

# LABOR MANAGEMENT PROCEDURE

## Skilling Up Lebanon Project

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## ABBREVIATIONS AND ACRONYMS

BDD	Beirut Digital District
CBO	Community Based Organization
DO	Development Objective
DT	Digital Technology
ESCP	Environmental and Social Commitment Plan
FM	Financial Management
GBV	Gender Based Violence
GoL	Government of Lebanon
GM	Grievance Mechanism
NGO	Non-Governmental Organization
PDO	Project Development Objectives
SUL	Skilling up Lebanon
SUM	Skilling up Mashreq
SEP	Stakeholder Engagement Plan
WB	World Bank
WBG	World Bank Group
WDR	World Development Report

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## 1. INTRODUCTION

The overall Development Objective (DO) of the proposed project is to increase access to market-relevant digital skills for the Lebanese youth. This proposed project will support the promotion of digital skills under the Skilling Up Lebanon (SUL) initiative launched by the World Bank in 2019. This initiative aims to prepare young women and men for the local, regional and global jobs of the future and to attract Digital Technology (DT) players to invest in the region. The specific outcomes expected for this project are to: (i) provide a proof of concept for the model proposed under the SUL with a view to attract additional funding to scale up and sustain the model; (ii) design and implement five pilot digital skills programs and train approximately 700 young men and women, of which 50 percent women.

The project is composed of two components:

### **Component 1: Support to the SUL model**

This component will provide financial and technical support to the Beirut Digital District (BDD) Talent Development Hub, to establish the SUL model. Under this component, the proposed project will finance the following activities:

- (a) **Setting up the Team:** the following individuals will be hired through a competitive process: Executive Director, Training Coordinator, Communications Coordinator, Job Market Coordinator, and Digital Skills Expert. The team will be responsible for the following:
  - (i) **Establishment of the governance structure:** The Governance structure of SUL will need to be developed and qualified members recruited. It is expected to be composed of two categories of committees: (a) SUL Steering committee that will provide strategic direction and oversee implementation<sup>1</sup>; and (b) SUL Technical Committees: with the training provider selection committee which will aim to assess programs validity and ensure high-quality skills provision standards as well as the private sector committee which will identify employment opportunities and training needs.
  - (ii) **Establishment of partnerships:** BDD Talent Development Hub will develop tailored agreements with a network of international and local partners either through contractual arrangements or Memoranda of Understanding. Different types of partnerships would be developed: training providers for access to high-quality curricula and trainers, private-sector employers, tech giants and recruiters to provide internships, projects and job opportunities to SUL trainees, ecosystem players (government, schools, universities, etc.) as well as certification providers, such as leading cloud services certification bodies.
  - (iii) **Launch and management of the Training Grant Program:** The team will be launching a competitive call for proposals to design and implement market-relevant digital skills trainings. Once proposals have been approved, the team will oversee their implementation and ensure a consistent and effective monitoring and evaluation. More details on this Training Grant Program are provided in the next component.
  - (iv) **Release of a job market digest:** BDD Talent Development Hub will develop a job market digest that will provide information on jobs openings in the digital and creative sectors in Lebanon; it will also tackle overseas companies and expats who want to outsource projects to Lebanon. The job market digest will attempt to assess the employers' skills needs to ensure the relevance of the digital skills trainings provided under this project.

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<sup>1</sup> Members will include qualified individuals with knowledge on the tech and digital industry, e.g.: impact investors, education and skills experts, private sector representatives working in this sector, university and school representatives

- (b) **Setting up of systems and processes:** The following two key systems and processes would need to be put in place: (a) a *Career and Internship Portal* that will provide SUL beneficiaries with an effective mean to find and apply to suitable job openings; and (b) *M&E processes and tools* to enable consistent monitoring across providers and allow for accurate output measurement of the activities implemented.
- (c) **Development of marketing and branding:** BDD Talent Development Hub will develop the SUL online presence on the web and on Social Media (Twitter, Facebook, Instagram, etc.). It will also develop a marketing and outreach strategy campaign detailing the different approach and messages for key categories of stakeholders.

### **Component 2: Support to Digital Skills pilots**

This component will finance the design and implementation of five pilot digital skills programs by the BDD Talent Development Hub. The five pilots will be financed through grants following a competitive selection process. One pilot will focus on raising awareness of the importance of digital skills as early as in school, another pilot will provide internship opportunities for youth in the digital sector to gain on-the-job experience while the remaining 3 pilots will profile digital skills training.

Each training will have clear eligibility criteria for the selection of candidates. Some trainings will require academic bar or threshold which every candidate would need to cross prior to being accepted into a training. This academic threshold could be set very low or could be higher, depending on the type of training to be conducted. This will ensure that each beneficiary has the minimum requirement to succeed in the course. One of the pilots could cover a career guidance program for secondary school students (15-18 years old) to expose them to the various opportunities in the digital market, specifically in light of the changing nature of jobs resulting from technology, accelerated by the COVID-19 Pandemic mandated lockdowns. A second pilot could provide university students across Lebanon (18-25 years old) with on the job training opportunities in the digital and creative sector to provide them with a practical job experience that increases the chances of their employability. The program would include career orientation and soft skills development workshops to prepare them for the job market. Participating corporations that seek to employ full-timers at the end of internship would be prioritized. The remaining three pilots for working or unemployed professionals will be selected based on the outcome of the job market digest (based on latest market trends and employers' needs), and could cover some of the following topics (more details are provided in the figures below):

- Computer Sciences / Emerging Tech Intensive Bootcamp to train unemployed Computer Science / Computer engineering university graduates with the aim to bridge the gap between academia and market requirements
- Cloud / Online Courses with the objective of enhancing the skillset of students on Cloud to open up remote career options
- Soft Skills Bootcamp to develop the soft skills of computer engineers / developers / product managers or anyone involved in the digital sector to be a better fit with the requirements of the job market

*Part of the trainings would also include activities to prepare participants to find jobs.*

## 2. OVERVIEW OF LABOR USE ON THE PROJECT

**Number of Project Workers and Timing of Labor Requirements:** The total number of direct workers to be employed in the project is five, as shown in the below table. They are all hired to execute the SUL project. The estimated number of contracted workers is 5.

	Contract Duration	Type of Worker	Location	Weekly Hours	Type of Job and Skills
BDD Academy Executive Director	12 months from Nov 21 to Nov 22	Direct	BDD Academy, Beirut	Full Time 40 hours/week	Management and Education
Digital Skills Expert	12 months from Nov 21 to Nov 22	Direct	BDD Academy, Beirut	Part Time 8 hours/week	Technical Consultant and Management
Job Market Coordinator	12 months from Nov 21 to Nov 22	Direct	BDD Academy, Beirut	Part Time 25 hours/week	HR
Communication Coordinator	10 months from Jan 22 to Nov 22	Direct	BDD Academy, Beirut	Full Time 40 hours/week	Communication and Marketing
Training Coordinator – E&S Specialist	10 months from Jan 22 to Nov 22	Direct	BDD Academy, Beirut	Full Time 40 hours/week	Business Coordination
Training Providers	For the training program duration	Contracted	Full Time for the duration of the contract	40 hours	Training, digital, education

The Training Coordinator will be also the Environmental and Social focal point to follow-up on the Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Grievance log and reporting, and overall implementation and reporting on the ESCP.

It is unlikely to employ community workers under the SUL project.

**Characteristics of Project Workers:** All the project direct workers and all the project contracted workers will be skilled Local workers holding at least a bachelor degree or equivalent. Their age range will be between 22 and 50. The recruitment is underway and it will aim for a fair representation of both genders.

The direct workers will be responsible for the management of all the SUL project activities, whilst the contracted workers will be responsible for the implementation of the five training programs.

**Contracted Workers:** An open and fair selection process will be put in place in order to select the training providers which will implement the 5 training programs. A request for proposals for each program will be released, after which an evaluation process will take place to agree on the best fit provider. A contract will be signed with each training provider.

**Migrant Workers:** No migrant workers will be employed under the SUL project.

### 3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

**Project activities:** It is intended that the SUL project activities address target audience from different cities in Beirut including less privileged one. The main activities of the SUL project are listed below:

- a) Setting up the team including the Executive Director, the Training Coordinator, the Communication Coordinator, the Digital Skills Expert, and the Job Market Coordinator. The team will work on establishing partnerships with a network of local and international partners, in order to ensure an effective implementation of the grant program.
- b) Release of a job market digest, providing information on job openings in the digital and creative sectors. It will also reach out to overseas companies and expats who want to outsource projects to Lebanon
- c) Setting up systems and processes including the Career and Internship Portal and the M&E Processes and Tools
- d) Development of a marketing and outreach strategy campaign for the project
- e) Development and implementation of 5 pilot digital programs which are:
  - a. Career Orientation Program to provide career orientation for secondary school students, exposing them to the various opportunities in the market, specifically in light of the changing nature of jobs recruiting from technology field
  - b. Internship Program to expose university students to opportunities in the digital and creative sector, as well as the start-up and entrepreneurship ecosystem
  - a. Computer Sciences/Emerging Tech Intensive Bootcamp to bridge the gap between academia and market requirements
  - b. Cloud/Online Courses to enhance cloud computing skillset of students; this skillset is becoming extremely important as most businesses are switching to cloud
  - c. Soft Skills/Agile Process Management Bootcamp to enhance the soft skills of computer engineers/ developers/ product managers or anyone involved in the tech development industry, specifically around agile project management skills

**Key Labor Risks:** Taking into consideration the nature of the SUL project, the culture of the BDD Talent Hub and very limited number of workers to be involved in the project, there are no chances of labor risks arising related to child labor, and a low risk of GBV/SEA/SH. In addition, there is no civil work associated with this project that could result in labor influx.

However, given the nature of the project intervention, the key labor risks which may be associated with the project include:

- Risks on Project workers related to labor and working conditions that are not compliant with either the Lebanese Labor Law or ESS2. For example, wages that are not proportionate with tasks performed or industry standards, discrimination towards women and workers with disabilities or other vulnerabilities, unlawful termination, withholding of benefit etc.,
- Inadequate Grievance Mechanism (GM) to handle complaints and concerns for all the Project Workers, and
- Potential but low risk Sexual Exploitation and Abuse/Harassment (SEA/SH) risks and Gender-Based Violence (GBV) among the Project workers.  
Occupational Health and Safety (OHS) risks particularly due to COVID-19 related risks

As per the Fitch Solutions Report entitled '[Lebanon Labor Market Risk Report](#)', Lebanon is regionally uncompetitive with regard to labor market risks due to a host of issues making the process of hiring and maintaining a suitable workforce difficult for investors. Among the many key concerns are a small labor force, high employment costs, regionally low school enrolment rates, the influx of refugees, low expenditure on education and a brain drain of talented graduates. Lebanon's economic crisis has further exacerbated these problems, with wages paid in the Lebanese pound unable to afford basic necessities. Recruitment options are limited by very low female labor force participation, a spatial disparity in refugee camps and regulations preventing refugees from entering the labor force. The country's overall ranking is slightly uplifted by the lack of onerous regulations and low costs related to hiring and firing local workers; however, this leaves supply chains vulnerable to exploitative labor practices, and employers will face difficulty in maintaining and motivating staff paid in the Lebanese pound.

**The COVID-19 pandemic presented new risks to the Lebanese workforce. As per the '[Rapid Diagnostic Assessment of Employment Impacts Under COVID-19](#)', published by the ILO, Lebanon has been in a state of emergency since mid-March 2020 and is struggling to cope with the COVID-19 pandemic during its worst economic and financial crisis in decades.**

- Some 819,000 workers in Lebanon are employed in the six high-risk sectors: accommodation and food services, manufacturing, construction, wholesale and retail trade, real estate and business activities, and arts and entertainment.
- High-risk sectors employ almost half of the Lebanese workforce (610,000 workers) and 60 per cent of non-Lebanese workers (208,000 workers).
- Women are disproportionately exposed to significant health and economic risks, as they make up 61.3 per cent of workers in human health and social work activities, which puts them in the frontline in the fight against COVID-19.
- Prior to the crisis, half of employed young people were working in high-risk sectors and almost a quarter were not in employment, education or training (NEETs). With disruptions in education and training, and limited prospects for work due to the COVID-19 containment measures and the deteriorating economic situation, youth inactivity and NEET rates are expected to increase significantly. Informally employed individuals and low wage workers are among the most vulnerable groups hit by the crisis: almost two-thirds of workers in the high-risk sectors are informally employed (63.9 per cent) and 75 per cent of low wage workers work in these sectors.



- Refugees and migrant domestic workers are also particularly disadvantaged as they face exacerbated challenges and discriminatory practices that impact their employment and livelihoods.
- To address the employment and labor market challenges in Lebanon, short-term interventions are required to alleviate the economic and social pressure on households, workers and businesses, in addition to medium- to long-term measures that would help ensure sustainable employment and labor market outcomes. These include the development of a comprehensive National Employment Policy and a review of the macroeconomic framework to shift away from the current “rentier” economy towards a more productive and diversified economy that is able to create decent employment for all.

The BDD talent Hub will establish and maintain a safe working environment consistent with the national law and ESS2 for all project workers. All project workers will sign the BDD Talent Hub employee handbook and code of conduct which contains provisions on terms and conditions of employment, non-discrimination, and equal opportunities for employment, worker’s organizations, and restrictions on child and forced labor, and prevention of SEA/SH. Code of Conduct is found in Annex 2.

#### 4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

The following laws and legislation provide basis for sound and safe working conditions to the employees working under this project. According to the Lebanese Labor Law No. 23 dated September 1946, an employee is any person who works for consideration of a wage or salary. It has declared many rights to the employees among them: no one may commit by any work for lifetime and contract can be either oral or written.

Legislation	Illustration of Relevant Content
Terms and Conditions of Employment	<p><b>Article 31:</b> Forty-eight hours are the maximum duration of work per week.</p> <p>This is in line with ESS2.</p> <p><b>Article 34:</b> Whenever the duration of work exceeds six non-stop hours for men and five non-stop hours for women, the employer should allow them in the middle of the day, a resting time which is not to be under one hour.</p> <p>This is in line with ESS2.</p> <p><b>Article 36:</b> All employees are to be granted a weekly rest which must not be under thirty-six unbroken hours.</p> <p>This is in line with ESS2.</p>

	<p><b>Article 38:</b> All employees whose father, mother, spouse, children, grandchildren or ascendants have died are entitled to two-day holiday with full pay.</p> <p>This is in line with ESS2.</p> <p><b>Article 39:</b> Every employee in an establishment for at least once a year is entitled to an annual leave of fifteen days with full pay.</p> <p>This is in line with ESS2.</p> <p><b>Article 44:</b> The minimum pay must be sufficient to meet the essential needs of the wage-earner or salary-earner and his family. Pay is not to be less than the official minimum pay.</p> <p>This is in line with ESS2.</p> <p><b>Article 50:</b> The employer and the worker shall each have the right to terminate, and at any time the work contract of unspecified duration concluded between them. The aggrieved party shall be entitled to claim indemnity. The employer and the worker shall each be required to advise the other of intent to terminate the contract, one month in advance in case a period equal or under three years has elapsed since the implementation of the work contract, two months in advance in case more than three years and less than six years have elapsed, three months in advance in case more than six years and less than twelve years have elapsed, and four months in advance in case twelve years or more have elapsed.</p> <p>The dismissal notice may not be served on an expectant mother, the woman on delivery leave and any wage-earner or salary-earner on ordinary holiday or on sick leave.</p> <p>This is in line with ESS2.</p>
<p>Child Labor and Minimum Age</p>	<p><b>Article 22:</b> It is absolutely forbidden to set to work adolescents who have not yet completed their thirteen year of age.</p> <p>As per ESS2, the minimum age of employment or engagement in connection with the project shall be 14 therefore for these particular requirements of the ESF, ESS2 will apply because it is more stringent. Please note that 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, interfere with the child’s education, or be harmful to the child’s health or physical, mental, spiritual, moral, or social development.</p>

	<p><b>Article 24:</b> The establishment of the age of children and adolescents shall be affected under the responsibility of employers, irrespective of the categories to which they belong.</p> <p>This is in line with ESS2.</p>
<p>Nondiscrimination and Equal Opportunity</p>	<p><b>Article 26:</b> The employer may not discriminate between working men and working women with regard to type of work, amount of wage or salary, employment, promotion, professional qualification and apparel.</p> <p>This is in line with ESS2.</p> <p><b>Article 28:</b> Women working in all categories, mentioned in the present law are entitled to a delivery holiday of seven weeks, comprising the period before and the period after delivery, on presentation of a medical certificate stating the presumed date of delivery. It is forbidden to dismiss or to serve notice of dismissal on a woman lying-in, unless she is convicted of having been employed elsewhere in the course of the said period.</p> <p>This is in line with ESS2.</p> <p><b>Article 29:</b> The wage or salary shall be paid in full during delivery holiday.</p> <p>This is in line with ESS2.</p>
<p>Prevention of Sexual Harassment</p>	<p>A standalone Law no. 205 criminalizing sexual harassment was passed in December 2020. This law targets all types of sexual harassment, in any setting, and especially in the workplace.</p> <p>As per the law, perpetrators can be sentenced up to two years in prison and fined up to 20 times the value of the minimum wage, which stands at 675,000 Lebanese pounds, according to Lebanese rights group Legal Agenda.</p> <p>The punishment increases between six months and two years in prison and a fine of between 10 and 20 times the minimum wage if there is a “relationship of dependency” or work between the perpetrator and the victim; if the perpetrator uses their position of power over a colleague; or if the harassment occurs at a range of state institutions, universities, schools or on transport services.</p> <p>Maximum penalties are reserved for harassment in the workplace, public institutions or educational facilities.</p> <p>In addition, relevant measures as per the World Bank’s Good Practice Note on addressing sexual exploitation and abuse and sexual harassment (SEA/SH) will be followed as necessary.</p>

## 5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Lebanese Labor Law further provides legislations regarding occupational and health safety. These legislations revolve around prevention and safety and hygiene.

Legislation	Illustration of Relevant Content
Occupational Health Safety	<p><b>Article 3:</b> The employer must install a safety (security) fence at the following locations: round any flywheel in direct connection with the main engine (motor), at the tip and extremities of any hydraulic wheel, round all electricity generators, round each part of transmission machine and around any dangerous part of machine.</p> <p><b>Article 6:</b> The employer shall take all necessary measures to prevent fires and shall provide appropriate fire extinguishers.</p> <p><b>Article 10:</b> Any staircase or ladder must be provided with a strong manual banister. All steps, passage-ways and gangways must be protected with a strong railing.</p> <p><b>Article 22:</b> It is forbidden to ask or authorize employees to manually transport any load which, by reason of its weight, may endanger health and safety of the employee.</p> <p><b>Article 25:</b> All concerns must maintain their work places in a good state of cleanliness, free from unhealthy emanations.</p> <p><b>Article 28:</b> Suitable sanitary installations must be put at the disposal of employees, in sufficient number. Cleanliness and good lightening must be provided. The floors should be built with solid materials and the doors firmly closed from the inside.</p> <p>All the above in line with ESS2</p>

A risk of COVID-19 contagion still remains, therefore the BDD Talent Hub will ensure that the below provisions apply for all categories of project works and these are:

- The health conditions of the workers will be assessed prior to engaging them in the Project, and sick workers will be refused entry to the work places.
- Adherence to the Government and WHO protocols guidelines related to COVID-19.
- Trainings for workers on hygiene and other preventative measures will be carried out, and a communication strategy for regular updates on COVID-19.
- Adjustments will be made to work practices to reduce the number of workers and increase social

distancing following the government and WHO guidelines procedure if a worker becomes sick.

- Adequate supplies of Personal Protective Equipment (such as masks); hand washing facility, soap and/or alcohol-based sanitizer, will be made available at the worksites.

The BDD Talent Hub will adopt the below WHO guidance documents:

- WHO guidance getting your workplace ready for COVID-19: <https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf>.
- WHO interim guidance: For guidance on water, sanitation and health care waste relevant to viruses, including COVID-19. [https://apps.who.int/iris/bitstream/handle/10665/331846/WHO-2019-nCoV-IPC\\_WASH-2020.3-eng.pdf](https://apps.who.int/iris/bitstream/handle/10665/331846/WHO-2019-nCoV-IPC_WASH-2020.3-eng.pdf).

The BDD Talent Hub will report to the World Bank any incident or accident to the Bank within 48 hours after becoming aware of the occurrence of the incident or accident as detailed in the ESCP.

## 6. RESPONSIBLE STAFF

To ensure a successful implementation of the SUL project components, there is a need to define roles and responsibilities of the key workers in the project. In total, five employees will be recruited to work on the SUL project. The team will be responsible for the establishment of a project governance structure, partnerships establishment, launch and management of the Training Grant Program and finally the release of a job market digest. The team will consist of the Executive Director, the Digital Skills Expert, the Job Market Coordinator, the Communication Coordinator, and the Training Coordinator.

The Executive Director will be full-time consultant responsible for leading the SUL project to ensure achieving its intended objectives. In addition, the Executive Director will manage the below workers:

- The **Job Market Coordinator**, who will be a part-time consultant, responsible for managing the career platform, researching the market to identify job opportunities across corporations and matching talents with the right opportunities.
- The **Communication Coordinator**, who will be a full-time consultant, responsible for developing and implementing a comprehensive communication and marketing strategy, which aims to promote the SUL project's impact on youth empowerment and employment.
- The **Training Coordinator and E&S Specialist**, who will be a full-time consultant, responsible for ensuring smooth running of daily activities related to the program, support the team, handle program coordination and manage general administrative activities. The Training Coordinator will be also the Environmental and Social focal point to follow-up on the Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Grievance log and reporting, and overall implementation and reporting on the ESCP.

The **Digital Skills Expert** will be a part-time consultant responsible for setting, managing as well as assessing the digital strategy of the project.

There will be an evaluation committee from the team to evaluate the proposals submitted by the contracted workers. Once the Contracted Workers are agreed upon, they will be responsible for sourcing participants according to the terms in the contract, training delivery, measuring impact and project management.

## 7. POLICIES AND PROCEDURES

BDD Talent Hub has the overall responsibility to oversee all aspects of the implementation of the LMP.

Five direct workers will be recruited to lead and support the implementation of the SUL project. All the workers will be briefed by BDD Talent Hub HR about the policies and procedures that apply to the working environment and during working hours. All the employees should fulfill the following eligibility criteria:

- Minimum qualification is a bachelor degree or equivalent
- Minimum age shall be 18
- Minimum requirements: residing in Lebanon and eligible to work
- Clear criminal record

All project workers will sign a code of conduct. Workers shall ensure adherence to Codes of conduct (CoC). The CoC commits all direct and contracted workers to acceptable standards of behavior. The CoC will include sanctions for non-compliance, including non-compliance with specific policies related to sexual exploitation and sexual harassment (e.g., termination). The CoC will be written in plain and culturally appropriate language and signed by each worker to indicate that they have:

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

As the project does not involve construction work and/or sites or any physical work, there should be no aspects of child labor. However, key risks might arise from emergencies related to health and safety of the employees, including COVID19 contagion, and/or emergencies related to political and economic turmoil within the country, as well as sexual harassment. In general, a policy is a statement which details how issues will be dealt with in an organization. Policies reinforce and clarify standard operating procedures in the workplace. BDD Talent Hub is committed to provide all necessary trainings and practices to ensure policies are followed and if necessary, BDD might take disciplinary actions when individuals fail to comply with the policies and procedures. In particular, the following measures will be implemented to ensure that all staff are aware and will adhere to the set policies to guarantee safe and fair treatment of all employees:

Anticipated Risk	Measures followed:
<p>Emergencies related to health and safety and COVID19 contagion procedures</p>	<ul style="list-style-type: none"> <li>• Clear explanation of hazards at work –if any and how to deal with it</li> <li>• Explanation to employees what do in case of fire or other emergencies</li> <li>• Information about prohibited or restricted areas – if any</li> <li>• Maintain safe and healthy work conditions</li> <li>• Provide work environment free from risks related to health and safety of the employee</li> <li>• Provide facilities for employees’ welfare</li> <li>• Monitor the health of employees and the workplace conditions to prevent illness/injuries.</li> <li>• Employees shall take care of their health and safety</li> <li>• Employees are expected to report incidents related to their health and might cause illness to their coworkers</li> <li>• Employees are expected to report any observed hazards to their manager/supervisor</li> <li>• The health conditions of the employees will be assessed prior to engaging them in the Project, and sick workers will be refused entry to the work places.</li> <li>• Adherence to the Government and WHO protocols guidelines related to COVID-19.</li> <li>• Trainings for employees on hygiene and other preventative measures will be carried out, and a communication strategy for regular updates on COVID-19.</li> <li>• Adjustments will be made to work practices to reduce the number of workers and increase social distancing following the government and WHO guidelines procedure if a worker becomes sick.</li> <li>• Adequate supplies of Personal Protective Equipment (such as masks); hand washing facility, soap and/or alcohol-based sanitizer, will be made available at the worksites.</li> </ul>
<p>Emergencies related to political or economic turmoil in the country procedures</p>	<ul style="list-style-type: none"> <li>• Protective actions will be followed such as evacuation and sheltering of the employees</li> <li>• Lockdown shall be followed until the situation gets back to normal in the country</li> </ul>

<p>Sexual harassment related procedures</p>	<ul style="list-style-type: none"> <li>• BDD Talent Hub considers any physical conduct, verbal conduct or non-verbal conduct as sexual harassment. Physical conduct includes physical contact: touching, pinching, hugging and other similar acts without the approval of the other person, in addition to using job related issues such as rewards to solicit sexual behaviors. Verbal conduct includes acts as comments of physical appearance, age and private life of the employee, sexual comments and jokes, and insults based on the sex of the employee. Non-verbal conduct includes whistling, leering and displaying of sexually explicit subjects.</li> <li>• Any employee can be a victim of sexual harassment regardless of the sex, and the sex of the harasser.</li> <li>• BDD Talent Hub is committed to provide a safe environment for all of its employees free from discrimination on any ground and from any kind of harassment including sexual harassment.</li> <li>• BDD Talent Hub will operate zero tolerance policy for any form of sexual harassment at work, and will treat all incidents in a very serious manner, and will take legal actions.</li> <li>• Disciplinary actions will be taken against the employee who performs the action, up to being dismissed from the work.</li> <li>• All complaints of sexual harassment shall be treated in a serious manner and with high level of confidentiality.</li> <li>• All employees shall be encouraged to make complaints and will not be victimized for doing so.</li> <li>• All sexual harassments are prohibited whether they take place within BDD Talent Hub premises or outside.</li> <li>• Employees are required to fill or report GRM log in case of any sexual harassment incident and all complaints will be handled with a survivor-centric approach.</li> </ul>
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All grantees, such as the training providers, shall sign a legally binding Code of Conduct that will ensure accountability and this Code of Conduct will also serve as a preset condition for receiving any grant.



## 8. AGE OF EMPLOYMENT

Based on the Lebanese Labor Law, the minimum age of employment is 13 for light type of works. The retirement age is 64 years old. However, minimum age of employment on this project is 18.

It is required to verify and identify the age of the employed workers under this project. To do so, potential employees will be requested to present official documents at the time of recruitment. These official documents can include: national ID, passport or civil status record.

## 9. TERMS AND CONDITIONS

Terms and conditions of labor will be guided under the Lebanese Labor Law. Employees should be residing in Lebanon, working from the office located at BDD or conducting remote work. Schedule of work will be held Monday to Friday from 9:00 a.m. till 5:00 p.m. Once hired, the employee will be read the employees' handbook to get informed about the working conditions which will be as following:

- The remuneration for each post will be determined based on the candidate's experience and the Terms of Reference
- Full time employees will be working for 5 days per week and 8 hours per day with a maximum number of 40 hours per week.
- Flexible working arrangements
- Payment in USD will be made on monthly basis
- Class B insurance and NSSF will be provided
- 15 days of yearly vacation will be provided
- Public Holidays as per the Lebanese Labor Law
- Free parking access
- Private lactation room

## 10. GRIEVANCE MECHANISM

The grievance mechanism described in this section includes grievance (hereinafter referred to only as 'grievances'). Grievances raised by stakeholders will be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. In addition, a GRM (Grievance Redress Mechanism) log is to be utilized to keep track of all the grievances that are reported and which will be documented as part of the regular progress reporting. A sample log could be found in Annex 1.

This grievance mechanism sets out the following steps to be taken to resolve grievances, the role of different staff members involved and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Lack of access to project benefits (ex: proposals rejected, training request denied, etc.)
- Health and safety risks; and
- Unacceptable standards of trainings delivered.
- Sexual exploitation and abuse and sexual harassment (SEA/SH) related complaints.

It is critical that workers understand that all grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism and will ensure the confidentiality and anonymity of the concerned party.

The channels that are available for direct and indirect workers to register any grievances are as follows:

- Phone: +961.1.660.941
- Email address: [mariam@bddacademy.com](mailto:mariam@bddacademy.com)
- Website: <https://beirutdigitaldistrict.com/>

The hours of operations of the GRM shall be from Monday to Friday, 9AM-5PM. The timeline for closure of grievances shall be no longer than 5 working days, and the outcome will be communicated by the Executive Director.

All complaints except the SEA/SH ones will be directed to the program coordinator who will involve the right parties. SEA/SH complaints shall be directly escalated to the Executive Director who will ensure confidentiality and a survivor-centered approach as per the [World Bank's Good Practice Note](#) and ensure referral of survivors to the relevant service providers where necessary. The complaint shall be logged onto the GRM log and will be documented as part of the BDD's regular progress reporting and as per the provisions of the Environmental and Social Commitment Plan (ESCP). BDD will ensure data confidentiality of all registered complainants.

## **11. CONTRACTOR MANAGEMENT**

For the selection process of contractors, which are the training providers, a request for proposal will be sent out, based on which proposals will be submitted. An evaluation committee will be formed to assess the proposals based on specific standards. As a result of this transparent process, the training provider will be selected. A contract will be signed with the training provider. Labor requirements, including specific sections on occupational health and safety, will be incorporated into the specifications of the procurement documents, grant agreements and contracts with contractors/trainers.

As part of managing and measuring the performance of the training providers and following the requirements of the ESS2 of the ESF, the BDD Talent Hub will establish procedures for managing and monitoring the performance of the training provider. In addition, the BDD Talent Hub will incorporate the requirements of the ESS into contractual agreements with training providers, together with appropriate noncompliance remedies. The BDD Talent Hub will enforce periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by the training providers. The training management labor management records and reports may include:

- (a) a representative sample of employment contracts or arrangements between training providers and contracted workers;
- (b) records relating to grievances received and their resolution;
- (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions;

(d) records relating to incidents of noncompliance with national law; and

## **12. COMMUNITY WORKERS**

There will be no community workers hired on this project.

## **13. PRIMARY SUPPLY WORKERS**

There are no primary supply workers under this project.



## Annex II Code of Conduct

As per the World Bank definitions, SE or Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. SA or Sexual abuse is any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. SH or Sexual harassment is any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.

BDD Talent Hub expects that each employee conduct himself or herself in a way that reflects the conduct standards which BDD Talent Hub has set.

All employees are accountable for conducting themselves in a responsible and ethical manner that upholds and promotes BDD Talent Hub values. This includes representing BDD Talent Hub in a **professional** manner at all times by applying the highest standards of ethical behavior, appropriate conduct, and professional attire in everything performed.

Employees are encouraged to socialize and develop **professional relationships** in the workplace, provided that these relationships do not interfere with the work performance of either individual or with the effective functioning of the workplace. Employees who engage in personal relationship (e.g. romantic ones) should be aware of their professional responsibilities, and will be responsible for assuring that the relationship does not raise concerns about favoritism, bias, ethics and conflict of interest. If such a relationship currently exists or develops, it must be disclosed to your direct manager.

## Disciplinary Policies

BDD Talent Hub has a set of policies to protect its employees and these are:

### **Anti-Harassment Policy**

Employees are prohibited from harassing others both on and off the BDD Talent Hub's premises and during or outside of work hours. Harassment based upon an individual's sex, race, ethnicity, national origin, age, religion or any other legally protected characteristics will not be tolerated. Sexual harassment that is persistent or offensive and interferes with an employee's job performance or creates an intimidating, hostile or offensive work environment is not tolerated at BDD Talent Hub. Harassment can be physical and psychological in nature. An aggregation of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing. If an employee feels that he or she is being subjected to harassment, he or she may immediately inform the harasser that the conduct is unwelcome and needs to stop. If the inappropriate conduct does not cease, or if the employee is unable to or uncomfortable with addressing the alleged harasser directly, he or she should report the incident to his or her own supervisor or to the Human Resources Department.

Employees who harass their colleagues will go through our disciplinary process and we may reprimand or terminate their contract depending on the severity of their offense.

### **Anti-Discrimination Policy**

BDD Talent Hub will not tolerate any kind of discrimination that creates a hostile and unpleasant environment for employees, interns or volunteers. Discrimination upon an individual's sex, race, ethnicity, national origin, age, religion or any other legally protected characteristics will not be tolerated. We recognize that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to identify and overcome. In case we conclude that an employee unconsciously discriminates, we will support them through training and counseling and implement processes that mitigate biases. If this person shows unwillingness to change their behavior, we may reprimand or terminate their contract.

### **Adherence:**

*I understand that I have read the BDD Talent Hub Employee Handbook.*

*I acknowledge that I have read the Individual Code of Conduct, I do agree to comply with the standards contained in this document, and I understand my roles and responsibilities to prevent and potentially report issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.*

*I, \_\_\_\_\_, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (employee/contractor) of BDD Talent Hub, I acknowledge that SEA and SH activities on BDD Talent Hub premises and outside its premises constitute a violation of this Code of Conduct. I will **Not** participate in sexual contact or activity with anyone below the age of 18, **regardless of the age of majority or age of consent locally**. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH may be pursued if appropriate.*

Name:

Title:

Signature:

Date: