRCs) shall be constituted at various levels to implement the GRM for the project including School level, District level and National level.

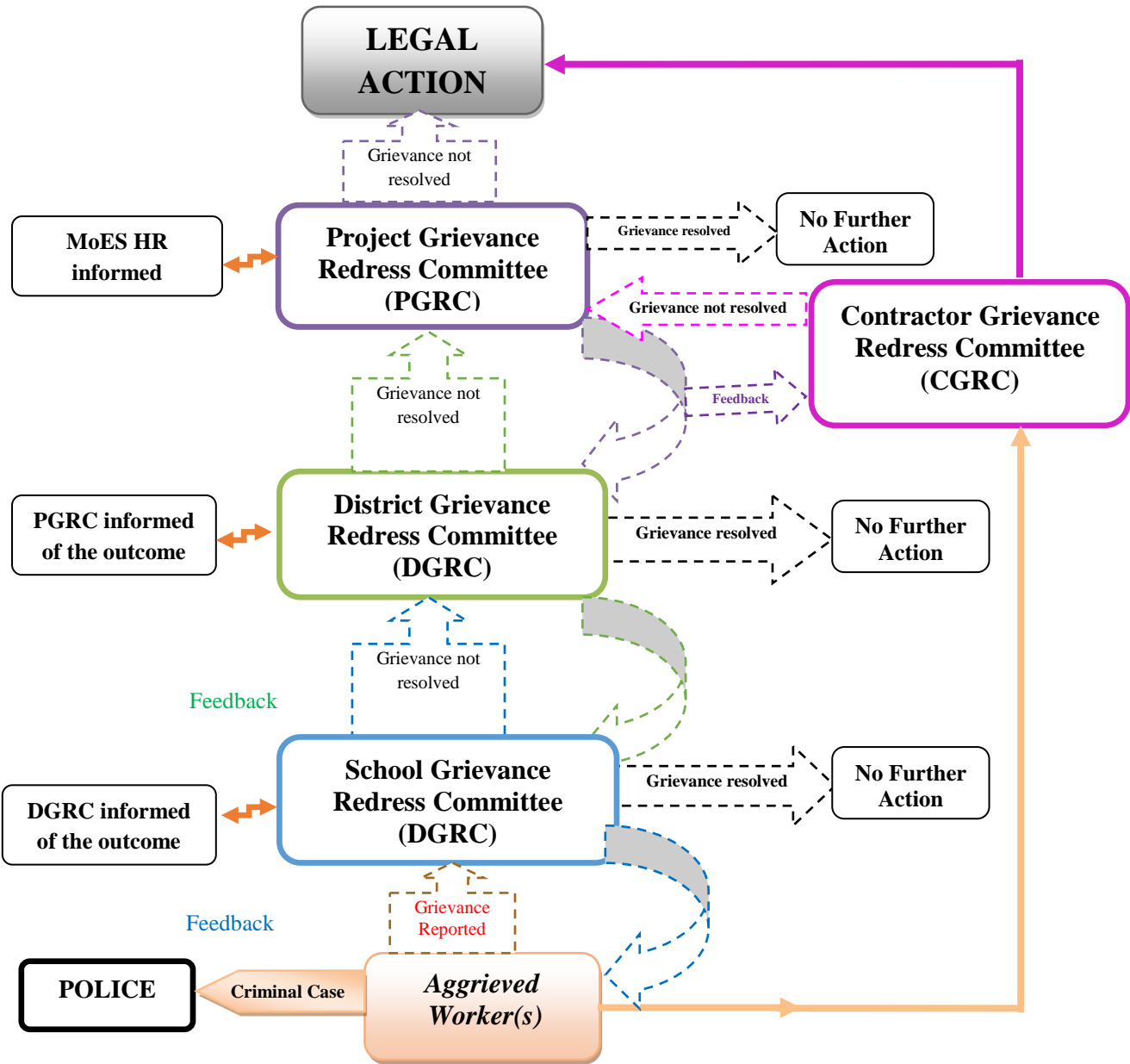
Table3: Levels of Grievance Redress Committees

LEVEL	COMPOSITION
Legal Action Level	The PCU shall inform aggrieved persons of their right to seek for redress in the court of law as the final resort. This is the last level of redress provided for by the national laws. It is anticipated that a scenario might occur where aggrieved person is not satisfied with the process and judgment given by the grievance redress committee(s).
National Level GRC	The national GRC will be required to intervene in workers grievances beyond the district level resolution. Proposed PCU members would including the Project Coordinator, Social Development Specialist, Environmental Development Specialist, M&E Specialist and the MoES Project Coordinating Officer
District Level GRC	Beyond the school level, the district GRC will be required to intervene in workers grievances beyond the school level resolution. This will comprise of the District Education Officer, District Labour Officer (DLO), Chief Administrative Officer (CAO), District Community Development Officer (DCDO), District Inspector of Schools (DIS), District Health Officer (DHO), Chairperson Head teachers Association and teacher representatives.
School Level GRC	At school level, the GRC would comprise of the School Head teacher, Teacher representative (preferably the SWT/SMT), SMC/CMC/BoG representative, Community Leader and non-teaching staff representative.
Contractor(s)'Level	The project is anticipated to contract service providers to undertake several kinds of short period assignments. These are expected to house small internal GRCs to

	intervene in workers grievances before they are referred to the project GRC. These can be composed of Contractors' Coordinator, Sociologist and Elected workers representatives and others
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The above Grievance Redress Committees at all levels will be responsible for implementing the GRM at different levels.

Figure1: Flowchart for the Grievance Redress Committees



9.4 Roles of the GRCs

The Grievance Redress Committees will be responsible for:

- Communicating with the Aggrieved persons (APs) and evaluate if they are entitled to recompense;
- Making the list of aggrieved person(s) public and the established grievance redress procedure.
- Recommending to the Social Development Specialist (SDS) of the PCU solutions to such grievances from affected persons;

Communicating the decisions to the APs; to acknowledge appeals from persons, households or groups who rightfully will not be affected by the project, but claim to be, and to recommend to the PCU whether such persons should be recognized as AP's, and to communicate back the decisions to the Claimants.

9.5 Workers Grievance Redress Process

The process of grievance redress will start with registration of the grievance(s) to be addressed, for reference purposes and to enable progress updates of the cases. Thus, the aggrieved worker will file a complaint with the Grievance Redress Committee through its secretary. Different ways in which workers can submit their grievances will be allowed, such as submissions in person, by phone, text message, mail and email.

Grievances will then be registered in a registry of complaint and all information related to the handling of the grievances will be recorded in the registry. Contract workers will be informed of the grievance mechanism at the induction session prior to the commencement of work, and the contact information of the GRM focal person and the PCU will be shared with contract workers.

The officer receiving the complaint (secretary to the GRC member) will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The response time will depend on the issue to be addressed but it should be addressed with efficiency. The social safeguard officer will also ensure that the aggrieved worker receives feedback of the receipt of the complaint.

Considering COVID-19 context, allowing workers to quickly report labor issues, and allowing the project to respond and take necessary action immediately, would be important. Thus, the grievance raised will be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of the grievance, health and safety concerns in work environment or any other urgent issues will be addressed within 10 working days.

The Grievance committee will act on the case within 10 working days of receipt of the grievance(s). If no amicable solution is reached, or the affected person does not receive a response within 14 working days, the aggrieved worker can appeal to higher authorities (MoES level), which should act on the grievance within 15 working days of its filing.

Where the grievance cannot be addressed within 10 working days at MoES level, the aggrieved worker will be informed in writing, so that the worker can consider proceeding to the national appeal process and structures (MoGLSD or courts of law) guided by the Labour Disputes (Arbitrations and Settlement) Act No. 8 of 2006. The Employment Act 2006 also provides for the Formal Grievance Procedure in case a worker who has been laid-off, retrenched, discharged, dismissed, removed, or otherwise terminated from employment.

These timelines are further illustrated in the table below:

Table 4: Typical Steps in a Grievance Redress Process

Steps	Process	Description	Completion Time frame	Responsible Agency/Person
1	Receipt of complaint	<ul style="list-style-type: none"> Document date of receipt, name of complainant, village, nature of complaint, Acknowledgement of grievance 	1 day	Secretary to GRC at project level & Social Development Specialist (SDS)
2	Assessment, Analysis and Response	Assess, gather evidence and make necessary determination, make station visits; listen to the complainant/community; assess the merit	7 days	GRC

Steps	Process	Description	Completion Time frame	Responsible Agency/Person
3	Resolution and registry	<ul style="list-style-type: none"> Where complaint is justified and a resolution has been arrived at, Aggrieved worker) accepts and signs the resolution Received complaints will be recorded in the complaints logbook or grievance excel-sheet/grievance database. 	1-2 day after assessment	Aggrieved workers , Social safeguard officer & Secretary to GRC
4	Implement and monitor a redress action	carry out resettlement redress in line with the entitlement matrix	14 days or at a time specified in writing to the aggrieved worker	PC-PCU & SDS
5	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	10 days of receiving status report	PC-PCU & Social Development Specialist
6	Appeals process (Judicial adjudication)	Take complaint to court of law	No fixed time	Complainant

9.6 WORLD BANK GRIEVANCE REDRESS SYSTEM

Project workers may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address the project's labor related issues. Project workers may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redressservice>. For information on how to submit complaints to the World Bank Inspection Panel, please visit; www.inspectionpanel.org.

10.0 CONTRACTOR MANAGEMENT

It is mandated that the contractor execute the management of the contract in a manner that is acceptable to the client and is in accordance with the World Bank rules and regulations as it relates to ESS2, specifically relating to the selection process for contractors, management of labour issues, including health and safety, procedures for managing and monitoring of performance for contractors, as well as reporting on workers under the project. The PCU in collaboration with MoES will review the following information:

- a) Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies
- b) Business licenses, registrations, permits, and approvals and workers' certification/permits and training to perform the work.
- c) Documents relating to a labor management system, including OHS issues, for example, labor management procedures
- d) Identification of labor management, safety, and health personnel, their qualifications, and certifications
- e) Records of safety and health violations, and responses; recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth);
- f) Accident and fatality records and notifications to authorities
- g) Records of legally required worker benefits and proof of workers' enrollment in the related programs
- h) Worker payroll records, including hours worked and pay received
- i) Identification of safety committee members and records of meetings; and
- j) Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting/ materially consistent with ESS2.

The contracts with selected Contractor/service provider will include provisions related to labor and occupational health and safety, as provided in the World Bank Standard Procurement Document (SPD) and Uganda's Employment Act 2006.

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

10.2 COVID-19 Considerations

The contractual agreement also requires inclusion of measures required of Contractors considering the COVID-19 situation. They will include:

- Provision of adequate measures for the workers working under COVID-19 situation including free PPEs and sanitization.
- Provision of medical insurance covering treatment for COVID-19, sick pay for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death.
- Requirement of safe working condition and the conduct of the work (e.g. creating at least 4 feet between workers by staging/staggering work, limiting the number of workers present).
- Procedures and measures dealing with specific risks. For example, for health care contractors: infection prevention and control (IPC) strategies, health workers exposure risk assessment and management, developing an emergency response plan, per WHO Guidelines.
- Appointing a COVID-19 focal point with responsibility for monitoring and reporting on COVID-19 issues, and liaising with other relevant parties.

11.0 COMMUNITY WORKERS

As per the POM, the project will not directly employ community workers but rather use the existing district community engagement systems to reach out to stakeholders within the community.

The project will therefore comply with the provisions of the ESS 2 of ESF regarding involvement of community workers. These provisions are in relation to: assurance of safety and health, promotion of fair treatment, non-discrimination and equal opportunity, protection including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS), prevention on the use of all forms of forced labor and child labor, and access to workers' GRM established under the project.

12.0 PRIMARY SUPPLY WORKERS

Supplier of the project equipment and supplies (both national and school level) are not known to involve significant risks of child labor and forced labor. It is expected that these primary suppliers will be vetted companies. MoES will 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 case of a significant risk of child labor or serious safety issues in relation to where primary suppliers have been identified with the project, the procedure for monitoring and reporting on primary supply workers will involve various measures that have been put in place to prevent and control them such as establishment of child labor prevention committees at local council levels. In the event of identification of child labor cases, it will be reported to concerned authorities. The Employment Act 2006 also provides for penal and administrative penalties in case of non-compliance with labor provisions. In case of any occurrence, the sanctions provided by labors law or Employment Act will be applied.

REFERENCES

Constitution of the Republic of Uganda, 1995

Employment Act, 2006

European Bank for Reconstruction and Development and International Finance Corporation, 2009

International Labour Organization (1998) ILO, Declaration on Fundamental Principles and Rights at Work

Uganda Covid-19 Education Response Project, Draft Environmental and Social Management Framework (ESMF)

Uganda Covid-19 Education Response Project, Draft Project Implementation Manual

United Nations Universal Declaration of Human Rights, 1948

ANNEX I: GRIEVANCE REGISTRATION FORM

CARP/GRM...../..... (Location) (Reference No.)				
1. Complainant's Information				
(This information must be provided. The identity of complainants will be kept confidential if they request so.)				
Names and Titles (Dr/Mr/Ms/Mrs)		Signatures	Positions/ Organizations (If any)	Addresses:
				Contact Tel.
Authorized Representative?	No <input type="checkbox"/> Yes <input type="checkbox"/>	If yes, Description of Group		
Please indicate how you prefer to be contacted (e-mail, mobile, letter, fax, verbal etc.):				
2. Brief Description of the problem:				
3. Description of the Complaint				
a) What harm do you believe the COVID-19 Emergency Project caused or is likely to cause to you?				
b) Why do you believe that the alleged harm results directly from the COVID-19 Emergency Project?				

c) Do you have any other supporting documents that you would like to share?		
4. Previous Efforts to Resolve the Complaint		
(a) Have you raised your complaint with any other authorities? <input type="checkbox"/> No <input type="checkbox"/> Yes		
If Yes (Please, provide the following details):		
When?: _____		
How and with whom the issues were raised? _____		
Please describe any response received from and/or any actions taken by the project level grievance mechanism.		
Please also explain why the response or actions taken are not satisfactory.		
If No, Why?		
(b) How do you wish to see the complaint resolved?		
5. Name of the person who completed this form:	Signature:	Date:

ANNEX II: GRIEVANCE RESOLUTION FORM

CARP/GRM...../..... <div style="display: flex; justify-content: space-around; width: 100%;"> (Location) (Reference No.) </div>			
1. Complainant's Information			
RESPONDENT DETAILS		COMPLAINANT DETAILS	
Full name		Full name	
Address:		Address:	
Phone No. (home/cell) IF ANY		Phone No. (home/cell) IF ANY	
Email:		Email:	
Date of complaint resolution		Location	
SUMMARY OF RESOLUTION			
a) Brief description of Complaint:			
b) Brief description of Resolution:			

SIGNATURES			
Chairperson		Complainant	
Signature		Signature	
Name of Chairperson		Name of Complainant	
Date		Date	
Secretary		Witness	
Signature		Signature	
Name of Secretary		Name of Complainant's Witness	
Date		Date	

ANNEX III: SAMPLE OF A RISK ASSESSMENT TOOL

What are the hazards?	Who may be harmed and how?	What are you already doing?	What further action is necessary?	How will you put the assessment into action?		
<p>Spot hazards by:</p> <ul style="list-style-type: none"> ▪ Walking around the workplace; ▪ Asking workers what they think; ▪ Checking safety instructions; ▪ Contacting your supervisors <p>Don't forget long-term hazard</p>	<p>Identify groups of people. Remember:</p> <ul style="list-style-type: none"> ▪ Some workers have particular needs; ▪ People who may not be in the workplace all the time; ▪ If you share your workplace think about how your work affects others; ▪ Members of the public Say how the hazard could cause harm 	<p>List what is already in place to reduce the likelihood of harm or make any harm less serious</p>	<p>You need to make sure that you have reduced risks "so far as is reasonably practicable". An easy way of doing this is to compare what you are already doing with best practice. If there is a difference, list what needs to be done</p>	<p>Remember to prioritize. Deal with those hazards that are high-risk and have serious consequences first.</p>	Action by whom	Action by whom

<p>Review your assessment to make sure you are still improving, or at least not sliding back</p> <p>If there is a significant change in your worksite, remember to check your risk assessment and where necessary, amend it</p>				<p>Review Date:</p>		
<p>Assessment completed by:</p>				<p>Signature:</p>		

ANNEX IV: SAMPLE OF A WORKERS CODE OF CONDUCT

I, _____, acknowledge that preventing any misconduct as stipulated in this code of conduct, including gender based violence (GBV), child abuse/exploitation (CAE) are important. Any activity, which constitutes acts of gross misconduct violating this code of conduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the workstation or at the surrounding environment. Prosecution of those who commit any such misconduct will be pursued as appropriate.

I agree that while working on this project, I will:

- 1) Consent to security background check;
- 2) Treat women, children (persons under the age of 18) and persons with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, birth or other status;
- 3) Not use language or behaviour towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- 4) Not participate in sexual activity with children/learners (Minors- under the age of 18)—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence;
- 5) Not exchange money, employment, goods, or services for sex, with community members including sexual favours or other forms of humiliating, degrading or exploitative behaviour;
- 6) Not have sexual interactions with members of the communities surrounding the work place, worker's camps and fellow workers that are not agreed to with full consent by all parties involved in the sexual act (see definition of consent above). This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex such sexual activity is considered "non-consensual" within the scope of this Code;
- 7) Attend trainings related to HIV and AIDS, GBV, CAE, occupational health and any other relevant courses on safety as requested by my employer;
- 8) Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith;
- 9) With regard to children (under the age of 18):
 - a) Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.

- b) Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
 - c) Refrain from physical punishment or discipline of children.
 - d) Refrain from hiring children for domestic or other labour, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
 - e) Comply with all relevant local legislation, including labour laws in relation to child labour.
- 10) Refrain from any form of theft for assets and facilities including from surrounding communities.
 - 11) Remain in designated working area during working hours;
 - 12) Refrain from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours;
 - 13) Wear mandatory PPE at all times during work;
 - 14) Follow prescribed environmental occupation health and safety standards;
 - 15) Channel grievances through the established grievance redress mechanism.
 - 16) Follow the set SoPS by MoES and MoH in response to COVID-19

I understand that the onus is on me to use common sense and avoid actions or behaviours that could be construed as misconduct or breach this code of conduct.

I acknowledge that I have read and understand this Code of Conduct, and the implications have been explained with regard to sanctions on-going employment should I not comply.

Signed by: _____

Signature: _____

Date: _____

FOR THE EMPLOYER

Signed by: _____

Signature: _____

Date: _____

ANNEX V: SUMMARY OF LABOUR RELATED ISSUES FROM FIELD CONSULTATIONS

SN	ISSUES RAISED	PROPOSED REMEDY
1	Lack of PPEs for both the teaching and the non teaching staff (many do not have masks for example, cleaning protective gears, hand washing facilities...etc)	<ul style="list-style-type: none"> • More provisions in form of funds sent to schools for purchasing PPEs for staff. • Strict follow-up and monitoring to ensure that funds are effectively utilized for the intended purposes • Guidance should be given to schools on procurement of quality equipments.
2	Inadequate space to handle all learners in a following recommended SOPs leading to congestion in schools	<ul style="list-style-type: none"> • Plan and budget for more infrastructures such as classrooms • Utilize natural space under natural shades • Plan for contraction of temporally structures such as tents. • Promote virtual learning
3	High people teacher ratio	<ul style="list-style-type: none"> • Recruitment of more teachers on replacement to fill up the district quotas.
4	Teachers complain of the long distances they move to access schools due to inadequate accommodation for teachers.	<ul style="list-style-type: none"> • Plan and budget for construction of staff quarters to avoid the unnecessary movements in and out of schools. • Encourage staff to rent near the school
5	In private schools, the teachers have not been paid since the schools closed and therefore many teachers are likely to lose their jobs as directors fight to reduce expenditures at school level	<ul style="list-style-type: none"> • Creation of a fund to support proprietors of private schools. • There is need to advocate for a dialogue between the teachers and directors of private schools
6	Increased cost of living .i.e. more transport cost, feeding costs, family care cost, water bills and medication. Despite increase in the expenditure side, the income side (salary and wages) has not been commensurate.	<ul style="list-style-type: none"> • Propose an increase in the salary • Design and implement financial literacy and economic empowerment sessions targeting teachers in active roles.
7	High risk of exposure to COVID-19 infection given the different categories of learners handled from	<ul style="list-style-type: none"> • Form COVID-19 committee for teachers at school level • Enhance capacity building for the staff at

SN	ISSUES RAISED	PROPOSED REMEDY
	different communities	<p>schools on SOPs</p> <ul style="list-style-type: none"> • Think of health insurance coverage for school staff • Plan and budget for risky allowance for teachers should also be considered
8	Lack of parental support for learners sometimes creates grievances between the parents and teachers. Parents complain on school requirements since they have not been working	<ul style="list-style-type: none"> • Mass community sensitization campaign on the role of education to changing the society • Implementing education ordinances and bye-laws at district and sub county level respectively.
9	Poor working conditions at school level e.g. inadequate latrine facilities, no lunch for teachers, no staffroom and among others	<ul style="list-style-type: none"> • Increasing the school facility grant budget
10	Increasing rates of Domestic violence	<ul style="list-style-type: none"> • Mass community awareness campaign on the disastrous effects of domestic violence to both the family and the country at large
11	Loan burden with increased interest to be paid since many were not servicing their loads because of the pandemic	<ul style="list-style-type: none"> • Increase funding for teacher's circles to enable them access low interest loans. • Design and implement financial literacy and economic empowerment sessions targeting teachers in active roles. • Dialogue with financial institutions to adjust the loan payment periods.
12	Trauma, stigma and stress experienced during school closure	<ul style="list-style-type: none"> • Designing and implementing a psychosocial support programme targeting affected staff.
13	Increasing GBV and SEA cases recorded during the stay home period. Some reported unwanted pregnancies	<ul style="list-style-type: none"> • Conducting special GBV and SEA trainings for staff with a special focus on the legal and policy framework as well as Reporting, Tracking, referral and Response to such cases. • Psychosocial support for the affected staff is also relevant.
14	Teachers complained of being overworking in a bid to catch-up with syllabus coverage for the P7	<ul style="list-style-type: none"> • Organizing special training for institution administrators on the existing work policies in Uganda in reference to the Education Act, Public Service CoC and the Teacher's

SN	ISSUES RAISED	PROPOSED REMEDY
	classes	CoC.
15	Due to Financial constraints Some teachers have lost lives and others have decided to change to other professions.	<ul style="list-style-type: none"> Recruitment of more teachers on replacement to fill up the district quotas.
16	Inadequate capacity building for teachers on detection and emergency handling of COVID 19 registered School case	<ul style="list-style-type: none"> Train teachers on the SOPs and signs and symptoms of Covid 19 Link more health workers to the neighboring schools to handle emergency issues