



**REVOLUTIONARY GOVERNMENT OF ZANZIBAR
MINISTRY OF EDUCATION AND VOCATIONAL TRAINING**

**SKILLS DEVELOPMENT FOR YOUTH EMPLOYABILITY IN BLUE
ECONOMY PROJECT (SEBEP)**

LABOUR MANAGEMENT PROCEDURES

2025

ABBREVIATION AND ACRONYMS

MoEVT	Ministry of Education and Vocational Training
SEBEP	Skills Development for Youth Employability in Blue Economy
VTC	Vocational Training Centre
LMP	Labour Management Procedure
AfDB	Africa Development Bank
ISS	Integrated Safeguard System
ESS	Environmental and Social Standard
PIT	Project Implementation Team
OHS	Occupational Health and Safety
RGoZ	Revolutionary Government of Zanzibar
EHSGs	Environmental Health and Safety guidelines
ESMP	Environmental and Social Management Plan
MP	Monitoring Plan
PPE	Personal Protective Equipment
SEAH	Social Exploitation Abuse and Harassment
GBV	Gender Based Violence
CoC	Code of Conduct
ESF	Environmental and Social Framework
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome
ILO	International Labor Organization
M&E	Monitoring and Evaluation
NGO	Non- Governmental Organization
PPE	Personal Protective Equipment
PWDs	Person With Disability
RMNCAH-N	Reproductive Maternal Neonatal Child and Adolescent Health-Nutrition
SAC	Shehia Advisory Council
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
ESIA	Environmental and Social Impact Assessment
STD	Sexually Transmitted Diseases
TZS	Tanzania Shilling
TOR	Terms of Reference
WGM	Workers Grievance Mechanism
WHO	World Health Organization
ZEMA	Zanzibar Environment Management Authority

1.0 Introduction

The Ministry of Education and Vocational Training, (MoEVT) Zanzibar, is implementing a five-year project (2022/2027) under the name of Skills Development for Youth Employability in the Blue Economy (SEBEP). The main objective of the SEBEP project is to improve youth access to quality and relevant skills for increased employability in the blue economy to contribute to the Revolutionary Government of Zanzibar efforts to increase the supply of skilled labour in the areas of Tourism, Maritime and Fishery and offshore oil and gas (Blue Economy) required for future economic and social development. The main activities in this project are the construction of five vocational training centres (VTCs) in both Unguja and Pemba, Construction of Marine and Maritime Institute, Construction of Business Incubation Centre, Construction of Hostel for 500 Girls students, Construction of oil and gas workshop together with Administration block.

The Labour Management Procedures (LMP) is a document which prepared to manage risk under the Skills Development for Youth Employability in Blue Economy Project (SEBEP). This document aims to facilitate project planning, preparation, and implementation. The LMP sets out the Program's approach to meet national requirements as well as the objectives of the AfDB Integrated Safeguard System (ISS) on Assessment and Management of Environmental and Social Risk and Impact (ISS1), Labour and Working Condition (ISS2) Resources Efficiency and Pollution Prevention and Management (ISS3) and Community Health and Safety (ISS4). Stakeholder Engagement and Information Disclosure (ISS10).

Labour Management Procedures (LMP) applies to all categories of SEBEP project workers, including full-time, part-time, and/or temporarily employed individuals. Prior to the commencement of their duties, selected project workers will be required to sign a code of conduct that stipulates the norms, rules and proper practices of an individual worker. The LMP will assist the SEBEP project with the identification of main labour requirements and risks associated with the program and determine the resources necessary to address the project labour issues regard to the compliance of Occupational Health and Safety standards.

The purpose of LMP is to facilitate planning and implementation of OHS at the workplace during construction of the project, where the activities will be undertaken as part of implementing the project, and also “National Labour Law” and “Zanzibar Labour Law” will be used interchangeably.

2.0 Labour Management Procedure

The Labour Management Procedures (LMP) have been developed by the SEBEP projects to manage risks and impacts. The main objective of LMP is to manage labour risks during the planning and implementation of the project. The LMP identifies main labour requirements and risks associated with the project, and is designed to enable project-related parties, such as Supervising Consultant Project Implementation Team (PIT), Contractors, Subcontractors, Primary Suppliers, and Project Workers to have a clear understanding of what is required on a specific labour issue.

3.0 Objectives of the Labour Management Procedure

The objectives of the LMP are as follows: -

- a. To promote Health and Safety at working sites for project workers;
- b. To promote fair treatment, non-discrimination and equal opportunity of project workers;
- c. To protect project workers, including vulnerable workers such as women, people with disabilities, migrant workers, contracted workers, community workers and primary supplier workers;
- d. To provide a Grievance Redress Mechanism (GRM) for project workers to raise their concerns;
- e. To address child labour, and prevent the worst forms of child labour;
- f. To support the principles of freedom of association and collective bargaining of project workers that abide by the National Labour Laws, Policies, Regulations and the ESS2

4.0 Overview of LMP in the Project

This LMP applies to all project workers, whether full-time, part-time, temporary, seasonal or migrants, skilled or unskilled, who will be working in the project activities. The LMP is applicable, as per ESS2 to the project in the following manner:

- Person employed or engaged directly or indirectly, including community workers who will be engaged to work specifically in relation to the project.
- Persons employed or engaged by Contractors or subcontractors to perform work related to core functions of the project, regardless of location
- Persons employed or engaged by the project's primary suppliers.

5.0 Number of Project Workers

Apart from the permanent public employees from the Ministry of Education and Vocational Training, the project also intends to provide temporary employment opportunities to community and household level, specifically during the construction works activities. Additionally, the following categories of project workers will be working on the project as well.

5.1 Supervising Consultant

The project engaged one Supervising Consultant to work directly in the project to ensure the Project receive quality product in accordance with the design. The consultant will work in on a contractual basis for the duration of at least eighteen months. The Consultant will work closely with the expert will work closely with PIT to ensure the Project achieved the intended objectives.

5.2 Contractors' workers

Based on the requirement in every component, the PIT will employ contractors who will hire contracted workers based on their level of skills and project needs.

5.3 Direct Workers:

A permanent staff/consultants, government civil servants and experts in SEBEP who will work throughout the project implementation period. SEBEP has 12 permanent staff including a Project Manager, an Accountant, a Procurement officer, (2) Engineers (one from Unguja and one from Pemba), an Environmental and Social Safeguard officer, a Monitoring and Evaluation officer, a Gender Specialist officer, Secretary and two 3 Drivers (two in Unguja and one in Pemba).

5.4 Community workers

These are labourers that can be made available by the Communities for the benefit of sub-projects (in-kind contributions to community activities) could be hundreds. The community workers will be identified during the project implementation stage, and the LMP will be updated accordingly.

6.0 Brief Overview of Labour Legislation and Policies

6.1 Zanzibar Labour Laws and Legislation

The Employment Act No. 11 of 2005 and The Labour Relation Act No. 1 of 2005 sets out fundamental labour rights and employment standards relating to employment in the public and private sector. It contains prohibitions on forced labour, sexual harassment in employment, worst forms of child labour, and employment discrimination, and establishes conditions of employment for special categories of workers, including protections for pregnant and nursing employees, night work and other work situations for female employees, and equal employment rights for persons with disabilities. The Employment Act also sets out provisions on its administration and jurisdiction, including through the establishment and operation of labour officers and inspectors, the labour advisory board, the labour commissioner, and its power to institute criminal proceedings for labour law violations. The Act also provides procedure for temporary employment which should be between six months and three years.

The Zanzibar Public Service Act, no; 2 (2011) and the Public Service Regulation of 2014 provide detailed information on employment standards and labour relations for public and private sector workers. The work-related matters governed by the Act and its Regulation include: length of working day and week, special Friday break, manner of undertaking and compensation for overtime work, regulation of working time and overtime rate, restrictions on number of work days, extra pay for night work, annual leave for public holidays, temporary and emergency leave, compassionate leave, sick leave, maternity leave, leave without pay and action to be taken by employers when leave without pay expires, provision of transport and accommodation in deserving circumstances; identification of public service occupation eligible for meal allowance and other special allowances; provision for the manner in which medical care and treatment shall be provided to public service employees; obligation to provide safety and protective gear to employees in deserving occupations; allowances for travelling on duty; obligation of public service institutions upon death of employee; certificate of service upon eligible termination or retirement; repatriation of employees to place of first appointment; sanction for breach of employment standards; protection of pregnant and nursing

employees; engagement of female employees at night; exception of female employees from certain categories of night work; additional conditions for female employees; equal rights of employment for persons with disabilities.

6.2 Provisions of Zanzibar Employment Act No. 11 of 2005 that are directly related to the project include, but are not limited to the following:

- i. Section 11 (6) requires that employers employing more than 25 employees shall be required to prepare a policy statement on sexual harassment, which should explain the procedure which should be followed by employees who are victims of sexual harassment.
- ii. Section 44 (b) provides that the period of service which may be stipulated or implied in any temporary contract of service shall be between the period of six months and three years.
- iii. Section 46 provides that every written contract of service entered into between an employer and employee shall be attested by Labor Officer.
- iv. Section 62(1) requires that working hours should be not exceeding 8 hours per day or 42 hours per week
- v. Section 62 (6) requires that an employer provide a one-hour break per day to employees.
- vi. Section 62(4) permits persons working on shift to work more than eight hours per day provided the period for that person should not exceed forty-eight hours for any one week.
- vii. Section 97(1) provides that wages shall be paid at the end of each month and not less than the minimum amount as set by the government. The Minister may, after the proclamation of the minimum wage by the President, by order publish in the Gazette, and provide for the payment of minimum wages or the rates of minimum wages by employers in relation to the public or private sector, as the case may be, provided, that an

employer is not prohibited from paying his or her employees' wages above the minimum wage or rates of minimum wages.

- viii. Section 63 (1) provides that overtime and night work should be the payment for overtime and the working time for over time should not exceed 3 hours per day, and for night work the employer should set a night allowance at the mutual agreement between the parties. Subject to the provisions of the Act, an employer may not require or permit any employee to work overtime.
- ix. Section 65(1) provides that an employee shall not be required to work more than six days in one week.
- x. Section 67 provides that the legal period of rest is 2 days (i.e., Saturday and Sunday) per week and all public holidays as declared by the government.
- xi. Section provides that sick leave and medical assistance for the employee is granted after the employer confirms the sickness/need for medical assistance of his/her employee; this also includes all employees who are under probation period.
- xii. Section 67 provides for each worker to have 28 working days of annual holiday/vacation leave.
- xiii. Section 70 provides for maternity and family leave, including 90 calendar days for maternity leave, and three days family leave in relation to the death of a family member, such as spouse or child.
- xiv. Sections 52 and 54 provide for termination of employment and details of severance payments as prescribed in Section 68(I) a – d of the Zanzibar Public Service Act. No 2 of 2011

Section 82(1) provides employer to provide uniform, special protective clothes and other protective gear to employee as shall be specified in the regulation.

6.3 Occupational Health and Safety

The Occupational Health Safety and Health Act, 2005 applies generally to work places. It governs the duties, rights and responsibilities of employers and employees in relation to occupational health and safety. Relevant provisions of this Act relating to the activities of the project include:

1. Section 20(2) requires the employer to registers the workplace to the Director of OSHA before commencement of the operation of the workplace.
2. Section 23 provides that all plans and architectural drawings of the new workplace and alteration of existing workplace be submitted to OSHA for approval before actual construction of building begins.
3. Section 28(1) require the employer to provide adequate supply of clean, safe and wholesome water and readily accessible to all persons employed on the premises.
4. Section 24(1) require the employer to provide sufficient and suitable sanitary conveniences to persons in a workplace for the different sexes.
5. Section 32 (1) provides for the provision of first aid box to the prescribed standard and marked "FIRST AID".
6. Section 32 (2) requires that employer provide a first aid box to be placed under the charge of a responsible person who has receive first aid training from a recognized institute and who will be available during working hours.
7. Section 36 requires that employers provide and maintain protective equipment for workers in any workplace where there are any processes involving exposure to any injurious or offensive substance or environment.
8. Section 53 states that it is the worker's duty to report immediately to the supervisor any situation which the worker has reasonable grounds to believe presents an imminent or serious danger to his/her life or health or that of others in the same premises, and until the employer has taken remedial action, if necessary, the employer shall not require workers to return to a work situation where there is continuing imminent or serious danger to life or health.
9. Section 54 provides that any worker who has removed himself or herself from a work situation which he or she has reasonable justification to believe present and imminent and serious danger to his or her life or health shall not be punished or subjected to undue consequence, provided the danger is con-firmed by the Director.

10. Section 58 provides that a thorough periodic occupational medical examination for fitness for continued employment for employees to be carried out by a qualified practitioner as may be authorized by the Director, who is the Chief Inspector of workplaces.
11. Section 85 requires the employer to provide a means of extinguishing fire at the workplace and should be readily accessible.
12. Section 118 (1) (c) provides that there shall be kept available for inspection in every work place, in the prescribed form, a register, called the General Register and there shall be entered in or attached to that register the prescribed particulars as to every accident and case of occupational disease(s) occurring in the work place of which notice is required to be sent under the provision of this Act.

7.0 Policies and Procedures

This section outlines the main policies and procedures to be followed during project implementation in relation to occupational health and safety, forced labour and related labour issues. It will be updated considering new information during project implementation. While most of this information is also included elsewhere in the LMP, it is presented here in a consolidated manner to assist the PIT and other Users of the LMP:

7.1 Occupational Health and Safety

The PIT will address project occupational health and safety risks by ensuring that the hierarchy of hazard/risk control is followed including as part of the development of subproject ESMPs (and HS Plan) and C-ESMPs (and HS Plan). The provision of potable water, sanitary and waste disposal facilities at each activity site, regular monthly trainings on national law requirements and best practices for occupational health and safety is considered. The PIT will ensure that all its direct hires for the project comply with national occupational health and safety laws and Project OHS requirements (including those in this LMP, subproject ESMPs, and Project ESCP) and wear all required PPE appropriate for their project work duties.

The PIT will ensure that project workers comply with all requirements of applicable occupational health and safety legislation of Zanzibar and with the AfDB Bank Group (ESF, ESS2, etc.), General Environmental Health and Safety guidelines (EHSGs) on Occupational Health and Safety, and AfDB Life Safety Guidance. The PIT will maintain all records for activities related to project safety and health for inspection by Directorate of OSH or the AfDB.

The PIT will also ensure that each of the Contractors and subcontractors which they have engaged respectively for the project will comply with the following:

- 1) Provide each project worker under the contraction areas a Personal Protective Equipment (PPE)/ safety gear.
- 2) Provide monthly training, and written confirmation documenting persons trained and type of training, to each project worker under their control, on national law requirements and best practices on occupational health and safety and the proper use of PPE.
- 3) Provide written confirmation to the PIT that each project worker under the contractor's/subcontractor's control complies with national occupational health and safety laws and this Project OHS requirements and uses all required PPE appropriate for the worker's project work duties.
- 4) Provide written confirmation of their compliance with all requirements of applicable occupational health and safety legislation of Zanzibar and with the AfDB Group General Environmental Health and Safety guidelines (EHSGs) on Occupational Health and Safety.
- 5) Maintain all records for activities related to project safety and health for inspection by the PIT/ Directorate of OSH or the AfDB.

7.2 Forced Labor:

The PIT will ensure that no person is employed or engaged in relation to the project under circumstances that would constitute forced labour or the result of labour trafficking.

To this end PIT in collaboration with Commissioner for Labor will conduct periodic inspections, at least once in three months of Contractor, Subcontractor and Primary Supplier to verify consistency and compliance with the law in relation to recruitment of workers and provision to all workers of a written signed employment contract in English or Kiswahili, depending on the worker's preference.

If forced labour or persons who are engaged in the project as a result of trafficking are identified, the PIT will act promptly to address the issue, including referring

the matter without delay to the relevant Zanzibar government authorities to be addressed in accordance with Zanzibar law.

7.3 Employment Age

Section 98 (1), (2), and (3) of the Zanzibar Children's Act of 2011 establishes the minimum age for employment or engagement in work at 15 years. And a minimum age of 18 years for hazardous work. Tanzania has ratified ILO Convention 138 on minimum age and Convention 182 on worst forms of child labour.

There is a risk that persons employed or engaged as unskilled workers or other working categories are directly hired by contractors or subcontractors, or by primary suppliers, including those involved in producing and providing gravel and other materials or other activities constituting the worst forms of child labour, might be persons under 18 years old.

The PIT will undertake monitoring of at least every three months to all Project Workers, to ensure that all Contractors, Subcontractors, and Primary Suppliers engaged in the project are not employing/engaging anyone under 18 years old.

The project will use the following process, prior to the employment or engagement of an applicant for work on the project, to verify the person's age.

- written confirmation from the applicant of their age; and
- Where there is reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age).

If the employee is under the age of 18 years and discovered to work on the project, PIT will terminate the employment or engagement of that person in a responsible manner.

7.4 Terms and Conditions

This section sets out details regarding specific wages, working hours, and collective agreement that apply to the project.

- a The maximum number of hours per week that a worker can undertake is 42 hours, and if a worker's duties require him to exceed these maximum hours,

he/she shall be paid overtime as per sections (63), (64) and (66) of the Employment Act, 11 of 2005.

- b The SEBEP, as the project implementing agency, will ensure respect for any collective bargaining agreements related to project workers, whether direct or hired through contractors or subcontractors. Collective bargaining agreements specific to the project are not known at this time, but should exist in relation to any contracted or direct hired workers; such agreements will be respected.
- c The minimum net salary for all project workers, which is the legal minimum wage in Zanzibar, will be TZS 300,000 per month, excluding social security and other payments/benefits; the daily wage for unskilled labour is set at TZS 25,000 per day.
- d All government civil servants working in the project, whether full-time or part-time, will remain subject to the terms and conditions of their existing public sector employment agreements/arrangements.
- e All project workers will be given a legally enforceable written employment contract, signed by the employer and the worker, in either English or Kiswahili, depending on the worker's preference, and at a level of language that is understandable to the worker.
- f All project workers will sign a Code of Conduct related to GBV and other issues.
- g All contractors, subcontractors, and primary suppliers will ensure that they have qualified staff who are always fluent in either English or Kiswahili in relation to project activities and in all communications with the project workforce.
- h The project will ensure compliance with all Zanzibar legal requirements and World Bank guidelines concerning management of the workforce in the context of COVID-19. The PIT, all contractors, subcontractors, and primary suppliers shall ensure that wages to project workers are paid not less than twice per month, paid in legal tender, and paid directly to the individual worker. Workers shall be free to dispose of their earnings as they choose.
- i The PIT, all Contractors, Subcontractors, and Primary Suppliers shall ensure that payments to project workers are made in a transparent manner, showing clearly the gross wages, any deductions taken and for what purpose, and net wages due. Deductions shall be made only if prescribed by national laws or regulations or fixed by a collective agreement or arbitration award.

- j The project will not engage/employ prison labour for any purpose in relation to the project, including any work involving direct hires, workers engaged through Contractors/Subcontractors, and workers engaged through primary suppliers.
- k To ensure the absence of child labour and considering the nature of work to be undertaken, the project will not employ or engage any person under the age of 18 years. The PIT will ensure that this requirement is strictly applied to all workers whom they hire directly or indirectly in the project, and regarding all workers engaged by Contractors/Subcontractors and Primary Suppliers for the project.

7.5 Responsible Staff

The PIT has been established as the Monitoring Team (MT), which will be responsible for the overall management and implementation of this LMP. The Unit will comprise various stakeholders including MoEVT monitoring officer, Project Manager, Environmental and Social safeguard officer, Monitoring and Evaluation officer, Gender officer, Zanzibar Environmental Management Authority (ZEMA), Directorate of Occupational Safety and Health (OSH) Ministry of Labour, Ministry of Blue Economy and Fisheries and State University of Zanzibar (SUZA), to implement the LMP in compliance with national laws. The PIT will be responsible for the following tasks:

- a) Undertake the overall implementation of this LMP.
- b) Engage and manage and supervise all Project workers, including consultants and contractors in accordance with this LMP and the applicable Procurement Documents.
- c) Monitor project Contractors and workers (including during operation phase) during operation phase to ensure their activities
- d) Monitor the potential risks of child labour, forced labour and serious safety issues in relation to primary suppliers.
- e) Provide monthly training to mitigate potential safety and health risks, including in relation to HIV/AIDS and other communicable diseases, including COVID-19, for project workers.

- f) Ensure that the GRM for project workers is established and implemented, and that project workers are informed about it at the time of their recruitment for employment/engagement in relation to the project.
- g) Monitoring the implementation of the Code of Conduct (CoC) for workers.
- h) Monitoring, supervising, and reporting on all project-related occupational, health and safety (OHS) issues, including regarding COVID-19.
- i) Ensuring that all project workers receive training on the use of appropriate Personal Protective Equipment (PPE) and always have access to such PPE while performing their project duties to such PPE, and on their OHS responsibilities and rights.
- j) Report to the AfDB on labour and OHS performance and key risks and complaints, including per the Monitoring and Reporting requirements in the ESCP.

7.6 7.6 Assessment of Key Potential Labour Risks

The main labour risks associated with the project are assessed to be related to the potentially hazardous work environment, the associated risk of accidents and labour influx. Based on current conditions in the sector, it is assessed that the risk of a child or forced labour is negligible and already managed through national legislation.

Potential risks related to labour and working conditions for this project, which include but are not limited to the following:

- a) Workplace injuries, accidents, and related occupational health and safety hazards.
- b) Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)
- c) Transmission of diseases including sexually transmitted diseases (STD), HIV/AIDS and COVID-19.
- d) Child labour and forced labour
- e) Labour influx into local communities, including transmission of communicable diseases
- f) Lack of employer compliance with national labour laws, including in relation to hours, provision of PPE, and minimum wage.
- g) Discrimination against women and persons with disabilities in the recruitment and employment
- h) Lack of Grievances Registry Mechanism

Lack of an emergency plan/procedure in case of emergencies such as fires, explosions, flooding, earthquakes and other related emergencies.

7.7 Potential Labour Risks and Mitigation Measures

No	RISK	Phase	Mitigation measures
	<p>Workplace Accidents and Injuries</p> <p>During construction, workers are at risk of falling from trenches, scaffolding, roofs, ladders and other heights at work and falling of objects from above.</p> <ul style="list-style-type: none"> - Exposure to construction risks, including noise and dust. - Exposure to electrical hazards from the use of tools handling solid waste, and sludge - Exposure to chemicals such as paints, solvents, lubricants, and fuels 	<p>All phases of construction and Operation</p>	<p>The SEBEP will address workplace accident and injury risks by notifying the AfDB Bank within 24 hours after learning of the incident or accident ensuring that Contractors provide with appropriate and other need of Personal Protective Equipment (PPE) and safety gears for each worker</p> <ul style="list-style-type: none"> - Occupational Health and Safety Officer must ensure those workers uses Proper Personal Equipment (PPE) during all times of working since the time of construction and project implementation - Enhance Workplace Occupational Health and Safety awareness and training - Establish a 24-hours emergency response system at all project worksites.

			<p>- For major incidents/accidents, the supervisor, in consultation with the site engineer, will temporarily suspend the work until the situation is addressed in accordance with applicable Zanzibar occupational health and safety laws, the AfDB General Environmental Health and Safety Guidelines (EHSGS) Section 2 “Occupational Health and Safety,” and the applicable provisions of ESS2</p>
1b	<p>Accident from around the construction site</p> <p>There will be an accident from construction activities and from around the construction area such as Traffic accidents, Lifting of heavy structures, Environmental hazards (snakes, wasps, bees, etc. Welding hazards (fumes, burns and radiation)</p>	<p>All phases of construction and operational</p>	<p>Occupational Health and Safety Officer must ensure those workers uses of proper personal equipment (PPE) during all the time of working since the time of construction and project implementation</p>

2	<p>Gender Based Violence (GBV)</p> <p>Sexual Exploitation and Abuse (SEA)</p> <p>There is a risk that workers involved in project sites might engage in transactional sex and/or sexual exploitation of communities in a project site leading to spread of diseases and domestic conflicts within households in the local communities.</p> <p>Women in all project employment categories may also face sexual harassment, including demands for sexual favours as a condition of employment.</p>		<p>Implement a Code of Conduct (CoC) for all project workers, that will include provisions related to GBV/SEA/SH, and which all contractors and subcontractors and primary suppliers will agree to abide by as a condition of contract.</p> <ul style="list-style-type: none"> - Raise awareness regarding GBV/SEA/SH and train all project workers and residents of local communities affected by the project. - Ensure that all project workers have access to the grievance mechanism established specifically for the project workforce or the grievance redress mechanism established generally for the project. - Ensure that at least 50% of unskilled labour is hired within the community surround the project sites
3	<p>Discrimination against Women and Persons with Disabilities</p>	<p>All phases of construction and operation</p>	<p>The SEBEP will ensure that Contractors will employ project workers on the basis of no</p>

	<p>There is a risk for women 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 favours in return for job placement or advancement</p> <p>There is also risk related to work discrimination against persons with disabilities, albinism and persons based on actual or perceived HIV/AIDs status</p>		<p>discrimination in recruitment personal characteristics unrelated to inherent work requirements. Such personal characteristics include but not limited to gender, age, race, colour disability, including albinism, marital status, pregnancy or maternity status, social origin, gender orientation, religion, real or perceived, HIV/AIDs status, and ethnic origin.</p>
4	<p>Child Labor and Forced Labor</p> <ul style="list-style-type: none"> - There is a risk of employing children under 18 years old in such project activities such as gravel making and quarrying due to poverty. - There is a risk that persons employed or 	All phases of construction and operation	<p>The PIT will ensure that all persons directly hired or employed/engaged by Contractors, Subcontractors, and Primary Suppliers for the project are at least 18 years old.</p> <p>PIT in collaboration with Commission of Labour will maintain</p>

	<p>engaged by primary suppliers for the project, including those involved in producing and providing gravel and other materials, might engage persons under 18 years to perform worst forms of child labour.</p> <ul style="list-style-type: none"> - Use of child labour is anticipated to be a risk in relation to use of unskilled workers from local communities hired for project activities. - There are risks of persons being trafficked to work for contractors, subcontractors, or primary suppliers for work activities related to the project. 		<p>records verifying the age by using their National ID cards or Zanzibar ID Card for demonstration for all direct project workers and ensure that all contractors, subcontractors and primary suppliers maintain such documentation for their workers engaged in relation to the project</p> <ul style="list-style-type: none"> - PIT will also require all Contractors, Subcontractors, and Primary Suppliers to identify the risk of child labour in their workforce relating to the project and supply chains and to take appropriate steps to remedy the situation, or to terminate the contract with the contractor or primary supplier - The PIT will ensure that no person is employed or engaged in the project under circumstances that would constitute forced labour, prison labour, or
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			<p>the result of labour trafficking.</p> <ul style="list-style-type: none">- The PIT 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- The PIT will conduct periodic inspections, at least once every three months, of contractor, subcontractor and primary supplier employment records to verify consistency and compliance with the law in relation to recruitment of workers and provision to all workers of a written signed employment contract in Kiswahili, If forced labour or persons who are engaged in, the PIT will act promptly to address the issue, including referring the matter without delay to
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			the relevant Zanzibar government authorities.
5	<p>Lack of Employer Compliance with National Labour Laws</p> <p>There are risks of workers from exploitation, abuse, discrimination and other forms of unfair and illegal treatment by employers. Such risks include being forced to work beyond the legally mandated maximum hours per week with no additional compensation, insufficient rest periods, wages that do not conform to minimum legal requirements, failure of the employer to pay legally required health or social security benefits for workers, failure of employers to pay workers their wages on time and in the full amount required by law, and failure of employers to provide workers with a written and signed legally enforceable contract in a language</p>	All phases of construction and operation	<p>The PIT will ensure that all Contractors, Subcontractors, and Primary Suppliers abide with the following provisions for all workers they have engaged in relation to the project:</p> <p>Provide all project workers with information and documentation that is clear and understandable to the workers regarding their terms and conditions of employment. This information and employment law including: -</p> <ul style="list-style-type: none"> a) Benefits, as well as any related provisions required under ESS2. a) Pay project workers on a regular basis as required under national law. b) Ensure that deductions from

	that the worker understands.		<p>payment of wages are made only as allowed by national law.</p> <p>c) Workers should have a time of rest per week, annual holiday, sick and maternity as required by the Labor Relation Act No 1 of 2005 and Employment Act. No. 11 of 2005 (Section 62 to 70).</p> <p>d) Provide project workers with written notice of termination of employment and details of severance payments in a timely manner</p>
6	Lack of Grievances Registry Mechanism	All project phases	MoEVT through SEBEP will establish GRM at the Shehia level and project level to facilitate stakeholders to file their concerns on project implementation

7.7 Workers Grievance Mechanism

Though complaints occur in workplaces are not always reported for fear of victimization. Hence, a separate Worker Grievance Mechanism (WGM) will be established for project workers (direct workers and contracted workers). Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. The WGM will also allow for anonymous

complaints to be raised and addressed. Individuals who submit their complaints or grievances to the WGM may request that their names be kept confidential, and this should be respected. The WGM however, does not replace or override the requirement that the PIT and other implementing agencies for the project provide for workplace processes for project workers to report work situations that they believe are not safe or healthy, such as reporting requirements regarding workplace injuries and accidents.

For the government civil servants seconded to the project, their respective employment and labour laws and regulations that provide for reporting and redress of worker grievances will be applicable as provided in Public Service Act No 2 2011.

a) Direct and Contracted Workers

The project will have an effective WGM for direct and contracted workers in line with the provisions of ESS2. PIT, Contractors, Consultants and Contracted Workers will hold periodic team meetings to discuss any workplace concerns. The grievances raised by workers will be recording with the actions taken by each unit. The summary of grievance cases will be reported to the AfDB as part of the regular report.

Where the aggrieved workers wish to escalate their issues or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise the issues with the PIT or follow the legal or judicial process. The Safeguards team of PIT will establish a committee of persons to address anonymous complaints and the requests of workers who believe they have not received effective redress through the project worker grievance mechanism and seek to escalate their complaints.

The direct and contracted workers will be informed of the grievance mechanism on recruitment while the grievance mechanism will be made easily accessible through various communication channels such as comment/complaint form, suggestion boxes, email, a telephone hotline; and a confidential procedure for workers to submit anonymous grievances in writing or otherwise.

The WGMs to be used by the PIT and the project Contractors and Sub-contractors will include:

- A procedure to receive, record, refer, resolve, and track grievances.
- Multiple uptake channels such as comment/complaint form, suggestion boxes, email, a telephone hotline; a confidential procedure for workers to submit anonymous grievances in writing or otherwise.
- Stipulated timeframes to respond to grievances.
- A register to record and track the timely resolution of grievances. Grievances reported by the contractors/subcontractors will also be reported and recorded in this master project worker grievance register;
- A responsible person/department to receive, record and track resolution of grievances. In the case of the project WGM for direct hires working for the PIT, Social Safeguard Officer will be responsible for receiving, recording and tracking resolution of such grievances.

The WGM will not preclude any project worker's ability to access any other judicial or administrative remedies that might be available under national law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

b) Project GRM

The PIT will require Contractors/Subcontractors to develop and implement a GRM for their own workforce prior to the start of implementation of the project for each specific site. The Contractor will prepare their Labor Management Plan before the start of civil works, which will also include detailed description of the workers GRM. The GRM must be well circulated and written in a language understood by all workers. The workers GRM will include:

- A channel to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline that might also be anonymous;
- Stipulated timeframes to respond to grievances;
- A register to record and track the timely resolution of grievances;
- A responsible section/wing/committee to receive, record and track resolution of grievances.

The GRM will be described in workers induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- 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 and any grievances will be treated confidentially
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.
- Maintain all records on GRM during implementation of project activities.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed. Existing grievance mechanism methods such as ‘suggestion boxes’ may be used to file complaints. However, community member need awareness creation to ensure they use these boxes to channel grievances at community level. A formal structure needs to be put in place to guide their opening, reviewing, responding to concerns, and providing feedback on the issues raised.

b) c) Actions for Managing Complaints

- Complaints should be sent to the GRM focal point at the workplace by email, text, phone, and letter or in person. The complaints will be logged into the complaints register. The phone number and email address and will be made available to the workers at signing the contract or at recruitment.
- The PIT shall establish Complaints Redress Committee (CRC) that will review complaints on weekly basis upon receipt. The CRC will review the complaints and provide guidance on the course of action and ensure follow-up on previous complaints. Any preliminary investigation should take place within 5 working days of the committee meeting. Feedback will be given to the complainant within 10 working days after receiving complaint.

- The CRC shall deliberate upon informal complaints which will be raised through social media, print media or not formally lodged, to decide whether to investigate based on the substance and potential impact or reputational risk.
- In case the complaint is referred to respective government's legal complaints structures such as ethics and anti-corruption, government administrative or judicial agencies, the AfDB shall be notified.
- With regards to SEA, such complaints shall be kept confidential, the name of the complainant should not be recorded, only the age and gender of the complainant, and whether a project worker was involved and should be sent directly to the PIT.
- As a general practice, no disciplinary or legal action will be taken against anyone raising a complaint in good faith.
- On reporting, a monthly report of complaints resolution shall be prepared and included in the quarterly report.

c) Contract Management

For contract bidding and contracts for the Project, PIT will use the AfDB standard procurement documents, which include labour, and occupational health and safety requirements.

PIT will incorporate standard language, based on project requirements drawn from ESS2 and other sections of the AfDB Environmental and Social Framework and supporting documentation in the tender and contract documents to ensure potential bidders are aware of the environmental and social requirements to be met under the project.

Tender documentation should note that the contractor/subcontractor shall actively collaborate and consult with project workers in promoting understanding, and methods for, implementation of OHS requirements, as well as providing information and training on occupational safety and health, and provision of PPE without expense to project workers. Project workers who remove themselves from dangerous work situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removing themselves from such dangerous situations.

PIT will also state in the tender documentation that adherence to national legislation regarding labour and employment relations and occupational health and safety is a prerequisite for participation in the project.

PIT will also include in the tender documents provisions that forced labour, child labour, discrimination in hiring and employment based on gender, disability, ethnicity, or other personal characteristics unrelated to work requirements, sexual harassment in the workplace, and sexual exploitation and abuse are prohibited and may be grounds for removal of the contractor from the Project.

PIT will require bidders for contracts for the Project to agree to and implement a workplace Code of Conduct that includes provisions prohibiting any form of sexual exploitation, assault or harassment of project workers, as well as sexual exploitation or sexual assault of persons in local communities affected by the project. The CoC will apply to all persons employed or engaged, including persons employed or engaged through contractors and subcontractors, in relation to the project.

PIT will require bidders for contracts for the project to submit a statement confirming their firm compliance with national labour and employment and occupational health and safety laws, and labour management procedures in accordance with Environmental and Social Standard 2 “Labor and Working Conditions” (ESS2) and the LMP for the project.

PIT will make reasonable efforts to ensure that parties awarded contracts for the project are reliable law-abiding entities that do not have a history of problems relating to disrespect for national labour law, unresolved labour disputes, or frequent work-related accidents.

As part of the selection process for contractors, PIT will request and review from prospective contractors the following information:

- i. Information in public records, for example, corporate registers and public documents relating to violations of applicable labour law, including reports from labour inspectorates and other enforcement bodies;
- ii. Business licenses, registrations, permits and approvals;

- iii. Documents relating to a labour management system, including OHS issues, for example, labour management procedures;
- iv. Identification of labour management, safety and health personnel, their qualifications and certifications;
- v. Workers' certifications/permits/training to perform required work;
- vi. Records of safety and health violations, and responses within the last three years of project
- vii. Accident and fatality records and notifications to authorities within the last three years of project;
- viii. Records of legally required worker benefits and proof of workers' enrolment in the related programs;
- ix. Worker pay roll records, including hours they worked and payment received; and
- x. Identification of safety committee members and records of meetings

During the implementation of the contract, PIT will require that contractors submit quarterly reports on compliance with the LMP. The report should include the number and status of project workers, the number of hired and terminated employees in the given period, the number of hours worked, overtime, regularity of payment, OHS issues (injuries and fatalities, if any), safety measures, grievances raised and resolved, training provided/attended, incidents of noncompliance with national law or the LMP.

8.0 8.2 Primary Supply Workers

It is expected that the project will engage primary suppliers to provide raw materials and other goods and services. There are risks of the worst forms of child labour, including children working in gravel making, as well as risks of serious worker safety issues, including accidents, fatalities, and lack of adequate occupational health and safety equipment in project supply chains related to construction, quarrying and transport sectors. Where a significant risk of child or forced labour or serious safety issues in relation to primary suppliers has been identified, the supplier shall be excluded from contracts on the Project until the issues are addressed in line with national laws and ESS2 requirements.

The PIT will ensure that all purchase orders and contracts with primary suppliers contain specific provisions prohibiting child labour and forced labour, and mandating compliance with all national laws, workers health and safety standards.

The PIT will make reasonable efforts to ensure that parties engaged as primary suppliers for the project are reliable law-abiding entities that do not have a history of problems relating to disrespect for national labour law, unresolved labour disputes, or frequent work-related accidents.

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

The PIT will also conduct periodic inspections, at least once in every six months, of primary supplier employment records to verify consistency and compliance with the law in relation to the recruitment of workers and the provision to all workers of a written, signed employment contract in English or Kiswahili, depending on the worker's preference.

To address the risk of forced labour, victims of labour trafficking, and child labour among primary suppliers, the PIT will undertake due diligence to identify primary suppliers and the extent to which these risks might be present in their activities for the project. If forced labour, victims of trafficking, or child labour is discovered in a primary supplier's workforce, the PIT will act promptly to address the issue, including referring the matter without delay to the relevant Zanzibar Government authorities, as well as relevant government or NGO trafficking victims'/forced labour victims' support services, as appropriate, to be addressed by Zanzibar Laws.

Where there is a significant risk of serious safety issues related to a primary supplier, the PIT will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues, which the PIT will review every four months to ascertain their effectiveness. Where forced labour, trafficking, or child labour is identified, the PIT will require the primary supplier to report the situation to the police and other relevant government authorities. Depending on the circumstances, the PIT will discontinue

use of that primary supplier and instead use primary suppliers that can demonstrate they are meeting the relevant requirements of Zanzibar laws relating to forced labour, child labour, trafficking in persons, and occupational health and safety.

ANNEX1: Template for Code of Conduct

The **Employee Code of Conduct (CoC)** outlines the expectations regarding employees' behaviour towards their colleagues, supervisors, communities where they work and the overall organizational set-up. The CoC should promote freedom of expression and open communication. Employees should avoid offending, participating in serious disputes and disrupting our workplace. They are also expected to foster a well-organized, respectful and collaborative environment at the workplace and in the communities where they work. The following should inform the CoC.

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 others Contractor'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 Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with other Contractor'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 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, Sexual Exploitation and Abuse (SEA), 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 the grievance mechanism for Contractor's

Personnel or the project's Grievance Redress Mechanism.

13. The CoC should be written in plain language, preferably in Kiswahili and signed by each worker to indicate that they have:

a. received a copy of the code;

b. had the code explained to them;

c. acknowledges that adherence to this CoC is a condition of employment; and

d. Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

