## Labour Management Procedures Template

The Labour Management Procedures (LMP) facilitates planning and assists responsible parties to ensure that project implementation adheres to the requirements of SES Standard 7 on Labour and Working Conditions. The LMP (a) sets out the written labour procedures for the project, (b) identifies the main labour requirements and risks associated with the project, and (c) helps the project developer to determine the resources necessary to address project labour issues and risks and sets out an action plan.

The LMP summarizes key labour-related risks and issues and may be supplemented by more targeted analyses and plans (e.g. such as an occupational safety and health action plan, WBG EHS sector specific guidelines, ISO standards, contractor management matrices, etc.). The LMP (as with supporting analyses) should be undertaken by experts with relevant expertise.

The LMP may be prepared as a stand-alone document, or form part of other environmental and social management documents. 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.

In preparing and updating the LMP, project developers should refer to the requirements of national law and S7 and its Guidance Note. The content of the LMP is indicative: some issues may not be relevant to the project while some projects may have other issues that need to be captured from a planning perspective. Where national law addresses requirements of S7 this should be noted in the LMP.

Where project workers under a single project may be engaged under significantly different circumstances (e.g. different regions of a country, different employment arrangements), it may be necessary to ensure that these differences are appropriately addressed in the LMP, or separate LMPs may need to be developed.

For projects utilizing an ESMF given that specific activities and/or subprojects have yet to be defined, the development of the LMP may need to be deferred. The ESMF should address as many potential issues outlined in the LMP as is feasible during project development, and the ESMF should include procedures for undertaking a specific LMP once locations and activities are defined.

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.

Below is an indicative outline of the LMP.

1. **Overview of Labour Use in the Project:** This section describes the following, based on available information:
   1. *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, temporary or seasonal workers and community workers. Where numbers are not yet firm, an estimate should be provided.
   2. *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.
   3. *Timing of Labour Requirements*: The timing and sequencing of the project’s labour requirements in terms of numbers, locations, types of jobs and skills required.
   4. *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 of the number of workers that are expected to be recruited in this way.
   5. *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.
2. **Assessment of Key Potential Labour Risks*:*** This section describes the following, based on available information:
   1. *Project activities*: The type and location of the project, and the different activities the project workers will carry out, including primary supplier(s)
   2. *Key Labour Risks:*The key labour risks that may be associated with the project (see, for example, those identified in S7 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
   * discriminatory policies or practices that deny equal opportunity
   * restrictions on freedom of association and collective bargaining
   * 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
3. **Brief overview of labour legislation, agreements and potential gaps with Standard 7:**

* **Core Labour Standards:** This section sets out the key aspects of national legislation implementing the ILO fundamental rights at work, i.e. prohibition of child labour/minimum working age; prohibition of forced labour, non-discrimination/equal opportunity; and freedom of association and collective bargaining. The overview should highlight any material gaps between national law and S7.9-19.
* **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 S7, paras.5-8 (i.e. wages, deductions and benefits) and any material gaps with S7. The section should also identify the terms of any existing collective agreements that stipulate workplace terms and conditions.
* **Occupational Safety and Health (OSH):** 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 that relates to the items set out in S7, paras. 20-25 and any material gaps with S7.

1. **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 safety and health (OSH)
* 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.

1. **Policies and Procedures:** This section sets out :

* **Management systems:** Relevant management systems ***in place*** to implement S7, e.g. human resources policy, anti-harassment policy, staff handbook, grievance procedure, OSH management system, etc. These can be referenced or annexed to the LMP, together with any other supporting documentation. Where relevant, it identifies applicable national legislation.
* **Age of Employment:** Details regarding (see S7 paras. 16-19 and GN):
  + 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
  + Where incidences of **child labour** are identified, describe how these will be remediated
* **Forced Labour:** Where the risk of forced labour has been identified, this section outlines how this risk will be mitigated, and how any instances of forced labour will be addressed (see S7 para. 14 and GN).
* **Occupational safety and health:** Where significant health and safety risks have been identified, summarize how these will be addressed in a manner consistent with national labour and employment regulations and the requirements of S7. (Note that a specific OSH plan may be necessary.)
* **Terms and Conditions:** This section sets out details regarding (see S7 paras. 5-8):
  + 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 (e.g. benefits)
  + “Beyond compliance” initiatives e.g. to promote local employment or the hiring of traditionally underrepresented groups
* **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 (S7, paras. 26-28).
* **Contractor Management:** This section sets out details regarding (see S7, paras. 29-31 and GN):
  + the selection process for contractors/third parties
  + the contractual provisions that will be put in place relating to contractors for the management of labour issues, including OSH
  + the procedure for managing and monitoring the performance of contractors
* **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. This section sets out details of the grievance mechanism for community workers and the roles and responsibilities for monitoring such workers.
* **Primary Supply Workers:** Where a significant risk of violations of core labour standards[[1]](#footnote-1) or serious safety issues in relation to primary suppliers has been identified, this section sets out the procedure for monitoring and reporting on primary supply workers (S7 paras. 32-34)

**7. Action Plan** This section sets out details of actions required to achieve and maintain compliance with national law and S7, including responsibilities, timelines and cost/resource estimates. The Plan will also include monitoring and reporting requirements appropriate to the nature of the project and associated labour risks and impacts. The Action Plan includes the following elements:

* Summary of required measures identified in above sections of the LMP.
* Describe schedule, institutional arrangements, and responsibilities and mechanisms for carrying out the identified measures, indicating who is responsible and when actions will be undertaken.
* Describe the monitoring framework for the project and key indicators for measuring progress in implementing the identified measures.
* Budget and Financing: Include an appropriately costed plan, with itemized budget sufficient to satisfactorily undertake the identified measures.

1. Child labour, forced labour, non-discrimination and equal opportunity, freedom of association and collective bargaining. [↑](#footnote-ref-1)