FINAL REPORT

LABOUR MANAGEMENT PROCEDURE (LMP) FOR SUSTAINABLE POWER AND IRRIGATION FOR NIGERIA (SPIN) PROJECT.

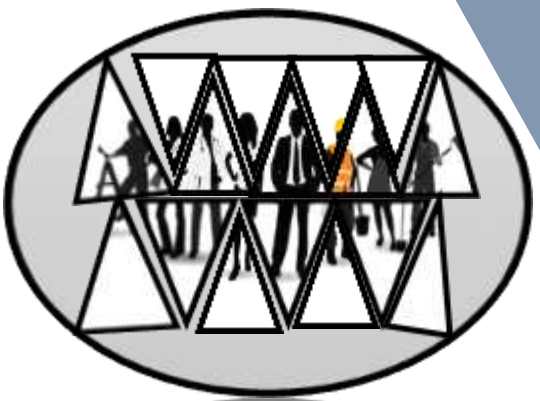


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ACRONYMS

BCM	Billion Cubic Meters
BPE	Bureau of Public Enterprises
CPF	Country Partnership Framework
CPS	Country Partnership Strategy
DISCOs	Distribution companies
EAP	Emergency Action Plan
EPSRA	Electric Power Sector Reform Act
ETP	Energy Transition Plan
FEC	Federal Executive Council
FGN	Federal Government of Nigeria
FMP	Federal Ministry of Power
FMWR	Federal Ministry of Water Resources
GDP	Gross Domestic Project
GENCOs	Generation companies
GHG	Green House Gas
ICOLD	International Commission on Large Dams
IFC	International Finance Corporation
IWRM	Integrated Water Resources Management
MDA	Ministries, Departments and Agencies
MFD	Maximizing Finance for Development
MIGA	Multilateral Investment Guarantee Agency
MO	Market Operator
MW	Mega-watts
NBET	Nigerian Bulk Electricity Trading Company
NDC	Nationally Determined Contribution
NDU	Nigeria Development Update
NERC	Nigerian Electricity Regulatory Commission
NIDP	National Irrigation Development Programme
NIWRMC	Nigeria Integrated Water Resources Management Commission
NPMU	National Project Management Unit
NREEEP	National Renewable Energy and Energy Efficiency Policy
NWR	National Water Resources
O&M	Operations and Maintenance
PDO	Project Development Objective
PSRP	Power Sector Recovery Program
R&D	Research and Development
RBDA	River Basin Development Authorities
SPIN	Sustainable Power and Irrigation in Nigeria
TCN	Transmission Company of Nigeria
TRIMING	Transforming Irrigation Management in Nigeria
WBG	World Bank Group
WUAs	Water User Associations

EXECUTIVE SUMMARY

ES 1: Project Background and Context

The World Bank is supporting the Federal Government of Nigeria to prepare and design the Sustainable Power and Irrigation for Nigeria (SPIN) Project. The Project Development Objective (PDO) of the proposed project is to improve utilization of existing storage for irrigation and hydropower generation and strengthen institutional arrangements for integrated water resources management in Nigeria.

Building upon the lessons learned and achievements from the Transforming Irrigation Management in Nigeria (TRIMING) Project (P123112), the project moves to promoting a more holistic water and storage management by the inclusion of hydropower sector and supporting institutional strengthening, such as on dam safety regulations and guidelines.

Project components:

The proposed project has four main components which include:

Component 1: Institutional strengthening and capacity building for Water Resources Management, through:

i) Institutional Strengthening and Capacity Building for dam safety; ii) Institutional Strengthening and Capacity Building for Irrigation Management; and; iii) Institutional Strengthening and Capacity Building for Hydropower.

Component 2: Irrigation Modernization

This component sets to support the rehabilitation and revitalization of about 40,000 hectares of irrigated command area.

Component 3: Improvements in Dam operations and Enhancing Dam Safety

The component focuses on increasing the safety of selected dams in Nigeria with a view to strengthen the dam safety management system in the country.

Component 4: Project Management

The objective of this component is to effectively implement, monitor, and evaluate project activities. The Component will also support and strengthen the capacity of the government counterparts on the application of Environmental and Social Framework (ESF) and Citizen Engagement activities. These measures ensure efficient project management, monitoring, and citizen participation, contributing to the successful achievement of project outcomes.

Labour Management Procedure for the Project

The Labour Management Procedure (LMP) for the proposed SPIN project is prepared to set out the Project's approach to meeting national requirements as well as the World Bank's Environmental and Social Standard 2, Labour and working conditions (ESS2). Accordingly, this LMP will facilitate the planning and implementation of the project by the National Project Management Unit and other implementing agencies such as the River Basin Development authorities (RBDA) through identifying the main labour requirements, the associated risks, the procedures and resources necessary to address the related labour issues. The LMP also sets out general guidance relevant to labour risks associated with the SPIN project. The LMP will be reviewed continuously during implementation and adequate measures and procedures will be put in place to manage negative impacts.

ES 2: Overview of Labour Legislations

In developing this LMP, compliance obligations have been documented which will serve as supplemental policies that will guide the implementation of this LMP including national laws, international laws, the Labour Act, applicable Laws of the Federal Government of Nigeria, and in particular, the World Bank ESS 2, covering general provisions including:

- Protection of wages.
- Contracts of employment and terms and conditions of employment.
- Fair treatment and equal opportunities for project workers.
- Hours of work and overtime.

- Employment of women.
- Labour health matters.
- Prohibition of forced labour.
- Labour complaints.

Chapter 2 provides details of the Labour legislations applicable to development of the SPIN project's LMP.

ES 3: Overview of Labour Use on the Project

Focusing on the project components, the SPIN project activities will include different categories of workers.

Direct workers

This category of workers will comprise a mix of civil servants from various relevant line ministries who have been deployed or have a legal transfer of their employment or their engagement to the project, full and part-time, under the National Project Management Unit. Direct workers will also comprise of project staff hired as consultants. These workers basically make up the NPMU team, to consist of the National Project Coordinator, Technical Officers, Procurement Officer, Internal Auditor, Accountant, Financial Officer, Monitoring & Evaluation Officer, Gender Officer, Environmental Safeguard Officer, Social Safeguard Officers, Communications Officer, among others. The requirements of paragraphs 9 to 30 of ESS2 will apply to direct workers.

The SPIN project is at project preparation stage and as such, the specific project activities are yet to be decided while their locations are also yet to be finalised, thus the exact personnel load for each project activity and staffing level could not be determined at the point of preparation of this LMP. However, based on the experience of the TRIMING project upon which the SPIN project will be scaled up, the Direct worker will record an estimate of 110 Direct workers.

Contracted workers

The categories of contracted workers to be involved in the project will be consultant service providers who will provide implementation support services to the NPMU in preparation of documents and support, and the staff of contractors, suppliers, and contractors to be subcontracted to arrange for design and civil works, and for construction and supervision activities which the SPIN project may implement. Preference will be given to local workers, including those who may come from host communities to work as unskilled labours. Learning on the experience of TRIMING project, it is estimated that between 300 to 500 contracted workers will be engaged under the SPIN project.

Community Workers

This category of workers is made up of labourers sourced from communities where projects are meant for community development and the labour is a contribution by the community. For the SPIN project, this category of workers may include community members, members of the producer organisations, farmers, women-led farmers, Water Users Association, and/or project beneficiaries who are mobilized by the local contractors for community works, whether paid or unpaid. While applying ESS 2 provisions for community workers, the Project will pay specific attention to sensitization and training of community workers on OHS risks, and the technical knowledge and behavioural awareness to minimize the risks.

Primary Supply Workers

A primary supply worker is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. It can only be anticipated that the SPIN project will have such employees as it cannot be stated precisely at this point. In the event that the project has such workers, they shall be treated as the other workers in the sense that they shall be required to observe all necessary regulations are requirements i.e. signing of Code of Conduct.

Timing of Labour Requirement

The direct workers at NPMU will generally be required full time and around the year for the project duration. Other experts/consultants will be hired on demand basis throughout the project period. Timing for involvement of contracted workers will be known at later stages, however it is clear that they will be engaged depending on implementation of various project interventions.

ES 4: Potential Labour Risks

Based on available information. The key labour risks which may be associated with the project. These include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials
- Likely incidents of child labour or forced labour, with reference to the sector or locality
- Likely presence of migrants or seasonal workers
- Risks of labour influx or gender-based violence
- Risk of Sexual Exploitation and Abuse (SEA)
- Possible accidents or emergencies, with reference to the sector or locality
- General understanding and implementation of occupational health and safety requirements
- Security risk.
- Security Risks

ES 5: Roles and Responsibilities for Managing the LMP

Roles and responsibilities for implementing the LMP have been documented in line with the project structure for implementing the SPIN project. Chapter 5, Table 4 enumerated the Roles and Responsibility required for the LMP responsibility matrix implementation, while Table 5 present the capacity assessment with a summary of lessons learned from assessing the existing implementing agencies such as TRIMING PMU, relevant Ministries, Departments and Agencies (MDAs) the River Basin Development Authority offices in the three Pilot states (Nasarawa, Benue and Taraba) proposed for the SPIN project, with suggested strengthening actions to ensure effective implementation of this LMP.

ES 6: Policies and Procedures for Labour Management in the Project.

Policies and procedures for the management of worker's vulnerability threats and identified labour risks for the SPIN project are outlined in chapter 6 of this LMP and will be governed by the provisions of the World Bank ESS2: Labour and Working Conditions, International Labour Organisation (ILO) standards, Labour Act and other national regulations as outlined in section 4 of this procedure.

Overall, the guiding labour risks management policies for SPIN implementation include:

- There shall be non-discrimination and equal opportunity provided for all workers.
- The terms and conditions of employment shall be outlined in clear and understandable terms, ensure fairness of employment terms and conditions against the applicable and prevailing National stipulations for all workers.
- All Government workers deployed to work on the project shall be given official letters of deployment by their parent ministries.
- The National Project Management Unit (NPMU) shall ensure provision of safe and healthy working conditions for all category of workers, void of worker exploitation, and shall ensure the provision of standard facilities such as decent accommodation for migrant workers.
- Contractors also shall provide safe and healthy working conditions for workers, void of worker exploitation, and shall ensure provision of standard facilities.
- The NPMU and contractors shall conduct job hazard and risk assessment and implement actions to address such risks
- NPMU and contractors shall provide adequate work tools and personnel protective equipment to all workers.
- Timely and adequate training on OHS/HSE shall be provided to all category of workers.
- There shall be no use of child labour or forced labour. No worker less than the age of 18 should be employed in the project, given the level of risk and hazards likely to be involved in the project.
- Workplaces shall be free of Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV).

- ❖ Grievance redress mechanism for workers shall be instituted at all levels of engagement in consultation with the affected worker category.
- ❖ Workers shall have their right of association and collective bargaining.
- ❖ There shall be proper documentation of contractor's/supplier's management in line with OHS requirements.
- ❖ Termination of appointment shall be valid or reasonable, clear and unambiguous, without prejudice and the employee must be aware of the reason.
- ❖ There shall be continuous consultation with workers on the effectiveness and improvement of the Labour Management Procedures.

ES7: Grievance Redress Mechanism for Workers

This LMP recognizes the significance of having a structured process for managing complaints and has established a grievance redress mechanism for workers. Thus, a Grievance Redress Mechanism (GRM) will be implemented with a view to ensure that all complaints from workers are dealt with appropriately, with corrective actions implemented, and the complainant informed of the outcome.
The proposed project recognises that various categories of workers may be deployed to work on the project and as such a uniform grievance process will be beneficial. This is described in line with the required grievance redress committees (GRC) as presented in Table 6 chapter 7. Also presented in this section are typical steps to be adopted for any complaint by contractors as part of the Environmental and Social Management Plan development for site-specific Labour Management Plan. Issues relating to GBV/SEA were also captured.

ES 8: Contractor Management

The LMP will form an integral part of the bidding documents to be issued to consultant/contractors and shall form part of the awarded contracts to all consultants/contractors. Selection of consultant / contractors shall be made according to the World Bank procurement procedures and occupational health and safety as provided in the World Bank standard procurement documents and applicable Nigerian laws. Measures will be put in place by the NPMU to ensure compliance of all requirements of the LMP by the contractors, with adequate monitoring system, as presented in chapter 8 of this report.

ES 9: Stakeholders Consultation

The stakeholder consultation involved key stakeholders, including employees, management, union representatives, and other relevant parties which provided policy direction on labour issues in the proposed project states as well as the exiting project management Unit of TRIMING. The essence of the stakeholder 's consultations was to ensure stakeholders' involvement, as well as collect useful information that will help in putting a comprehensive LMP in place for SPIN project implementation to meet up with the requirements of ESS 2. A variety of methods were employed to gather insights from stakeholders such as community meetings, Focus group discussions among which were women, Surveys: adopted to gather quantitative data, One-on-one interviews: Individual discussions with key stakeholders to ensure diverse perspectives.
Identified Stakeholders include;

- The Project Management Unit of TRIMING project (predecessor of the SPIN project)
- The Nigeria Labour Congress
- Project Engineers / Managers at the River Basin Authority of selected pilot states (Taraba, Benue and Nasarawa); and the Community leadership / representatives.

CHAPTER ONE: INTRODUCTION

1.1 Project Background Information

The World Bank is supporting the Federal Government of Nigeria to prepare and design the Sustainable Power and Irrigation for Nigeria (SPIN) Project. The Project Development Objective (PDO) of the proposed project is to improve utilization of existing storage for irrigation and hydropower generation and strengthen institutional arrangements for integrated water resources management in Nigeria.
By mobilizing water for productive purposes, optimizing the use of existing storage facilities, and enhancing hydropower generation capacity, the project aims to promote sustainable development, efficient water resource utilization, and strengthen integrated water resources management practices.

Building upon the lessons learned and achievements from the Transforming Irrigation Management in Nigeria (TRIMING) Project (P123112), the project moves to promoting a more holistic water and storage management by the inclusion of hydropower sector and supporting institutional strengthening, such as on dam safety regulations and guidelines. The project components and related interventions would be chosen through economic, technical, and geographical criteria, to act synergistically and promote an integrated water and storage management. It would also strengthen institutional coordination on storage and water management between the related ministries and departments.

1.2 Description of the Project Components

The proposed project has four main components which move to promoting a more holistic water and storage management by the inclusion of hydropower sector and supporting institutional strengthening, such as on dam safety regulations and guidelines. The four main components include:

Component 1: Institutional strengthening and capacity building for Water Resources Management

The objective of this component is to promote an enabling policy environment, strengthen the organizational as well as human resource capacities of institutions in charge of water resources management at the federal, river basin and state levels. The component will, on a priority basis, institutionalize and scale up the implementation structure, processes, and design standards successfully showcased by the TRIMING project. The component will be implemented through three sub- components:

- Sub-component 1.1: Institutional Strengthening and Capacity Building for dam safety;
- Sub-component 1.2: Institutional Strengthening and Capacity Building for Irrigation Management; and;
- Sub-component 1.3: Institutional Strengthening and Capacity Building for Hydropower.

Component 2: Irrigation Modernization

This component sets to support the rehabilitation and revitalization of 40,000 hectares of irrigated command area. The component aims to design and implement a comprehensive modernization program for improving the physical infrastructure of irrigation and drainage which will complement the policy, institutional, and regulatory reforms. Irrigation services are key to adapt to climate change, especially to build resilience against precipitation variability, including water extremes such as floods and droughts. The focus will be on rehabilitation, modernization, promoting climate resilient irrigation management strategies to reduce climate vulnerabilities and transitioning the irrigation and drainage services to more accountable and reliable service provisioning.

Component 3: Improvements in Dam Operations and Enhancing Dam Safety

The component will focus on increasing the safety of selected dams in Nigeria with a view to strengthen the dam safety management system in the country. The scope is to improve the safety of dams and associated appurtenances of 10 to 20 prioritized dams. The project will not finance any new dam construction but focused only on the rehabilitation of existing dams and their associated structures. Planned activities are neither intended to alter the original schemes, change their nature, nor expand dam extents as to make them appear as new or different schemes. Priority will be to select dams providing downstream irrigation services to schemes to be identified under Component 2. The safety of dams is key to climate adaptation, such as through water delivery for irrigation to mitigate droughts, and to protect from dam break flooding, store excess water to mitigate floods following high precipitation.

Component 4: Project Management

This component sets to effectively implement, monitor, and evaluate project activities. It involves establishing the National Project Management Unit (NPMU) and Technical Units (TUs) at the federal level, and lean State Project Implementing Units for (Model II states) to oversee and coordinate project implementation, as well as setting up a monitoring and evaluation (M&E) system. It will also support the National Steering Committee for the Project. An external M&E agency may be contracted to support the in-house M&E team of the FMWRS to assess project activities and their impact. The component includes financing for consultancies, training, materials, office equipment, and operating costs. It also provides investment and technical support for a robust management information system (MIS) and ICT system.

1.3 Rationale for Preparing the Labour Management Procedure

The Labour Management Procedure (LMP) for the proposed SPIN project is prepared to ensure compliance with the National laws and World Bank's Environmental and Social Standard 2 (ESS 2) on Labour and Working Conditions. Accordingly, this LMP will facilitate the planning and implementation of the project by the National Project Management Unit and other implementing agencies, through identifying the main labour requirements, the associated risks, the procedures and resources necessary to address the related labour issues. The LMP also sets out general guidance relevant to labour risks associated with the SPIN project, and will be reviewed continually during implementation and adequate measures and procedures to manage negative impacts will be put in place. The LMP is a living document which is to be reviewed and updated throughout the development and implementation of the SPIN**.**

1.4 Objectives of the LMP

The LMP is developed taking into consideration the ESS 2 which specifies the requirements for the management of labour and working conditions. The LMP seeks to achieve the following specific objectives:

- Establish arrangements to appropriately manage and protect the OHS and welfare of workers including both employees and contractors and others who may be exposed to risks associated with the SPIN project activities;
- Ensure that employees understand their rights in relation to labour, working and on-site living conditions;
- Allow employees to exercise their right to freedom of association and collective bargaining;
- Provide employees and contractors with a grievance mechanism for them to raise concerns, complaints and grievances and to receive feedback on the response and any associated corrective action;

- Prevent discrimination in hiring, remuneration, access to training, on the grounds of race, national or social origin, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age and promote equal opportunities;
- Manage disciplinary practices and grievances in a manner that treats affected individuals with respect and dignity and without threat, abuse or ill-treatment;
- Ban the use or support of child, forced or compulsory labour in direct operations and in the supply chain.

1.5 Purpose and Scope of Works

The LMP describes the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labour and working conditions, including camp accommodation of workers, covering all categories of project workers to be engaged under the SPIN project components, but exclude government workers/civil servants working in connection with this project except there is a legal transfer of their employment or direct engagement to the project.

This LMP specifically sets out the following.

- Overview of labour use on the project
- Assessment of key potential labour risks
- Brief overview of labour legislation (Terms and conditions)
- Brief overview of labour legislation (Occupational Health and Safety)
- Responsible Staff
- Policies and procedures including
  - Non-discrimination and equal opportunity
  - Age of employment
  - Terms and conditions of employment
  - Working conditions
  - Occupational health and safety
  - Child labour and Forced labour
  - Sexual harassment (SH), sexual exploitation and abuse (SEA), gender-based violence (GBV)
  - Grievance Redress mechanism (GRM)
  - Right of association and collective bargaining
  - Contractors' management
  - Primary suppliers
- Grievance Mechanism; and Contractor Management.

CHAPTER TWO: REVIEW OF INSTITUIONAL FRAMEWORK AND LABOUR LEGISLATIONS

2.1 Introduction

This section outlines relevant institutional framework as well as labour laws, policies and regulations that are applicable within the scope of work in accordance with Nigeria and the World Bank requirement for the SPIN project. These requirements are presented in the subsections below.

2.2 Institutional framework for labour and employment in Nigeria

Federal Ministry of Labour & Employment (FML&E)

The Nigeria Ministry of Labour and Employment is the country ‘s designated authority for Labour-related matters. The ministry has the authority and capacity to ensure appropriate labour management in the country; as such, its institutional framework is adequate to accommodate and oversee the implementation of requirements under the World Bank ‘s ESS 2 – Labour and Working Conditions. Table 1 provides an overview of the relevant department within the FML&E.

Table 1: Summary of Relevant Departments within the FML&E

Department	Functions
The Inspectorate Department	The Department is charged with the responsibility of ensuring compliance with all national and international Labour legislations connected with terms and conditions of employment, promotion of health and safety and sustenance of industrial peace and harmony. The department is also charged with the protection of children from child labour especially in its worst forms
Social Security Department	The function of the Social Security Department within the ministry is to promote a coordinated and holistic approach to social security. The policy drafted by the National Working Committee was in line with International Labour Organization (ILO) Convention 102, to provide a framework for international best practices based on set minimum standards. The policy is expected to provide the poor, weak and vulnerable an equitable access to medical care, employment, maternity care, survivor ‘s benefits, etc. The department collaborates with relevant stakeholders to regulate a well-focused, coordinated and effective National Social Security System.
Employment and Wages Department	The Department is charged with the responsibility of initiating and implementing the employment and wages policies of the Federal Government of Nigeria and has the following functions: 1. Formulation and implementation of employment policies. 2. Registration and placement of unemployed applicants through: • Employment Exchanges • Professional and Executive Registries • National Electronic Labour Exchange 3. Coordination of Decent Work Country Program 4. Wages administration through: • Wages Monitoring • Processing of Collective Agreements

	5. Issuance of Recruiter 's Licenses. 6. Labour migration management. 7. Initiating and implementing programs on active aging Oversight functions over National Directorate of Employment.
Occupational Safety and Health Department	The department of Occupational Health and Safety is responsible for the enforcement of Factories Act 1990, Cap 126 Law of the Federation of Nigeria. The department also oversees the implementation of several other subsidiary legislations, which provide for the safety, health and welfare of workers in all workplaces nationwide. The enforcement of Factories Act is done through: • Registration of new factory premises, renewal of certificate of registration and amendment or revocation of certificate of registration. • Special Inspection of workplaces. • Investigation of accidents, dangerous occurrences and occupational diseases. • Prosecution of recalcitrant occupiers. • Preparation of safety and health regulations, code of practice, guidelines and standards for various operations, processes and hazardous agents. • Provision of occupational safety and health education to workers and employers. • Recording and dissemination of information and statistics on all aspects of occupational safety and health through the national Occupational Safety Health Information Centers (CIC). • Provision of technical assistance and advisory services to workplaces on HIV and AIDS interventions.

Federal Ministry of Women Affairs and Social Development

The national machinery for the promotion of gender issues in Nigeria is the Department of Women Affairs of Federal Ministry of Women Affairs and Social Development (FMWA), which was established in 1995. Each State in Nigeria has the State Ministry of the Women Affairs and Social Development.
The role of the Ministry is to serve as the national vehicle to bring about speedy and healthy development of Nigerian women, children, the socially disadvantaged and person with disabilities, and the mainstreaming of their rights and privileges in national development process.

2.3 Legal framework for labour and employment in Nigeria

Labour Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004:

The Act covers general provisions including:

- **Protection of Wages**: the wages of all project workers shall be made payable in legal tender or with prior consent of both parties in cheque and not otherwise. Wages shall become due and payable at the end of each period for which the contract is expressed (daily, weekly or at such other period as may be agreed upon), provided the period is not more than one month, the wages shall become due and payable at intervals not exceeding one month.
- **Contracts of Employment, Terms and Conditions of Employment**: no employer shall make any deduction or make any deductions from wages to be paid to project workers. An employer may with the consent of a project worker make deductions except with consent of the worker in terms

of VAT, TAX, pension funds or other schemes as agreed by the worker and approved by the State Authority. Not later than three months after the beginning of a project worker's period of employment with an employer, the employer shall give to the worker a written statement specifying the name of the employer or group of employers, and where appropriate, of the undertaking by which the worker is employed;

- The name and address of the worker and the place and date of his engagement;
- The nature of the employment;
- If the contract is for a fixed term, the date when the contract expires

- **Hours of work and overtime**: Normal hours of work in any undertaken according to the regulation shall be those fixed under mutual agreement or collective bargaining within the organisation. This shall also be in line with Federal Government regulations and as maybe stipulated by the programme management at the federal level. However, being a project environment, the normal working hours is proposed to be from 8am to 5pm with one-hour interval break period.
- **Benefits:** project workers shall be entitled to a minimum of 12 working day holiday with full payment of wages after twelve months of continuous service including sick leave.

Other areas covered by the act are:

- Fair treatment and equal opportunities of project workers.
- Employment of women
- Labour health matters
- Prohibition of forced labour
- Labour complaints

Employee's Compensation Act (ECA) 2010: The crux of the Act is the creation of ―an open and fair system of guaranteed and adequate compensation for all employees or their dependants in the case of any death, injury, disease or disability, arising out of the course of employment. The Act also seeks to provide an ―Employees' Compensation Fund (ECF) which will be managed in the interest of the employees and their employers. The ECA further makes provision for the rehabilitation of employees affected by work related disabilities including mental illness. Like the Workmen Compensation Act, the ECA applies to employers and employees in the public and private sectors. The Act however exempts members of the Armed Forces who are not employed in a civilian capacity.

Trade Unions (Amended) Act, 2005: Relevant provisions include:

- Membership of a trade union by employees shall be voluntary and no employee shall be forced to join any trade union or be victimized for refusing to join or remain a member‖.
- For the purposes of collective bargaining all registered Unions in the employment of an employer shall constitute an electoral college to elect members who will represent them in negotiations with the employer
- The right to strike is an integral part of the freedom of every citizen to associate with others particularly to form or join a trade union of his choice for the protection of his interests, which is entrenched in section 40 of the Constitution of the Federal Republic of Nigeria 1999.
- No person shall subject any other person to any kind of constraint or restriction of this personal freedom in the course of persuasion.

National Minimum Wage Act, 2010: National minimum wage in Nigeria is determined by the Government. Government is empowered to set up "industrial wages boards" for specific sectors or geographical areas where it considers wages to be "unreasonably low" or where there is no adequate collective bargaining machinery for the effective regulation of wages or other conditions of employment of those workers.

Generally, wage rate is determined by the applicable collective agreement or the agreement between the worker and the employer.

Section 15 of the Labour Act states that wages shall become due and payable at the end of each period for which the contract is expressed to subsist (daily, weekly or at such other period as may be agreed upon) provided that where the period is more than one month, the wages become due and payable at intervals not exceeding one month.

The Occupational Safety and Health Act 2005: This act states that every employer shall, so far as is reasonably practicable, ensure the Safety, Health and Welfare at work of all his employees. Other special provisions relevant to this LMP include:

- Prohibitions regarding young persons
- Duties of employer regarding Safety and Health Officers
- Risk assessment by employer and Record of risk assessments
- Exposure to serious and imminent danger
- Duties of Safety and Health officers, Establishment of Safety and Health Committees
- Health and welfare: Structure of building, Overcrowding, Ventilation and temperature, Lighting, Sanitary conveniences, Supply of drinking water, Washing facilities, Provisions for first-aid
- Safety (Machinery): Training and supervision, use of equipment and machinery
- Safety (general provision): Safe means of access and safe place of employment, Substances hazardous to health, Prevention of fire, Safety provisions in case of fire.

National Policy on Occupational Safety and Health, revised 2020: This policy was approved by the Federal Executive Council (FEC) in September 2020. While this has not been legislated, in this LMP it is captured as a guide for voluntary compliance and serve as a basis for OSH programs. Furthermore, it recognizes ISO 45001:2018 and captures policy provisions for implementing Occupational Safety and Health, and duties and roles of various groups including: Statutory authority, federal ministry of health, MDAs, employers, organisations, manufacturers, transporters, workers, HSE Committees, Nigeria Social Insurance Trust Fund, Standards Organisation of Nigeria, Office of the Head of Civil Service, Mass Media, Academia, other stakeholders.

National Industrial Court Act – 2006 : The NIC[1] is a specialized court in Nigeria whose overall mandate is to provide an effective and specialized judicial forum for the resolution of labour and industrial disputes in Nigeria. It has been put in place as an instrument of the state to ensure stability in the labour sector. The court serves as the umpire between the Labour unions and the Federal Government which is quite a vital role to play towards stabilization of the economy. Some provisions of the National Industrial Court Act include;

- The Act defines the jurisdiction of the National Industrial Court, specifying the types of cases it can hear. This typically includes disputes arising from the employer-employee relationship, industrial actions, trade disputes, and matters related to labour and employment laws.

[1] National Industrial Court, Nigeria.> https://nicn.gov.ng/officialGazette/act.pdf

- The NIC Act contain provisions related to the resolution of disputes through arbitration, mediation, or other alternative dispute resolution mechanisms. The court plays a role in settling labour-related disputes to ensure harmonious industrial relations.
- The court has the authority to hear and determine cases related to labour and employment laws, including issues such as wrongful termination, industrial accidents, collective bargaining agreements, and other employment-related disputes.
- NIC may have the power to interpret labour laws and regulations, providing guidance on the application and interpretation of statutes related to industrial relations.

2.4 International Regulations

International Labour Organization (ILO)

International Labour Organization has maintained and developed a system of international labour standards aimed at promoting opportunities for women and men to obtain decent and productive work, in conditions of freedom, equity, security and dignity. International labour standards are legal instruments drawn up by the ILO's constituents (governments, employers and workers) and setting out 15 basic principles and rights at work. The standards provide a comprehensive system of instruments on work and social policy, backed by a supervisory system designed to address all sorts of problems in their application at the national level of member-countries including Nigeria. Specifically, Nigeria is a signatory to the following agreements relevant to this project:

- Freedom of Association and Protection of the Right to Organise, 1948 (No. 87)
- Right to Organise and Collective Bargaining, 1949 (No. 98)
- Discrimination (Employment and Occupation), 1958 (No. 111)
- Equal Remuneration, 1951 (No. 100)
- Child Labour, 1999 (No. 182)
- Abolition of Forced Labour, 1957 (No. 105)
- Occupational Safety and Health, 1981 (No. 155).

2.5 World Bank Environmental and Social Standards

The World Bank has in place a number of environmental and social safeguards standards, which are aimed at preventing and mitigating undue harm to people and their environment in any development projects involving the Bank. The Bank's Environmental and Social Framework which consists of ten standards, has ESS 2 Labour and Working Conditions which is of utmost important to this assignment.

Environmental and Social Standards (ESS 2)

ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers shall promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

The objectives of ESS 2 are as follows:

- To promote safety and health at work;
- To promote the fair treatment, non-discrimination and equal opportunity of project workers;

- To protect project workers, including vulnerable workers such as women, widows, orphans and persons living with disabilities, children (of working age, in accordance with this ESS) and migrant workers contracted workers, community workers and primary supply workers, as appropriate;
- To prevent the use of all forms of forced Labour and child Labour; and
- To provide project workers with accessible means to raise workplace related concerns, grievances etc.

World Bank Environmental, Health and Safety Guidelines (EHS)

The OHS measures will be designed to address identification of potential hazards to project workers (Direct, Casuals, Contracted and Consultants) particularly those that may be life threatening; provision of preventive and protective measures via modification, substitution or elimination of hazardous conditions; training of project workers; emergency prevention and preparedness and response arrangements to emergency situations; documentation, reporting and remedies of accidents and incidents.

In the implementation of SPIN project, the following guidelines shall be adhered to:

- Identification of all occupational hazards and associated risks early as possible for project life cycle.
- Involvement of EHS professionals, who have the experience, competence, and training necessary to assess and manage ESH impacts and risks
- Conduct risk assessment to understand the likelihood and magnitude of EHS risks associated with project based on: whether the project will involve hazardous materials or processes; the potential consequences to workers, communities, or the environment if hazards are not adequately managed, which may depend on the proximity of project activities to people or to the environmental resources on which they depend.
- Prioritize the risk management strategies with the objective of achieving an overall reduction of risk to human health and the environment
- Favour strategies that eliminate the cause of the hazard at its source, for example, by selecting less hazardous materials or processes
- When impact avoidance is not feasible, incorporate engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants to workers or environments.
- Monitor and document the performance of the OHS.

2.6 Policies, Treaties and Legislations on GBV

International Treaties Relevant to GBV

- The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004)
- The International Covenant on Civil and Political Rights (ICCPR) (2004)
- The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (1993)
- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)
- The Convention on the Rights of the Child (CRC) (1990)
- The Convention on the Rights of Persons with Disabilities (CRPD) (2012)
- International Convention on the Elimination of All Forms of Racial Discrimination (1976)

Regional Treaties Relevant to GBV

- The African Charter on Human and Peoples Rights (ACHPR) (1982)
- The African Charter on the Rights and Welfare of the Child (ACRWC) (2007)
- The Protocol to the ACHPR on the Rights of Women in Africa (the ―Maputo Protocol‖) (2007)

National polices on GBV

- The National Action Plan for the Implementation of United Nations Security Council Resolution 1325 (2009);
- The National Gender Policy (2010).

Table 2: Gaps between the National Labour Laws and the World Bank ESS 2

Areas	Nigeria Labour Legislation	ESS2: Labour & Working Conditions	Identified GAPS	Measures to Address Identified Gaps
Minimum Age	The law stipulated the age of Sixteen Years and above.	Minimum age of Fourteen years and above but under special condition; A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.	The disparity in age of engagement	Given the nature of the project whereby potential OHS risk are envisaged, the Nigeria Labour legislation works in this instance. However, the minimum age of 18 is most preferred. Birth certificate or Sworn Affidavit should be used for screening and confirmation of age.
Forced Labour	Any person who requires any other person, or permits any other person to be required, to perform forced labour contrary to section 34 (1) *(c)* of the Constitution of the Federal Republic of Nigeria 1999, shall be guilty of an offence and on conviction shall be liable to a fine not exceeding N1,000 or to imprisonment for a term not exceeding two years, or to both.	All work associated with this project shall be performed voluntarily without coercion or any form of threats. Forced labour in this context can be any form of indentured labour.	Both Condemn forced labour	There should be periodic Screening Checks and Monitoring for Forced Labour.

Protection of wages	Wages shall become due and payable at the end of each period that is to say daily or weekly. No employer shall make any deduction or make any agreement or contract with a worker for any deduction from the wages to be paid by the employer	This stipulates the same as the National law	Both protect Worker wages.	There should be an effective Grievance Redress Mechanism for Complaint that may arise as a result of irregularities in wages payment by the employer.
Non-discrimination and Equal Opportunity.	There is no defined Labour management procedure to guide developmental projects	The standard recognizes that the project will make use of various categories of workers, direct and indirect workers such as contract staff and primary suppliers.	The ESS2 provides a unified approach while the National Labour legislation does not.	The project will implement the ESS2 and ensure that nondiscrimination and Gender Issues are implemented.
Hours of Work	Working hours shall be agreed mutually or by collective bargain	Stipulates the same as the National law	Both say the same thing.	A Staff Register will be maintained in all work locations to capture worker time of resumption and departure
Institutional Cooperation regarding labour risk management	Lack of synergy Ministry of Labour and Employment and other relevant ministries, which limits the efficiency and effectiveness of Labour risks on projects	Procedures for managing these Labour management risks and impacts are infused in ESS2	Lack of Unified Standard for the Nigerian Labour legislation.	The SPIN project will adopt improved consultation with both ministries seeking more collaboration throughout the duration of the project.
Standard and Resources for OHS management	Inadequate resources, capacity, standardized tools for effective implementation and monitoring of OHS standards	Adequate OHS Procedures are set out according to ESHS	There are no adequate resources and standards to implement OHS.	The SPIN project will implement the Provisions of ESS2**.**
Gender Issues	No provision in Labour Act that prohibits sexual harassment or any other kind of harassment as an employee. However, there is a subsisting National Act addressing sexual harassment.	The procedure forbids sexual harassment of any kind especially once the grievances have been reported	The Labour Act did not make provisions for Gender issues like sexual harassment, Sexual Exploitation and Abuse (SEA)	Gender-based principles as provided by ESS2 will be implemented in the project.

Terms & Conditions of Employment	The country's labour law recognizes that employers must provide the employee with clear agreement terms within the engagement letter termed "Contract Agreement" whether written or verbal within the first 3 months**.**	Provisions of clear information and documentation are provided at the onset of working relationship	Both have documented evidences, but the procedures could differ**.**	The project will implement the ESS2 provisions.
Workers' Organization	National legal framework is robust and implemented well in the formal sector, however, casual workers are not given the same benefits (such as compensation for injuries, right to belong to trade unions and bargain collectively, various social security benefit, unequal pay, forced Labour, absence of grievance redress mechanism)	This standard makes provisions for borrowers to promote sound worker management relationships and enhance the development benefits of a project by treating all category of workers in the project fairly and providing safe and healthy working conditions.	The National legal framework does not have adequate provision for Grievance Redress Mechanism (GRM), and no sufficient consideration for casual workers in terms of worker's organization.	The SPIN project will implement the ESS2 provisions in this regard.

CHAPTER THREE: OVERVIEW OF LABOUR USE ON THE SPIN PROJECT

3.1 Introduction

This chapter examines the overview of labour use in the SPIN project implementation to ensure compliance with relevant laws and regulations. Accordingly, the project will recruit and manage project personnel in full accordance with national laws on labour management as well as the World Bank's Environmental and Social Framework on labour and working conditions as stipulated in ESS 2.

The LMP will facilitate the planning and implementation of the project by identifying the main labour requirements, the associated risks, and the procedures and resources necessary to address the project-related labour issues, setting out general guidance relevant to different forms of labour but also issues and concerns that relate to the project activities.

The SPIN will be jointly implemented by the FMWR and the FMP to operate and maintain the overall project activities, which include but not limited to fulfilling the fiduciary and safeguards responsibilities. The FMWR and FMP will establish a dedicated National Project Management unit (NPMU) which could involve representatives from the Irrigation Department of FMWR, Dams Department of FMWR, and Hydropower Department of FMP working together with other employed staff.

3.2 Types of Workers

Focusing on the project components, the SPIN project activities will include different categories of workers, who will be engaged in different project activities. With regard to ESS 2, the workers required for the projects will be classified into the following groups: Direct workers, Contracted workers, Community workers and Primary supply workers. These project workers include full-time, part-time, temporary, seasonal, and migrant workers. The categories of workers are described below:

a) Direct workers

This category of workers will comprise a mix of civil servants from various relevant line ministries who have been deployed or have a legal transfer of their employment or their engagement to the project, full and part-time, under the National Project Management Unit. Direct workers will also comprise of project staff hired as consultants, who are specialized in certain disciplines (such as training, supervision, community relations). These consultants are hired under individual contracts with specific definition of the assigned tasks and responsibilities. Together, these workers basically make up the NPMU team, to consist of the National Project Coordinator, Technical Officers, Procurement Officer, Internal Auditor, Accountant, Financial Officer, Monitoring & Evaluation Officer, Gender Officer, Environmental Safeguard Officer, Social Safeguard Officers, Communications Officer, among others. The requirements of paragraphs 9 to 30 of ESS2 will apply to direct workers.

The SPIN project is at project preparation stage and as such, the specific project activities are yet to be decided while their locations are also yet to be finalised, thus the exact personnel load for each project activity and staffing level could not be determined at the point of preparation of this LMP. However, based on the experience of the TRIMING project upon which the SPIN project will be scaled up, the Direct worker will record an estimate of 110 Direct workers.

b) Contracted workers

The categories of contracted workers to be involved in the project are consultant service providers who will provide implementation support services to the NPMU in preparation of documents and support, and the staff of contractors, suppliers, and contractors to be subcontracted to arrange for design and civil works, and for construction and supervision activities which the SPIN project may implement. Preference will be given to local workers, including those who may come from host communities to work as unskilled labours in a bid to managing labour influx and its attendant social risk and impacts. Learning on the experience of TRIMING project, it is estimated that between 300 to 500 contracted workers will be engaged under the SPIN project.

C) Community Workers

This category of workers is made up of labourers sourced from communities where projects are meant for community development and the labour is a contribution by the community. For the SPIN project, this category of workers may include community members, members of the producer organisations, farmers, women-led farmers, Water Users Association, and/or project beneficiaries who are mobilized by the local contractors for community works, whether paid or unpaid. While applying ESS 2 provisions for community workers, the Project will pay specific attention to sensitization and training of community workers on OHS risks, and the technical knowledge and behavioural awareness to minimize the risks.

d) Primary Supply Workers

A primary supply worker is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. It can only be anticipated that the SPIN project will have such employees as it cannot be stated precisely at this point. In the event that the project has such workers, they shall be treated as the other workers in the sense that they shall be required to observe all necessary regulations are requirements i.e. signing of Code of Conduct.

It is required that all contractors and suppliers be assessed to ensure compliance to the required environmental and social management standards. The assessment shall be embedded in the tendering, hiring and contracting processes, and any due diligence measures required in the sourcing of contractors and suppliers for the project activities. The bidding documents for works includes specific requirements that minimize the use of workers from outside the vicinity. While hiring labour from local communities, the contractors will ensure that workers are hired as contract labour and not temporary/day wage labour to the extent possible.

The contract documents for works as well as for monitoring consultants require explicit Codes of Conduct to be signed by the contractors/suppliers and made available to all workers to also sign. Periodic mandatory training of all workers on Sexual Exploitation and Abuse issues and Code of Conduct shall be carried out.

3.3 Number of Project Workers

The SPIN project is at project preparation stage and as such, the specific project activities are yet to be decided while their locations are also yet to be finalised, thus the required personnel load for each project activity and staffing level could not be determined at the point of preparation of this LMP. When sub-projects are known, with prepared Project Implementation Manual stating the implementation activities per component, site-specific Labour Management Plan will be prepared as a part of the Environmental and Social Impact Assessment/Environmental and Social Management Plans. Nonetheless, most workers will

be employed by contractors, which will each determine their labour needs, and this will become known as and when the implementation gains ground.

3.4 Terms and conditions of employment

The Terms and Conditions of employment for the SPIN project shall be in accordance to the national labour laws and ESS 2 with the following guidelines:

- 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 and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of ESS 2. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.
- Project workers will be paid on a regular basis as required by national law and labour management procedures. Deductions from payment of wages will only be made as allowed by national law or the labour management procedures, and project workers will be informed of the conditions under which such deductions will be made. Project workers will be provided with adequate periods of rest per week, annual holiday and sick, maternity and family leave, as required by national law and labour management procedures.
- Where required by national law or the labour management procedures, project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments.

3.5 Timing of labour

The direct workers at NPMU will generally be required full time and around the year for the project duration. Other experts/consultants will be hired on demand basis throughout the project period. Timing for involvement of contracted workers will be known at later stages, however it is clear that they will be engaged depending on implementation of various project interventions.

CHAPTER FOUR: POTENTIAL LABOUR RISKS AND MITIGATION MEASURE

4.1 Introduction

This chapter outlines the potential labour risks and impacts associated with the SPIN project. These potential risks are moderate for the direct workers due to the nature of activities which are expected to have limited impacts as they can largely be avoided, minimized or managed through procedures, including procedures set out in this LMP. The main risks for project workers may arise during construction work where most of the labour are used. The LMP will be reviewed during project implementation and adequate measures and procedures to manage negative impacts will be indicated as required.

4.2 Expected Project Activities

The proposed project activities will include minor to major civil works during the rehabilitation of dams, rehabilitation and revitalization of about 30,000 hectares of irrigated command area, and improvement of hydropower and storage works. Significant use of labour is mostly expected to arise during the civil works and project workers will be involved in a number of activities that include trenching, excavations, land clearing, lifting of heavy materials such as rocks, development of the electricity grid, hydro mechanical work, instrumentation confined to the existing dam area, rehabilitation of existing approach roads, construction of drains, repair of barrage roads, fencing, canal clearing and cleaning**,** desilting, stabilization of embankments**,** piping and conduit installation, and others. These activities may pose occupational safety and health risks to workers. The health and safety risks to which people working on these projects will be assessed and mitigation measures will be put in place. On the other hand, Direct works could also be negatively impacted through gender discrimination and inequality, inadequate compensation and benefits, workplace violence and harassment, among others. Table 3 below presents the expected labour risks and impacts of the project and their mitigation measures.

Table 3: Labour Risks and Mitigations measures

Risk Category	Labour Risks	Impacts	Mitigation
Non-discrimination and equal opportunity	Unfair and unclear recruitment/employment and selection practices	This could discriminate against women, vulnerable groups, ethnicity, religion, etc.	The NPMU should ensure that employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.
	- Unfair and unclear deployment of government workers to work in the PMU (no contract, terms of reference, etc.) - Lack of competitive process of employment/ deployment	- Workers may become frustrated, lack focus or be redundant. - The above two could also attract the attention of NGOs and legal actions against the project.	- Government workers to be deployed to the NPMU should have official letters of deployment, stating designation and reporting obligations. - Condition of service with detailed job description should be outlined in the letter of engagement of all categories of workers.
	- Payment of workers may be based on discrimination, e.g., male may be paid higher than women even on the same level of job schedule. - In case of involvement of foreign workers may be treated better than local workers in terms of living conditions, unequal pay, etc., even when they are on the same level.	- Displeasure, strives and conflicts amongst workers. Sabotage and under-performance by workers - This could create bad reputation for the project.	The NPMU to safeguard the interests of vulnerable groups, women including gender parity at the workspace NPMU to ensure equal pay and equal treatment for all workers.
Terms and Conditions of Employment	Project workers may not be provided with information and documentation that is clear and understandable	Speculations, wrong expectations, grievances, refusal to work etc.	The NPMU should ensure fairness of employment terms and conditions against the applicable and prevailing National stipulations and requirements set out in this LMP. They should also closely

	regarding their terms and conditions of employment/ deployment		supervise contractors to ensure fairness of employment terms and conditions for the workers.
	- Lack of unified rules and regulations for all workers - Adequate facilities may not be provided	- Workers may become frustrated, lack focus or be redundant - High staff turnover - Workers could be overlaboured, fatigued & stressed	- All information and documentation must be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur - Government workers deployed to the NPMU should have clearly defined terms of reference, terms and conditions of employment, entitlements amongst others, and condition of service with detailed job description shall be outlined in the letter of engagement of all category of workers
	Exploitative wages: wages may not be commensurate with the level of work/services performed	- Legal action against the project - Abuse of power and personnel	Project workers should be paid on a regular basis as required by national law and labour management with a principle of "equal pay for equal work" .
	Over-stretched working hours: undefined cut-off time, no break periods, denial of time for religious practices etc.	- Under-compensation - Unfair dismissal procedures - Workers could be overlaboured, grievances, high turnover, poor reputation for the project, workers fatigue & stress.	- All project workers should abide by the national adopted hours of work, which is eight hours, five days a week, be provided with adequate periods of one-hour rest per day and one day per week[2], annual holiday and sick leave, as required by national law
Occupational Health and Safety.	Unsafe and unhealthy work environment	This could result to injuries, incidents and accidents.	The NPMU, contractors, suppliers and all those involved in the project should conduct a risk and hazard analysis for the work under their control and ensure adequate mitigation measures are in place.
	- Poor work safety culture such as lack of provision of PPEs, absence of hazard analysis and HSE training	Increased accidents during project execution	Contractors to ensure workers have appropriate working conditions, sanitation facilities separate for male and female, basic amenities, appropriate signage in place, provision of adequate PPEs, first aid boxes, appropriate work tools, work permit etc. Adequate monitoring

[2] Labour Act section 13

	- Inadequate work tools		of contractors' activities should be done by respective Monitoring officers at the NPMU to ensure compliance.
	Sub-standard worker facilities and workers management	- Spread of diseases and illnesses amongst workers - Sub-optimal work	The NPMU and contractors must provide clean, safe and accessible toilets, drinking water, washing and eating facilities, and secure storage for personal items for all workers.
	- Accidents from movement of equipment and infrastructure and other project works - Road safety issues from transportation activities of goods from one location to another.	- Lost Time Injury (LTI), - Medical Treatment Case (MTC), - Permanent disability, - Fatality	- Only skilled and licensed drivers should be used under the project with continual training. - Project Managers, contractors and other involved groups to operate an Environmental, Social, Health and Safety System (ESHSS) that is consistent with good international industry practice while also conducting risk assessment and develop emergency preparedness and response plans for various work types. - Adequate Monitoring by the Safeguard teams to ensure compliance
Security risk/threat to workers	Significant security risks in some parts of the country where the project will be implemented	Unsafe exposure to security threats from ambush, carjacking, kidnaping, banditry and terrorism especially migrant workers.	The NPMU to develop and implement a Security Management Plan
Child Labour	Underage children (below the age of 18) could be exploited by contractors or primary suppliers or in other project related activities	- Children could be exposed to dangerous situations causing injury, accidents and ill-health. - Deprive children of school attendance, which is against the law - Child abuse could ensue.	- Given the nature of the project where health and occupational risks are envisaged especially during civil works, the minimum age of eighteen (18) should be enforced at recruitment and continuously during project implementation. The NPMU should also supervise this through the monitoring activities of their Safeguard team.
Forced Labour	- People could be coerced and threatened to work. - Involuntary or compulsory - Labour, such as indentured Labour, bonded Labour, or similar Labour-contracting arrangements.	- Reprisals - Exposure to injury and harm - Abuse of human rights and poor working conditions - Legal action against the project	- The NPMU, Contractors, Suppliers to ensure that no forced Labour exists in the project by gathering documents and appropriate proof - A consent section should be part of the employee's signed employment contract, for all workers - Contractors and primary suppliers should ensure that if Labour is sourced from any subcontracting agency, the workers are not subject to coercion and forced labour conditions

Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV)	Workplace sexual harassment /sexual exploitation and abuse/gender-based violence.	- Abuse of human rights - Injury and associated physical and mental health conditions. - Sexually transmitted diseases - Legal action against the project	NPMU should ensure that: - A GBV action plan is prepared - Provision of a reporting mechanism for all category of workers for such incidents including referral services - Communities are sensitized on GBV/SEA & SH and the referral pathways; - All project personnel should be sensitized on GBV/SEA & SH; - All category of workers in the project to be made aware of zero tolerance to Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV). - **All categories of workers in the project (including the staff of NPCU, PMU, RBDA) are to sign the code of conduct forms.**
Grievance Mechanism (GRM)	Lack of grievance redress channel for workers	- Workers may be aggrieved due to unfair treatment, - Poor working conditions, conflicts, poor pay, - Overstretched working hours - Reprisals, refusal to work	- A Mechanism for resolution of grievance by workers has been integrated into chapter 7 of this LMP to expeditiously address concerns among workers. It employs a clear and transparent process, delivering timely feedback to individuals in a language they comprehend, with no fear of retaliation. The GRM operates independently and objectively - The NPMU should review the effectiveness of the GRM system periodically or when there is any significant change in the project.
Right of Association and Collective Bargaining	- Workers may not have the right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker. - Workers may not be allowed the right to organize and collective bargaining, and representation	- Abuse of power by employers - Reprisals, legal action	- The NPMU, contractors to ensure that all workers are informed of their right of association and collective bargaining according to ESS2 - Workers should also be informed of the workers GRM and their right to utilize the system.

Contractors Management	- Contractors on the project may not be adequately managed or monitored. - Non-compliance to provisions of this LMP and other national Labour requirements.	- Accidents/incidents, loss time injury to workers due to negligence in adhering to OHS concerns. - Unruly behaviour of contractors - Unfair treatment of workers, conflicts - Legal actions and bad reputation for the project.	Contractors to prepare a Labour Management Plans as part of Contractor's ESMPs based on the provisions of this LMP and the details of labour to be used in those contracts. These plans will be reviewed and cleared by the NPMU, as appropriate. Contractors to maintain records of: - Workers engaged under the Project, including contracts must be kept. - Training attended by workers including CoC, HSE, STIS/STDS, GBV etc. - Accidents/ incidents and corresponding root cause analysis - Sanctions, punishments and terminations with reasons and follow-up actions taken. These records will be periodically reviewed by the Project's Safeguard team, including consistent monitoring of Contractor's performance and compliance.
Labour influx	- Influx of workers into project communities due to SPIN project activities.	- Some of the Sub-Projects may face influx of labour to local communities especially where skilled labourers are not available in some project sites. This could lead to increase in potential spread of STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA especially for Girls that have been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities	- Encourage hiring of labour from the host communities. Maintain labour relations with local communities through a code of conduct (CoC) - The Code of Conduct must be signed by all workers. - Workers must be trained on the provisions of the CoC about refraining from unacceptable conduct toward local community members, specifically women and informed of the sanctions for non-compliance. Training must be conducted for all new hires including sub-contractors. - Contractors should make resources available for their workers especially where stated in the ESMF.
- Primary Suppliers	- Primary suppliers could also be exposed to occupational risks. -	- Incident/accidents while performing project related functions.	- Primary suppliers should maintain records related to occupational injuries, illness and lost time accidents, corrective action, conditions of work etc.

	- Worker's mismanagement	- Workers could be treated unfairly	- Environmental and Social Safeguard specialist of the NPMU shall monitor the performance of primary suppliers as regards workers management.
Discipline and Termination of Employment	- Disciplinary process may not be fairly or equitably employed across board - Conditions for termination may not be clearly outlined in the terms of employment	- Grievances, reprisals etc. - Unfair dismissal from work - Abuse of power and human rights - Legal action against the project	The NPMU should periodically review workers disciplinary and termination processes to ensure that they are executed fairly and without prejudice. Where unfair treatment is established, correction and corrective action should be implemented and monitored Termination of appointment should abide by the following principles: - Valid or reasonable; - Clear and unambiguous; - The employee is aware, or could reasonably be aware of the rule or standard; and - The procedure to be applied in the event the employee contravenes any of these rules .

4.3 Security Risks Management

Given the notable security challenges in certain parts of the country and where the projects are to be implemented, the project will undertake appropriate and proportionate security measures to minimize the potential risk to the workers, as detailed in the project and site specific Security Management Plan to be developed by the NPMU and contractors respectively. Key security measures will include restrictions on work hours where security risks are higher (such as night time); and measures to maintain low profile of the site and workers (such as the minimum use of sign boards and uniforms); project workers making inter-city/state travels to maintain a road travel time of 8am to 4pm. While security measures to be arranged in coordination with public security personnel to address external security risks (such as armed insurgency) will be determined by relevant security authorities engaged in each location, the project will ensure internal security risks associated with the deployment of such security personnel on the community and guarding of project workers is in line with the WB Good Practice Note "Assessing and Managing the Risks and Impacts of the Use of Security Personnel" (such as the training of security officers on the principles of proportionality in the use of force)[3].

4.4 Journey Management Plan and Emergency Preparedness

As part of procedural safety culture in the implementation of LMP, a journey management plan which provides guidance to employees in case of road emergencies and accidents shall be developed by the NPMU and contractors. Aside from providing general safety guidelines on what to do if their vehicle breaks down, the journey management plans shall include project or company specific processes and information such as a list of contact persons an employee can reach out to if necessary. Likewise, general guidelines for dealing with the most common safety and security incidents shall be prepared as a critical element of emergency preparedness and incidents response.

[3] https://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf

CHAPTER FIVE: ROLES AND RESPONSIBILITIES FOR MANAGING THE LMP

5.1 Introduction

The project will be jointly implemented by the FMWR and the FMP, to operate and maintain the overall project activities, which include but not limited to fulfilling the fiduciary and safeguards responsibilities. The FMWR and FMP will establish a dedicated National Project Management unit (NPMU) which shall consist of representatives from the Irrigation and Dam Departments of FMWR, and Hydropower Department of FMP and a team comprising of environmental and social safeguards specialist, procurement specialist, M&E specialist among others.

The PMU will be in charge of the daily coordination, supervision and implementation of the project's component, and has the overall responsibility to oversee all aspects of the implementation of this LMP including contractor's compliance and will also address all LMP aspects as part of procurement for works/services as well as during contractor induction/training. This role will primarily be part of the responsibilities of the Environmental and Social Safeguard specialist and the GBV specialist., however, they will be required to liaise with their management on the fulfilment of such duties.
Contractors will be responsible for the engagement with their workers and training them for activities that will be implemented by contractors/subcontractors under the supervision of component leaders and Environment and Social Safeguard Specialist.

5.2 Roles and Responsibilities Matrix

Specific roles are outlined in Table 4 below.

Table 4: Roles for Implementation of the LMP

Institution	Roles	Specific Responsibilities
NPMU for SPIN Project	Overall Implementation of the LMP	· Regulation of OHS/HSE guidelines for the project. · Ensure the project provides good working conditions for all direct workers. · Ensure the contracts with the contractors are developed in line with the provisions of this LMP and the project's ESMF. · Keep OHS records. · Review of OHS/HSE documentation of contractors/suppliers. · Safety compliance checks and monitoring of contractors/suppliers. · Ensure that the Grievance Redress Mechanism for project workers is established and operational and that workers are informed of its purpose and how to use it. · Provide workers with safety materials as well as training on safety procedures · Obligatory reporting on OHS compliance and fatalities to the World Bank
	Environmental and Social Safeguards.	· Provide health and safety awareness for workers and stakeholders. · Ensure the contractors prepare site specific Labour Management Plan for their projects and implement accordingly. · Carry out site inspection during project implementation to ensure that the LMPs prepared are implemented

SPIN project Managers and Engineers at Implementing states.	Supervision of contractors and sub-contractors	· Supervising contractor's / subcontractors' implementation of labour managements plans and Occupational Health and Safety Plans · Supervise compliance with the Code of Conduct. · Have a system for regular review and reporting to PMU on labour issues, occupational safety and health performance of contractors and their workers.
Contractors	ESHS/HSE Officers	· Work within the scope of contractual requirements and other tender conditions; · Prepare Site Specific Labour Management Plan · Provide workers with safety materials as well as training on safety procedures. · Implement mitigation measures and procedures outlined in this LMP. · Keep OHS records
Trade Unions: Workers associations	As defined in the MOU or agreement	· Manage workers' welfare. · Promote workers' health and safety. · Provide a fair system of grievance redress
Federal Ministry of Labour and Employment	Relevant Departments	Overall responsibility for enforcing labour laws

5.3 Capacity Assessment for Implementing the LMP

This sub section, as presented in Table 5 below gives a summary of the lessons learned from assessment of the labour capacity and performance of existing project offices such as TRIMING PMU, relevant MDAs, the River Basin Development Authority offices in the three Pilot states (Nasarawa, Benue and Taraba) proposed for the SPIN project implementation. The assessment was done in terms of policies, procedures, roles and responsibilities in relation to labour management, also suggested strengthening actions to ensure effective implementation of this LMP.

Table 5: Capacity Assessment for Implementation of the LMP

Aspect	Capacity Assessment	Strengthening Actions
Policies	The National Labour laws and legislations are widely used among the Ministries / institutions and Agencies. These laws provide robust policies governing worker's management, safety and wellbeing, however, there is no adequate provisions for freedom of association, grievance redress mechanism, gender-based violence, forced labour etc. especially for casual workers.	The LMP has been prepared, incorporating provisions of the ESS 2, to set a straightforward mitigation measures to be adopted for the SPIN project in addition to applicable laws.
		The provisions of this LMP should be disseminated for adoption to all institutions, and **all category of workers** under the project.
		This should also be included in procurement contracts / other contracts.
Procedures	Most contractors do not have defined procedures for managing labour and working conditions especially in the area of maintaining a standard OHS/HSE procedure. There was recorded inefficiency in provision	Procedures have been outlined in this LMP which will guide the implementation of mitigation measures for risks associated with labour and working conditions under the SPIN project, especially contractor workers.

	of PPEs for casual workers by contractors in all institutions assessed. This however do not conform to the minimum requirements of World Bank ESS 2.	Adequate sensitization and enforcement on these procedures should be carried out at every level of implementation of the project, and especially prior to / and during the implementation of project/works.
Roles	All the organizations have some form of HSE team/department, however, no proactive analysis of potential HSE risks beyond the procedures, and there is insufficient monitoring and reporting of HSE issues as part of the project operations especially at the RBDA offices.	Enhance the capacity of the HSE teams in terms of staffing and staff qualifications, monitoring and effective reporting of all HSE risks, incorporating procedures in the LMP.
	Some contractors do not engage HSE officers, and/or not on a full-time basis	Contracts should entail the employment of HSES officers
Responsibilities	The staff of the various institutions have a good understanding of their responsibilities in implementing and monitoring matters relating to labour and working conditions. However, there is some level of limited capacity in handling emerging themes like SEA/SH/GBV, grievance redress mechanism.	Implement capacity building programs to strengthen responsibilities, especially with respect to ESS2 and the provisions of this LMP. An effective system of monitoring and reporting on matters relating to labour and working conditions will also need to be emphasized.

CHAPTER SIX: POLICIES AND PROCEDURES FOR LABOUR MANAGEMENT IN THE PROJECT

6.1 Policies

Labour Management in the SPIN project will follow the specified guidelines of the World Bank ESS2: Labour and Working Conditions, International Labour Organisation (ILO), Labour Act, and other regulations as outlined in chapter 2.

Overall, the guiding policies for the proposed project include:

- There shall be non-discrimination and equal opportunity provided for all workers.
- The terms and conditions of employment shall be outlined in clear and understandable terms, ensure fairness of employment terms and conditions against the applicable and prevailing National stipulations for all workers.
- All Government workers deployed to work on the project shall be given official letters of deployment by their parent ministries.
- The NPMU shall ensure provision of safe and healthy working conditions for all category of workers, void of worker exploitation, and shall ensure the provision of standard facilities.
- The NPMU and contractors shall conduct job hazard and risk assessment and implement actions to address such risks, while also providing adequate work tools and personnel protective equipment to all workers.
- Timely and adequate training on OHS/HSE shall be provided to all category of workers.
- There shall be no use of child labour or forced labour.
- Workplaces shall be free of Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV).
- Grievance redress mechanism for workers shall be instituted at all levels of engagement in consultation with the affected worker category.
- Workers shall have their right of association and collective bargaining.
- There shall be proper documentation of contractor's/supplier's management in line with OHS requirements.
- Termination of appointment shall be valid or reasonable, clear and unambiguous, without prejudice and the employee must be aware of the reason.
- There shall be continuous consultation with workers on the effectiveness and improvement of the Labour Management Procedures.

6.2 Procedures

6.2.1 Non-Discrimination and Equal Opportunity

Employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion, or termination of employment. The following measures will be followed by the NPMU and contractors and monitored by the respective Safeguard teams:

- Recruitment procedures will be transparent, public and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability or gender;

- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post;
- All workers will have written contracts describing the terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract;
- The employment terms and conditions will be communicated in a language that is understandable to both parties;
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- Government workers deployed to work in the NPMU will be given official deployment letters from their parent ministries which will state the designation at the NPMU, reporting obligations, commencement date and end date (where possible), entitlements amongst others.

6.2.2 Age of Employment and Child Labour

- Due to the nature of the SPIN project, whereby occupational health and safety risks are envisaged especially during civil works and other implementation activities, the project will only engage individuals at the minimum age of eighteen (18) and this will be enforced at recruitment and monitored by the NPMU, Suppliers, and Contractors.
- Contractors will verify the identity and age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or medical or school record.
- If a child under the minimum age of eighteen (18) is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, considering the best interest of the child.

6.2.3 Terms and Conditions of Employment

- All workers will be provided with clearly defined terms and conditions of employment.
- Terms and conditions of direct workers will be determined by their individual contracts and public service rules (for government staff) and are guided by terms and conditions stipulated in the Public Service Rules (2008 edition). [4]
- Consultants will apply the terms and conditions stipulated in their contract of engagement.
- The conditions of employment will set out workers' rights under national labour and employment law (which will include any applicable collective agreements), including job title, supervisor, their rights related to hours of work, wages, overtime, compensation and benefits, contract duration, disciplinary procedures, rules & regulations, procedure for termination of appointment, as well as those arising from the requirements of this LMP. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.
- Oral communication and explanation of working conditions and terms of employment will be provided where project workers do not read or have difficulties understanding the documentation.
- Project workers will be paid on a regular basis as required by national law and in the conditions of employment. Deductions from payment of wages will only be made as allowed by national law or

[4] https://interior.gov.ng/media/1054/publicservicerules.pdf.

the labour management procedures, and project workers will be informed of the conditions under which such deductions will be made.

6.2.4 Working Conditions

- Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest.
- Where workers' camps are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs in line with the SPIN project's ESMF.
- The NPMU and contractors will ensure accessibility of facilities, resources and information communication for project workers with disabilities including the provision of wheelchair ramps or elevators, or alternative formats of communication, such as large print, Braille, accessible digital formats or audio tape where applicable.
- Provide protection and assistance for pregnant women against prejudice, physical harm, and unfair dismissal and allow for adequate maternity leave in line with applicable laws.
- Ensure workplace ergonomics including:
- Adequate lighting to avoid eyestrain including protective screens on computers
- position the computer workstation at a parallel position to the eyes
- Use of supportive chairs for good lumbar support
- Good housekeeping practices
- Proper layout of electrical wires and appliances
- Deployment of fire extinguishers

6.2.5 Occupational Health and Safety

The NPMU and contractors will implement the following procedures:

- Conduct hazard and risk assessment for all job types/activities.
- Provide preventive and protective measures for such risks, including modification, substitution, or elimination of hazardous conditions or substances.
- Provide adequate work tools, first aid boxes, appropriate personnel protective equipment (PPEs) and implement job controls such as work permits and standard operating procedures (SOPs).
- Provide HSE/OHS training for workers and maintain records of such training.
- Ensure the inclusion of Occupational health issues in contract documents to make them obligatory/mandatory.
- Prepare emergency prevention and preparedness and response plan, assign responsibilities, train responsible parties, test and improve on such plans.
- Establish Environmental, Social, Health and Safety System (ESHSS) and ensure training for associated workers in line with the required national labour requirements, World Bank ESS2 requirements and procedures set out in this LMP.
- It is recommended to include women representative on OHS team to help design policies and practices responding to the needs of female project workers.
- Provide mechanism for consultation and participation of workers in OHS matters and implementation of OHS measures.
- Provide workers in high noise areas with earplugs or earmuffs.

- Project workers have the right to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health.

6.2.6 Forced Labour

- The NPMU and contractors will not make use of any work or service which is exacted from an individual under threat of force, penalty, coercion, abduction, fraud, or deception. The SPIN project will not entertain any kind of involuntary or compulsory labour, such as indentured labour, bonded labour, or similar labour-contracting arrangements. No trafficked persons will be employed in connection with the project.
- Workers will be allowed free and informed consent of the type of job they are being engaged to perform.
- Where forced labour is discovered in the project's workforce, prompt action will be taken to address the practice that has coerced the worker and reported to the responsible authorities as appropriate to be addressed in accordance with national law.

6.2.7 Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV)

- All categories of workers in the project will be made aware of zero tolerance in matters relating to SEA/SH/GBV.
- **All categories of workers in the project (including staff of NPCU, PMU, RBDA) are to sign the code of conduct forms.**
- The NPMU, contractors will establish and inform workers of a reporting mechanism for such incidents including referral services.
- Implement any World Bank approved GBV action plan prepared for the project, including management of suppliers.

6.2.8 Grievance Mechanism (GRM)

A grievance mechanism will be provided for all category of workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers. The GRM will be in line with the procedures set out in chapter 7 of this LMP.

6.2.9 Right of Association and Collective Bargaining

- Workers will be allowed rights to form and to join workers' organizations of their choosing and to bargain collectively without interference.
- Workers will also provide the information needed for meaningful negotiation in a timely manner.
- The NPMU and contractors will not discriminate or retaliate against project workers who participate or seek to participate, in such workers' organizations and collective bargaining.

6.2.10 Contractors Management

The NPMU will:

- ensure that contracted workers (contractors, subcontractors, brokers, agents, or intermediaries) are legitimate and reliable entities, having documentation of their business licenses, registrations,

permits and approvals. Should have safety and health personnel, review their qualifications and certifications.

- Have records of safety and health violations, and responses, accident and fatality records, and notifications to authorities.
- Ensure to have records of legally required worker benefits and proof of workers' enrolment in relevant programs, worker payroll records, including hours worked and pay received.
- Ensure contractors prepare Labour Management Plans as part of their C-ESMPs based on the provisions of this LMP and the details of labour to be used in those contracts. These plans will be reviewed and cleared by the NPMU, as appropriate.
- Ensure that contracted workers have access to a grievance mechanism as provided in the LMP.

6.2.11 Primary Suppliers

- The NPMU will review industry labour issues relating to the supply of goods and materials that will be required under the SPIN project, and the risks and implement actions to mitigate such risks.
- The NPMU will also track suppliers' performance to help inform whether procedures and mitigation measures are being appropriately implemented and provide feedback on performance and any new areas of risk.
- Specific requirements on child labour, forced labour and work safety issues will be included in all purchasing orders and contracts with suppliers.
- Where there is a significant risk of child labour, forced labour, serious safety issues related to primary supply workers, the NPMU will require the relevant primary supplier to introduce procedures and mitigation measures to address such issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.

6.2.12 Discipline and Termination of Employment

Project workers will receive written notice of termination of employment and details of severance payments in a timely manner: one month for skilled labour, one week for unskilled labour. However, in cases of gross misconduct, termination can be immediate but must be accompanied with proper incident report, fair, without prejudice and ensure adequate documentation.

CHAPTER SEVEN: GRIEVANCE MECHANISM

7.1 Introduction

This procedure requires every employer, including contractors, to have a formal grievance management procedure which should be known and explained to the employee. The NPMU staff and consultants will be informed of the applicable grievance procedure to adopt in their contracts or terms of employment. All the contractors who will be engaged for the project will be required to produce their grievance procedure in line with the GRM provided in this LMP as a requirement for tender. All grievance mechanisms should at a minimum comply with these requirements:

- Who the employee should report to;
- Time frame for addressing grievances at each level should be specified;
- Opportunity to report to a higher-level authority if grievance is not resolved at within the stipulated time;
- Right to seek judicial redress
- The grievance process should be guided by the following principles:
- Transparency
- Non-vindictive
- Confidentiality
- Right to representation
- Accessibility
- Proper documentation
- Non-retribution
- It is important to note that the GRM for workers is not the same as the project-wide GRM defined in the ESMF for the SPIN project. The former sets out specific procedures for worker's management (labour and working conditions), while the latter sets out procedures for reporting issues related to the overall implementation of the project.

7.2 Establish a GRM

A Grievance Redress Mechanism (GRM) will be implemented to ensure that all complaints from workers are dealt with appropriately, with corrective actions implemented, and the complainant informed of the outcome.

The SPIN project recognises that various categories of workers may be deployed to work on the project and as such a uniform grievance process will be beneficial. This is described in line with the required grievance redress committees (GRC) as presented in Table 6. This procedure will guide the preparation of site specific GRM to be prepared as part of the Environmental and Social Management Plans (ESMPs) by contractors.

7.2.1 Direct workers' GRM structure

Direct workers will mainly be government employees in the project's PMU. The GRM structure for direct workers will have three levels as presented in Table 6 below:

Table 6: Grievance Redress Procedures for PMU Workers

First Level GRM	The GRC will be formed at the project level and be easily accessible to project workers. The committee will comprise of Social Safeguard Specialist, National Project Coordinator, Environmental Safeguards Specialist at the PMU. The complainant shall make official compliant to the GRC through the social safeguard person. Complaints shall be duly received, registered and reviewed by the committee. If the complainant does not accept the solution offered by the first level GRC, then the complaint is referred to the 2nd level GRC.
Second Level of GRM: GRC at the institutional level	The GRC will be more of an institutional level. This committee shall be expanded to comprise of members from the parent ministries that makes up the NPMU. Only grievances that are not resolved by the first level GRM will be referred to the second level GRM. Complaints shall be duly received, registered and reviewed by the committee. If the complainant does not accept the solution offered by the second level GRC, then the complaint is referred to the court redress of grievances.
Court Redress of Grievances	While the purpose of GRM put in place for workers is to resolve all issues of labour and working conditions under the SPIN project out of court and to save time which is usually involved in litigation matters, it is not out of place to anticipate a scenario where aggrieved person is not satisfied with the process and judgment thereby seeking court counsel.

Please note that Table 6 only present a generic procedure, and the PMU may need to adapt their GRM to ensure that while they adopt the requirements of the World Bank ESS2, they do not contravene with national laws.

7.2.2 Contracted workers' GRM structure

Contractor's level: Contractors shall develop their own GRM and required to resolve the grievances of contracted workers in accordance with requirements in this LMP as well as the ESS2. Grievance Focal Point (GFP) will be assigned by the Contractor to file the grievances and appeals of contracted workers and will be responsible to facilitate addressing the grievances. If the issue cannot be resolved at contractor's level within 7 working days, then it can be taken up at the scheme level whereby a Social Officer at the scheme will be engaged to coordinate the GRM functions that flow from the scheme level among other social responsibilities. If the issue isn't resolve at the scheme level, then it will be escalated to the SPIN project's NPMU, and follows the procedure as described in table 6 above.

7.3 Roles of the GRCs

The Grievance Redress Committees will be responsible for:

- Communicating with the affected worker and evaluating if they are entitled to recompense;
- Making the established grievance redress procedure public
- Escalating unresolved matters to the next level of GRC
- Maintain proper documentation of complaints, proceedings, and resolutions

7.4 Expectation When Grievances Arise

When workers present a grievance, any of the followings is or are expected from the project management/channel of grievance resolution:

- acknowledgement of their problem;
- an honest response to questions/issues brought forward;
- an apology, adequate compensation; and
- Modification of the conduct that caused the grievance and some other fair remedies.

7.5 Typical 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/ complete a grievance form with the GRC.

The complaint should contain a record of the person responsible for an individual complaint and records dates for the date the complaint was reported; the date the Grievance Log was uploaded onto the project database; date information on proposed corrective action sent to the complainant (if appropriate), the date the complaint was closed out and the date response was sent to complainant.

The officer receiving the complaint (part of 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 Grievance Committee will act on it within 10 working days of receipt of grievances. If no amicable solution is reached, or the affected person does not receive a response within 15 working days.

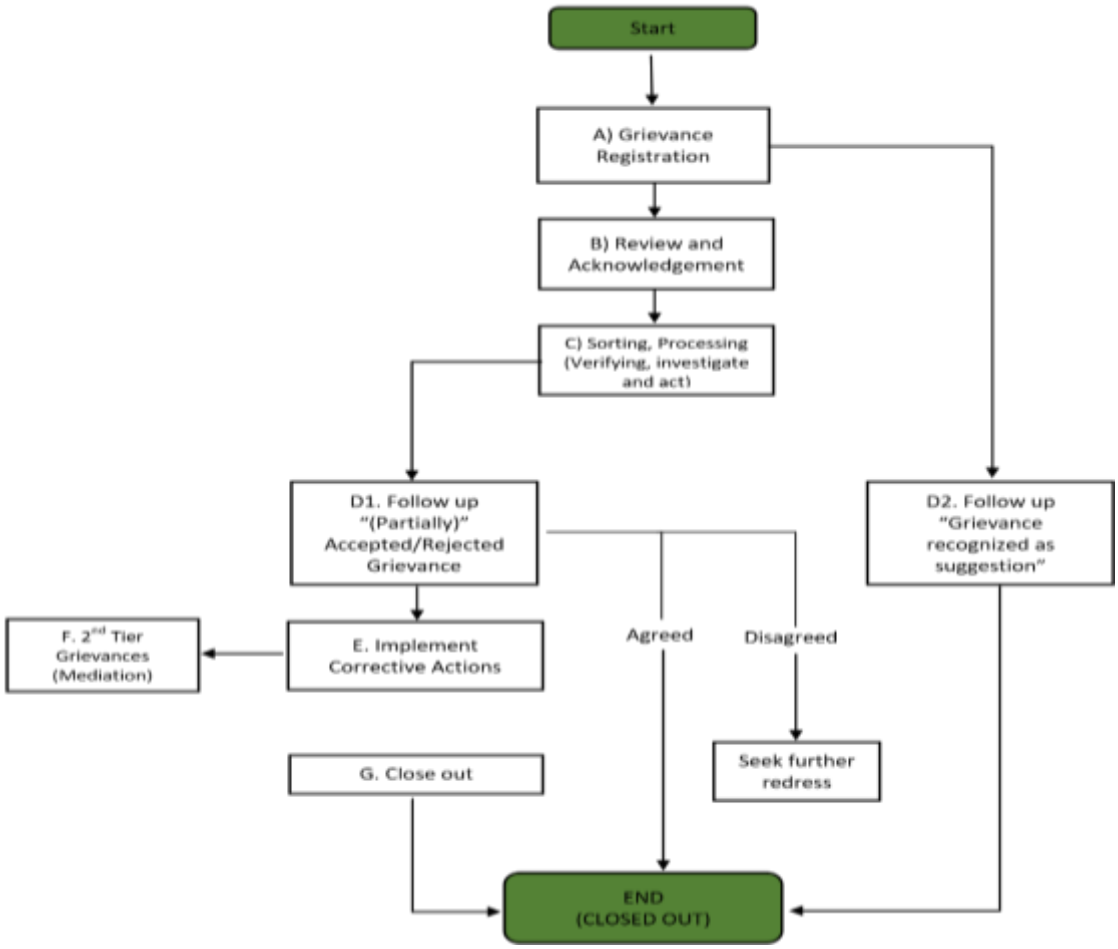


Figure 1: A typical Flowchart for Grievance Redress Mechanism

7.6 How to Register a Complaint

There shall be a variety of channels to submit complaints:

- The complaints are submitted to the GRC member to whom they have easy access.
- The complainants can put their grievances into the complaints boxes which will be checked every two days by the grievance redress officer.
- The GRC will acknowledge the receipt of complaints.
- Received complaints should be registered in a grievance logbook.
- GRC will inform the complainant about the timeframe in which a response can be expected.
- GRC will investigate the grievance, consult with the aggrieved worker, and resolve the issue.

7.7 Grievances related to Gender-Based Violence

The GRM equally applies to workers who experience GBV. However, to avoid the risk of stigmatisation, exacerbation of the mental or psychological harm and potential reprisal, the GRM shall have a different and sensitive approach to GBV related cases. Where such a case is reported to the GRM, it should immediately be referred to the appropriate GBV service providers, such as medical and psychological support, or any

other necessary services. It should also be reported to the social safeguards staff of the PMU who can advise on relevant service providers.

Detailed description of how the project will address GBV and SEA are included in the Stakeholder Engagement Plan (SEP). In all cases, the incidents of GBV and SEA will be reported and dealt with through the GRM procedure which will have protocols to manage information sharing and confidentiality of the survivors and accused persons. However, since GBV and SEA cases are substantively different from other complaints that are typically handled through the grievance redress mechanisms, such cases will need a specific channel within the GRM for their management. The SPIN project will recruit a GBV Service provider, specifically responsible for GBV issues in the project. All information will be treated as confidential and handled by the GBV/SEA/SH Service Provider.

7.7.1 Manifestations of GBV

To understand if an act of violence is an act/manifestation of GBV, one must consider whether the act reflects and/or reinforces unequal power relations between males and females. Many—but not all— forms of GBV are criminal acts in Nigeria laws and policies:

- Physical Violence (such as slapping, kicking, hitting, or use of weapons);
- Emotional abuse (such as systematic humiliation, controlling behaviour, degrading treatment, insults, and threats);
- Sexual violence, which includes any form of non-consensual sexual contact, including rape;
- Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage.
- Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person);
- Trafficking and abduction for exploitation.

The project is expected to comply with the provisions regarding SEA/SH/GBV in the SPIN ESMF, while also relying on World Bank-approved GBV action plans developed for the TRIMMING project. Thus, measures for how GBV/SEA are to be handled would be outlined in the ESMF which is also being prepared for the SPIN project. Other additional measures include:

a) Strengthen NPMU capacity to prevent and respond to GBV in the project. To this end, the project in part time based will engage a gender and a GBV specialist
b) Define and reinforce GBV requirements in procurement processes and contracts.
c) A communication campaign will be implemented aiming at raising awareness and informing stakeholders on how to use the GRM and explaining the investigation and resolution sequential process, timeline, and procedures. The GRM will include a gender-based-violence redress procedure to ensure that any allegations of sexual exploitation and abuse/sexual harassment (SEA/SH) in the Project financed activities are handled safely and ethically.

CHAPTER EIGHT: CONTRACTOR MANAGEMENT

8.1 Introduction

Selection of consultant / contractors shall be made according to the World Bank procurement procedures and occupational health and safety as provided in the World Bank Standard Procurement Documents and Nigerian laws. The NPMU for the project, after receiving bids from the contractors shall ensure that the contractors are legitimate and have permits according to the Nigeria law, and the necessary professional bodies. This LMP form an integral part of the bidding documents to be issued to consultant/contractors and shall form part of the awarded contracts to all consultants/contractors under the IPF/TA activities.

In addition, proper training and orientation shall be given by the NPMU and the Environmental and Social safeguards specialists on different stages of awarding contracts and implementation to contractors, to ensure full understanding and compliance. The project will maintain numerous stakeholders such as contractors, and other third-party suppliers, it is advisable to inform the contractors and other third suppliers about their commitment and obligation to ensuring worker welfare and safety which must be included in the contractual agreement.

8.2 Monitoring

On realization of the project activities for the SPIN projects, different layers of monitoring systems will be instituted as part of Labour Management Plan.
The PMU, through the Environmental and Social Safeguard staff, will manage and monitor the performance of contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties) and labour management procedures. This may include periodic audits, inspections, and/or spot checks of project locations and work sites as well as of labour management records and reports compiled by any contractors. Labour management records and reports that may be reviewed would include: representative samples of employment contracts or arrangements between third parties and contracted workers, records relating to grievances received and their resolution, reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions, records relating to incidents of non-compliance with national law, and records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

8.3 Verification, Monitoring Mechanism and Reporting

The SPIN project will institute several layers of monitoring systems will be instituted as part of Labour Management Plan. These will include the following:

- Employee ‘s grievance register (where applicable)
- Nominal roll and class of employment
- Workers benefits in relation to contract between contractors and workers

8.4 Human Resources Employee Database

The NPMU shall keep a database of all workers employed under the project, the database will record information on the personal details of employees (such as home address, next of kin/emergency contact); their job description, role and responsibilities, training records and training needs, etc.

8.5 Contractor Database

There shall also be comprehensive database of all primary and secondary contractors for the SPIN Project. The database will record a summary of their scope of work, business origins, and a brief profile about history of compliance to environmental and social standards.

8.5 Supply Chain Database

This will contain information of the key suppliers which will be used to monitor the primary supply chain and record results of risk assessments for incidents of child and / or forced labour and significant environmental safety issues.

CHAPTER NINE: STAKEHOLDERS' CONSULTATION FOR LMP PREPARATION

The stakeholder consultation involved key stakeholders, including employees, management, union representatives, and other relevant parties which provided policy direction on labour issues in the proposed project states as well as the exiting project management Unit of TRIMING. The objective was to gather diverse perspectives, identify common concerns, and incorporate valuable insights into the development of an effective Labour Management Procedure thereby creating a more inclusive, legally compliant, and operationally effective framework that promotes positive workplace relationships, identifying potential labour-related risks and social impacts associated with the project and contribute to a more comprehensive understanding of the local context and potential challenges.

Additionally, the essence of the stakeholder 's consultations was to ensure stakeholders' involvement as well as collect useful information that will help in putting a comprehensive LMP in place for SPIN project implementation to meet up with the requirements of ESS 2.

A variety of methods were employed to gather insights from stakeholders such as community meetings, Focus group discussions among which were women, Surveys: adopted to gather quantitative data, One-on-one interviews: Individual discussions with key stakeholders to ensure diverse perspectives.

A Number of issues were discussed some of which were general in nature and others were labour related issues. The issue of prioritizing locals for employment took centre stage.

Stakeholder Identification:

Key stakeholders were identified based on their roles, responsibilities, and potential impact on the Labour management process. A separate Stakeholders Engagement Plan (SEP) has also been prepared for the SPIN project to guide continuous stakeholders 'consultation all through the lifetime of project implementation. A list of stakeholders consulted during LMP preparation is presented below;

- The Project Management Unit (TRIMING)
- The Nigeria Labour Congress
- Project Engineers / Managers at the River Basin Authority of selected pilot states (Taraba, Benue and Nasarawa)
- Community leadership / representatives

Summary of key Findings:

Table 7: Summary of key findings from stakeholders consultation

Findings	Remarks
The PMU (TRIMIMG) Date of consultation: (16th February, 2024):	
• Selection of consultant / contractors were made according to the World Bank procurement procedures, with integration of all labour terms and conditions. • Regular capacity building / training of workers on OHS, GBV risk, also for casual workers. • The PMU lacked a structured GRC for direct workers. Workers report to the head of department. • Operational efficiency and productivity with non-discriminatory practices, this also involves gender balance • Employee performance and accountability are duly monitored by Heads of departments.	The Spin project, building on the existing Labour structure of the TRIMING will integrate the Labour Management policies and procedures laid down in this LMP, which has been prepared according to the stipulations of ESS 2 and the National laws. The project will also enhance the Grievance Redress structure for Direct worker as presented in chapter 7, for flexibility.

• Flexibility in workforce management • The Safeguard Unit carried out periodic monitoring of contractors' activities, also with the service of a supervision consultant, to ensure adherence to labour policies and procedures specifically child and forced labour, OHS standards among contractor workers, and code of conducts.	
The Nigeria Labour Union (State representatives) **Date of consultation: (17th February, 2024)**	
• The Labour Regulatory Authorities in the states provided insights into legal requirements and compliance standards, whereby the Labour Act is the principle legislation adopted in the project states for management of labour related concerns. • They operate through collective bargaining with other organization to ensure protection of workers' right. • Labour issues in the construction sector are managed and regulated by the trade union arm of the NLC.	Provisions of the Labour Act are integrated in preparation of the LMP for the SPIN project.
Project Engineers / Managers at the River Basin Authorities **Date of consultation: (8th to 13th February, 2024)**	
• Contractors working in the states ensured to use the local communities as part of the labour force with clear understanding of right communications channels starting from the community leadership. However, there is no evidence of contractual agreements between contractors and local workers. Employment is given without proper engagement process and procedures. • Inadequate provision for PPEs and other OHS protocols for local workers, and no enforcement of penalties given to defaulting contractors.	The project will ensure adequate monitoring of contractors, to ensure compliance on all aspects of labour. Guidelines on rights of contractors' workers have been provided in chapter 6 of the SPIN project's LMP.
Community Leadership / Representative **Date of consultation: (8th to 13th February, 2024)**	
• The Communities acknowledged full participation in all project activities, whereby contractors seek for their contribution as unskilled workers. • They were no cultural hindrances on labour practices in the communities especially women inclusion, however, the women in Nasarawa stated that they are not carried along by contractors even when they express capability in handling certain project activities. • Local labours are not provided with adequate PPEs thereby exposing themselves to occupational hazards.	All contractors to adhere to labour procedures in sub-section 6.2 of the LMP on equal opportunity and non-discrimination. The Contractor shall sign a Code of Conduct which stipulates good work ethics and also has specific prevention or mitigation measures on all labour risk and impacts.



Figure 2: Consultation pictures during visit to the proposed pilot states (Nasarawa, Benue and Taraba) for the SPIN project

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- United Nations. (1948). Universal Declaration of Human Rights.
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ANNEX ONE: TERMS OF REFERENCE

SUSTAINABLE POWER AND IRRIGATION FOR NIGERIA PROJECT

DRAFT TERMS OF REFERENCE FOR LABOUR MANAGEMENT PROCEDURE (LMP) FOR THE SUSTAINABLE POWER AND IRRIGATION FOR NIGERIA PROJECT

1.0 INTRODUCTION

The World Bank is supporting the Federal Government of Nigeria to implement the Sustainable Power and Irrigation for Nigeria (SPIN) Project. The project aims to address critical issues related to water resources management, food security, and energy security in Nigeria by mobilizing water for productive purposes, optimizing the use of existing storage facilities, and enhancing hydropower generation capacity.

Building upon the lessons learned and achievements from the Transforming Irrigation Management in Nigeria (TRIMING) Project (P123112), the project moves to promoting a more holistic water and storage management by the inclusion of hydropower sector and supporting institutional strengthening, such as on dam safety regulations and guidelines. The project components and related interventions would be chosen through economic, technical, and geographical criteria, to act synergistically and promote an integrated water and storage management. It would also strengthen institutional coordination on storage and water management between the related ministries and departments.

1.1 Project Overview

The Project Development Objective is to improve utilization of existing storage for irrigation and hydropower generation and strengthen institutional arrangements for integrated water resources management in Nigeria.

The components of the project, as outlined below, reflect a comprehensive approach towards promoting sustainable development, efficient water resource utilization, and integrated water resources management practices:

A. **Institutional Strengthening and Capacity Building for Irrigation, Hydropower, and Storage Management**
B. **Irrigation and Agricultural Services Modernization**
C. **Rehabilitation and Improvement of Hydropower and Storage Services**
D. **Project Management**

2.0 RATIONALE AND OBJECTIVE OF THE ASSIGNMENT

The objective of the consultancy service is to prepare a Labour Management Procedure (LMP) for the proposed SPIN. The Consultant shall ensure that the LMP outputs of the assignment comply with and meet the legal, laws and technical requirements of the Government of Nigeria and the World Bank. More specifically, the LMP should set out the procedures for addressing labour conditions and risks associated with the proposed project. The LMP is expected to align with the context of the World Bank Environmental and Social Standards (ESS) 2 on Labour and Working Conditions. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project**.**

3.0 SPECIFIC REQUIREMENT OF THE LMP

The project activities will require engagement of contractors with large labour work force (skilled and unskilled). In this regard, the requirements of ESS2 will be relevant.

The Project will prepare, disclose, and implement a Labour Management Procedure (LMP) that spells out the condition of engagement and the age of eligibility to work in line with national standard. The LMP will specify

i. Terms and conditions of employment;
ii. Non-discrimination and equal opportunity;
iii. The development and adherence to Code of conduct by all workers engaged
iv. Worker's organizations;
v. Child labour;
vi. Forced labour;
vii. A grievance mechanism
viii. Journey management procedure; and
ix. Occupational health and safety management plan.

The LMP will be prepared during Project appraisal and subsequently included in the ESIAs/ESMPs prepared during implementation.

4.0 PROPOSED METHODOLOGY FOR THE ASSIGNMENT

In preparing the LMP, the Consultant will be required, to carry out the following activities.

- Review relevant Nigerian law and procedures regarding labour management.
- Review LMP's prepared for other recent World Bank projects in Nigeria especially TRIMING Project (other examples include: Acresal, SURWASH etc.).
- Consult with the appropriate Ministries, Department and Agencies.
- Consult with persons to be potentially affected by project activities.
- Consult with other key stakeholders- Community leaders, Community based organizations, relevant civil society organizations.

5.0 SCOPE OF WORK FOR THE LABOUR MANAGEMENT PROCEDURE

The LMP should describe the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labour and working conditions, including camp
accommodation. It should cover all categories of workers but does not cover government workers/civil servants working in connection with the project except there is a legal transfer of their employment or engagement. The LMP should set out the following procedures.

i.Overview of labour use on the project;

This section should describe the following, based on available information:

- ***Number of Project Workers***: The total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers and community workers. Where numbers are not yet firm, an estimate should be provided.
- ***Characteristics of Project Workers***: To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18.
- ***Timing of Labour Requirements***: The timing and sequencing of labour requirements in terms of numbers, locations, types of jobs and skills required.
- ***Contracted Workers***: The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers, intermediaries or agents, this should be noted together with an estimate how many workers are expected to be recruited in this way.
- ***Migrant Workers***: If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be noted and details provided.

ii.Assessment of key potential labour risks;

This section should describe the following, based on available information:

Project activities: The type and location of the project, and the different activities the project workers will carry out.

Key Labour Risks: The key labour risks which may be associated with the project could include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials
- Likely incidents of child labour or forced labour, with reference to the sector or locality
- Likely presence of migrants or seasonal workers
- Risks of labour influx or gender-based violence
- Possible accidents or emergencies, with reference to the sector or locality
- General understanding and implementation of occupational health and safety requirements

iii.Brief overview of labour legislation (Terms and conditions);

This section sets out the ***key aspects*** of national labour legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in ESS2, paragraph 11 (i.e. wages, deductions and benefits).

iv.Brief overview of labour legislation (Occupational Health and Safety);

This section sets out the ***key aspects*** of the national labour legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in ESS2, paragraphs 24 to 30.

v. Responsible Staff;

This section should identify the functions and/or individuals within the project responsible for (as relevant):

- engagement and management of project workers and contractors/subcontractors.
- occupational health and safety (OHS)
- raining of workers
- addressing worker grievances

In some cases, this section should identify functions and/or individuals from contractors or subcontractors, particularly in projects where project workers are employed by third parties.

vi. Policies and procedures;

This should identify where significant safety risks are to be identified as part of Section 2, this section should outline how these will be addressed. Where the risk of forced labour has been identified, this section should outline how these will be addressed (see ESS2, paragraph 20). Where risks of child labour have been identified, these should be addressed in Section 7. Nigerian policies or procedures can be referenced or annexed to the LMP, together with any other supporting documentation.

vii. Age of employment:

The following should be highlighted here:

- The minimum age for employment on the project
- The process that will be followed to verify the age of project workers.
- The procedure that will be followed if underage workers are found working on the project.
- The procedure for conducting risk assessments for workers aged between the minimum age and 18.

See ESS2, paragraphs 17 to 19 .

viii. Terms and Conditions:

This should highlight:

- Specific wages, hours and other provisions that are to apply to the project Maximum number of hours that can be worked on the project.
- Any collective agreements that could apply to the project. When relevant, provide a list of agreements and describe key features and provisions and Other specific terms and conditions.

ix. Grievance Mechanism:

This section should set out details of the grievance mechanism that would be provided for direct and contracted workers and describes the way in which the workers would be made aware of the mechanism. Where community workers are engaged in the project, details of the grievance mechanism for these workers should be set out in Section 11.

x. Contractor Management:

This section should set out details regarding:

- The selection process for contractors.
- The contractual provisions that will put in place relating to contractors for the management of labour issues, including occupational health and safety.
- The procedure for managing and monitoring the performance of contractors

xi. Primary Supply Workers

Where a significant risk of child or forced labour or serious safety issues in relation to primary suppliers are identified, this sectiond should set out the procedure for monitoring and reporting on primary supply workers.

5.1 Expertise Required

The consultant must have a master's Degree in humanity, policy, and administration or related field with at least 8 years' experience in development studies, and experience with similar assignments in project development and implementation.

Skills, Knowledge, and Competencies:

- Proven experience in conducting qualitative research/analysis on issues related to labour inspection and labour administration and/or human resources policies for highly qualified staff retention.
- Experience in analysis of labour administration - labour inspection and/or HR policies in public offices for staff retention-motivation, standard operational proceedings, training schemes, planning, etc.
- Good communication skills, partnering, conducting of workshops or events, collection of feedback, etc.
- Ability to write accurate and concise reports.
- Excellent written and oral communication skills in English.
- Familiar with World Bank ESF standards particularly ESS2.
- Ability to understand the changing environment, and to anticipate developments and opportunities, threats, and weaknesses to project a clear pathway forward for the project.

5.2 Fees and Reimbursable

Consultant billable fees and reimbursable (travel costs, organization of consultation meetings with key stakeholders) shall be included in the proposal. The consultant shall be paid on a lump sum all-inclusive basis in three (3) instalments upon acceptance of deliverables of the reports.

6.0 DELIVERABLES:

The consultant at the end of the assignment must submit a comprehensive and fully referenced RPF within the provided timeline:

I. **Inception report** (with table of content of the report) in five (5) hard copies and one (1) electronic copy within **two (2) weeks** from commencement date.
II. **Draft report** in five (5) hard copies and one (1) electronic copy shall be submitted for reviewed within **six (6) weeks** of the commencement date. On submission of the draft report, the client shall be allowed one (1) week to review the draft and compile comments.
III. **Final report** in ten (10) hard copies and one (1) electronic copy with comments incorporated within **eight (8) weeks** from commencement date.

7.0 Duration of Task

It is expected that the effort level for this consultancy services shall be for a period of 8 weeks within which the Consultant shall accomplish all the tasks including submission of final report to the Client.

ANNEX TWO: ANNOTATED OUTLINE FOR PREPARING A LABOUR MANAGEMENT PLAN (LMP)

How to Use this Template?

Under ESS2 on Labour and Working Conditions, Borrowers are required to develop labour management procedures (LMP). The purpose of the LMP is to facilitate planning and implementation of the project. The LMP identify the main labour requirements and risks associated with the project, and help the Borrower to determine the resources necessary to address project labour issues. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

The Template is designed to help Borrowers identify key aspects of labour planning and management. The content is indicative: where the issues identified are relevant in a project, Borrowers should capture them in the LMP. Some issues may not be relevant; some projects may have other issues that need to be captured from a planning perspective. Where national law addresses requirements of ESS2 this can be noted in the LMP, and there is no need to duplicate such provisions. The LMP may be prepared as a stand-alone document, or form part of other environmental and social management documents.

A concise and up to date LMP will enable different project-related parties, for example, staff of the project implementing unit, contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labour issue. The level of detail contained in the LMP will depend on the type of project and information available. Where relevant information is not available, this should be noted and the LMP should be updated as soon as possible.

In preparing and updating the LMP, Borrowers refer to the requirements of national law and ESS2 and the Guidance Note to ESS2 (GN). The template includes references to both ESS2 and the GN.

OVERVIEW OF LABOUR USE ON THE PROJECT

This section describes the following, based on available information:

Number of Project Workers: The total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers and community workers. Where numbers are not yet firm, an estimate should be provided.

Characteristics of Project Workers: To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18.

Timing of Labour Requirements: The timing and sequencing of labour requirements in terms of numbers, locations, types of jobs and skills required.

Contracted Workers: The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers, intermediaries or agents, this should be noted together with an estimate how many workers are expected to be recruited in this way.

Migrant Workers: If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be noted and details provided.

ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

This section describes the following, based on available information:

Project activities: The type and location of the project, and the different activities the project workers will carry out.

Key Labour Risks: The key labour risks which may be associated with the project (see, for example, those identified in ESS2 and the GN). These could include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials

- Likely incidents of child labour or forced labour, with reference to the sector or locality
- Likely presence of migrants or seasonal workers
- Risks of labour influx or gender based violence
- Possible accidents or emergencies, with reference to the sector or locality
- General understanding and implementation of occupational health and safety requirements

BRIEF OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

This section sets out the ***key aspects*** of national labour legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in ESS2, paragraph 11 (i.e. wages, deductions and benefits).

BRIEF OVERVIEW OF LABOUR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

This section sets out the ***key aspects*** of the national labour legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in ESS2, paragraphs 24 to 30.

RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for (as relevant):

- engagement and management of project workers
- engagement and management of contractors/subcontractors
- occupational health and safety (OHS)
- training of workers
- addressing worker grievances

In some cases, this section will identify functions and/or individuals from contractors or subcontractors, particularly in projects where project workers are employed by third parties.

POLICIES AND PROCEDURES

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

Where significant safety risks have been identified as part of Section 2, this section outlines how these will be addressed. Where the risk of forced labour has been identified, this section outlines how these will be addressed (see ESS2, paragraph 20 and related GNs). Where risks of child labour have been identified, these are addressed in Section 7.

Where the Borrower has stand-alone policies or procedures, these can be referenced or annexed to the LMP, together with any other supporting documentation.

AGE OF EMPLOYMENT

This section sets out details regarding:

- The minimum age for employment on the project
- The process that will be followed to verify the age of project workers
- The procedure that will be followed if underage workers are found working on the project
- The procedure for conducting risk assessments for workers aged between the minimum age and 18
- See ESS2, paragraphs 17 to 19 and related GNs.

TERMS AND CONDITIONS

This section sets out details regarding:

- Specific wages, hours and other provisions that apply to the project
- Maximum number of hours that can be worked on the project
- Any collective agreements that apply to the project. When relevant, provide a list of agreements and describe key features and provisions
- Other specific terms and conditions

GRIEVANCE MECHANISM

This section sets out details of the grievance mechanism that will be provided for direct and contracted workers, and describes the way in which these workers will be made aware of the mechanism.

Where community workers are engaged in the project, details of the grievance mechanism for these workers is set out in Section 11.

CONTRACTOR MANAGEMENT

This section sets out details regarding:

- The selection process for contractors, as discussed in ESS2, paragraph 31 and GN 31.1.
- The contractual provisions that will put in place relating to contractors for the management of labour issues, including occupational health and safety, as discussed in ESS2, paragraph 32 and GN 32.1
- The procedure for managing and monitoring the performance of contractors, as discussed in ESS2, paragraph 32 and GN 32.1

COMMUNITY WORKERS

Where community workers will be involved in the project, this section sets out details of the terms and conditions of work, and identifies measures to check that community labour is provided on a voluntary basis. It also provides details of the type of agreements that are required and how they will be documented. See GN 34.4.

ANNEX THREE: SAMPLE RISK ASSESSMENT TOOL

Hazard Identification	**Categorize Hazards**	**Control Hazards**	**Decision Makers**
What are Hazards? Danger which threatens physical harm to employees	Who or what may be harmed? Identify groups of people, materials, equipment that can be hazardous? People who may not be in the workplace all the time; Analyze the workstation, interaction with other workers	List what is already in place to reduce the likelihood of harm or make any harm less serious	Make sure risks are reduced "so far as is reasonably practicable". An easy way of doing this is to compare what is being done with best practice. If there is a difference, list what needs to be done
Recognizable and Foreseeable Hazard 1. Look and walk around, what do you see? Conduct wide surveys. 2. Categorize Hazards into Materials, Environment, Equipment, People and System (MEEPS) 3. Review documentation by checking safety instructions. 4. Contacting your supervisors	Low risks Moderate risks Substantial risks	Prioritize hierarchy of controls -Elimination -Substitution -Administrative -PPEs	Remember to prioritize. Deal with those hazards that are high-risk and have serious consequences first.
Risk Assessment Review			
Review assessment to make sure you are still improving, or at least not sliding back If there is a significant change in the worksite, remember to check your risk assessment and where necessary, amend it	Reviewer:	Review Date:	Endorsed by:

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ANNEX FOUR: SAMPLE CODES OF CONDUCT

1.0. AIM OF THE CODE OF CONDUCT

The main aim of the Code of Conduct is to prevent and/or mitigate the social risks within the context of the project. The Codes of Conduct are to be adopted by contractors and other categories of workers. The social risks that may arise include but not limited to Gender-Based Violence (GBV), Violence Against Children (VAC), HIV and AIDS infection/spread, and occupational health and safety.

2.0 KEY DEFINITIONS

The following definitions apply:

Gender-Based Violence (GBV)

This is defined as any conduct, comment, gesture, or contact perpetrated by an individual (the perpetrator) on the work site or in its surroundings, or in any place that results in, or is likely to result in, physical, sexual, or psychological harm or suffering to another individual (the survivor) without his/her consent, including threats of such acts, coercion, or arbitrary deprivations of liberty.

Violence Against Children (VAC)

This may be defined as physical, sexual or psychological harm of minor children (i.e., under the age of 18), including using for profit, labour, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any mediums.

Child Labour

This involves employment of underage. Any person under the age of 18 should not be employed in the project sites.

Child Protection (CP)

An activity or initiative designed to protect children from any form of harm, particularly arising from VAC, and child labour.

Child

The word is used interchangeably with the term ‘minor’ and, in accordance with the United Nations Glossary on Sexual Exploitation and Abuse, refers to a person under the age of 18.

Grooming

This is defined as behaviours that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship (for instance by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Online Grooming

This is the act of sending an electronic message with indecent content to a recipient who the sender believes to be a minor, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Survivor/Survivors

This is defined as the person(s) adversely affected by GBV, VAC, and child labour. Women, men and children can be survivors of GBV, VAC, and child labour.

Perpetrator

This is defined as the person(s) who commit(s) or threaten(s) to commit an act or acts of GBV, VAC, and child labour.

Work site

This is defined as the area in which infrastructure development works are being conducted, as part of interventions planned under the project, funded by the World Bank.

Work site surroundings

These are defined as the ‘Project Area of Influence’ which is any area, urban or rural, directly affected by the project, or located within the distance of three kilometres’ radius from the work site and/or worker’s camps, including all human settlements found on it.

Consent

This word is defined as the informed choice underlying an individual's free and voluntary intention, acceptance, or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. Any use of a threat to withhold a benefit, or of a promise to provide a benefit, or actual provision of that benefit (monetary and non-monetary), aimed at obtaining an individual's agreement to do something, constitutes an abuse of power; any agreement obtained in presence of an abuse of power shall be considered non-consensual. In accordance with the United Nations, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the code of conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defence.

Contractor

This is defined as any firm, company, organisation or other institution that has been awarded a contract to conduct infrastructure development works in the context of the project and has hired managers and/or employees to conduct this work.

Manager

The word is used interchangeably with the term 'supervisor' and is defined as any individual offering labour to the contractor, on or off the work site, under a formal employment contract and in exchange for a salary, with responsibility to control or direct the activities of a contractor's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.

Employee

This is defined as any individual offering labour to the contractor on or off the work site, under a formal or informal employment contract or arrangement, typically but not necessarily in exchange for a salary (e.g. including unpaid interns and volunteers), with no responsibility to manage or supervise other employees.

Workers Committee

A team established by the Contractor to address GBV, VAC, child labour and other relevant issues with the work force.

3.0 CODES OF CONDUCT

This chapter presents three Codes of Conduct (CoC) for use:

1. **Contractors Code of Conduct**: Commits the contractor to addressing GBV and VAC issues;
2. **Manager's Code of Conduct**: Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,
3. **Individual Code of Conduct**: Code of Conduct for each individual working on project funded projects

3.1 Contractors Code of Conduct

Contractors are obliged to create and maintain an environment which prevents social risks. They have the responsibility to communicate clearly to all those engaged on the project the behaviours which guard against any form of abuse and exploitation. In order to prevent Social risks, the following core principles and minimum standards of behaviour will apply to all employees without exception:

GBV or VAC constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment and/or contract. All forms of Social risks including grooming are unacceptable be it on the work site, the work site surroundings, or at worker's camps of those who commit GBV or VAC will be pursued.

Treat women, children (persons under the age of 18) and people with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic, cultural beliefs/practices, or other status.

Do not use language or behaviour towards men, women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

Sexual activity with children/learners under 18 (including through digital media) is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defence.

Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.

Sexual interactions between contractor's employees and communities surrounding the work place that are not agreed to with full consent by all parties involved in the sexual act are prohibited (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.

Where an employee develops concerns or suspicions regarding acts of GBV or VAC by a fellow worker, whether in the same contracting firm or not, he or she must report such concerns in accordance with established Grievance Redress Mechanism (GRM) that protects the identities of victims and whistleblowers.

All contractors are required to attend an induction prior to commencing work on site to ensure they are familiar with the social risks and Codes of Conduct.

All employees must attend a mandatory training once a month for the duration of the contract starting from the first induction prior to commencement of work to reinforce the understanding of the institutional social risks and Code of Conduct.

The Contractor shall ensure provision of financial resources and support compliance to occupation health and safety requirements for all workers.

1. The Contractor shall ensure that workers dress appropriately i.e. dress in a way that: - ▪ Is unlikely to be viewed as offensive, revealing, or sexually provocative.
    - ✦ Does not distract, cause embarrassment or give rise to misunderstanding
    - ✦ Is absent of any political or otherwise contentious slogans
    - ✦ Is not considered to be discriminatory and is culturally sensitive

The Company shall ensure provision of financial resources and trainings to prevent spread of HIV and AIDS.

The company shall comply with all the applicable international and national legislation including giving terminal benefits to workers who have served for at least three months;

All contractors must ensure that their employees sign an individual Code of Conduct confirming their agreement to support prevention of social risks activities.

The contractor should ensure equitable access to limited natural resources (e.g. water points) to avoid conflicts with local communities

Where possible, the contractor should ensure employment of local workforces especially where unskilled labour is required to mitigate social risks

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in termination of the contract.

FOR THE CONTRACTOR

Signed by: _____

Signature: _____

Title: _____ Date:

3.2 Code of Conduct for Construction Site Supervisor/Managers Code of Conduct

Site Supervisors at all levels play an important role in creating and maintaining an environment, which prevents workers misconduct. They need to support and promote the implementation of the Contractors Codes of Conduct and enforce Workers Codes of Conduct. Construction site supervisor must adhere to this Code of Conduct. This commits them to develop and support systems, which maintain a safe working environment. Construction Site Supervisor responsibilities include but are not limited to:

1. Where possible, ensure employment of local workforces especially where unskilled labour is required to mitigate social risks;
2. Ensure there is zero tolerance to child labour practices;
3. Promote gender inclusion at all levels;
4. Establish a workers' committee to oversee issues of workers' misconduct including GBV and VAC;
5. Ensure compliance to occupation health and safety requirements for all workers;

6. Ensure that workers dress code is adhered to appropriately;
7. Ensure that access to construction sites is restricted to authorized persons; hoarding is provided and that there is proper signage to construction site(s);
8. Facilitate workers training and capacity building on social, environmental and health and safety;
9. Ensure that all workers are sensitized on HIV and AIDS issues, provided with condoms and HTC services;
10. Ensure that fundamental workers' rights (e.g. working hours, minimum wages, etc) are protected;
11. Ensure that 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 workings hours should be strictly prohibited;
12. Ensure compliance to all legal requirements;
13. Supervisors failing to comply with such provision can be in turn subject to disciplinary measures including termination of employment; and
14. Ultimately, failure to effectively respond to some provisions of the code of conduct may provide grounds for legal actions by authorities.
15. Ensure that every employee under his/her supervision has been oriented on the Code of Conduct and has signed.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to comply to all rules of this code of conduct. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action.

Signed by: _____
Signature: _____
Date: _____

FOR THE EMPLOYER
Signed by: _____
Signature: _____
Date: _____

3.3 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 constitute acts of gross misconduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the work site, the work site surroundings, or at worker's camps. 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—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 "nonconsensual" 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):
    - Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
    - 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.
    - Refrain from physical punishment or discipline of children.
    - 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.
    - 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 workings 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.

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 FIVE: SAMPLE HEALTH TRAINING AND ENVIRONMENT PLAN

S/N	Training Title	Description	Timing	Who to Deliver the Training
1	Sensitization on the HSE Manual	To train all workers on all the provisions in the HSE Manual and the company's HSE Policy (use local language as necessary) including the right use of PPEs	Upon mobilization of every worker to site	HSE Expert
			Refresher on a monthly basis	Contractor HSE Officer
2	First Aid administration/ Use of First Aid Box	To train selected officers (Contractor HSE Officer, Site Manager, Yard Manager, Team leaders, Female workers representative) on the right first aid administration for different scenarios including demonstrations	Upon mobilization to site and after every 6 months	Public Health Expert/ First Aid Care Giver
3	Protocol for construction site, staging areas, borrow pits and campsite	To ensure all workers understand the protocol to adopt at the construction site, staging areas, borrow pits and campsite	Upon mobilization to site Refresher every 3 months	Site Manager
4	General Training on site work	Right procedures for: manual handling, electrical safety, emergency procedures, work at height, confined spaces, underground construction, cofferdams etc.	Upon mobilization to site Refresher every 2 months	Site Manager/ Project Manager/ Engineer/ HSE Officer
5	Daily HSE Pep Talks	To provide daily reminder on safety precautions and acceptable environmental and social protection including do's and don'ts for all workers	Daily	Contractor HSE Officer
6	Community Health and Safety Training	To train all workers and project management on: • Sexual Exploitation and Abuse/ Gender-Based Violence Training • Code of Conduct Training • Sensitization on STDs/STIs • Grievance Redress Mechanism	Upon mobilization of every worker to site Refresher every 3 months	Social Safeguard Specialist
7	Drivers Training	To train all project drivers on safety and acceptable conduct	Upon employment Daily Monitoring Monthly Refresher	FRSC Expert in conjunction with project manager

ANNEX SIX: CONSULTATION OUTLINE / DATA COLLECTION FORM

PREPARATION OF A LABOUR MANAGEMENT PROCEDURE (LMP) FOR THE SPIN PROJECT

	Questions	Responses
	1. The Project Management Unit	
1.	What are the labour requirements of the Project; an estimate of the number of workers and their characteristics / types. (Direct and Contracted workers, community and Primary suppliers)	
2.	Are there specific policies and procedures in place to guide employment and onboarding of workers?	
3.	How I s women inclusion effected in the projects?	
4.	What measures are taken to ensure fair and non-discriminatory practices among workers?	
5.	How often are trainings and capacity building of workers conducted, especially in OHS, GBV Risk and sensitization, preventing marginalization of vulnerable groups.	
6.	Is there a system in place for monitoring the performance of workers?	
7.	How are contractors selected and what criteria are in place to ensure compliance with OHS standards and good labour working condition.	
8.	How does the project ensure that no child labour is employed, and no forced labour is used in any part of the sub projects and supply chain especially among contractors' workers? What mechanisms are in place to monitor and address any instances of child or forced labour?	
9.	Are there specific issues in the existing labour management process in the project, that need to be addressed?	
	2. Scheme Project Managers / Engineers	
10.	What are the key activities and tasks carried out at the scheme?	
11.	What types of labour skills and qualifications are required for these activities?	
12.	Are health and safety measures in place to protect workers? How often are safety training sessions conducted?	
13.	Are there policies in place to prevent discrimination and ensure equal opportunities among workers?	
14.	What are the identified labour risks / issues at the scheme experienced during project implementation?	
	3. Ministry of Women Affairs	
15.	What are the existing national and state-level policies and regulations related to labour and employment, particularly those concerning women?	
16.	What is the current level of women's participation in the local labour force?	
17.	Is there a GBV Referral pathways in place?	
18.	What are the gender-specific employment challenges faced by women in the state especially in development projects, and what measures are put in place to solve those challenges?	
	4. Ministry of Labour and Employment	
19.	What are the Labour laws and policies available in the state?	
20.	Is there an existing Guidelines on rights of workers particularly in the construction sector?	
21.	How do you currently ensure compliance with labour laws and regulations especially among workers in development projects?	
	5. Local Government Authorities	
22.	Are there any existing local labour laws that govern employment practices?	
23.	How does the local community typically engage with project teams regarding labour-related matters?	

24.	Are there any specific requirements or standards that must be adhered to for implementation of projects within your jurisdiction?	
25.	How does the LGA collaborate with project teams to ensure effective monitoring throughout the project lifecycle?	
26.	Are there any customary or cultural practices related to employment that should be taken into account?	
6. Project Community		
27.	Has there been any labour related issues among workers in the community especially during implementation of development projects, and how are the issues handled.	
28.	Any cultural values influencing labour practices in the community, especially women inclusion, vulnerable groups.	
29.	How are disputes or conflicts related to labour typically resolved within the community? Is there an existing community Grievance mechanism in place / conflict resolution procedures?	
30.	What are the common expectations of the community with regards to employment during project implementations?	

ANNEX SEVEN: ILO CORE LABOUR STANDARDS

Fundamental Principle	**Corresponding ILO Conventions**	**Number of Ratifications of Convention**	**Ratified by Nigeria (Yes/No)**
1. Freedom of association and effective recognition of the right to collective bargaining	C. 87: Freedom of Association and Protection of the Right to Organize Convention, 1948	141	Yes
	C. 98: Right to Organize and Collective Bargaining Convention, 1949	152	Yes
2. The elimination of all forms of forced or compulsory labour.	C. 29: Forced Labour Convention, 1930	161	Yes
	C. 105: Abolition of Forced Labour convention, 1957	159	Yes
3. The effective abolition of child labour.	C. 138: Minimum Age Convention, 1973	121	Yes
	C. 182: Worst Forms of Child Labour Convention, 1999	132	Yes
4. The elimination of discrimination in respect of employment or occupation	C. 100: Equal Remuneration Convention, 1951	160	Yes
	C. 111: Discrimination (Employment and Occupation) Convention, 1958	158	Yes