Labor Management Procedure (LMP)
for the Excellence in Learning in Liberia Project (P181455), Ministry of Education – Republic of Liberia

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ACRONYMS

Acronym	Meaning
C-ESMP	Contractor Environmental and Social Management Plan
CoC	Code of Conduct
COVID-19	Coronavirus Disease 2019
EHS	Environmental, Health and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRS	Environmental and Social Review Summary
ESS	Environmental and Social Standard
EXCEL	Excellence in Learning in Liberia Project
FM	Financial Management
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
HR	Human Resources
IDA	International Development Association
IPF	Investment Project Financing
IT	Information Technology
LMP	Labor Management Procedures
MoE	Ministry of Education
OHS	Occupational Health and Safety
PDT	Project Delivery Team
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
TLM	Teaching and Learning Materials
WB	World Bank
WASH	Water, Sanitation and Hygiene

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1. INTRODUCTION

1.1 Purpose of the Labor Management Procedures

These Labor Management Procedures (LMP) have been prepared for the Excellence in Learning in Liberia (EXCEL) Project to establish a structured, legally compliant, and operationally robust framework governing the engagement and management of all categories of project workers. The LMP defines the policies, standards, and procedures that will regulate labor recruitment, employment conditions, occupational health and safety, conduct, grievance redress, and monitoring arrangements throughout the life of the project. The EXCEL Project is financed through an International Development Association (IDA) credit of US$60 million and a Global Partnership for Education (GPE) grant of US$28.7 million, bringing total financing to US$88.7 million. The project is implemented by the Ministry of Education (MoE) of the Republic of Liberia and operates nationwide. Given its scale, geographic footprint, and Substantial Environmental and Social Risk Classification, labor management under EXCEL requires a comprehensive and carefully structured approach.

The purpose of this LMP is therefore not merely procedural. It is intended to ensure that labor under EXCEL is managed in a manner that:

- Promotes fair treatment, transparency, and non-discrimination;
- Protects workers' rights consistent with Liberian labor law and international good practice;
- Prevents child labor and forced labor;
- Ensures safe and healthy working conditions, particularly in school environments where children are present;
- Integrates SEA/SH prevention and safeguarding measures into labor systems;
- Establishes clear, confidential, and accessible grievance mechanisms for workers.

This LMP fulfills the commitment set out in the Environmental and Social Commitment Plan (ESCP), which requires preparation and disclosure of Labor Management Procedures within ninety (90) days after the Effective Date. It is therefore both a compliance instrument and an operational management tool.

1.2 Project Overview and Context

The Excellence in Learning in Liberia (EXCEL) Project is an Investment Project Financing (IPF) operation with the Project Development Objective (PDO) to improve foundational learning and access in public primary schools and to strengthen the education system.

The project is structured around four components:

1. **Improving foundational learning for all.**
2. **Improving access for all.**
3. **System strengthening to deliver foundational learning.**
4. **Project management and technical assistance**

EXCEL will be implemented nationwide across Liberia's fifteen counties and will directly support approximately 2,337 public primary schools, benefiting an estimated 362,000 students and more than 12,000 teachers and school leaders. The scale of implementation implies the engagement of multiple categories of workers across administrative, technical, and construction domains.

The Environmental and Social Review Summary (ESRS) confirms that the project will support renovation and rehabilitation of school facilities, including sanitation and WASH infrastructure, primarily within

existing school premises. Based on the project's civil works packaging, rehabilitation, construction and WASH improvements are expected to be delivered across an indicative total of 400 to 800 classrooms over the project lifecycle, organized into procurement lots of approximately 10-20 schools each. At peak implementation, approximately 5-10 lots may be active concurrently. While the environmental footprint of works is expected to be limited and site-specific, the presence of civil works activities within active school compounds introduces heightened occupational health and safety risks. While the environmental footprint of works is expected to be limited and site-specific, the presence of civil works activities within active school compounds introduces heightened occupational health and safety risks, as well as safeguarding concerns. In addition to infrastructure interventions, EXCEL involves extensive teacher professional development, data systems strengthening, distribution of teaching and learning materials (TLMs), and institutional capacity building. Labor engagement therefore extends beyond construction workers to include direct project staff, consultants, master trainers, enumerators, logistics providers, and primary suppliers.

The ESRS also identifies substantial social risks, particularly in relation to gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH), especially within school environments. Given that project implementation will occur in environments populated primarily by minors, the LMP must incorporate heightened safeguarding standards and strict codes of conduct applicable to all workers. The national context further reinforces the importance of structured labor management. Liberia's education system is undergoing reform to address foundational learning gaps, teacher qualification challenges, infrastructure deficits, and system management weaknesses. EXCEL is positioned as a transformational operation within this reform trajectory. Sound labor management is therefore essential not only for compliance, but also for institutional credibility and sustainability.

1.3 Alignment with the World Bank Environmental and Social Framework (ESS2)

Environmental and Social Standard 2 (ESS2): *Labor and Working Conditions* is identified as relevant to the EXCEL Project. ESS2 requires borrowers to promote sound worker-management relationships and ensure that project workers are treated fairly, provided with safe working conditions, and afforded mechanisms to raise grievances.

The LMP has been developed in full alignment with ESS2 and reflects its core objectives:

- It establishes clear procedures governing the engagement of direct, contracted, primary supply, and community workers. This ensures clarity in contractual relationships and allocation of responsibilities.
- Second, it defines standards for working conditions, including wages, working hours, leave entitlements, and non-discrimination, consistent with Liberian labor legislation.
- Third, it sets out occupational health and safety requirements applicable to construction and non-construction activities. The ESRS requires contractors to prepare Contractor Environmental and Social Management Plans (C-ESMPs), including waste management and OHS provisions. The LMP complements this requirement by defining labor-specific OHS obligations and incident reporting procedures.
- Fourth, it prohibits child labor and forced labor and requires age verification and documentation for all contracted workers, particularly in rural construction settings.
- Fifth, it mandates the adoption and enforcement of Codes of Conduct addressing SEA/SH, with special safeguards reflecting the school-based nature of project sites.
- Finally, it establishes a dedicated worker grievance mechanism consistent with ESS2 requirements, separate from but linked to the project-level Grievance Redress Mechanism.
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Through these measures, the LMP operationalizes ESS2 within the specific risk context and institutional framework of EXCEL.

1.4 Linkages with Other Project Instruments

The Labor Management Procedures are embedded within the broader environmental and social risk management framework of the EXCEL Project and must be read in conjunction with the following instruments.

- The Environmental and Social Review Summary (ESRS) establishes the Substantial Environmental and Social Risk Classification and identifies labor-related risks including occupational health and safety and SEA/SH concerns. The LMP translates these identified risks into enforceable labor standards and procedures.

- The Project Appraisal Document (PAD) provides the project design, implementation arrangements, and financing structure. It confirms the establishment of a Project Delivery Team (PDT) that includes Environmental and Social specialists responsible for oversight of ESF instruments. The LMP assigns labor monitoring responsibilities within this institutional structure.

- The Environmental and Social Commitment Plan (ESCP) includes a binding covenant requiring the preparation and implementation of Labor Management Procedures. The LMP fulfills this covenant and forms part of the legally enforceable commitments between the Republic of Liberia and the World Bank.

- The Environmental and Social Management Framework (ESMF) provides the screening and mitigation framework for subprojects. The LMP constitutes the labor-specific component of the ESMF and must be integrated into subproject-level instruments, including site-specific ESMPs and C-ESMPs.

- The Stakeholder Engagement Plan (SEP) outlines mechanisms for community engagement and identifies vulnerable groups, including girls and children at risk of exclusion. The LMP reinforces these objectives by ensuring that worker behavior and contractor activities do not undermine community trust or child protection safeguards.

- The Project Implementation Manual (PIM) establishes operational procedures for procurement, financial management, and implementation oversight. The LMP requires that labor-related clauses, Codes of Conduct, and OHS provisions be embedded within procurement documentation and contractual agreements consistent with PIM procedures.

- The EXCEL Grievance Redress Mechanism (GRM) Manual establishes a multi-tier grievance structure for community-level complaints. While the GRM primarily addresses project-affected stakeholders, the LMP introduces a worker-specific grievance channel that interfaces with, but remains distinct from, the community GRM to ensure confidentiality, particularly in SEA/SH cases.

Together, these instruments form an integrated environmental and social governance framework within which the LMP operates.

1.5 Scope of Application

These Labor Management Procedures apply to all individuals engaged in activities financed under the EXCEL Project, regardless of employment category or geographic location. The LMP covers direct workers employed or contracted by the Ministry of Education under the Project Delivery Team; contracted workers engaged by civil works contractors and subcontractors; primary supply workers providing goods essential to core project functions; and any community workers engaged in project-supported activities. Community worker activities under EXCEL include: administration of school improvement grants by

School Management Committee (SMC) members; community mobilization and facilitation support for the Back to My Classroom campaign; and minor logistical assistance at school level during project-supported campaigns or activities . The LMP applies across all fifteen counties of Liberia and to all project components, including foundational learning interventions, classroom construction and rehabilitation, WASH improvements, system strengthening, and project management.

2. OVERVIEW OF PROJECT LABOR USE

2.1 Estimated Number of Project Workers

The EXCEL Project is national in scope, implemented across Liberia's fifteen counties and targeting approximately 2,337 public primary schools. Given the diversity of interventions, system reform, training, materials production and distribution, and small-scale rehabilitation works, the total workforce engaged under the Project will not be a single fixed number. Instead, it will fluctuate by implementation phase, procurement packaging, and the number of civil works lots active at any given time. For planning and ESS2 compliance purposes, this LMP adopts an indicative workforce projection based on a practical implementation scenario consistent with EXCEL's operating context and the project's internal implementation planning assumptions. These estimates are not contractual ceilings; they are a management tool to ensure that labor risk controls (OHS, Codes of Conduct, worker GM access, supervision, and reporting) are adequately sized from the outset.

Key planning assumptions used for this projection:

- Project Delivery Team (PDT): A core team of approximately 15 direct workers, including Project Coordinator, fiduciary staff, safeguards, M&E, Education Specialists, and essential operational support (including drivers).
- Civil works packaging: Rehabilitation works are organized into lots of approximately 10 schools per lot, with small rehab and WASH improvements occurring across multiple sites.
- Concurrent implementation: Multiple lots may be active simultaneously. A conservative planning basis is to assume about five (5) lots active at peak during the height of construction.
- Contractor labor force per lot: A typical small rehab lot working across 10 schools may carry an average on-site workforce of 20–30 workers, including skilled trades, helpers, and supervision, moving between schools.
- Local labor: A significant share of unskilled and semi-skilled labor is expected to be recruited locally, especially for site clearing, minor demolition, material handling, and basic works.
- Consultants and training personnel: The project will engage consultants to produce knowledge products and deliver technical assistance; training delivery will require facilitators and field teams who may be engaged in waves rather than permanently stationed.
- Suppliers: TLMs, furniture, and construction material supply chains | Printer staff; bindery staff; warehouse staff; dispatch/logistics teams; workers employed by contractors' material suppliers (cement, aggregate, roofing, sanitation fittings) where those suppliers are ongoing and project-specific | Up to 50 (off-site); contractor material supplier workers as identified through screening | Periodic, tied to production and construction cycles | Not directly employed by MoE or contractors; subject to ESS2 primary supply screening and due diligence under Section 11.6. Contractor primary supply chains must be disclosed in the C-ESMP
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The EXCEL GRM framework confirms that the project will maintain systems for worker grievance handling and severe incident escalation, which will be applied across these worker categories.

Table 1: Indicative Projection of EXCEL Project Workers (Estimated Workforce Envelope)

Worker Group (ESS2 Category)	Typical Roles / Examples	Estimated Average No of Workers	Likely Engagement Pattern	Planning Notes / Assumptions
Direct Workers				
MoE / PDT core	Project Coordinator; safeguards; GBV specialist; procurement; FM; M&E; admin; drivers	15	Continuous (full project duration)	Indicative staffing composition: approximately 8 positions under project-specific fixed-term contracts or consultancy agreements (full LMP terms apply directly); approximately 7 positions expected to be seconded or assigned civil servants from MoE departments (terms of civil service employment apply; ESS2 obligations operationalized through MoE HR frameworks and supplemented by this LMP). Final staffing composition to be confirmed at project effectiveness
Short-term consultants	Technical authors; curriculum/learning specialists; systems/IT advisors; safeguards/ESMP support consultants	Up to 30 active at any time	Intermittent waves (short assignments)	Assumes multiple short consultancies overlap during reform rollouts and deliverable deadlines.
Training Delivery Teams	Master trainers; facilitators; training coordinators; enumerators for assessments	Up to 50 active during training windows	Periodic deployment (campaign style)	Size depends on rollout approach across 15 counties; engaged in cohorts; not constant year-round.
Contracted Workers				
Civil works contractor staff	Site supervisors; foremen; skilled trades (mason, carpenter, plumber, electrician); helpers; H&S focal	750	Time-bound (construction/rehab periods)	Assumes ~5 lots active at peak; ~25–30 workers per lot (moving between 10 schools).
Local laborers under contractors	Unskilled labor; material handlers; basic works support	500	Time-bound, site-specific	Assumes 40–60% of the contractor workforce at peak is local labor, depending on county labor availability.
Service providers / logistics	Distribution contractors; transporters; warehouse	50	Periodic	Peaks around materials distribution and major

	handlers under service contracts			procurement deliveries.
Primary Supply and Contractor's Primary Supply Workers				
Textbooks/TLMs and furniture supply chain Contractor Primary Supply Workers	Printer staff; bindery staff; warehouse staff; dispatch/logistics teams Subcontractors hired to supply materials and aggregates	Up to 100 (off-site)	Periodic, tied to production cycles	Not directly employed by MoE; requires supplier screening for child/forced labor risks and OHS in production.

Indicative total workforce envelope (all categories combined):

- Estimated Estimated Average Number of Workers will be approximately 1,500 persons when civil works, training rollouts, and material distribution overlap. Of this, the civil works component accounts for approximately 1,250 workers [civil works contractor staff: ~750; local laborers under contractors: ~500]. The remaining approximately 250 workers comprise training delivery teams, short-term consultants, service providers, and primary supply chain workers.
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- Note on interpretation: These totals do not imply that all workers are engaged simultaneously in one location. They reflect a national aggregate estimate, distributed across counties, suppliers, training sites, and school worksites.

2.2 Operational implications of this workforce projection

This workforce envelope has direct implications for how the LMP must be operationalized. A workforce of this size and dispersion requires: (i) consistent contractor enforcement systems; (ii) strong induction and Code of Conduct compliance for any worker entering school environments; (iii) scalable worker grievance channels; and (iv) adequate supervision capacity, particularly during periods when multiple lots are active concurrently. The GRM manual already establishes a Workers' Grievance Mechanism logic and severe incident escalation thresholds that should be mirrored in the LMP implementation system, especially for contractor labor and school-site safeguarding risks.

2.2 Categories of Project Workers

In accordance with ESS2, project workers under EXCEL are organized into four categories: direct workers, contracted workers, primary supply workers, and community workers (if applicable). This classification is not cosmetic; it is the basis for determining which terms and conditions apply, who is responsible for OHS compliance, how codes of conduct are enforced, and which grievance mechanisms workers can access.

2.2.1 Direct Workers (PDT, consultants, trainers, specialists)

Direct workers are personnel engaged directly by the Ministry of Education to implement EXCEL. They include staff assigned to the Project Delivery Team (PDT)/Project Implementation Unit (PIU) and individuals engaged through consultancy contracts, short-term technical assignments, and service agreements to deliver project activities. This category typically includes project coordination staff, fiduciary personnel (procurement, financial management), monitoring and evaluation staff, environmental and social specialists, education specialists, and GBV-related expertise. The EXCEL GRM Manual confirms that project implementation is managed through a MoE-led structure with safeguards staffing embedded in the project architecture, including a GRM Lead and GBV specialist functions, reflecting the project's Substantial social risk and the need for dedicated oversight.

In the education context of EXCEL, direct workers also extend to specialist consultants and facilitators engaged for curriculum-related technical assistance, teacher professional development delivery, training-of-trainers programming, and data and system strengthening support. These roles often involve

significant field travel, interaction with school staff, and work within school environments. Their labor risks differ from construction labor but remain material, particularly around safeguarding, ethical conduct, and travel-related OHS. Direct workers are covered by MoE employment/engagement terms and by the protections and requirements established in this LMP, including codes of conduct, SEA/SH prohibitions, and access to the worker grievance mechanism.

2.2.2 Contracted Workers (construction contractors, site laborers, service providers):

Contracted workers are individuals employed by third parties that enter into contracts with the Ministry of Education to deliver EXCEL-financed activities. It is important to note that site-level laborers employed under civil works contractors are not in a direct contractual relationship with the Ministry of Education. Their employment contracts are with the contractor or subcontractor. However, ESS2 requires the Project to ensure that the labor practices of contractors and subcontractors comply with this LMP. MoE's oversight of site labor is exercised through contract clauses embedded in the procurement documents, mandatory C-ESMP requirements, and supervision as detailed in Section 9.

This category is most visible in relation to civil works. The ESRS confirms that EXCEL will finance rehabilitation and renovation activities (including WASH improvements) primarily within existing school premises. Contracted workers therefore include contractor management staff and site-level labor, such as supervisors, skilled trades, and unskilled laborers. Because the works are located in school environments where children are present, contracted workers are subject to heightened safeguards: strict site access control, codes of conduct, zero tolerance for SEA/SH, and strong supervision requirements. These expectations are consistent with the risk framing presented in the GRM Manual, which establishes specialized handling for SEA/SH cases and requires strict confidentiality and rapid escalation for severe incidents. In addition to construction, contracted workers may include firms and personnel engaged for logistics, distribution, IT services, training delivery support, and other service contracts that involve temporary mobilization. For ESS2 purposes, these remain contracted workers and must be managed through contract provisions aligned with this LMP.

2.2.3 Primary Supply Workers (TLM printing, furniture suppliers, materials providers)

Primary supply workers are individuals employed by suppliers that provide goods essential to core EXCEL functions on an ongoing basis. In the EXCEL context, this can include production and supply chains associated with teaching and learning materials, school furniture, and construction inputs. While the Ministry of Education does not directly employ these workers, ESS2 requires the project to assess and manage risks in primary supply chains where there is a credible risk of child labor, forced labor, or serious safety issues. The practical implication for EXCEL is that supplier due diligence and contractual clauses must support responsible sourcing and labor compliance, particularly where supply chains are complex or operate across multiple tiers.

2.2.4 Community Workers (if applicable under school-level engagement)

Community workers, under ESS2, refer to community members engaged in project activities where their participation constitutes labor (paid or unpaid). EXCEL is not designed as a community labor program; however, it is implemented through schools and community-linked governance structures, and community members may support certain activities at school level, particularly in facilitation, monitoring, or minor logistical support.

Where community workers are engaged, their participation must be voluntary (where unpaid), clearly documented, and managed with appropriate protections. The EXCEL GRM Manual anticipates school-level structures, county escalation, and national oversight for grievance handling, providing a governance foundation that can accommodate community worker concerns if such labor engagement occurs.

2.3 Geographic Distribution of Labor

Labor under EXCEL is geographically dispersed across Liberia due to the project's national scope. The GRM Manual confirms that EXCEL implementation covers all fifteen counties, anchored in a decentralized structure that allows grievances and operational issues to be addressed at school, county, and national levels. Direct workers will be concentrated primarily at the national level (MoE/PDT), but many will be deployed periodically to counties and schools for supervision, training, and monitoring. Contracted workers will be distributed across the project footprint depending on the location of rehabilitation sites and WASH-related investments. Because works are expected to occur mainly within existing school premises, labor distribution will follow school selection and readiness sequencing, with site-level mobilization occurring in multiple counties in parallel where procurement packaging allows.

This geographic dispersion has direct implications for labor management. It requires standardized procedures that can be applied consistently across counties, clear reporting lines, and decentralized access to grievance channels, especially for workers who may be stationed far from Monrovia or operating in remote districts.

2.4 Timing and Phasing of Labor Engagement

Labor engagement under EXCEL will occur in phases aligned with the sequencing of project components and the readiness of schools to participate in different interventions. The GRM Manual notes that implementation will be phased based on school readiness and infrastructure conditions, despite the overall national scope.

In practical terms, the project will typically mobilize labor in three overlapping waves:

- Direct workers and technical consultants are mobilized early to establish project systems, finalize implementation arrangements, and initiate reform activities (including planning, training design, and system strengthening). These roles tend to begin at project effectiveness and continue throughout implementation, with fluctuating intensity depending on annual workplans.
- Contracted workers associated with civil works are mobilized progressively as rehabilitation and WASH packages are prepared, procured, and approved through environmental and social screening processes. Because these activities occur within active school environments, mobilization must be synchronized with school calendars, safety controls, and supervision arrangements.
- Supply and logistics-related labor peaks around procurement and delivery cycles for teaching and learning materials and related goods. These cycles may be periodic (annual or semi-annual) and will require attention to working conditions and safety in warehousing, loading/offloading, and transport. Where contractor procurement of materials involves the mobilization of supply-side labor, contractors are required to align such labor mobilization with their approved site work plans and the school calendar coordination requirements established under Section 6.3. Supply labor peaks must be captured in the Contractor's workforce register and reported in monthly labor compliance reports submitted to the PDT under Section 9.4.
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Across all phases, labor engagement is not static. The LMP therefore requires continuous monitoring, contractor reporting, and adaptive oversight to ensure that labor and working conditions remain compliant as workforce size, location, and risk exposure evolve.

3. ASSESSMENT OF KEY LABOR RISKS

The EXCEL Project is implemented in a complex operational environment characterized by nationwide geographic dispersion, active school settings populated by minors, and concurrent small-scale civil works.

The Environmental and Social Review Summary (ESRS) classifies the Project as having Substantial Environmental and Social Risk, reflecting both occupational health and safety (OHS) considerations and significant social risks, particularly those associated with gender-based violence (GBV), sexual exploitation and abuse (SEA), child labor, and sexual harassment (SH).--- The assessment below analyzes labor-related risks across categories of project workers, evaluating both the nature of the risk and the extent to which it may affect project implementation if left unmanaged.

3.1 Construction-Related Labor Risks

Although EXCEL is primarily an education reform initiative, its infrastructure component, comprising rehabilitation and WASH improvements within existing school premises, introduces construction-sector labor risks. These risks are not large-scale industrial hazards; however, they are significant because they occur in school environments where children and teachers remain present.

Occupational Health and Safety (OHS) Hazards
Civil works activities inherently expose contracted workers to physical hazards. These include falls from height during roofing or structural repairs, injuries from tools and machinery, manual handling strain, exposure to dust and debris, electrical risks during installation works, and slips or trips on uneven surfaces. What distinguishes EXCEL from a conventional construction project is that works occur within active school compounds.

This creates dual OHS exposure: risk to workers and risk to students. Poor site segregation, inadequate fencing, or uncontrolled movement between work areas and school spaces can result in injuries not only to contractor personnel but also to children. Given the projected workforce envelope and the potential for multiple lots to be active simultaneously across counties, OHS risks must be treated as systemic rather than incidental. Inadequate safety supervision at one site can undermine the overall safeguard credibility of the project.

Informal Labor Recruitment Risks
In rural and peri-urban Liberia, contractors often recruit unskilled labor locally. While this promotes economic inclusion, it may introduce informal employment practices. Workers may be hired verbally without written contracts, clear wage terms, or formal induction into OHS procedures. Informality increases the risk of wage disputes, excessive working hours, lack of PPE usage, and difficulty accessing grievance channels. The scale of rehabilitation activities under EXCEL, dispersed across numerous schools, creates conditions under which contractor oversight may weaken if supervision is inconsistent. Without robust registration and documentation requirements, local recruitment could inadvertently bypass ESS2 compliance obligations.

Child Labor Risks
Construction activities are classified as hazardous work under international labor standards. In socioeconomically vulnerable contexts, minors may seek employment for income support. The combination of local recruitment and limited documentation in rural areas creates a credible risk of underage workers being engaged in manual tasks. Given that works occur at school, institutions serving children, the presence of child labor would represent both a legal violation and a reputational crisis. This risk, while preventable, is assessed as moderate in probability but high in consequence, warranting strict preventive measures such as age verification protocols and workforce audits.

Interaction with School Communities
The interaction between contractor personnel and school communities represents one of the most sensitive labor interface risks under EXCEL. Contractor workers will be present in environments primarily populated by children, including adolescent girls. Unregulated interaction, inappropriate communication,

or boundary violations can lead to harassment, intimidation, or exploitation. Because the ESRS identifies SEA/SH as a relevant social risk under the Project, and the GRM Manual establishes special procedures for severe incidents, contractor conduct must be tightly managed. The risk is less about physical harm and more about behavioral misconduct, which can significantly undermine community trust.

Table 2: Construction-Related Labor Risk Assessment

Risk Category	Relevance to EXCEL	Probability (Low/Moderate/ High)	Impact if Unmanaged	Overall Risk Significance
OHS hazards (injury, falls, tools)	Directly relevant due to school-based rehab works	Moderate	High (worker injury, school disruption)	Substantial
Informal recruitment	Relevant in rural contexts	Moderate	Moderate (wage disputes, non-compliance)	Moderate
Child labor	Credible risk in local hiring contexts	Low–Moderate	Very High (legal/reputational impact)	High (due to severity)
Worker–student interaction risks	Highly relevant due to school setting	Moderate	High (safeguarding breach)	Substantial

3.2 Education Sector Specific Labor Risks

3.2.1 General Labor risks associated with the Education Sector

Unlike typical infrastructure projects, EXCEL's labor environment is embedded within the education sector. Direct workers, including trainers, facilitators, enumerators, and consultants will engage directly with schools and teachers across fifteen counties.

- **Exposure of Minors to Project Workers:** Because project implementation occurs in primary schools, minors are routinely present in the project environment. Exposure risk arises not only from contractor workers but also from direct workers who interact with students during monitoring visits, training support, or data collection. The risk lies in the power imbalance between adults associated with a national project and school-aged children. Even isolated misconduct can have severe psychological and social consequences. This risk is heightened in rural areas where formal reporting structures may be weaker.

- **Trainer and Enumerator Field Deployment Risks:** Teacher professional development and system strengthening activities require extensive field travel. Trainers and enumerators may travel long distances, sometimes under challenging road conditions. Risks include road accidents, fatigue-related errors, and personal security concerns in remote areas. While these risks are occupational rather than safeguarding-related, they affect worker welfare and must be addressed through travel protocols, supervision, and scheduling controls.

- **Overextension of School Personnel:** Although teachers are not "project workers" under ESS2, EXCEL interventions increase administrative and coordination demands on school leadership. Training participation, coordination of rehabilitation works, and engagement with monitoring teams may contribute to stress or fatigue. While indirect, this labor interface risk can affect workplace morale and increase the potential for conflict between school staff and project personnel.

3.2.1 Risks Associated with Overage and Adolescent Students in the Accelerated Learning Program (ALP)

The EXCEL Project includes support for the Accelerated Learning Program (ALP), which serves overage students, adolescents who are significantly older than their primary school peers, within the same school environments targeted by project interventions. This population represents a particularly vulnerable group requiring dedicated risk consideration within the LMP's social risk framework.

The presence of ALP students introduces a distinct risk dynamic that differs from the general student population. Overage adolescents, particularly girls, may be more susceptible to targeted exploitation, transactional relationships, or coercive behavior by adult project workers, including contractors, trainers, and enumerators deployed within school settings. The risk is compounded by the power imbalance inherent in the relationship between adult project personnel associated with a nationally financed initiative and adolescents who may face economic vulnerability or limited awareness of their rights and available reporting channels. This risk is not primarily driven by labor influx but by repeated and normalized proximity between adult workers and older adolescent students across multiple project sites and counties. Even where individual interactions appear routine, cumulative exposure without adequate behavioral controls can create conditions conducive to misconduct.

The following mitigation measures are explicitly required to address this risk:

- The Code of Conduct (Section 7 and Annex 1) applies without exception to interactions with ALP students, who, regardless of age, remain enrolled minors entitled to full child protection safeguards under Liberian law and ESS2.
- Contractor and direct worker inductions must explicitly address the presence of ALP students and reinforce that no sexual relationship, exchange of favors, or inappropriate communication with any student, including older adolescents, is permissible under any circumstance.
- The SEA/SH prohibitions detailed in Section 7.2 and the SEA/SH Compliance Addendum (Annex 1a) apply with equal force to interactions with ALP students.
- The Worker Grievance Mechanism (Section 8) is exclusively the channel for project workers to raise workplace complaints, including complaints relating to SEA/SH. Grievances from children, adolescent students, and other community members, including ALP students, are addressed through the project-level Grievance Mechanism as established in the GM Manual, using age-appropriate and safe reporting channel Supervision protocols under Section 9.3 should specifically flag ALP-hosting schools for heightened behavioral monitoring during contractor site visits.

This risk is assessed as moderate in probability but very high in consequence, given the severity of potential harm and the reputational and legal implications of any incident involving adolescent students. It is therefore classified as Substantial in overall significance, consistent with the Project's broader social risk classification under the ESRS.

3.2.2 Risks Associated with Community Volunteers and School Management Committee Members

The Project also engages community members in school-level activities, including School Management Committees (SMCs) that administer school improvement grants, and volunteers supporting campaigns such as "Back to My Classroom." While these individuals are not formal project employees, their participation constitutes community labor engagement within the meaning of ESS2, and their conduct within school environments carries material social risk implications that must be addressed in this LMP.
Community volunteers and SMC members operate with a degree of authority and proximity to students and school staff that, if unmanaged, can create risks of misconduct, abuse of influence, or exclusion of vulnerable community members from project benefits. The informal nature of their engagement — often

undocumented and without structured orientation, increases the likelihood that behavioral expectations, safety protocols, and grievance rights are not adequately communicated or understood.
Specific risks include:

- **Conduct risks:** All community volunteers associated with the project who provide services as part of project delivery — including SMC members and Back to My Classroom Community Volunteers — must sign a simplified Community Code of Conduct prior to commencing activities. This Code must clearly define SEA/SH and explicitly state the consequences of non-compliance, including removal from project-supported activities and referral to relevant authorities. The PDT Social and GBV Specialist shall develop the simplified CoC template and ensure its distribution and collection before engagement.
- **Safety risks:** Volunteers supporting physical activities at school level, such as mobilization campaigns or grant-related logistics, may be exposed to occupational hazards without access to appropriate safety guidance or protective equipment.
- **Grievance exclusion risks:** Community workers who lack awareness of available grievance channels may be unable to raise concerns related to their own treatment or to report misconduct they witness, undermining the broader accountability framework of the Project.

Mitigation measures to address these risks are detailed in Section 10 of this LMP, which governs the engagement of community workers. These include the provision of safety information and PPE where applicable, orientation on behavioral expectations, and assured access to the Worker Grievance Mechanism established under Section 8. Cross-reference is also made to the Stakeholder Engagement Plan (SEP), which identifies community volunteers and SMC members as relevant stakeholder groups requiring structured engagement.

This risk is assessed as low to moderate in probability but moderate to high in consequence where safeguarding or safety failures occur, yielding an overall significance of Moderate to Substantial depending on the nature and scale of community engagement at any given site.

3.3 SEA/SH and SRGBV Risks

Gender-based violence and sexual exploitation risks are among the most serious labor-related concerns under EXCEL. The ESRS and the project's safeguard architecture recognize these risks explicitly.
The presence of contractor workers in schools introduces a gendered risk dynamic, particularly for adolescent girls. Risks include sexual harassment, coercive behavior, inappropriate communication, and transactional exploitation.. These risks are primarily contextual rather than influx-driven at the project level. However, where multiple civil works lots are active concurrently in close geographic proximity — for example, several schools within the same district community being rehabilitated at the same time — the cumulative concentration of contractor workers may create localized influx conditions with associated risks of resource competition, community tension, and elevated SEA/SH exposure equivalent to those associated with larger labor camps. Contractors operating in such conditions shall implement enhanced behavioral controls, increase site supervision frequency, and ensure that community liaison mechanisms are active. The PDT shall flag concurrent lot activity in close proximity as a trigger for heightened GBV risk monitoring

Safeguarding obligations under EXCEL must therefore be treated as a core labor management issue. Codes of Conduct must prohibit sexual relations with minors, harassment, discrimination, and retaliation. Enforcement must be real, not symbolic. The GRM Manual provides a structured approach for handling SEA/SH complaints, including confidentiality protections and escalation protocols. The LMP must ensure that worker conduct systems are aligned with these procedures.

Table 3: Education and GBV-Related Labor Risks

Risk Category	Contextual Trigger in EXCEL	Probability	Impact if Unmanaged	Overall Significance
SEA/SH by contractor workers	Presence in school compounds	Moderate	Very High	High
Harassment by direct workers	Field deployment in schools	Low–Moderate	High	Substantial
Retaliation against complainants	Weak reporting culture	Moderate	High	Substantial
Inadequate Code enforcement	Weak supervision	Moderate	High	Substantial

3.4 Labor-Related GBV Risk Assessment

Labor-related GBV risks in EXCEL are primarily associated with proximity to vulnerable populations rather than large labor influx or camp-based living arrangements. The Project does not involve worker accommodation camps; however, its nationwide footprint and repeated worker–school interaction increase exposure frequency. The risk profile is therefore characterized by moderate probability but high potential impact. This framing does not imply that GBV under EXCEL is limited to non-physical misconduct. Physical harm — including sexual assault, coercion, and exploitation — is a live and serious risk, particularly in remote or peri-urban project areas where contractor worker presence is less visible to formal oversight structures. The distinction between influx-driven and proximity-driven risk describes the mechanism, not the severity. Even a single SEA/SH incident involving physical harm could have severe, irreversible consequences for the survivor and grave reputational, legal, and compliance consequences for the project . Accordingly, prevention mechanisms must emphasize due diligence in induction, clarity in Code of Conduct governing working arrangements and expectations governing community interactions, sensitization training, supervision, reporting clarity, and swift disciplinary action.

3.5 Risks Associated with Primary Suppliers

Primary suppliers engaged in the production and distribution of teaching and learning materials operate outside direct project control. However, given the scale of materials required for nationwide foundational learning reform, supply chains must be assessed for labor risks. Potential risks include child labor in printing facilities, unsafe working conditions in warehouses, and informal subcontracting practices. While probability may vary by supplier, the potential impact of labor violations, particularly child labor, would be significant. The project must therefore implement supplier screening and contractual compliance clauses to mitigate these risks proportionately.

4. OVERVIEW OF APPLICABLE LABOR LEGISLATION AND ESS2 REQUIREMENTS

4.1 National Legal and Regulatory Framework

Labor management under the EXCEL Project is governed primarily by the labor and employment laws of the Republic of Liberia, supplemented by sectoral legislation relevant to child protection and workplace conduct. The LMP is designed to operate within this national legal framework while ensuring compliance with the World Bank Environmental and Social Standard 2 (ESS2).

The principal legislation governing labor relations in Liberia is the Liberian Decent Work Act (2015), which establishes the rights and obligations of employers and employees in matters relating to employment contracts, wages, working hours, occupational safety, termination procedures, and dispute resolution. The Decent Work Act prohibits forced labor, regulates child labor, and establishes standards for fair working conditions. It also requires employers to provide safe working environments and to ensure that workers are informed of the terms of their employment. Under Liberian law, written contracts are required for certain categories of employment, and wage payment obligations must be clear and regular. The Act also establishes provisions governing maximum working hours and rest periods, ensuring that employees are not subjected to excessive working schedules without compensation. In relation to child labor, the Decent Work Act and related child protection frameworks prohibit hazardous work for individuals under eighteen (18) years of age. Construction activities fall within hazardous categories due to their exposure to physical injury risk. The Children's Law of 2011 further reinforces the protection of minors from exploitation and abuse, including economic exploitation.

Occupational health and safety obligations are embedded within labor legislation, requiring employers to take reasonable measures to ensure worker safety and prevent workplace injury. Although Liberia's OHS regulatory infrastructure is developing, the legal principle of employer responsibility for worker safety is well established. In addition to labor-specific laws, Liberia has enacted sectoral frameworks relevant to safeguarding and anti-discrimination. These include legal protections addressing sexual violence, harassment, and abuse, as well as gender-based violence frameworks implemented through the Ministry of Gender, Children and Social Protection. Taken together, Liberia's legal framework provides a foundational basis for labor management under EXCEL. However, compliance with national law alone is not sufficient for a World Bank–financed project. The project must also meet the additional requirements of ESS2, which in some areas exceed or clarify national standards.

4.2 World Bank Environmental and Social Standard 2 (ESS2)

ESS2: *Labor and Working Conditions* applies to all Investment Project Financing operations and is explicitly identified as relevant to EXCEL in the Project Appraisal Document. It seeks to promote sound worker-management relationships and ensure that project workers are treated fairly, provided with safe and healthy working conditions, and protected from discrimination, child labor, and forced labor. The standard applies to four categories of workers: direct workers, contracted workers, primary supply workers, and community workers. This categorization underpins the structure of Section 2 of this LMP.

Key ESS2 obligations relevant to EXCEL include:

- Provision of clear and understandable information on employment terms and conditions;
- Non-discrimination and equal opportunity in employment practices;
- Prohibition of child labor and forced labor;

Establishment of occupational health and safety measures consistent with international good practice;
Implementation of a worker grievance mechanism separate from community-level grievance systems;
Management of risks in primary supply chains where significant child or forced labor risks are identified.

4.3 Comparative Alignment Between National Law and ESS2

In most areas, Liberia's Decent Work Act aligns broadly with ESS2 principles, particularly regarding prohibition of forced labor, regulation of working hours, wage protections, and basic workplace safety obligations. However, ESS2 introduces additional procedural and operational requirements that go beyond national law in certain respects. The table below summarizes key areas of alignment and areas where ESS2 establishes heightened requirements for the purposes of the EXCEL Project.

Table 4: Alignment Between Liberian Labor Law and ESS2 Requirements

Employment Contracts	Regulated under the Decent Work Act (2015); written contracts required for most employment categories.	Clear written terms and conditions required for all project workers, including contractors and consultants.	EXCEL requires written employment documentation for all direct and contracted workers. Verbal or undocumented arrangements are prohibited (Section 5.1).
Wages and Working Hours	Minimum wage protections and working hour limits established under the Decent Work Act. Overtime rates applicable.	Fair wages and reasonable working hours required; overtime must be compensated at not less than 1.5x the standard rate.	Contractor contracts must explicitly state wage rates, payment schedules, and overtime rates. Minimum overtime rate of 1.5x standard wage applies (Section 5.2).
Forced Labor	Forced and compulsory labor prohibited under the Decent Work Act and the Constitution of Liberia.	Explicit prohibition required across all worker categories; ongoing monitoring and contract clause enforcement required.	Prohibition incorporated into all contractor contracts, Codes of Conduct, and supervision protocols. No debt bondage, document confiscation, or involuntary labor permitted (Section 5.6).
Non-Discrimination and Equal Opportunity	The Decent Work Act prohibits discrimination in employment on grounds including gender, ethnicity, religion, and disability. Equal pay provisions are included.	Borrowers must adopt proactive non-discrimination policies covering recruitment, promotion, wages, and access to grievance mechanisms. Equal opportunity must be ensured across all worker categories.	EXCEL adopts both national and ESS2 standards. Section 5.4 of the LMP and the Code of Conduct (Annex 1) address non-discrimination in full. Contractors must ensure women are not excluded from eligible roles. Discrimination constitutes a Code of Conduct violation subject to disciplinary action.
Freedom of Association / Workers' Right to Organize	Liberian law recognizes workers' rights to form and join trade unions and to engage in collective bargaining, consistent with ILO Convention principles.	The project must not restrict, discourage, or penalize workers for exercising legally recognized rights of association or collective bargaining. Where national law restricts these rights, the project must provide alternative means for workers to express grievances and protect their interests.	EXCEL confirms that no worker engaged under the project shall be penalized, dismissed, demoted, or adversely treated for exercising legally recognized rights of association or collective bargaining. This commitment is binding on contractors through contract clauses and is incorporated into the Code of Conduct. The Worker Grievance Mechanism (Section 8) provides an independent channel for workers to raise concerns where collective mechanisms are unavailable.
Child Labor	Hazardous work prohibited for persons under 18 years of age. General minimum working age is 16 under the Decent Work Act. The Children's Law (2011) reinforces	Strict prohibition on child labor in hazardous activities; minimum age of 18 for all construction work; mandatory age verification required for all contracted workers.	Age verification is mandatory for all construction and rehabilitation workers before mobilization. No person under 18 may be engaged in any construction, WASH, or physically hazardous task under EXCEL. Child Labor Verification Checklist (Annex 5) is a required contractor compliance tool (Section 5.5).

	protections against economic exploitation of minors.		
Occupational Health and Safety (OHS)	Employer responsibility for worker safety established under the Decent Work Act. OHS regulatory infrastructure is developing; legal principle of employer duty of care is well established.	OHS measures consistent with international good practice required; site-specific OHS plans must be developed for construction activities; workers must receive OHS induction before site entry.	EXCEL adopts a World Bank Group EHS Guidelines-aligned approach. Each contractor must prepare and submit a C-ESMP including an approved OHS plan before works commence. Monthly toolbox talks are mandatory during active construction (Sections 6.2 and 11.1).
Worker Grievance Mechanism	General labor dispute channels exist under Liberian law, including the Ministry of Labor. No project-specific worker GM required under national law.	Dedicated project-level worker grievance mechanism required, separate from community-level GM and national labor dispute systems; must be accessible, confidential, and free of charge.	EXCEL establishes a dedicated Worker GRM integrated with but distinct from the project-level GRM Manual. SEA/SH complaints are handled through a specialized referral pathway, not the standard GM process (Section 8).
Primary Supply Chain	Limited regulatory oversight of supply chains under national law; no mandatory supply chain due diligence framework.	Where credible risks of child labor, forced labor, or serious OHS violations are present in primary supply chains, the project must conduct proportionate due diligence and take corrective action.	Supplier screening required for TLM printing, furniture, and construction material supply chains. Mandatory contractual compliance clauses, child and forced labor certifications, and right-of-access provisions required for all primary supply contracts (Section 11.6).

This alignment analysis confirms that while national law provides a solid baseline, EXCEL must adopt additional procedural safeguards, particularly in relation to grievance systems, OHS supervision, and supply chain screening to fully satisfy ESS2.

4.4 Legal Hierarchy and Applicable Standard

For the purposes of EXCEL implementation, compliance with both national law and ESS2 is mandatory. Where national legislation and ESS2 requirements differ, the project will apply the more stringent standard, provided that such application does not conflict with mandatory provisions of Liberian law. For the avoidance of doubt, this LMP is materially consistent with ESS2 in all areas relevant to the EXCEL Project.
This principle ensures that:

- No worker under EXCEL is engaged in hazardous construction activity below the age of eighteen;
- All contractor workers are covered by enforceable written agreements and Codes of Conduct;
- OHS practices meet internationally recognized standards;

Workers have access to a confidential and responsive grievance mechanism consistent with ESS2 and the project's established GRM architecture. The legal and standards framework outlined above establishes that labor management under EXCEL must be proactive, documented, and enforceable. It is insufficient to rely on contractor declarations of compliance. Instead, the Project Delivery Team must embed labor clauses in procurement documentation, supervise contractor performance, and maintain auditable records of compliance.

5. TERMS AND CONDITIONS OF EMPLOYMENT

The terms and conditions governing employment under the EXCEL Project are designed to ensure full compliance with the Liberian Decent Work Act (2015), relevant national legislation, and the World Bank Environmental and Social Standard 2 (ESS2). These provisions apply to all categories of project workers, including direct workers, contracted workers, and where applicable, community workers and primary supply workers within the scope of ESS2. The objective of this section is to establish clear, fair, and enforceable employment standards that protect worker rights, ensure lawful engagement practices, and promote sound worker–management relationships throughout the life of the Project.

5.1 Employment Contracts

The EXCEL Project also affirms that no worker engaged under the project shall be penalized, dismissed, demoted, or otherwise adversely treated for exercising legally recognized rights of association, including the right to join a trade union or to participate in collective bargaining, consistent with Liberian law and ESS2."

All direct workers engaged under the EXCEL Project shall be employed through written contracts or formal engagement letters issued by the Ministry of Education. These contracts shall clearly specify the nature of the assignment, duration, remuneration, reporting structure, working hours, leave entitlements, and grievance access provisions. Where consultants are engaged under short-term technical assignments, their contracts shall clearly define deliverables, timelines, payment schedules, and applicable codes of conduct. Contracted workers employed by third-party contractors shall likewise be engaged under written agreements consistent with Liberian labor law. Contractors shall maintain a register of all workers mobilized under EXCEL-financed contracts, including full name, age, job category, date of hire, wage rate, and emergency contact information.

Verbal or undocumented employment arrangements are not permitted for any worker engaged under project-financed activities. All employment documentation shall be provided in a language understandable to the worker. Workers shall be informed of their rights and obligations at the time of engagement, including workplace safety requirements and behavioral expectations.

For both direct and contracted workers, employment contracts shall incorporate explicit reference to compliance with the Project's Code of Conduct, including zero tolerance for sexual exploitation and abuse (SEA), sexual harassment (SH), child abuse, discrimination, and retaliation.

5.1a Terms and Conditions of Employment

In addition to the general employment contract requirements established in Section 5.1, **the Ministry of Education requires that all contractors engaged under the EXCEL Project provide each worker with a written contract that explicitly defines the specific terms and conditions governing their employment**. This requirement applies to all contracted workers, including skilled trades, unskilled laborers, site supervisors, logistics personnel, and service providers engaged under project-financed activities, regardless of the duration or nature of their assignment. Verbal or informal arrangements do not satisfy this requirement under any circumstance. Compliance with this subsection is a contractual obligation enforceable by the Project Delivery Team through the supervision and sanctions framework established in Section 9. The written contract provided to each contracted worker must, at minimum, explicitly define the following four elements:

a) **Working Hours:** The contract must state the standard daily and weekly working hours applicable to the worker's role, consistent with the provisions of the Liberian Decent Work Act (2015). Workers must be informed in writing of their scheduled start and end times, the number of

working days per week, and any site-specific scheduling arrangements arising from school calendar coordination requirements under Section 6.3. Workers shall not be required to work beyond the legally prescribed standard hours without prior written notification and appropriate compensation.

b) **Overtime Compensation Rates:** Where overtime work is required due to construction scheduling, project deadlines, or operational necessity, the contract must specify the applicable overtime compensation rate in accordance with Liberian labor law. Overtime rates must be explicitly stated as a multiplier of the standard hourly or daily wage rate. Under the Liberian Decent Work Act (2015), overtime work must be compensated at a rate of not less than one and one-half times (1.5x) the worker's standard hourly or daily wage. This 1.5x rate is the minimum floor; contractors must pay higher rates where the Act prescribes them (for example, for work performed on public holidays or mandatory rest days). Contractors are prohibited from structuring overtime arrangements in a way that avoids lawful overtime obligations. Contractors are prohibited from requiring workers to perform overtime on a voluntary basis as a condition of continued employment or as a means of avoiding lawful overtime payment obligations. Overtime records shall be maintained by the contractor and made available for review by the Project Delivery Team during supervision visits, consistent with the monitoring obligations established in Section 9.3.

c) **Wage Rates and Payment Schedules**: The contract must clearly specify the worker's wage rate, expressed in Liberian dollars or United States dollars as agreed, the method of calculation (hourly, daily, or task-based), and the payment schedule, including the frequency of payment (weekly, bi-weekly, or monthly) and the method of disbursement. Wage rates must meet or exceed the legally established minimum wage applicable in Liberia at the time of engagement. Payment must be made in full, on time, and without unauthorized deduction. Contractors shall maintain accurate payroll records disaggregated by worker, role, and pay period, consistent with the reporting requirements established in Section 10.2 and Annex 4.

d) **Legal Deductions:** The contract must itemize any deductions that will be applied to the worker's wage, limited strictly to those permitted under the Liberian Decent Work Act and other applicable national legislation. Permissible deductions must be clearly described, quantified where possible, and acknowledged in writing by the worker prior to commencement of employment. Deductions that are not expressly authorized under Liberian law are strictly prohibited. These include, but are not limited to, deductions imposed as a disciplinary measure, deductions for the cost of personal protective equipment required by the Project, or deductions linked to recruitment fees or other pre-employment charges. Any dispute regarding wage deductions shall be addressed through the Worker Grievance Mechanism established in Section 8.

Contractor Compliance and Verification

Contractors must submit a sample employment contract template to the Project Delivery Team as part of their Contractor Environmental and Social Management Plan (C-ESMP) prior to mobilization, as required under Section 9.2. The PDT shall review the template to verify that all four elements above are explicitly addressed before granting approval to commence works. During supervision visits conducted under Section 9.3, the PDT may request access to individual worker contracts and payroll records to verify ongoing compliance. Non-compliance with this subsection shall be treated as a contractual deficiency subject to the corrective action and sanctions framework established in Section 9.5.

5.2 Wages and Working Hours

Wages for all project workers shall comply with the Liberian Decent Work Act and shall meet or exceed the legally established minimum wage where applicable. For direct workers, remuneration shall be

defined in their contracts and paid in accordance with agreed schedules. For contracted workers, contractors shall ensure that wage rates are clearly specified and paid regularly and without unlawful deduction. Working hours shall comply with national legal provisions governing standard working time and overtime. Workers shall not be required to work excessive hours without appropriate compensation. Overtime, where necessary due to construction scheduling or project deadlines, shall be voluntary where possible and compensated at legally mandated rates.

Contractors shall maintain accurate records of hours worked and wages paid. The Project Delivery Team (PDT) reserves the right to review payroll records during supervision to ensure compliance. Wage withholding, delayed payment, or arbitrary deductions are strictly prohibited. Special attention shall be given to ensuring that locally recruited laborers are not subject to exploitative wage practices. Contractors must ensure equal pay for equal work without discrimination based on gender, ethnicity, religion, disability, or other status.

5.3 Leave and Benefits

Project workers shall be entitled to leave benefits in accordance with Liberian labor law and the terms of their respective contracts. Direct workers shall be eligible for annual leave, sick leave, and public holiday entitlements consistent with national law and MoE employment policies. For contracted workers engaged in civil works, contractors shall ensure that statutory rest days are observed and that workers are not compelled to forgo legally required rest periods. Where workers are engaged on short-term or task-based contracts, leave entitlements shall be defined proportionately and in accordance with applicable legal standards.

Workers shall not be penalized for legitimate absence due to illness, provided that reasonable notice is given and documentation is supplied where required. Contractors shall not dismiss or threaten dismissal of workers for accessing legally entitled leave. In addition, the Project encourages contractors to provide basic welfare measures at worksites, including access to safe drinking water, sanitation facilities, and rest areas, particularly where works occur within school compounds.

5.4 Non-Discrimination and Equal Opportunity

The EXCEL Project is committed to non-discrimination and equal opportunity in employment practices. No worker shall be discriminated against on the basis of gender, age, disability, ethnicity, religion, political affiliation, marital status, or other protected status under Liberian law. Recruitment and promotion decisions shall be based on merit and qualifications relevant to the assignment. Contractors are required to ensure that women are not excluded from employment opportunities solely due to gender stereotypes, particularly in non-hazardous roles within construction or logistics.

Harassment, including sexual harassment, is strictly prohibited. All workers must operate in an environment of mutual respect. The Code of Conduct applicable to the Project establishes behavioral standards and disciplinary consequences for violations. Where feasible, contractors are encouraged to promote local employment opportunities while ensuring training and vigilance in compliance with labor standards and safeguarding requirements.

5.5 Prohibition of Child Labor

The Liberian Decent Work Act (2015) establishes a general minimum working age of 16 years for non-hazardous work. For construction, rehabilitation, and any other work classified as hazardous under Liberian law or international labor standards, the minimum age is 18 years. The EXCEL Project applies the 18-year threshold to all construction and rehabilitation activities without exception, regardless of the specific task. No individual under 18 years of age shall be engaged in any construction, rehabilitation,

WASH, or related physical work under this project. For non-hazardous roles (such as administrative support), the 16-year general minimum applies, though the project encourages engagement of adults wherever possible in non-hazardous roles as well.
Acceptable forms of verification may include national identification documents, birth certificates, voter identification cards (where applicable), or other reliable documentation.

In the absence of formal documentation, alternative verification measures must be applied cautiously and documented. If a child under eighteen is discovered working on a project site, the contractor shall immediately remove the individual from hazardous duties and notify the Project Delivery Team. The response shall prioritize the safety and well-being of the minor and comply with national child protection frameworks.

Failure to comply with child labor prohibitions may result in contractual sanctions, including suspension of works.

5.6 Prohibition of Forced Labor

Forced labor, defined as any work performed involuntarily under threat of penalty, is strictly prohibited under both Liberian law and ESS2. This includes bonded labor, debt-based labor arrangements, withholding of identity documents, coercion, intimidation, or retention of wages. Workers engaged under EXCEL must have the freedom to terminate employment in accordance with the terms of their contract and applicable legal notice provisions. Contractors shall not confiscate worker identification documents or restrict movement. Recruitment fees or other unlawful charges imposed on workers as a condition of employment are prohibited. The Project Delivery Team will monitor recruitment practices during contractor supervision to ensure compliance.

5.7 Worker Accommodation (if applicable)

The EXCEL Project does not anticipate large-scale worker accommodation camps, as civil works are limited to small-scale rehabilitation within existing school premises and contractor labor is expected to be locally sourced where possible. However, where contractors provide temporary accommodation for workers, particularly in remote areas, the accommodation must meet basic health, safety, and dignity standards.

This includes:

- Safe and structurally sound sleeping quarters;
- Adequate ventilation and lighting;
- Access to potable water and sanitation facilities;
- Fire safety measures;
- Separation of accommodation from active school zones;
- Zero tolerance for child presence in worker accommodation areas.

Accommodation arrangements shall not increase safeguarding risks within school communities. Workers shall not be housed within school facilities or in proximity to student dormitories (where applicable). Any accommodation plan must be disclosed to and approved by the Project Delivery Team prior to use.

6. OCCUPATIONAL HEALTH AND SAFETY (OHS)

The Environmental and Social Review Summary (ESRS) identifies occupational health and safety as a relevant environmental and social risk area under the Project's Substantial risk classification. In response, this section establishes a structured OHS framework that integrates national legal obligations, ESS2 requirements, and school-specific safeguarding considerations. The OHS system under EXCEL is built around five pillars: policy commitment, contractor compliance, school-site risk controls, incident reporting discipline, and emergency preparedness. Each pillar is designed to address the risk profile identified in Section 3.

6.1 OHS Policy Statement for EXCEL

The Ministry of Education, through the Project Delivery Team (PDT), affirms its commitment to preventing occupational injuries and illnesses among all project workers and to ensuring that project activities do not create hazards for students, teachers, or surrounding communities. The OHS policy for EXCEL is guided by the following principles:

- Prevention before reaction – hazards shall be identified and mitigated prior to commencement of works.
- Shared responsibility – contractors bear primary responsibility for site-level safety, while the PDT exercises oversight and enforcement.
- Protection of minors – OHS measures must extend beyond workers to safeguard students within school compounds.
- Transparency and accountability – incidents must be reported promptly and investigated systematically.
- Continuous improvement – lessons learned from incidents and near-misses shall inform corrective actions.

Because EXCEL operates within child-centered institutions, OHS under this Project is inseparable from safeguarding.. Safety failures may expose both workers and minors to harm, thereby elevating the consequence dimension of OHS risk. The OHS policy framework established in this section provides the overarching principles and minimum standards for the Project. Detailed, site-specific Occupational Health and Safety Plans will be prepared and finalized as a required component of each Contractor Environmental and Social Management Plan (C-ESMP), consistent with the project's Environmental and Social Commitment Plan (ESCP). Site-specific OHS plans will address the particular hazards, risk controls, emergency response measures, and technical safety procedures applicable to each rehabilitation site. No contractor shall commence works until a C-ESMP containing an approved OHS plan has been submitted and formally approved by the PDT, as required under Section 6.2.

6.2 OHS Requirements for Contractors

Contractors engaged under EXCEL are required to implement robust and site-specific occupational health and safety systems consistent with the Project's Environmental and Social Management Framework (ESMF) and ESS2 requirements.

Mandatory Contractor Environmental and Social Management Plan (C-ESMP)
Prior to mobilization, each contractor must prepare and submit a Contractor Environmental and Social Management Plan (C-ESMP) tailored to the specific site conditions and scope of works. The C-ESMP must include a dedicated Occupational Health and Safety Plan detailing hazard identification, risk control measures, PPE standards, worker induction protocols, site supervision arrangements, emergency procedures, and safeguarding integration. The C-ESMP shall be reviewed and formally approved by the Project Delivery Team before any construction activity commences. Where required under ESCP

commitments and supervision protocols, the C-ESMP shall also be shared with the World Bank for review and no-objection.

No contractor shall begin work until written approval has been granted. This approval requirement ensures that OHS measures are preventive rather than reactive and that contractors demonstrate preparedness prior to mobilization.

Core Contractor Obligations

Contractors must ensure that all workers receive OHS induction training prior to commencing work. This training shall cover hazard awareness, proper use of personal protective equipment (PPE), safe equipment operation, reporting procedures, and conduct expectations within school environments. Contractors must designate a qualified site supervisor responsible for daily safety oversight and compliance monitoring. Site supervisors are accountable for enforcing PPE usage, maintaining safe work zones, and preventing unauthorized interaction between workers and students. In addition, contractors must maintain accurate OHS records, including worker attendance logs, safety training attendance sheets, incident registers, and corrective action reports. The OHS plan within the C-ESMP must also specify the schedule for monthly OHS toolbox talks as required under Section 11.1, including the planned frequency, responsible supervisor, and documentation approach. Toolbox talks are a mandatory ongoing compliance requirement and must be reflected in the C-ESMP from the outset, not added after mobilization

These records shall be available for review by the PDT during supervision missions. Failure to comply with OHS obligations may result in corrective action directives, suspension of works, or other contractual remedies.

6.3 School-Specific Construction Safety Protocols

A. Worker Occupational Health and Safety Controls Contractors must implement task-specific OHS controls proportionate to the hazards of each rehabilitation activity. Minimum requirements by work type include:

- Roofing and height work: use of harnesses, scaffolding with guardrails, and fall arrest systems;
- Masonry and demolition: dust masks, eye protection, steel-capped footwear, and hard hats;
- Electrical installation: insulated tools, lockout/tagout procedures, and qualified electricians only;
- WASH and sanitation work: appropriate respiratory protection where chemical exposure is possible, hand hygiene facilities; and
- General site: high-visibility vests, appropriate footwear, and hard hats mandatory for all persons in the works zone.

Workers must have access to clean drinking water, sanitation facilities, and shaded rest areas at each active site. OHS hazard assessments must be conducted by the contractor before each new work phase commences and documented in the site OHS register.

B. School Community Safety Controls

- **Site Segregation and Controlled Access:** Work areas must be physically segregated from active school spaces through fencing, barricades, or other appropriate barriers. Access to construction zones must be restricted to authorized personnel only. Entry and exit points shall be controlled to prevent accidental student access.

- **Work Scheduling Coordination:** High-risk construction activities shall, where feasible, be scheduled in coordination with school leadership to minimize disruption to instructional time and reduce exposure of students to hazardous operations. Coordination meetings between contractors and school administrators shall be documented prior to commencement of works.

- **Materials and Equipment Control:** Tools, equipment, and hazardous materials must be securely stored when not in use. Under no circumstances shall construction materials be left unattended in areas accessible to students. This requirement is particularly critical in lower-grade primary school settings.

- **Behavioral Controls:** Workers are prohibited from any interaction with students. Workers shall not initiate, permit, or participate in verbal communication, physical contact, photography, gifts, or any other form of engagement with students at any time during project activities, on or around project sites. Site supervisors are responsible for enforcing this prohibition through active behavioral monitoring. Any breach constitutes grounds for immediate removal from site and referral to the PDT for disciplinary action under Section 7.3 Unauthorized photography, voyeurism, personal contact, or unsupervised communication with minors is strictly forbidden and constitutes grounds for immediate disciplinary action.

The integration of these controls reflects the elevated safeguarding context recognized in the ESRS and the Project's broader grievance and accountability framework.

Table 6.1: School-Based Construction Risk and Control Matrix

Hazard Category	Context in EXCEL	Potential Impact	Required Control Measures
Falls, tool injuries	Roof repairs, masonry, electrical works	Worker injury; disruption of school operations	PPE enforcement; trained supervision; method statements
Student access to worksites	Active school compounds	Injury to minors	Physical barriers; controlled entry; supervision
Unsafe material storage	Shared school grounds	Accidental injury to children	Secured storage; daily site housekeeping
Worker–student misconduct	School-based setting	Safeguarding breach; reputational harm	Code of Conduct; supervision; reporting pathways

6.4 Incident and Accident Reporting Procedures

Timely and transparent reporting is essential to effective OHS management. Under EXCEL, incidents are categorized according to severity, ranging from minor injuries and near-misses to serious accidents and safeguarding-related events.

Contractors are required to notify the Project Delivery Team within 24 hours of any serious incident, including fatalities, severe injuries, structural failures, or allegations involving student safety. The PDT shall notify the World Bank in accordance with ESCP reporting obligations.

A written incident investigation report must follow initial notification, detailing the root cause analysis, corrective actions taken, and measures to prevent recurrence. Incident logs shall be maintained at site level and consolidated in periodic E&S reports. The Project adopts a non-retaliation principle: workers who report safety concerns or hazards in good faith shall be protected from disciplinary action.

6.5 Emergency Preparedness and Response

Each contractor's C-ESMP must contain a site-specific Emergency Preparedness and Response Plan proportionate to anticipated risks. Emergency scenarios relevant to EXCEL may include fire outbreaks, structural collapse during rehabilitation, severe weather events, medical emergencies, and safeguarding-related crises such as criminal intimidation or assault, kidnapping, forced detention, etc . Emergency procedures must define communication channels, responsible personnel, evacuation routes, and contact information for local health facilities and emergency services. Emergency contact details shall be visibly posted at worksites. Where serious injury or safeguarding incidents involve students, coordination with school leadership and local authorities shall be immediate and documented. The GRM Manual's severe incident escalation framework shall guide communication and response.

6.6 Public Health Protocols

Communicable Disease and Public Health Protocols Communicable disease risks remain relevant in school and training settings regardless of the specific disease in question. Contractor workers and direct project staff operating in shared spaces, including school compounds and training venues, may be exposed to respiratory infections, gastrointestinal illnesses, and other communicable conditions

7. CODE OF CONDUCT

The Environmental and Social Review Summary identifies sexual exploitation and abuse (SEA), sexual harassment (SH), and related safeguarding risks as material social risk factors under the Project's Substantial risk classification. Given this context, the Code of Conduct (CoC), as a necessary element of successful bidding by Contractors and work agreements, constitutes a binding and enforceable behavioral framework that applies to all categories of project workers. It is a mandatory condition of engagement for direct workers, consultants, trainers, enumerators, contractors, subcontractors, and any personnel present at EXCEL-supported sites. The Code of Conduct is embedded contractually and reinforced operationally through induction, supervision, monitoring, and grievance procedures. It is designed to prevent misconduct, protect vulnerable populations, particularly minors, and establish clear disciplinary consequences for violations.

7.1 Mandatory Code of Conduct Requirements

All project workers must sign a written Code of Conduct prior to commencing any project-related activity. The signed Code of Conduct shall be retained in project records and, for contractors, included within personnel files maintained at site level.The Code of Conduct establishes clear behavioral standards. It requires workers to conduct themselves with professionalism, integrity, and respect toward colleagues, students, teachers, and community members. It prohibits any form of harassment, discrimination, intimidation, exploitation, or abuse.

Because EXCEL operates within educational institutions, the Code of Conduct explicitly addresses conduct in the presence of minors. Workers are prohibited from engaging in any inappropriate communication, physical contact, or behavior that could compromise the safety, dignity, or well-being of children.
The Code further requires compliance with occupational health and safety rules, adherence to site access restrictions, respect for school authority structures, and cooperation with monitoring and supervision processes. Importantly, the Code of Conduct must be provided in a language understandable to the worker. Signing the document must not be a perfunctory exercise; workers must be informed of its content during induction and must understand the consequences of violations, as a part of work agreement and condition.

7.2 SEA/SH Prohibitions

The EXCEL Code of Conduct incorporates strict prohibitions relating to sexual exploitation and abuse (SEA), sexual harassment (SH), and school-related gender-based violence (SRGBV). These prohibitions reflect both national law and the obligations under ESS2.

Under no circumstances shall a project worker:

- Engage in sexual activity with a person under eighteen (18) years of age, regardless of consent;
- Exchange money, employment opportunities, goods, or services for sexual favors;
- Engage in sexual harassment of students, teachers, colleagues, or community members;
- Use position, authority, or influence obtained through the Project to exploit or intimidate others.

Any sexual relationship between a project worker and a minor constitutes a gross violation of the Code of Conduct and shall trigger immediate disciplinary action, including removal from site and potential referral to national authorities. The Project's GRM framework includes provisions for handling SEA/SH complaints with confidentiality and survivor-centered principles.

The Code of Conduct is aligned with these procedures and requires workers to cooperate fully with investigations. Given the school-based implementation environment, SEA/SH risks are assessed as

moderate in probability but very high in consequence. The Code of Conduct therefore functions as a preventive and deterrent mechanism within the Project's broader safeguarding architecture.

7.2a: Investigation and Inquiry into SEA/SH Allegations:

"Where an SEA/SH allegation is raised against a contractor, worker, or project personnel, the following investigation principles apply:

(i) The PIU Social and GBV Specialist assumes lead responsibility for all inquiry coordination. No contractor-level investigation into SEA/SH allegations may proceed independently without prior notification to the PDT Social and GBV Specialist.
(ii) Investigation procedures shall be survivor-centered, preserving the confidentiality and dignity of the complainant at every stage.
(iii) The alleged perpetrator shall be suspended from duties involving contact with students or vulnerable community members pending the outcome of the inquiry, without prejudice to the presumption of innocence.
(iv) Inquiry findings shall be documented and transmitted to the PIU, with referral to law enforcement where the allegation constitutes a criminal offense under Liberian law.
(v) No mediation or informal resolution shall be used at any stage of an SEA/SH inquiry.

7.3 Sanctions and Disciplinary Measures

The Code of Conduct establishes a graduated system of sanctions proportionate to the severity of violations. Minor infractions, such as failure to comply with site access protocols, may result in warnings, retraining, or temporary suspension from site. Serious violations, including harassment, intimidation, violence, or safeguarding breaches, shall result in immediate removal from project activities pending investigation. Confirmed cases of SEA/SH, child abuse, or gross misconduct shall lead to termination of employment or contract and referral to competent national authorities where required. Contractors are obligated to enforce disciplinary measures against their personnel in accordance with contractual provisions. Failure by a contractor to address Code of Conduct violations may constitute breach of contract and may result in suspension of works or other remedies. Disciplinary procedures must be fair, documented, and consistent. However, confidentiality must be maintained, particularly in cases involving safeguarding or sexual misconduct allegations.

7.4 Worker Induction and Training

The effectiveness of the Code of Conduct depends on systematic induction and ongoing awareness. Prior to site mobilization or field deployment, all project workers must undergo orientation covering:

- Behavioral expectations under the Code of Conduct;
- Safeguarding principles;
- SEA/SH prohibitions;
- Worker grievance mechanisms;
- Reporting obligations for misconduct or suspected abuse.

For contractors, induction shall occur at site level before commencement of works. Attendance at induction sessions must be documented. Refresher sessions shall be conducted periodically, particularly where new workers are recruited or where incidents highlight gaps in understanding. For direct workers, consultants, trainers, and enumerators, induction shall occur prior to field deployment, particularly where engagement with school communities is anticipated. Training content must be clear, culturally appropriate, and aligned with the Project's safeguarding commitments.

7.5 Monitoring and Enforcement Mechanisms

Monitoring of Code of Conduct compliance occurs at multiple levels. At site level, contractor supervisors are responsible for daily oversight of worker behavior and compliance. The Project Delivery Team conducts periodic supervision missions to verify adherence to behavioral standards and review documentation. Worker grievance channels provide an additional monitoring layer. The Workers' Grievance Mechanism, integrated within the broader EXCEL GRM architecture, allows workers to report misconduct confidentially. Reports involving SEA/SH or safeguarding concerns are subject to strict confidentiality protocols and defined escalation pathways.

The Project Delivery Team maintains oversight responsibility for ensuring that:

- All workers have signed the Code of Conduct;
- Induction and refresher training have been conducted;
- Violations are documented and addressed;
- Contractors enforce sanctions appropriately.

Periodic reporting on Code of Conduct implementation shall be included in environmental and social performance reports submitted to the World Bank in accordance with ESCP commitments.
PAD Excel Project

8. WORKER GRIEVANCE MECHANISM

The Excellence in Learning in Liberia (EXCEL) Project establishes a dedicated Worker Grievance Redress Mechanism (WGRM) in accordance with Environmental and Social Standard 2 (ESS2). The Worker GRM is distinct from, but integrated with, the Project-Level Grievance Redress Mechanism (GRM) established under the Stakeholder Engagement Plan and the EXCEL GRM Manual. The Worker GRM provides all project workers, including direct workers, contracted workers, and where relevant, primary supply workers, with an accessible, confidential, and structured process for raising workplace-related concerns. It is designed to promote early resolution of disputes, prevent escalation, protect workers from retaliation, and ensure compliance with labor standards.

8.1 Objectives of the Worker GRM

The Worker Grievance Redress Mechanism serves five core objectives.

- Provides workers with a safe and accessible channel to raise concerns related to employment conditions, workplace safety, wage disputes, discrimination, harassment, or Code of Conduct violations.
- Strengthens accountability within contractor and project management systems by creating structured documentation and resolution processes.
- Reduces the likelihood of labor disputes escalating into work stoppages, reputational harm, or legal conflict.
- Ensures that sensitive cases, including sexual exploitation and abuse (SEA) and sexual harassment (SH) are handled confidentially and in alignment with survivor-centered principles.
- Finally, ensures compliance with ESS2 requirements regarding worker access to grievance mechanisms, independent of national labor dispute systems.

The Worker GRM functions as a project-level mechanism to facilitate timely resolution of workplace issues. For general labor complaints, resolution shall be conducted in good faith by all parties. For SEA/SH complaints, the good-faith resolution principle does not apply. Resolution of SEA/SH cases is governed exclusively by the survivor's or their guardian's informed consent, the mandatory referral protocol under

Section 8.5a, and applicable Liberian law. No expectation of mutual good-faith negotiation shall be imposed on a survivor of SEA/SH at any stage of the complaint process

8.2 Institutional Structure

The Worker GM operates through a tiered institutional structure aligned with EXCEL's implementation architecture.

1) At the first level, contractors are required to maintain site-level grievance logs and designate a focal point responsible for receiving worker complaints. For direct workers, complaints may be submitted to the Project Delivery Team (PDT) Safeguards Specialist or a designated HR focal point.

2) At the second level, unresolved complaints are escalated to the Project Delivery Team. The Social and GBV Specialist (PIU GM Focal Point) coordinates review and resolution, ensuring consistency with project policies and ESS2 requirements. For complaints of a safeguarding or SEA/SH nature, the Social and GBV Specialist leads the response. For environmental or OHS-related labor complaints, the Environmental Specialist provides technical support in coordination with the Social and GBV Specialist.

3) At the third level, where grievances remain unresolved or involve serious allegations (including SEA/SH), the matter may be referred to senior Ministry of Education leadership and handled in accordance with the escalation procedures defined in the Project GRM structure.

8.2a Dedicated Grievance Mechanism Awareness Sessions for Vulnerable Workers

While the Worker Grievance Mechanism established under this section is designed to be accessible to all categories of project workers, the Ministry of Education recognizes that accessibility in design does not guarantee accessibility in practice. Workers who are non-literate, speak minority languages, are unfamiliar with formal complaint processes, or fear social consequences for raising concerns face material barriers to using the GM that the Project must actively address. This subsection establishes mandatory requirements to ensure that the Worker GM is genuinely accessible to the most vulnerable workers engaged under the EXCEL Project, with particular attention to non-literate local laborers recruited under civil works contracts.

A. Mandatory Dedicated GM Awareness Session During Contractor Induction

Contractor inductions conducted prior to site mobilization, as required under Section 7.4, must include a dedicated and standalone session focused exclusively on the Worker Grievance Mechanism. This session is a mandatory compliance requirement and must not be merged with, abbreviated by, or substituted for general Code of Conduct orientation or OHS briefings. The dedicated GM session must be completed by all workers before they commence any project-related activity on site, without exception. The dedicated GM session shall be conducted by the contractor's designated site focal point, with oversight support from the Project Delivery Team where feasible. Where a significant proportion of the workforce is non-literate or speaks a local language other than English, the session must be delivered with the assistance of an interpreter or community liaison familiar with the relevant language or dialect. The PDT shall verify during supervision visits that dedicated GM sessions have been conducted and that attendance records are maintained in accordance with Section 9.3.

B. Content Requirements for the GM Awareness Session

The dedicated GM awareness session must address the following content elements in full, using plain language, oral delivery, and visual aids throughout:

- **What the grievance mechanism is and why it exists:** Workers must understand that the GM is a formal project system designed to protect them and that using it is their right, not a risk. The session must convey that the GM exists to resolve workplace concerns fairly and that the Project takes all complaints seriously.
- **How to submit a complaint**: The session must walk workers through the complaint submission process step by step, using simple and concrete language. Workers must understand that complaints can be submitted verbally as well as in writing, so that literacy is not a barrier to access. The availability of anonymous submission must be explicitly explained, and workers must be reassured that anonymous complaints will be recorded and investigated to the extent possible.
- **The channels available for submitting a complaint:** All available complaint channels must be communicated clearly, with specific emphasis on channels accessible to workers who cannot read or write. These must include, at minimum:
    - The name and physical location of the site-level grievance focal point;
    - The phone number of the site focal point and, where available, the PDT Safeguards Specialist;
    - Any project hotline or dedicated contact number established under the EXCEL GRM framework;
    - The option to submit a complaint directly and in person to the PDT during supervision visits.

  Phone numbers and focal point names must be posted visibly at the worksite in accordance with subsection C below. Workers must be shown these postings during the induction session so they know exactly where to look after the session concludes.
- **Timeframes for resolution:** Workers must be informed of the indicative resolution timeframes established in Section 8.6, communicated in simple terms. For example, workers should be told that they can expect an acknowledgment of their complaint within two working days and a proposed resolution within fourteen working days, and that they will be kept informed of progress.
- **The strict prohibition on retaliation:** The anti-retaliation principle established in Section 8.4 must be communicated explicitly, clearly, and with emphasis during the dedicated session. Workers must be told in direct terms that: no worker will be dismissed, demoted, threatened, harassed, or treated adversely in any way for submitting a complaint in good faith; any act of retaliation will itself be treated as a serious violation of the Code of Conduct and investigated; and they have the right to report retaliation through the same GM channels. The prohibition on retaliation must be presented not as a policy abstraction but as a personal protection that applies to each individual worker present at the session.

C. Visual Aids, Posters, and Accessible Materials

To reinforce GM awareness beyond the induction session, contractors are required to produce and display visual communication materials at all active worksites. These materials must be in place before workers commence activities and must remain displayed and legible throughout the duration of works. The following minimum requirements apply:

- A GM awareness poster must be displayed at a prominent, accessible location at each worksite, such as the site entrance, the workers' rest area, or the site office. The poster must be weatherproof and of sufficient size to be readable from a standing position;
- The poster must use simple language, icons, and pictorial representations of the complaint process to ensure comprehension by non-literate workers. Text-only posters do not satisfy this requirement;
- The poster must include, at minimum: a simple visual illustration of how to raise a complaint; the name and phone number of the site-level GM focal point; any project hotline number; a clear visual representation of the anti-retaliation guarantee; and a statement that anonymous complaints are accepted;

- Where a worksite serves a linguistically diverse workforce, posters must be produced in the relevant local language or dialect in addition to English.

Poster templates shall be developed by the Project Delivery Team and provided to all contractors prior to mobilization as part of the contractor orientation process described in Section 11.4. Contractors shall not substitute self-produced materials without PDT review and approval.

D. Refresher Sessions and Ongoing Awareness

A single induction session is insufficient to maintain GM awareness across a workforce that may experience turnover, long deployment periods, or evolving risk conditions. Contractors are therefore required to conduct GM refresher awareness sessions at intervals consistent with site conditions, and in any event:

- Whenever significant numbers of new workers are recruited onto site;
- Following any incident involving retaliation, misconduct, or a worker complaint, where a refresher session would reinforce awareness and trust in the system;
- At intervals of not more than three months during active construction periods.

Refresher sessions need not replicate the full induction session but must at minimum restate the available channels, confirm focal point contact details, and reinforce the anti-retaliation guarantee. Attendance at refresher sessions must be documented and included in contractor monthly labor reports submitted to the PDT under Section 9.4.

8.3 Channels for Submitting Complaints

To ensure accessibility across geographically dispersed worksites, the Worker GM provides multiple complaint submission channels. Workers may submit grievances verbally or in writing to site supervisors, contractor focal points, or directly to the PDT. Complaints may also be submitted via phone, email, or written forms made available at worksites. The mechanism allows anonymous submissions where workers fear retaliation. Anonymous complaints shall be recorded and investigated to the extent possible. Given the project's decentralized implementation across fifteen counties, accessibility must not depend solely on physical proximity to Monrovia-based offices. Contractors must ensure that complaint channels are visibly communicated to workers during induction.

Table 5: Worker GRM Access Channels

Submission Channel	Applicable Workers	Accessibility Level	Notes
Site-level focal point	Contracted workers	Immediate / on-site	First point of resolution
PDT Safeguards Specialist	Direct & Contracted workers	County/National	Escalation level
Email / Phone hotline	All workers	National	Allows remote access
Anonymous written submission	All workers	Site/National	Protects vulnerable complainants

The Worker GM and the specialized SEA/SH grievance pathway operate as distinct but interconnected channels. They do not share the same hotline number, email address, or intake system. The Worker GM uses the general project grievance contacts (see Table 5). The SEA/SH pathway is accessed through direct, confidential contact with the PIU Social and GBV Specialist and, where available, a dedicated safe reporting line. However, in any situation where a worker submits an SEA/SH complaint through the Worker GM channel, whether deliberately or because they are unaware of the specialized pathway, the mandatory referral protocol under Section 8.5a is immediately triggered. The two channels connect at

the point of referral, not at intake. Awareness materials shall clearly explain both channels and their distinct purposes, with SEA/SH channels visually distinguished on all posters and induction materials

8.4 Confidentiality and Non-Retaliation

Confidentiality is a foundational principle of the Worker GM. All complaints shall be handled discreetly, and access to complaint records shall be restricted to authorized personnel only. Retaliation against any worker who submits a grievance in good faith is strictly prohibited. Retaliation includes dismissal, demotion, wage reduction, harassment, intimidation, or any adverse employment action. Any allegation of retaliation shall itself be treated as a serious violation and investigated accordingly. Confidentiality protections are particularly critical in cases involving harassment or SEA/SH allegations.

8.5 SEA/SH Handling Protocol (Survivor-Centered Approach)

Cases involving sexual exploitation and abuse or sexual harassment require specialized handling.
Upon receipt of an SEA/SH-related complaint, the following principles apply:

- Confidential handling of information.
- Immediate separation of the alleged perpetrator from the complainant, where necessary.
- Referral of the survivor to appropriate support services where available.
- Protection against retaliation.
- Respect for the survivor's choices regarding formal reporting.

The EXCEL GRM Manual establishes defined procedures for handling severe incidents and safeguarding cases, and the Worker GM operates in alignment with these protocols.

Under no circumstances shall mediation be used to resolve SEA/SH complaints. Such cases shall be handled in accordance with established investigation procedures and, where required, referred to competent national authorities.

8.5a Referral of SEA/SH Complaints to the Specialized SEA/SH Grievance Pathway

The Worker Grievance Mechanism established under this section is designed to address employment-related concerns including wage disputes, working hours, occupational health and safety complaints, discrimination, harassment, and Code of Conduct violations. While the Worker GM provides an accessible and confidential entry point for all categories of workplace grievance, it is not the appropriate venue for investigating or resolving allegations of sexual exploitation and abuse (SEA) or sexual harassment (SH). This distinction is not procedural; it is substantive and reflects the specialized expertise, confidentiality protocols, survivor-centered principles, and referral pathways that SEA/SH allegations require and that the standard Worker GM process is not designed to provide.

This subsection establishes a clear and mandatory referral protocol applicable to any SEA/SH complaint or allegation received through the Worker GM at any tier of the institutional structure described in Section 8.2. It applies to all personnel responsible for receiving, logging, or processing worker complaints, including contractor site focal points, the PDT Safeguards Specialist, and any other designated grievance-handling staff operating under the EXCEL Project.

A. The Functional Boundary Between the Worker GM and the SEA/SH Pathway

The standard Worker GM and the specialized SEA/SH grievance pathway serve distinct and complementary functions within the EXCEL Project's accountability architecture. Their boundaries must be understood and respected by all personnel with grievance-handling responsibilities:

- The Worker GM is the appropriate channel for: wage and payment disputes; working hours and leave concerns; occupational health and safety complaints; discrimination on grounds of gender, ethnicity, religion, disability, or other protected characteristic not involving sexual misconduct; general Code of Conduct violations not of a sexual nature; retaliation complaints arising from non-SEA/SH grievances; and any other employment-related concern that can be appropriately addressed through a structured workplace resolution process involving the contractor, the PDT, and where necessary, MoE senior leadership.

- The specialized SEA/SH grievance pathway, established under the project's SEA/SH Action Plan, is the only appropriate channel for: any allegation of sexual exploitation or abuse as defined in Annex 1a; any allegation of sexual harassment in the workplace or in relation to project activities; any report of school-related gender-based violence involving project workers or contractor personnel; any concern involving the sexual safety, dignity, or well-being of a student, community member, or project worker that is sexual in nature. These matters require specialized investigation procedures, dedicated GBV-qualified personnel, strict information compartmentalization, and support service referral that are beyond the scope and competence of the standard Worker GM process.

The Worker GM and the specialized SEA/SH grievance pathway are operationally distinct channels — they do not share the same hotline number, email address, or intake system. The Worker GM operates through the general project grievance contacts published in Table 5. The SEA/SH pathway is accessed through direct, confidential contact with the PIU GM Focal Point (Social and GBV Specialist) and, where established, a dedicated safe reporting line with restricted access.

However, the two channels are integrated at the point of referral, not at intake. Where a worker submits an SEA/SH complaint through the Worker GM channel, whether because they are unaware of the specialized pathway or because they choose that entry point, the mandatory referral protocol under Section 8.5a is immediately triggered. The receiving personnel are required to initiate referral without delay, without assessing the credibility of the complaint, and without attempting to handle the matter through the standard Worker GM process.

There is no single universal access number (UAN) shared between the two channels. Maintaining separate contact infrastructure for the SEA/SH pathway is a deliberate confidentiality safeguard, ensuring that survivors can report without their complaint entering a general grievance system. All awareness posters, induction materials, and worker information sessions must clearly present both channels side by side, explain their distinct purposes, and make plain that SEA/SH complaints will always be handled through the specialized pathway regardless of the channel through which they are first received

B. Mandatory Immediate Referral Protocol

Any complaint, report, allegation, or concern received through the Worker GM that relates to SEA/SH, in whole or in part, must be referred immediately and confidentially to the specialized SEA/SH grievance pathway detailed in the project's SEA/SH Action Plan. This referral obligation is mandatory and applies regardless of:

- The tier at which the complaint is received, whether at site level by the contractor focal point, at PDT level by the Safeguards Specialist, or at senior MoE level;
- The form in which the complaint is received, whether verbal, written, anonymous, or through a third-party reporting on behalf of a survivor;
- Whether the complaint appears complete or sufficiently detailed at the point of receipt, the referral obligation is triggered solely by the nature of the allegation, that it relates to SEA/SH.

Referral is mandatory and unconditional. The receiving personnel have no authority to assess the plausibility or strength of the allegation before initiating referral Whether the complainant has explicitly requested referral to a specialized pathway or appears uncertain about which channel to use.

The referral must be executed within twenty-four hours of receipt of the complaint. The personnel receiving the complaint are responsible for initiating the referral and must not delay action pending further verification, documentation, or managerial approval. Where there is any doubt about whether a complaint falls within the SEA/SH category, the matter must be treated as SEA/SH and referred accordingly. Personnel must not make determinations that a complaint is not serious enough, not sufficiently evidenced, or not within the SEA/SH definition in order to retain it within the standard Worker GM.

C. Referral Procedure

The referral of an SEA/SH complaint from the Worker GM to the specialized SEA/SH pathway shall be conducted as follows:

- **Step 1 - Immediate acknowledgment and safety assessment:** Upon receipt of a complaint involving SEA/SH, the receiving personnel must first ensure the immediate safety of the complainant or survivor. If the complainant is in a situation of ongoing risk or distress, the receiving personnel must prioritize their safety and, where necessary, facilitate access to support services before proceeding with any documentation or referral steps;

- **Step 2 - Confidential notification to the PDT GBV Specialist:** The receiving personnel must immediately and confidentially notify the PDT Social and GBV Specialist, who holds primary responsibility for managing the SEA/SH pathway under the project's SEA/SH Action Plan. This notification must be made by direct and secure communication, such as a phone call or in-person contact, rather than by written channels that could compromise confidentiality. Contractor site focal points must have the direct contact details of the PDT GBV Specialist readily available at all times;

- **Step 3 - Information transfer on a need-to-know basis:** Only the minimum information necessary to enable the PDT GBV Specialist to initiate the specialized pathway must be communicated at the point of referral. The receiving personnel must not document detailed case information in standard grievance logs, share information with the contractor's management chain, or discuss the complaint with anyone other than the PDT GBV Specialist unless explicitly instructed to do so by the GBV Specialist or authorized project leadership;

- **Step 4 - Survivor choice and informed consent:** At every stage of the referral process, the choices and preferences of the survivor must be respected. The survivor must be informed of the referral in advance where possible and must understand what the specialized SEA/SH pathway involves, what support is available, and what will happen next. No action that affects the survivor's situation, including separation of the alleged perpetrator, must be taken without the survivor's informed consent except where immediate safety requires it;

- **Step 5 — Removal from standard GM process and referral notation:** Once a complaint has been identified as SEA/SH and the referral initiated, the complaint is removed from the standard Worker GM tracking and documentation system. It must not appear in standard grievance logs, contractor monthly labor reports, or any document accessible to those not directly involved in the specialized pathway. The GM shall document solely that a referral was made, recording only the date, the referral destination (the PIU Social and GBV Specialist), and the

referral code, strictly for tracking and reporting purposes, without recording any case details, survivor information, or allegation content. This notation is restricted access."

D. Prohibition on Mediation and Informal Resolution

As established in Section 8.5 and reinforced here with specific reference to the referral protocol, mediation must never be used to address SEA/SH complaints at any stage of the Worker GM process. Personnel receiving SEA/SH complaints through the Worker GM must not attempt to facilitate a negotiated resolution between the complainant and the alleged perpetrator, encourage the complainant to resolve the matter informally, or discourage the complainant from pursuing formal channels. Any attempt by contractor management or site personnel to resolve an SEA/SH allegation informally, suppress a complaint, or dissuade a worker from reporting shall itself constitute a serious violation of the Code of Conduct and shall be reported immediately to the PDT.

E. Capacity and Awareness Requirements

The functional boundary between the Worker GM and the SEA/SH pathway, and the referral protocol established in this subsection, must be understood by all personnel with grievance-handling responsibilities. The following capacity requirements apply:

- Contractor site focal points must receive specific training on the referral protocol as part of the contractor orientation sessions described in Section 11.4. This training must include practical instruction on how to recognize an SEA/SH complaint, how to initiate the referral, and how to maintain confidentiality throughout;
- The PDT GBV Specialist's contact details must be provided to all contractor site focal points prior to mobilization and must be updated immediately if personnel changes occur;
- The GM awareness posters required under Section 8.2a must include a clear and visually distinct reference to the SEA/SH referral pathway, using plain language and iconography to communicate that SEA/SH complaints are handled through a separate specialized channel. The poster must not suggest that the standard Worker GM will investigate or resolve SEA/SH allegations;
- The PDT shall include a summary of SEA/SH referrals made from the Worker GM to the specialized pathway, without identifying details, in its periodic environmental and social performance reports submitted to the World Bank, consistent with the reporting obligations established in Section 10.5.

SEA/SH incidents identified through the Worker GM shall be reported to the World Bank within 24 hours of identification by the PIU, in accordance with ESCP severe incident reporting obligations, irrespective of severity threshold. This 24-hour notification is immediate and operates independently of the project's periodic reporting cycle. In addition, the PDT shall include a summary of SEA/SH referrals made from the Worker GM to the specialized pathway — without identifying details — in its periodic environmental and social performance reports, for completeness of the safeguard record.

8.6 Timeframes and Resolution Procedures

Timeliness is essential to maintaining trust in the Worker GRM. The Project establishes indicative resolution timeframes:

Step	Maximum Timeframe
Acknowledgment of complaint	Within 2 working days
Initial review and investigation	Within 7 working days
Proposed resolution communicated	Within 14 working days
Escalation (if required)	Within 21 working days total

Complex cases may require additional time; however, workers must be informed of delays and provided with status updates. All grievances shall be documented in a grievance log, including date received, nature of complaint, action taken, resolution status, and closure date.

8.7 Linkage to the Project-Level GRM

The Worker Grievance Mechanism operates alongside the broader EXCEL Project-Level GRM established for community stakeholders. The key distinction is functional:

- The Worker GM addresses employment-related and workplace grievances.
- The Project-Level GRM addresses complaints from students, parents, community members, and other external stakeholders.

However, integration occurs in cases involving safeguarding or severe incidents. In such instances, escalation procedures defined in the Project GRM framework apply to ensure coordinated response and reporting.

9. CONTRACTOR MANAGEMENT

The Excellence in Learning in Liberia (EXCEL) Project relies on third-party contractors for rehabilitation works, WASH improvements, logistics services, and other contracted activities. As identified in previous sections, many of the Project's labor risks; particularly those relating to occupational health and safety, child labor, informal recruitment, and SEA/SH are most likely to arise at contractor level. Accordingly, contractor management under EXCEL is not limited to procurement administration. It constitutes a structured compliance system designed to ensure that all contractors adhere to the Labor Management Procedures (LMP), the Code of Conduct, ESS2 requirements, and national labor law.

Contractor management under EXCEL is organized around five interrelated control pillars:

(i) Integration of labor requirements into procurement documents;
(ii) Mandatory Contractor Labor Management planning;
(iii) Structured supervision and monitoring;
(iv) Regular reporting and documentation; and
(v) Enforceable sanctions for non-compliance.

9.1 Integration of LMP Requirements into Bidding Documents

Labor compliance under EXCEL begins at the procurement stage. All bidding documents for civil works, service contracts, and relevant supply contracts shall incorporate explicit labor management obligations consistent with this LMP.

The bidding documents shall include:

- Mandatory compliance with the EXCEL Labor Management Procedures;
- Requirement to sign and enforce the Project Code of Conduct and SEA/SH Addendum;
- Obligation to prohibit child labor and forced labor;
- Requirement to comply with occupational health and safety standards;
- Requirement to establish a worker grievance channel at site level;
- Obligation to prepare and submit a Contractor Environmental and Social Management Plan (C-ESMP), including labor and OHS sections, prior to mobilization.

These requirements shall be included in the Conditions of Contract and shall form part of the legally binding contractual framework. In addition, evaluation criteria may include assessment of the bidder's prior experience with environmental and social compliance, including labor management capacity. This strengthens preventive risk management by selecting contractors capable of meeting ESS2 standards. By embedding labor obligations at the bidding stage, EXCEL ensures that compliance expectations are clear before contract award, rather than negotiated after mobilization.

9.2 Contractor Labor Management Plans (C-LMP / C-ESMP Labor Sections)

Prior to commencement of works, each contractor must prepare and submit a Contractor Environmental and Social Management Plan (C-ESMP). The C-ESMP shall contain a dedicated Labor Management and Occupational Health and Safety section, effectively functioning as a Contractor-Level Labor Management Plan (C-LMP).

This plan must address, at minimum:

- Workforce composition and recruitment procedures;
- Age verification procedures;

- Wage payment systems and payroll documentation;
- Occupational health and safety risk assessment and mitigation;
- Worker induction and Code of Conduct training;
- SEA/SH prevention and reporting protocols;
- Worker grievance procedures;
- Incident reporting procedures.

The C-ESMP must be submitted to the Project Delivery Team (PDT) for technical review. Works shall not commence until formal approval is granted. Where required under the Environmental and Social Commitment Plan (ESCP), the C-ESMP may also be subject to World Bank review or no-objection prior to mobilization.

Approval of the C-ESMP signifies that the contractor has demonstrated readiness to manage labor risks in accordance with project standards. It does not transfer oversight responsibility away from the PDT.

Table 6: Core Elements Required in Contractor Labor Management Plans

Component	Required Content	Approval Authority
Workforce Plan	Recruitment procedures; labor categories; documentation requirements	PDT
OHS Plan	Hazard identification; PPE; supervision; emergency response	PDT (and WB if required)
Code of Conduct Implementation	Signed CoC records; SEA/SH training schedule	PDT
Worker GM	Complaint intake procedures; grievance log format	PDT
Incident Reporting	Reporting timelines; notification chain	PDT / WB (serious incidents)

9.2a GBV Specialist Review and Approval of Contractor SEA/SH Code of Conduct and Training Materials

The Contractor Environmental and Social Management Plan (C-ESMP) submission requirements established in Section 9.2 include, among other elements, the contractor's SEA/SH prevention and reporting protocols and the Code of Conduct implementation framework applicable to their workforce. While the requirement for contractors to prepare and submit these materials is well established within the LMP, the quality, accuracy, and contextual appropriateness of SEA/SH-specific content cannot be adequately assessed through a generalist administrative review alone. Contractor-produced SEA/SH materials vary significantly in quality, completeness, and alignment with survivor-centered principles, and inadequate materials, even where submitted in good faith, can create false assurance while leaving workers, students, and community members without meaningful protection.

To address this risk, the Ministry of Education establishes, through this subsection, a mandatory quality assurance requirement applicable to all contractor SEA/SH-related documentation and training content submitted as part of the C-ESMP. All such materials must be reviewed and formally approved by the PDT Social or GBV Specialist before they are used with any worker engaged under the EXCEL Project. This requirement applies to all contractors undertaking civil works, rehabilitation, WASH improvements, or any other contract that involves deployment of personnel within school environments or in proximity to students and community members.

A. Materials Subject to Mandatory GBV Specialist Review
The following contractor-produced materials are subject to mandatory review and approval by the PDT GBV Specialist prior to use:

- The contractor's SEA/SH Code of Conduct or any equivalent behavioral commitment document that workers are required to sign, including any site-specific adaptation of the EXCEL Code of Conduct template provided under Annex 1 and Annex 1a of this LMP;
- The contractor's SEA/SH Compliance Addendum or equivalent instrument, where the contractor has produced their own version rather than adopting the EXCEL standard addendum in Annex 1a verbatim;
- All SEA/SH awareness and prevention training materials intended for delivery to the contractor's workforce, including slide decks, handouts, facilitator guides, scenario-based exercises, and any visual aids or posters used during induction or refresher sessions;
- Any adapted or translated versions of the above materials produced for delivery to workers in local languages or dialects;
- The contractor's internal SEA/SH reporting and response protocol, to the extent that it governs how the contractor's focal point handles complaints before referral to the PDT GBV Specialist under the protocol established in Section 8.5a;
- Any subsequent revisions, updates, or supplementary materials produced during the contract period that alter or add to the above documents.

Materials that replicate the EXCEL standard templates provided by the PDT without modification are subject to a simplified confirmation review rather than a full substantive assessment, recognizing that the standard templates have already been approved for use under the project.

B. Review Criteria Applied by the GBV Specialist
The PDT GBV Specialist shall review all submitted materials against the following criteria, which reflect the minimum standards required for SEA/SH content to be fit for purpose within the EXCEL Project context:

- **Definitional accuracy:** The materials must define SEA, SH, and where applicable SRGBV, in terms consistent with the definitions established in Annex 1a and the project's SEA/SH Action Plan. Definitions must be clear, unambiguous, and expressed in language accessible to the intended audience, including non-specialist workers;
- **Zero-tolerance framing:** The materials must communicate an unequivocal zero-tolerance position toward SEA/SH, consistent with Section 7.2 of this LMP. Materials that present SEA/SH prohibitions as aspirational guidelines, policy preferences, or context-dependent standards do not satisfy this criterion;
- **Child protection specificity:** Given that EXCEL operates within primary school environments, materials must explicitly address the absolute prohibition on sexual activity with any person under eighteen years of age, the specific risks associated with worker proximity to students including ALP overage students as identified in Section 3.2.1, and the behavioral boundaries required within school settings. Generic SEA/SH materials that do not address the school-based context of the project are insufficient;
- **Reporting pathway accuracy:** The materials must accurately describe the complaint submission channels available to workers, including the referral protocol established in Section 8.5a, and must make clear that SEA/SH allegations will be referred to the specialized SEA/SH pathway rather than handled through the standard Worker GM. Contact details included in training materials must be verified as current and correct prior to approval;
- **Survivor-centered principles:** The materials must reflect survivor-centered principles throughout, including confidentiality, respect for survivor choices, prohibition on mediation, and protection from retaliation. Materials that frame SEA/SH response primarily from an institutional

risk management perspective, rather than a survivor protection perspective, must be revised before approval;

- **Anti-retaliation clarity:** An explicit, prominent, and unambiguous statement of the absolute prohibition on retaliation against anyone who reports SEA/SH concerns. The anti-retaliation protection is unconditional and does not require the report to meet any good-faith threshold. Materials must not introduce qualifications that could discourage survivors or witnesses from reporting
- **Cultural and linguistic appropriateness:** Where materials are intended for delivery to workers from specific linguistic or cultural communities within Liberia, the GBV Specialist shall assess whether the content is culturally appropriate and whether translations or adaptations accurately convey the intended meaning without distortion, omission, or inadvertent normalization of prohibited behaviors;

Facilitator competence requirements: Where materials include a facilitator guide or delivery instructions, the PDT Social and GBV Specialist shall assess whether the guidance is sufficient to enable competent delivery by the designated contractor focal point and whether any additional facilitation support from the PDT is warranted given the focal point's background and experience.

C. Approval Process and Timelines

The review and approval process shall operate as follows, integrated within the broader C-ESMP submission and approval sequence established in Section 9.2:

- **Submission**: Contractors must submit all SEA/SH materials subject to this subsection as a dedicated and clearly labeled component of their C-ESMP package, submitted to the PDT for review no later than fourteen days before the planned date of worker induction. Submission of SEA/SH materials as part of a general document bundle without clear labeling or indexing does not satisfy this requirement;

- **GBV Specialist review period:** The PDT GBV Specialist shall complete the substantive review of submitted SEA/SH materials within seven working days of receipt of a complete submission. Where materials are received as part of a larger C-ESMP package, the GBV Specialist's review of SEA/SH components proceeds in parallel with the broader PDT review of the C-ESMP rather than sequentially, to avoid delaying mobilization unnecessarily;

- **Outcome - Full approval:** Where submitted materials meet all review criteria, the GBV Specialist shall issue written confirmation of approval, specifying the materials approved, the date of approval, and any conditions attached. Approved materials may be used with the contractor's workforce from the date of written confirmation;

- **Outcome - Conditional approval with required revisions:** Where materials are substantially adequate but contain specific deficiencies, the GBV Specialist shall issue written feedback identifying the deficiencies and the revisions required, with a deadline for resubmission. Contractors must submit revised materials within five working days of receiving feedback. The GBV Specialist shall complete a follow-up review of revised materials within three working days. Conditional approval does not permit use of materials pending completion of required revisions;

- **Outcome: Rejection and mandatory replacement:** Where submitted materials are fundamentally inadequate, contain content that is factually incorrect, inconsistent with survivor-centered principles, or incompatible with the project's SEA/SH framework, the GBV Specialist shall issue written rejection with detailed grounds. In such cases, the PDT shall provide the contractor with the EXCEL standard template materials under Annex 1 and Annex 1a as a replacement baseline. The contractor must adopt the standard templates or resubmit substantially revised

materials within seven working days. Works shall not commence until approved SEA/SH materials are in place and trainings conducted;

- **No commencement without approval:** Under no circumstances shall a contractor conduct worker induction sessions, deliver SEA/SH training, or mobilize workers to project sites before written approval of their SEA/SH Code of Conduct and training materials has been granted by the PDT GBV Specialist. This requirement is a condition precedent to site mobilization and shall be reflected as such in the contractor's mobilization checklist maintained by the PDT.

D. Ongoing Oversight and Material Updates

GBV Specialist approval of contractor SEA/SH materials at the mobilization stage does not extinguish the PDT's oversight responsibility for SEA/SH content quality throughout the contract period. The following ongoing requirements apply:

- Where a contractor proposes to revise, supplement, or replace previously approved SEA/SH materials during the contract period, the revised materials must be resubmitted to the GBV Specialist for review and approval before use, following the same process and timelines established in subsection C above;
- The PDT GBV Specialist shall, during routine supervision visits conducted under Section 9.3, verify that the materials being used with the workforce correspond to the approved versions and have not been informally altered or supplemented without authorization;
- Where the PDT GBV Specialist identifies during supervision that unapproved or non-compliant SEA/SH materials are in use, this shall be treated as a serious compliance deficiency subject to corrective action under Section 9.5, including potential suspension of induction activities until compliant materials are restored;
- The PDT shall maintain a register of all contractor SEA/SH materials reviewed, the approval outcome, the date of approval, and any conditions or revisions required. This register shall be included as a component of the periodic environmental and social performance reports submitted to the World Bank under Section 10.5.

E. Relationship to Broader C-ESMP Approval

The GBV Specialist's approval of SEA/SH materials under this subsection is a distinct and specialized quality assurance step that operates within but is not subsumed by the broader C-ESMP approval process managed by the PDT Environmental and Social Safeguards Specialist. Both approvals are required before mobilization may proceed. The Safeguards Specialist retains overall responsibility for C-ESMP approval, while the GBV Specialist holds specific authority over SEA/SH content quality. Where the two specialists identify conflicting requirements or inconsistencies between the SEA/SH components and other C-ESMP elements, these shall be resolved through internal PDT coordination before approval is communicated to the contractor.

9.3 Supervision and Monitoring Arrangements

Contractor compliance shall be monitored through a combination of site inspections, documentation review, worker interviews, and periodic reporting. The Project Delivery Team, particularly the Environmental and Social Safeguards Specialist, shall conduct regular supervision visits to active worksites. These visits shall assess:

- Compliance with OHS requirements;
- Presence and proper use of PPE;
- Workforce registration records;
- Evidence of age verification;
- Code of Conduct display and training records;
- Functionality of site-level worker grievance channels.

Monitoring shall be risk-based. Sites with prior non-compliance or high workforce concentration may receive more frequent inspections. Supervision findings shall be documented in site visit reports, including identified deficiencies and required corrective actions. Contractors shall be required to implement corrective measures within defined timeframes. Where serious incidents occur, the PDT shall conduct or commission investigations and notify the World Bank in accordance with reporting requirements.

Figure 1: Contractor Oversight Flow Structure. This structured oversight process ensures that contractor compliance is continuous rather than one-time.

9.4 Reporting Requirements

Contractors are required to submit periodic labor compliance reports to the Project Delivery Team. The reporting frequency shall be defined in the contract but shall generally include monthly updates during active construction. Contractor reports shall include workforce numbers and composition; OHS performance data (injuries, near misses); grievances received and resolved; training conducted; any disciplinary actions taken; and SEA/SH-related incidents (without breaching confidentiality). The Project Delivery Team shall consolidate labor-related data into environmental and social performance reports submitted to the World Bank in accordance with ESCP obligations. This reporting architecture ensures traceability and accountability across the national implementation footprint.

Table 7: Contractor Reporting Matrix

Reporting Element	Frequency	Responsible Party	Recipient
Workforce Register Update	Monthly	Contractor	PDT
OHS Incident Report	Immediate (serious); Monthly summary	Contractor	PDT / WB (if serious)
Worker GM Log	Monthly	Contractor	PDT
SEA/SH Allegation Notice	Within 24 hours	Contractor	PDT

9.5 Non-Compliance and Sanctions

The Project adopts a graduated enforcement framework for contractor non-compliance. Where minor deficiencies are identified (e.g., incomplete documentation or delayed reporting), the PDT shall issue a written corrective action request with a defined compliance deadline. Where serious non-compliance is identified, such as engagement of underage workers, failure to enforce the Code of Conduct, serious OHS violations, or failure to report SEA/SH allegations, the PDT may issue formal warning notices; suspend works until corrective measures are implemented; withhold interim payments; recommend contract termination; or refer cases to competent authorities where required. Repeated or willful non-compliance shall be treated as material breach of contract.

The objective of sanctions is corrective rather than punitive; however, the Project will not tolerate violations that endanger workers, students, or community members.

10. MONITORING, REPORTING AND DOCUMENTATION

Effective labor management under the Project requires systematic monitoring, structured reporting, and disciplined documentation. Given the Project's nationwide footprint across fifteen counties and its Substantial Environmental and Social Risk classification, labor compliance cannot rely on informal oversight. It must be supported by verifiable records and defined reporting pathways.

Monitoring and reporting under EXCEL serve four core functions:

(i) Verification of compliance with the Labor Management Procedures (LMP);
(ii) Early identification of labor-related risks or emerging issues;
(iii) Documentation of corrective actions and enforcement measures;
(iv) Fulfillment of reporting obligations to the World Bank under the Environmental and Social Commitment Plan (ESCP).

This section defines institutional responsibilities, reporting templates, OHS documentation requirements, grievance tracking systems, and reporting obligations to the World Bank.

10.1 Roles and Responsibilities (MoE, PDT, Contractors)

Clear allocation of responsibility is fundamental to effective monitoring. Under EXCEL, labor oversight responsibilities are distributed as follows:

- **Ministry of Education (MoE):** The MoE retains overall accountability for compliance with ESS2 and national labor legislations. The MoE, through its Senior Management Team (SMT) or dedicated project leadership and project governance structures, ensures that labor obligations are embedded in procurement documents, contractual arrangements, and implementation oversight systems. The MoE is responsible for ensuring that sufficient staffing and institutional capacity exist within the Project Delivery Team to supervise labor compliance effectively.

- **Project Delivery Team (PDT):** The PDT, particularly the Environmental and Social Safeguards Specialist, serves as the operational focal point for LMP implementation. The PDT is responsible for reviewing and approving Contractor Environmental and Social Management Plans (C-ESMPs), including labor and OHS sections; Conducting routine site supervision and compliance inspections; maintaining centralized labor compliance records; consolidating contractor reports into project-level environmental and social performance reports; and escalating serious incidents in accordance with ESCP requirements. The PDT also oversees implementation of the Worker Grievance Mechanism and ensures that retaliation protections are enforced.

- **Contractors:** They bear primary responsibility for day-to-day labor management and occupational safety at worksites. They are required to maintain accurate worker registers; ensure compliance with wage, age verification, and working hour requirements; conduct OHS induction and training; maintain incident logs and grievance registers; and submit periodic labor compliance reports to the PDT; implement and enforce the EXCEL Code of Conduct among all their personnel and subcontractors, including conducting induction, obtaining signed Codes of Conduct from every worker before mobilization, and enforcing disciplinary measures for violations as required under Section 7; and operationalize the site-level Workers' Grievance Mechanism, including designating a grievance focal point, maintaining a grievance log, communicating GM channels to all workers, and reporting grievance data in monthly labor reports as required under Sections 8 and 9.4. Failure by contractors to fulfill any of these responsibilities constitutes contractual non-compliance . Failure by contractors to fulfill these responsibilities constitutes contractual non-compliance.

10.1a Community Workers: Guidance for Volunteers and School Management Committee Members

As noted in Section 2.2.4 and the risk assessment contained in Section 3.2.2, the EXCEL Project engages community members in school-level activities whose participation constitutes community labor within the meaning of ESS2. This includes members of School Management Committees (SMCs) who administer school improvement grants and oversee school-level implementation, as well as community volunteers supporting mobilization campaigns such as "Back to My Classroom." Although these individuals are not formally employed by the Ministry of Education, their engagement in project-supported activities creates obligations on the part of the Project to ensure that they are adequately informed, protected, and supported.

This subsection establishes the minimum standards governing the engagement, conduct, safety, and grievance access of community workers under EXCEL.

A. Conduct Expectations

Community workers, including SMC members and Community Volunteers, are expected to conduct themselves in a manner consistent with the principles established in the EXCEL Code of Conduct (Annex 1). Community workers shall not be required to sign the full Contractor Code of Conduct, as many of its provisions are inapplicable to their role. Instead, all community workers shall sign a simplified Community Volunteer Commitment prior to commencing any project-supported activity. This simplified instrument shall cover only the obligations relevant to their actual scope of engagement: For all community workers (SMC members and volunteers):

(i) Treat all students, teachers, parents, and community members with dignity and respect;
(ii) Refrain from any form of harassment, discrimination, intimidation, or abuse, including sexual harassment and exploitation;
(iii) Report any safeguarding concerns or suspected misconduct to the designated project focal point immediately. For SMC members only (additional obligations relevant to their fiduciary role):
(iv) Administer school improvement grants transparently and in accordance with PIM procedures;
(v) Avoid conflicts of interest in grant administration;
(vi) Cooperate with PDT supervision and monitoring visits.

The simplified Community Volunteer Commitment template shall be developed by the PDT Social and GBV Specialist and provided to all county focal points prior to community worker engagement.

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Prior to commencing any project-supported activity, all community volunteers including SMC members supporting the Back to My Classroom initiative, shall sign a simplified Community Code of Conduct acknowledging their understanding of and commitment to the behavioral expectations set out above. Signed copies shall be retained by the Project Delivery Team or designated county focal point. No community volunteer shall commence project-supported activities without a signed acknowledgment on file

For SMC members specifically, conduct expectations extend to the transparent and accountable administration of school improvement grants in accordance with the Project Implementation Manual (PIM). Any misuse of grant funds or abuse of fiduciary authority shall be treated as a serious violation and referred to the appropriate project authority for investigation. Orientation on conduct expectations shall be delivered by the Project Delivery Team or designated county-level focal points prior to the commencement of community worker engagement. Attendance at orientation sessions shall be documented.

B. Safety Protocols and Personal Protective Equipment (PPE)

The Ministry of Education, through the Project Delivery Team, shall ensure that all community workers are provided with the necessary information, instruction, and any personal protective equipment (PPE) required to carry out their activities safely, consistent with the requirements of ESS2 and the OHS framework established in Section 6 of this LMP. The specific safety requirements applicable to community workers shall be proportionate to the nature of their activities:

- Community volunteers engaged in physical mobilization activities, including materials handling, site support, or logistical assistance related to school campaigns, shall be briefed on relevant physical hazards and provided with appropriate PPE such as gloves, footwear, or high-visibility vests where required;
- SMC members overseeing or monitoring rehabilitation works at school level shall not enter active construction zones without appropriate site safety induction and, where required, PPE consistent with the requirements established in Section 6.2 and Section 6.3;
- All community workers shall be informed of emergency procedures applicable to their work location, including evacuation routes and emergency contact information, as required under Section 6.5.

Safety briefings for community workers shall be delivered in plain language and, where necessary, in local languages or dialects to ensure comprehension. Visual aids and simple printed materials shall be used where literacy levels may limit the effectiveness of written instruction. The PDT shall maintain records of safety briefings delivered to community worker groups.

C. Access to the Grievance Mechanism

Community workers under EXCEL shall have clear, accessible, and confidential access to the Worker Grievance Mechanism established in Section 8 of this LMP. The Project recognizes that community volunteers and SMC members may face particular barriers to raising concerns, including social pressure within tight-knit communities, fear of exclusion, or unfamiliarity with formal reporting processes.
To address these barriers, the following measures shall apply:

- Information on available grievance channels, including phone contacts, written submission options, and the identity of local focal points, shall be communicated to all community workers during orientation in plain and accessible language;
- Anonymous complaint submission shall be available to community workers who fear retaliation or social consequence, consistent with the provisions of Section 8.3;
- SMC members who serve as community-level focal points under the Project GRM structure shall not be designated as the sole grievance channel for other community workers, given the potential for conflict of interest; ...alternative channels must be clearly communicated. Alternative channels available to community workers include: (i) direct submission to the County-level GM focal person designated under the EXCEL GRM structure; (ii) direct submission to the PDT Safeguards Specialist by phone or in person during supervision visits; and (iii) any project hotline or dedicated contact number established under the EXCEL GRM Manual. Contact details for these channels shall be posted visibly at school level using the awareness materials developed under Section 8.2a. See also Table 5 (Worker GRM Access Channels) for the full channel matrix.
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- Any complaint submitted by a community worker involving SEA/SH, safeguarding concerns, or grant misuse shall be escalated immediately to the Project Delivery Team in accordance with the protocols established in Sections 8.5 and 8.7;

The PDT shall ensure that grievance channel information is displayed visibly at school level, using posters or notice boards that are accessible to community members, including those with limited literacy, through the use of icons or visual representations of complaint pathways. Community workers shall be explicitly informed that retaliation against any person who submits a complaint in good faith is strictly prohibited under the EXCEL Project and constitutes a serious violation subject to investigation and sanction.

10.1b Information, Instruction, and Personal Protective Equipment for Community Workers

In accordance with Environmental and Social Standard 2 (ESS2) and the obligations set out in the Environmental and Social Commitment Plan (ESCP), the Ministry of Education, as Borrower, will ensure that all community workers engaged under the EXCEL Project are provided with the necessary information and instruction, and any personal protective equipment (PPE) required to carry out their activities safely. This obligation applies regardless of whether community workers are compensated or participating on a voluntary basis, and regardless of the duration or scale of their engagement. This commitment reflects the Project's recognition that community workers, including School Management Committee members and Community Volunteers, may be exposed to occupational and safety risks in the course of their project-supported activities, and that the informal nature of their engagement must not result in a lower standard of protection than that afforded to other categories of project workers.

A. Provision of Information and Instruction

Prior to commencing any project-supported activity, community workers shall be provided with clear, accessible, and comprehensible information covering the following:

- The nature of the activities they will be performing and any associated hazards or risks;
- The safety rules, protocols, and behavioral expectations applicable to their work location, including school compound safety requirements where relevant;
- Emergency procedures applicable to their assigned site, including evacuation routes and emergency contact details, consistent with Section 6.5 of this LMP;
- Their rights as community workers under this LMP, including their right to raise concerns or complaints through the Worker Grievance Mechanism established in Section 8, without fear of retaliation;
- The conduct standards expected of them under the EXCEL Code of Conduct framework, as described in Section 10.1a.

Information and instruction shall be delivered in plain language and, where necessary, in local languages or dialects to ensure comprehension. Where literacy levels may limit the effectiveness of written materials, oral briefings supported by visual aids, diagrams, or pictorial safety guidance shall be used. The Project Delivery Team, through county-level focal points, is responsible for ensuring that information and instruction sessions are conducted, documented, and retained on record.

B. Provision of Personal Protective Equipment

Where the nature of a community worker's activities creates exposure to physical hazards, the Ministry of Education shall ensure that appropriate PPE is identified, procured, and made available to community workers at no cost to the individual worker. PPE requirements shall be determined based on a straightforward assessment of the activities to be performed and the hazards present at the relevant location. Indicative PPE requirements by activity type are as follows:

- Community volunteers engaged in physical mobilization, materials handling, or logistics support shall be provided with, at minimum, appropriate footwear, gloves, and high-visibility vests where required;
- SMC members or community volunteers present at or near active construction or rehabilitation sites shall receive a basic site safety briefing consistent with Section 6.3 and shall not enter active construction zones without appropriate PPE and site induction;
- Community workers involved in the distribution, offloading, or storage of teaching and learning materials or school supplies shall be provided with gloves and appropriate footwear to prevent manual handling injuries.

The Project Delivery Team shall maintain records of PPE issued to community worker groups, including the type of equipment provided, the number of individuals covered, and the date of issue. Community workers shall be instructed on the correct use and maintenance of any PPE provided. PPE that is damaged, lost, or no longer fit for purpose shall be replaced without charge to the community worker.

C. Responsibility and Oversight

Overall responsibility for ensuring compliance with this subsection is divided by subject matter. The **Environmental Specialist (PDT)** holds primary responsibility for ensuring that community volunteers receive adequate safety information and access to appropriate PPE prior to engagement, and that OHS-related compliance provisions are met. The **PIU GM Focal Point (Social and GBV Specialist)** holds primary responsibility for ensuring that community volunteers understand SEA/SH prohibitions, have signed the simplified Community Code of Conduct, and have clear access to the grievance mechanism. At county and school level, designated focal points shall coordinate the delivery of information sessions and PPE distribution under the guidance of the respective PDT lead, and shall report compliance status to both specialists as relevant. The PDT shall include a summary of community worker information, instruction, and PPE provision in its periodic environmental and social performance reports submitted to the World Bank in accordance with ESCP reporting obligations, as described in Section 10.5

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10.2 Labor Reporting Templates

Standardized reporting templates are required to ensure consistency and comparability across worksites and counties. Contractors shall submit monthly labor compliance reports using approved templates provided by the PDT. These templates shall capture:

- Workforce numbers (disaggregated by gender and category);
- New hires and terminations;
- Confirmation of age verification procedures;
- OHS training sessions conducted;
- Incidents and near-misses recorded;
- Grievances received and resolved;
- Code of Conduct enforcement actions.

The use of standardized templates ensures that labor data is consolidated in a structured format for analysis.

Table 8: Core Labor Reporting Indicators

Indicator	Reporting Frequency	Data Source
Total workforce (by category)	Monthly	Contractor register
Number of local laborers	Monthly	Contractor report
Number of safety trainings conducted	Monthly	Training log
Incidents (minor/serious)	Immediate (serious); Monthly summary	Incident register
Grievances received/resolved	Monthly	Grievance log
Code of Conduct violations	Monthly	Disciplinary records

10.3 OHS Reporting

Occupational health and safety reporting is a central component of labor oversight. Contractors shall maintain a site-level OHS register documenting:

- Injuries and illnesses;
- Near misses;
- Lost time incidents;
- Medical referrals;
- Corrective actions taken.

Serious incidents, including fatalities, severe injuries, structural failures, or incidents affecting students, must be reported to the PDT within twenty-four (24) hours. The PDT shall notify the World Bank in accordance with ESCP reporting timelines.

OHS performance data shall be analyzed periodically to identify trends and recurring risk patterns. Where patterns of unsafe practices are identified, targeted corrective measures shall be implemented.

10.4 Grievance Tracking

Worker grievances shall be recorded in a structured grievance log maintained at contractor level and consolidated at PDT level. Each grievance record shall include:

- Date received;
- Category of grievance (wage, OHS, harassment, discrimination, etc.);
- Action taken;
- Resolution date;
- Escalation status (if applicable).

Confidential cases, particularly SEA/SH-related complaints, shall be logged in a restricted-access format consistent with confidentiality protocols established under the Project's GRM Manual. Periodic analysis of grievance trends shall inform preventive management measures.

Table 9: Grievance Tracking Framework

Grievance Category	Logged at Site Level	Reviewed by PDT	Escalation Required?
Wage disputes	✔	✔	If unresolved
OHS complaints	✔	✔	If serious
Discrimination	✔	✔	Case-specific
SEA/SH allegations	Restricted	✔ (Confidential)	Immediate. However, escalation to the Social and GBV Specialist (PIU GM Focal Point) and referral to dedicated support services (medical, psychosocial, legal) are activated simultaneously upon identification. Referral is not contingent on the outcome or progress of escalation. Both are mandatory and concurrent

10.5 World Bank Reporting Obligations

The EXCEL Project is subject to reporting requirements defined in the Environmental and Social Commitment Plan (ESCP). In its quarterly E&S Reports submitted to the World Bank, the PDT shall include labor-related performance data, These reports shall summarize:

- Labor compliance performance;
- OHS statistics;
- Grievance trends;

- Serious incidents and corrective measures;
- Status of Code of Conduct enforcement;
- Any non-compliance cases and remedial actions.

In addition, any significant incident involving severe injury, fatality, or SEA/SH allegation must be reported to the World Bank promptly, in accordance with defined notification timelines.
This structured reporting ensures transparency and enables the World Bank to exercise its oversight function effectively.

11. CAPACITY BUILDING AND TRAINING

Effective implementation of the Labor Management Procedures (LMP) under the Excellence in Learning in Liberia (EXCEL) Project depends not only on contractual compliance but on sustained institutional capacity. Given the Project's Substantial environmental and social risk classification and its operation within primary school environments, capacity building functions as a preventive risk management tool. Labor risks in decentralized education infrastructure programs often arise from inadequate awareness, inconsistent supervision, or weak documentation practices. The EXCEL Project therefore adopts a structured capacity development framework designed to strengthen compliance at three levels:

(i) contractor workforce level;
(ii) Project Delivery Team (PDT) supervisory level; and
(iii) institutional oversight level within the Ministry of Education.

Capacity building under EXCEL is organized around four integrated domains: occupational health and safety; safeguarding and SEA/SH, SRGBV prevention; labor law compliance; and contractor compliance orientation. These domains are sequenced across the project lifecycle to ensure reinforcement rather than one-time sensitization.

11.1 Occupational Health and Safety (OHS) Training

Occupational health and safety training under EXCEL is structured as a layered system rather than a one-off induction. Because civil works take place within active school compounds, the consequence of safety failure extends beyond worker injury to potential harm to minors. OHS training therefore addresses both occupational and community safety dimensions. At the pre-mobilization stage, contractors are required to conduct formal OHS induction sessions for all workers prior to entry onto site. These sessions must address site-specific hazards identified in the approved C-ESMP, safe equipment handling, fall prevention measures, electrical safety, sanitation and hygiene protocols, emergency response procedures, and reporting obligations.

Once works commence, monthly toolbox talks are required to reinforce safe practices and address emerging risks. These shorter sessions allow supervisors to respond dynamically to site conditions, weather variability, or changes in workforce composition. The Project Delivery Team retains oversight responsibility for verifying that OHS training is being implemented effectively. During supervision visits, training attendance records and safety brief documentation are reviewed alongside on-site observations. The OHS training system is summarized below in the table below.

Table 10: OHS Capacity Development Structure

Training Level	Objective	Target Participants	Frequency	Verification Method
Pre-Mobilization Induction	Introduce site-specific hazards and safety procedures	All contracted workers	Before site entry	Signed attendance sheet
Supervisor Safety Briefing	Strengthen oversight responsibility	Site supervisors	Before works commence	Supervisor acknowledgment
Monthly Toolbox Sessions	Reinforce safe practices and address emerging risks	Site workforce	Monthly during works	Toolbox logbook
Corrective Retraining	Address deficiencies after incidents or inspections	Affected workers	As required	Corrective action report

Training documentation must be retained at site level and consolidated in monthly contractor reports.

11.2 SEA/SH Awareness and Safeguarding Training

Given the Project's implementation within primary schools, safeguarding training is an essential compliance requirement rather than a supplementary awareness activity. The Environmental and Social Review Summary identifies SEA/SH and child protection risks as relevant to the Project's social risk profile, necessitating structured prevention measures. SEA/SH training is delivered at three distinct points: pre-engagement, pre-mobilization, and periodic reinforcement. At the pre-engagement stage, all workers must review and sign the Code of Conduct and SEA/SH Compliance Addendum. This establishes formal acknowledgment of behavioral standards.

Prior to site mobilization or field deployment, contractors and consultants must participate in safeguarding orientation sessions. These sessions explain prohibited behaviors, child protection principles, reporting pathways, survivor-centered response protocols, and legal consequences of violations. Periodic refresher sessions are conducted where project supervision identifies risk factors such as high worker turnover, new subcontractor mobilization, or community-level complaints. The safeguarding training structure is presented below:

Table 11: Safeguarding and SEA/SH Training Framework

Training Phase	Focus Area	Participants	Timing	Monitoring Authority
Code of Conduct Briefing	Behavioral obligations; zero tolerance policy	All workers	Before contract activation	Contractor / PDT
Safeguarding Orientation	Child protection and SEA/SH definitions	Contractors, direct workers	Before field deployment	PDT
Refresher Awareness	Reinforcement and case review	Active workforce	Periodic / Risk-based	PDT
Specialized Training	Survivor-centered handling procedures	Safeguards staff	Annual or as needed	MoE / PDT

The effectiveness of safeguarding training is assessed through site interviews, supervision observations, and grievance trend analysis.

11.3 Labor Law Orientation

Labor compliance challenges in infrastructure projects frequently arise from misunderstanding of statutory obligations regarding wages, working hours, termination procedures, and worker documentation. To address this, EXCEL integrates structured labor law orientation into contractor engagement. Labor law orientation sessions are delivered to contractors, site supervisors, and relevant PDT staff prior to works commencement. These sessions clarify obligations under the Liberian Decent Work Act, including minimum age of employment, wage payment standards, documentation requirements, leave entitlements, prohibition of forced labor, and worker grievance rights. Rather than presenting labor law as abstract regulation, orientation sessions translate legal provisions into operational expectations, such as maintaining payroll records, verifying age documentation, and documenting disciplinary measures.

11.4 Contractor Pre-Mobilization Compliance Orientation Sessions

Contractor orientation sessions are mandatory pre-mobilization compliance briefings convened by the Project Delivery Team for all contractors awarded civil works, service, or supply contracts under EXCEL. Their purpose is to ensure that contractor management personnel, specifically site supervisors, the designated grievance focal point, and the designated OHS focal point, fully understand the LMP requirements, contractual obligations, and operational procedures they are required to implement and

enforce among their workforce. These are not administrative sign-off meetings. They are structured technical sessions that must demonstrate contractor readiness before any worker is mobilized to site During contractor orientation, the following are reviewed in detail:

- The Labor Management Procedures (LMP);
- C-ESMP submission requirements;
- Worker grievance procedures;
- OHS and safeguarding obligations;
- Reporting timelines and documentation formats;
- Incident escalation procedures consistent with ESCP commitments

Contractors are required to demonstrate understanding of compliance obligations prior to mobilization. Orientation minutes are documented and signed by contractor representatives. The sequencing of contractor capacity development is illustrated below:

This structured progression ensures that labor compliance capacity is embedded before operational risks materialize. Capacity building under the EXCEL Project is designed as a continuous, system-wide process that reinforces labor compliance across decentralized worksites. By integrating occupational safety training, safeguarding awareness, labor law orientation, and structured contractor compliance briefings, the Project ensures that labor management standards are operationalized rather than merely documented. This structured approach strengthens preventive risk management and supports compliance with ESS2 and ESCP reporting obligations across the Project lifecycle.

11.5 School Management Committee Orientation on Social Oversight and Community Concerns

The EXCEL Project recognizes School Management Committees as institutional partners in school-level governance. Through the project's school grants mechanism and improvement planning processes, SMCs are positioned with the authority, community presence, and local knowledge to serve not only as fiduciary stewards of school resources but as active contributors to social oversight at the point of project implementation. This subsection formalizes that role within the LMP's capacity-building framework by establishing a targeted SMC orientation program focused on contractor Code of Conduct monitoring and community-level grievance channeling. This orientation is distinct from general SMC capacity building provided under other project components. It is specifically designed to equip SMC members with the awareness, tools, and confidence to fulfill a social oversight function in relation to contractor behavior and community concerns arising from project activities at school level.

A. Rationale for SMC Engagement in Social Oversight

SMC members are community residents. They are present at schools on a regular basis, they know the community, and they are trusted by parents and students in ways that project staff deployed from county or national level may not be. When contractors are active within school compounds, SMC members are often the first to observe behavioral concerns, safety lapses, or community tensions that may not be visible to the Project Delivery Team during periodic supervision visits.

Without structured orientation, however, SMC members may not know what to look for, may not understand their role in relation to project safeguards, and may not know how to channel concerns they receive from community members into the project's formal accountability systems. The orientation established under this subsection addresses each of these gaps directly.

B. Content of the SMC Social Oversight Orientation

The SMC orientation shall be delivered by the Project Delivery Team, with support from county-level focal points where applicable, prior to the commencement of any contractor activity at the relevant school. The orientation must cover the following content areas in full:

- **Overview of the EXCEL Code of Conduct and contractor behavioral standards:** SMC members shall be provided with a plain-language summary of the behavioral standards that all contractors and project workers are required to uphold under the EXCEL Code of Conduct, as established in Section 7 and Annex 1. This summary must explain, in accessible terms, what constitutes acceptable and unacceptable worker behavior within the school environment, with particular emphasis on conduct toward students, school staff, and community members. SMC members do not need to read the full Code of Conduct; they need to understand its core prohibitions and expectations well enough to recognize when those standards may not be being met.

- **The SMC's role in monitoring contractor adherence**: SMC members shall be clearly informed that they have a recognized and valued role in observing contractor behavior and raising concerns when standards appear not to be met. This role is observational and reporting-oriented, SMC members are not expected to confront contractors, investigate incidents, or adjudicate disputes. Their function is to serve as an additional set of informed, community-based eyes that complement the PDT's formal supervision function. Orientation must make this boundary of responsibility explicit so that SMC members understand what is expected of them and are not placed in situations of personal risk or conflict.

- **Specific behaviors and situations to watch for:** The orientation shall provide SMC members with concrete, practical guidance on the types of behaviors and conditions that warrant reporting. These include, but are not limited to: workers entering school spaces or interacting with students in ways that appear inappropriate or unsupervised; failure to maintain site segregation or physical barriers between construction zones and active school areas as required under Section 6.3; workers not using required PPE in areas visible to students; signs of community tension, intimidation, or adverse interaction between contractor personnel and parents or community members; and any situation that appears to put the safety, dignity, or well-being of students or school staff at risk.

- **How to channel concerns and complaints:** SMC members shall be informed of the specific channels available to them for reporting observations and community concerns. This must include the name and contact details of the PDT Environmental and Social Safeguards Specialist, the county-level focal point where applicable, and any project hotline or GRM contact established under the EXCEL GRM Manual. SMC members must understand that they can report concerns on behalf of community members who may themselves be reluctant to engage with formal channels, and that doing so is a recognized and protected function under the project's accountability framework. Where an SMC member receives a concern from a parent, student, or

community member, they shall be guided to document it simply and refer it promptly to the appropriate project channel rather than attempting to resolve it independently.

- **The distinction between the SMC's community oversight role and the formal Worker GM:** Orientation must clearly explain that the SMC does not constitute a formal tier of the Worker Grievance Mechanism established in Section 8 and is not a substitute for it. Workers who wish to raise employment-related grievances must access the Worker GM directly through the channels described in Section 8.3. The SMC's role is specifically oriented toward community-level concerns and contractor behavioral observations, not internal labor disputes. This distinction is important both to protect SMC members from being placed in inappropriate adjudicatory roles and to protect the integrity of the Worker GM's confidentiality framework.

- **Handling of SEA/SH and child safeguarding concerns**: SMC members shall receive explicit guidance on what to do if they become aware of, or receive a report of, potential sexual exploitation, abuse, sexual harassment, or any other child safeguarding concern. The orientation must make clear that such concerns must never be handled informally, mediated at community level, or suppressed. SMC members must refer any such concern immediately and confidentially to the PDT Safeguards Specialist or GBV focal point, in accordance with the escalation procedures established in Sections 8.5 and 8.7. The survivor-centered principles governing the handling of SEA/SH allegations must be communicated in plain terms, including the prohibition on confronting alleged perpetrators or sharing information beyond those who need to know.

C. Format and Delivery of the Orientation

The SMC orientation shall be delivered as a structured, participatory session of sufficient duration to cover all content areas meaningfully. A minimum of half a day is recommended where SMC members are engaging with contractor oversight responsibilities for the first time. The session shall use plain language, visual aids, and practical scenarios or role-play exercises where appropriate to build confidence and comprehension. Written reference materials, including a one-page plain-language summary of the SMC's oversight role and key contact details, shall be provided to each SMC member attending the orientation and shall remain available at school level for future reference. Attendance at the orientation session shall be documented, including the names of SMC members present, the date and location of the session, and the name of the PDT or focal point facilitator. This documentation shall be retained in project records and referenced in periodic environmental and social performance reports submitted to the World Bank under Section 10.5.

D. Ongoing Support and Feedback

SMC orientation is a starting point, not a one-time transaction. The Project Delivery Team shall maintain communication with SMC members throughout the period of contractor activity at each school, providing updates on any changes to contractor personnel, project timelines, or relevant behavioral standards. SMC members shall be encouraged to raise observations or questions during PDT supervision visits and shall be informed of the outcomes of any concerns they have previously referred, to the extent permitted by confidentiality obligations. Where SMC members identify gaps in their understanding or request additional guidance, the PDT shall respond promptly and document the support provided.

11.6 Primary Supply Chain Due Diligence

The Project Appraisal Document confirms that the EXCEL Project will finance the development, printing, digitization, and distribution of teaching and learning materials (TLMs) for use across Liberia's public primary schools. This supply chain involves engagement with printing companies, binderies, warehousing operators, and distribution and logistics providers whose workforces operate outside the direct management and oversight of the Ministry of Education. As established in Sections 2.2.3 and 3.5 of this LMP, primary supply workers are recognized under ESS2 as a distinct category of project workers where

there is a credible risk of child labor, forced labor, or serious safety violations, and where the project bears a responsibility to assess and manage those risks proportionately.

While the existing LMP framework establishes the basis for primary supplier screening, the World Bank has correctly identified that this framework requires greater operational specificity to be effective. This subsection therefore establishes a structured set of due diligence actions that the Ministry of Education, through the Project Delivery Team, must implement in relation to all primary suppliers engaged under EXCEL-financed contracts. These actions apply from the procurement stage through to contract execution and ongoing monitoring.

A. Pre-Qualification and Procurement Stage Due Diligence

Labor compliance due diligence begins before contract award. The MoE shall integrate supplier labor screening into the procurement process for all primary supply contracts, including contracts for TLM printing, digitization services, furniture supply, and distribution logistics. At the pre-qualification or bid evaluation stage, the following requirements shall apply:

- All prospective primary suppliers shall be required to declare, as part of their bid submission, whether they have a documented labor management policy or equivalent framework governing their employment practices. Suppliers that cannot demonstrate any form of labor policy shall be flagged for enhanced scrutiny during evaluation;
- Prospective suppliers shall be required to complete a supplier labor and OHS self-declaration form, developed by the PDT, confirming their practices in relation to employment contracts, wage payment, working hours, child labor prevention, and workplace safety. The self-declaration shall be signed by an authorized representative of the supplier and retained on the procurement file;
- Where a prospective supplier's self-declaration reveals gaps or risks in their labor practices, the MoE may require clarification, impose contractual conditions, or, in cases of significant concern, exclude the supplier from consideration in accordance with applicable procurement rules.

B. Mandatory Contractual Requirements for Primary Suppliers

All contracts awarded to primary suppliers under the EXCEL Project shall include explicit labor compliance clauses as a condition of contract. These clauses are non-negotiable and shall be incorporated into all relevant supply contracts, including those for TLM printing, digitization, school furniture, and distribution services. The mandatory contractual requirements shall include the following:

- **Submission of labor and OHS policies:** Each primary supplier must provide the Project Delivery Team with copies of their current labor management policy and occupational health and safety policy, or equivalent documentation, within thirty days of contract award and prior to commencement of supply activities. These documents must demonstrate that the supplier has established internal systems for managing employment conditions and workplace safety in their own operations. Where a supplier does not have formal written policies, they must prepare and submit a written commitment statement, acceptable to the PDT, outlining the minimum labor and safety standards they apply in their operations. Suppliers shall notify the PDT of any material changes to their labor or OHS policies during the contract period;

- **Certification of no child labor:** Each primary supplier must certify in writing, as a condition of contract, that they do not employ any person under the minimum legal working age in their operations, and that no person under eighteen years of age is engaged in any task that is classified as hazardous under Liberian law or international labor standards. This certification must cover not only the supplier's direct workforce but also any subcontractors or labor providers they engage in the performance of EXCEL-financed work. The certification must be signed by an authorized senior representative of the supplier and resubmitted annually for contracts extending beyond twelve months;

- **Certification of no forced labor:** Each primary supplier must certify in writing that their operations are free from all forms of forced, compulsory, bonded, or trafficked labor, consistent with the prohibitions established in Section 5.6 of this LMP and applicable Liberian law. The certification must confirm that workers in the supplier's operations are free to terminate their employment in accordance with applicable notice requirements, that no worker identification documents are withheld, and that no recruitment fees or debt arrangements are used to bind workers to employment. As with the child labor certification, this commitment must extend to subcontracted labor within the scope of EXCEL-financed activities;

- **Right of access for monitoring:** Contracts with primary suppliers shall include a clause granting the Ministry of Education and the World Bank the right to conduct or commission labor compliance assessments, audits, or site visits at supplier facilities used in the performance of EXCEL-financed work, with reasonable advance notice. Suppliers must cooperate fully with any such assessment and make relevant records, including payroll documentation, worker registers, and OHS records, available for review upon request.

C**. Specific Due Diligence Actions for TLM Printing and Digitization Suppliers**

Given the PAD's explicit confirmation that EXCEL financing covers the development, printing, digitization, and distribution of teaching and learning materials, printing companies and digitization service providers represent the highest-priority primary supplier category for labor due diligence purposes. The following specific due diligence actions apply to this supplier category in addition to the general requirements above:

- Prior to contract award, the PDT shall conduct a desk-based review of each shortlisted printing or digitization supplier, drawing on publicly available information, industry references, and the supplier's self-declaration, to assess the supplier's labor risk profile. Factors to consider include the scale of the supplier's workforce, their use of subcontracted or casual labor, the availability of documentation on their employment practices, and any prior labor-related complaints or violations on record;
- Where a printing or digitization supplier operates facilities that can be practically visited within Liberia, the PDT Environmental and Social Safeguards Specialist shall conduct or commission a pre-contract facility visit to verify the accuracy of the supplier's self-declaration and assess working conditions firsthand. The visit shall include observation of the production environment, a review of a sample of worker documentation, and an assessment of OHS conditions in printing and bindery areas, which may involve exposure to chemical solvents, noise, and repetitive strain hazards;
- During contract execution, TLM printing and digitization suppliers shall submit a brief annual labor compliance update to the PDT confirming continued adherence to their submitted labor and OHS policies and the accuracy of their child and forced labor certifications. Any changes to workforce size, subcontracting arrangements, or production locations shall be disclosed to the PDT promptly;
- Where the PDT identifies credible evidence of child labor, forced labor, or serious OHS violations in a primary supplier's operations, it shall take proportionate remedial action consistent with the corrective action framework in Section 9.5, which may include requiring a corrective action plan, suspending procurement activity with the supplier, or terminating the supply contract in cases of confirmed and violations that are not remediated.

D. Distribution and Logistics Suppliers

Workers employed by distribution and logistics suppliers, including those engaged in the warehousing, loading, offloading, and transport of TLMs and other project materials, are classified as primary supply workers under ESS2 where those suppliers operate in direct and ongoing connection with core project functions. It is the individual workers employed by such suppliers, not the supplier entity itself, that ESS2 designates as primary supply workers. Due diligence and contractual compliance obligations under this section apply to the labor practices applicable to those individual workers
. The following due diligence actions apply specifically to this supplier category:

- Distribution and logistics suppliers must confirm in their contractual labor compliance certification that all workers engaged in loading, offloading, and transport of project materials are covered by written employment or engagement agreements and are compensated in accordance with Liberian labor law;
- Where distribution activities involve manual handling of heavy materials, such as textbook consignments, suppliers must demonstrate that they have in place basic manual handling safety protocols and that workers are provided with appropriate PPE, including gloves and appropriate footwear, consistent with the PPE requirements established in Section 10.1b;
- The PDT shall include a summary of primary supplier due diligence actions completed, certifications received, and any compliance concerns identified in its periodic environmental and social performance reports submitted to the World Bank under Section 10.5.

E. Proportionality and Risk-Based Approach

The due diligence actions established in this subsection are designed to be proportionate to the nature and scale of each supplier's engagement and the credibility of associated labor risks. Not all primary suppliers present the same risk profile, and the intensity of due diligence shall be calibrated accordingly. Suppliers with larger workforces, more complex supply chains, or activities in higher-risk labor categories shall receive more intensive scrutiny than smaller, lower-risk suppliers. The PDT shall maintain a simple supplier risk register, updated at the pre-qualification stage and reviewed annually, to guide the allocation of due diligence resources across the primary supply chain.

ANNEXES

Annex 1: Code of Conduct and Professional Commitment

Excellence in Learning in Liberia (EXCEL) Project
Ministry of Education, Republic of Liberia

1. Legal Status and Binding Effect

This Code of Conduct ("Code") constitutes a mandatory and legally binding condition of engagement for all persons employed or contracted under the Excellence in Learning in Liberia (EXCEL) Project. Execution of this Code is a prerequisite for participation in any EXCEL-financed activity. Compliance with its provisions is a contractual obligation enforceable under the terms of employment, consultancy agreement, or civil works contract. The Code applies to all direct workers, consultants, trainers, enumerators, contractors, subcontractors, and supplier personnel present at EXCEL-supported sites.

Failure to comply with this Code shall constitute grounds for disciplinary action, including suspension, termination of engagement, and referral to competent authorities where warranted.

2. General Professional Obligations

I acknowledge that I am engaged under a project implemented within primary school environments and that my conduct must reflect the highest standards of professionalism, integrity, and respect.
In accepting engagement under EXCEL, I expressly undertake to:

- Perform my duties lawfully, ethically, and in accordance with all applicable national legislation and project policies;
- Treat all students, teachers, colleagues, and community members with dignity and respect;
- Refrain from conduct that could harm individuals or undermine the reputation and credibility of the Project;
- Comply fully with occupational health and safety requirements and site-specific rules.

I understand that professional misconduct, negligence, or behavior inconsistent with these obligations may result in disciplinary measures.

3. Absolute Prohibition of Sexual Exploitation, Abuse, and Harassment

I acknowledge that the EXCEL Project operates in environments serving minors and that children are entitled to the highest level of protection under national law and international standards. I expressly affirm that I shall not:

- Engage in any sexual activity with a person under eighteen (18) years of age, irrespective of purported consent;
- Offer, solicit, or accept money, employment, goods, services, or other benefits in exchange for sexual activity;
- Engage in any form of sexual harassment, including unwelcome advances, suggestive language, physical contact, gestures, or intimidation;
- Exploit, coerce, or abuse any person by virtue of my position, authority, or access through the Project;
- Enter into romantic or sexual relationships with students.

I understand that any breach of this section constitutes gross misconduct and may result in immediate termination and referral to law enforcement authorities.

4. Protection of Children and Vulnerable Persons

- I acknowledge my duty to safeguard children and vulnerable persons encountered in the course of project implementation.
- I commit to maintaining appropriate professional boundaries at all times and shall not engage in any physical contact with students, any unsupervised interaction with students, or any unauthorized photography or recording of students or school premises. .
- Where I become aware of suspected abuse, exploitation, or safeguarding concerns, I shall immediately report such concerns through the designated reporting channels; and understand that failure to report known or suspected abuse may itself constitute misconduct.

5. Non-Discrimination and Respectful Conduct

- I affirm that I shall not discriminate against any individual on the basis of gender, ethnicity, religion, disability, age, political affiliation, or other protected characteristic.
- I shall not engage in bullying, intimidation, verbal abuse, threats, or any behavior that creates a hostile or unsafe working or learning environment.
- I understand that a respectful and inclusive workplace is a condition of employment under EXCEL.

6. Occupational Health and Safety Compliance

- I acknowledge that I have a duty to protect not only my own safety but also the safety of colleagues, students, and community members.
- I commit to complying with all site-specific safety instructions, using required personal protective equipment, and reporting unsafe conditions or incidents immediately.
- I understand that failure to comply with safety requirements may result in removal from site or termination of engagement.

7. Prohibition of Child Labor and Forced Labor

- I affirm that I shall not employ, facilitate, or tolerate the engagement of any person under eighteen (18) years of age in hazardous project-related work.
- I further affirm that I shall not participate in or facilitate forced labor practices, including coercion, intimidation, withholding of wages, or confiscation of identity documents.

8. Reporting and Non-Retaliation

- I acknowledge that the EXCEL Project maintains a Workers' Grievance Redress Mechanism and established procedures for reporting misconduct, including SEA/SH and safeguarding concerns.
- I commit to reporting violations of this Code in good faith. I understand that retaliation against any person who reports misconduct or cooperates with an investigation is strictly prohibited and constitutes a serious violation.

9. Disciplinary Consequences

- I understand that violations of this Code may result in disciplinary action proportionate to the severity of the offense. Such action may include formal warning, suspension, termination of employment or contract, and referral to competent national authorities.
- For contractor personnel, I understand that disciplinary enforcement is mandatory and that failure by the contractor to act may constitute breach of contract.

10. Declaration and Undertaking

I hereby declare that:

- I have read and understood the provisions of this Code of Conduct, recognize that compliance with this Code is a mandatory condition of my engagement under the EXCEL Project, and agree to abide by all obligations contained herein.
- I understand that violation of this Code may result in disciplinary action, including termination and possible legal consequences.

I sign this document freely and without reservation.

Name: _____

Position / Role: _____

Employer / Contractor: _____

Signature: _____

Date: _____

Annex 1a: Sexual Exploitation, Abuse, and Sexual Harassment (SEA/Sh) Compliance Addendum

1. Purpose and Legal Effect

This SEA/SH Compliance Addendum ("Addendum") forms an integral and binding part of all contracts, consultancy agreements, and subcontracts executed under the Excellence in Learning in Liberia (EXCEL) Project. This Addendum supplements the Project Code of Conduct and establishes enhanced compliance obligations specific to the prevention, reporting, and response to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and School-Related Gender-Based Violence (SRGBV). Execution of this Addendum is a condition of engagement. Non-compliance constitutes material breach of contract.

2. Definitions

For the purposes of this Addendum:

- **Sexual Exploitation and Abuse (SEA)** refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from sexual exploitation of another.
- **Sexual Harassment (SH)** refers to unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that interferes with work performance or creates an intimidating, hostile, or offensive environment.
- **Child** means any person under the age of eighteen (18) years.

3. Zero-Tolerance Commitment

The Contractor and all Project Workers expressly acknowledge and affirm that the EXCEL Project operates within primary school environments and that children are entitled to the highest standard of protection. The Contractor commits to a zero-tolerance policy toward SEA/SH and SRGBV. No SEA/SH-related misconduct shall be excused, minimized, or handled informally outside established procedures.
Any violation of this Addendum shall constitute gross misconduct.

4. Contractor Obligations

The Contractor shall:

- Ensure that all personnel sign the Project Code of Conduct and this SEA/SH Addendum prior to mobilization.
- Provide mandatory SEA/SH prevention training to all personnel before commencement of works and periodically thereafter.
- Appoint a designated focal point responsible for monitoring compliance with SEA/SH obligations at site level.
- Ensure that no worker engages in any sexual activity with a person under eighteen (18) years of age.
- Prohibit any exchange of money, employment, goods, services, or favors for sexual activity.
- Immediately remove from site any worker credibly accused of SEA/SH pending investigation.
- Report any SEA/SH allegation to the Project Delivery Team within twenty-four (24) hours of becoming aware of it.

Failure by the Contractor to enforce these obligations shall constitute breach of contract and may result in suspension or termination of the contract.

5. Worker Obligations

Each Project Worker affirms that he or she shall:

- Refrain from any form of sexual exploitation or abuse;
- Refrain from sexual harassment of students, teachers, colleagues, or community members;
- Maintain appropriate professional boundaries at all times;
- Report suspected SEA/SH misconduct through designated channels.

Workers understand that SEA/SH violations may result in immediate termination and referral to law enforcement authorities under applicable Liberian law.

6. Reporting and Confidentiality
SEA/SH allegations shall be handled in accordance with the Project's Grievance Redress Mechanism (GRM), which provides confidential and survivor-centered reporting pathways. The Contractor shall ensure that reports are treated with strict confidentiality; survivors are not subjected to retaliation; no attempt is made to privately settle or suppress SEA/SH allegations; and the PDT is notified promptly. The Contractor shall cooperate fully with any investigation initiated by the Ministry of Education or relevant authorities.

7. Survivor-Centered Approach
All responses to SEA/SH allegations shall prioritize the safety, dignity, and well-being of the survivor. Under no circumstances shall the survivor be compelled to confront the alleged perpetrator. No retaliatory action shall be taken against any individual who reports misconduct in good faith.

8. Sanctions
Confirmed SEA/SH violations shall result in immediate termination of employment or contract; permanent removal from all EXCEL Project activities; and referral to competent national authorities for investigation and prosecution where applicable. The Ministry of Education reserves the right to suspend or terminate contracts where SEA/SH compliance failures are identified.

9. Monitoring and Audit
The Project Delivery Team reserves the right to conduct site inspections to verify SEA/SH compliance; review training records and worker declarations; require corrective action plans where deficiencies are identified. The World Bank may review SEA/SH compliance performance in accordance with Environmental and Social Commitment Plan (ESCP) reporting requirements.

10. Declaration and Undertaking
I hereby acknowledge that I have read and understood this SEA/SH Compliance Addendum. I understand that compliance is mandatory and that violations may result in immediate disciplinary action, including termination and referral to authorities. I agree to abide by all provisions contained herein.

Name: _____

Position / Role: _____

Employer / Contractor: _____

Signature: _____

Date: _____

Annex 2: Worker Grievance Form

SECTION A: GRIEVANCE REGISTRATION (For Official Use Only)

Grievance Reference Number	Date Received	Received By	Level (Site / PDT / Escalated)

SECTION B: COMPLAINANT INFORMATION

(Workers may choose to remain anonymous. If anonymous, leave Section B blank.)

Full Name: _____

Position/Role: _____

Employer/Contractor: _____

Worksite / Location: _____

Contact Information (Phone/Email): _____

☐ I wish to remain anonymous

☐ I request that my identity be kept confidential

SECTION C: TYPE OF GRIEVANCE

Please indicate the category that best describes your concern:

☐ Wage or payment issue

☐ Working hours or leave

☐ Occupational Health and Safety concern

☐ Harassment or discrimination

☐ Code of Conduct violation

☐ SEA/SH-related concern (confidential handling required)

☐ Retaliation for reporting

☐ Other (please specify): _____

SECTION D: DESCRIPTION OF GRIEVANCE

Please describe your concern clearly, including relevant dates, persons involved, and any actions already taken.

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

(Attach additional pages if necessary.)

SECTION E: SUPPORTING INFORMATION
Are there any witnesses?
☐ Yes ☐ No
If yes, please provide names (if comfortable):
_____
_____
_____
_____

Are there any supporting documents?
☐ Yes (attached)
☐ No

SECTION F: DESIRED RESOLUTION (Optional)
Please indicate what outcome you are seeking:
_____
_____
_____
_____

SECTION G: RECEIPT ACKNOWLEDGMENT (To Be Completed by Receiving Officer)
I confirm receipt of this grievance and acknowledge that it will be processed in accordance with the EXCEL Worker Grievance Mechanism.

Name of Receiving Officer: _____
Signature: _____
Date: _____

SECTION H: REVIEW AND ACTION (For Official Use Only)

Action Taken	Date of Action	Responsible Officer

SECTION I: RESOLUTION STATUS
☐ Resolved
☐ Escalated to PDT
☐ Escalated to Senior Level
☐ Referred to External Authority
Date Closed: _____

Final Resolution Summary:
_____
_____
_____

CONFIDENTIALITY NOTICE
All grievances will be handled confidentially. Complaints involving Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), or safeguarding concerns will be subject to survivor-centered handling procedures and restricted access protocols. Retaliation against any worker who submits a grievance in good faith is strictly prohibited.

Annex 3: Occupational Health and Safety (OHS) Incident Report Form

SECTION A: BASIC INFORMATION

Field	Information
Incident Reference Number	
Date of Incident	
Time of Incident	
Location (School / Site)	
Contractor Name	
Report Prepared By	
Date Report Submitted	

SECTION B: TYPE OF INCIDENT

☐ Minor Injury
☐ Lost Time Injury
☐ Serious Injury
☐ Fatality
☐ Near Miss
☐ Property Damage
☐ Student Involvement
☐ Other (specify): _____

SECTION C: DESCRIPTION OF INCIDENT

Provide a clear factual description of what occurred, including sequence of events.

_____
_____
_____
_____

SECTION D: PERSON(S) INVOLVED

Name	Role	Employer	Injury Description

SECTION E: IMMEDIATE ACTION TAKEN

Describe first aid, evacuation, site stabilization, or emergency response measures.

_____
_____
_____
_____
_____

SECTION F: ROOT CAUSE ANALYSIS

Identify immediate and underlying causes of the incident.

_____
_____
_____
_____
_____

SECTION G: CORRECTIVE AND PREVENTIVE ACTIONS

Action	Responsible Person	Deadline	Status

SECTION H: NOTIFICATION

Was the PDT notified within 24 hours (if serious)?

☐ Yes ☐ No

Was the World Bank notified (if required)?

☐ Yes ☐ No ☐ Not Applicable

SECTION I: SIGNATURES

Site Supervisor: _____ Date: _____

Contractor Representative: _____

PDT Review Officer: _____

Annex 4: Contractor Monthly Labor Report Template

Reporting Month: _____
Contractor: _____
Site Location: _____

1. Workforce Summary

Category	Male	Female	Total
Skilled Workers			
Unskilled Workers			
Supervisors			
Administrative Staff			
Total Workforce			

Number of local laborers engaged this month: _____
Number of new hires this month: _____
Number of workers demobilized: _____

2. Wage and Employment Compliance

Confirmation that all workers have written contracts: ☐ Yes ☐ No
Confirmation that wages were paid on time: ☐ Yes ☐ No
Any wage disputes reported: ☐ Yes ☐ No
If yes, provide summary: _____

3. Occupational Health and Safety

Indicator	Number
Toolbox talks conducted	
OHS trainings conducted	
Minor injuries	
Serious injuries	
Near misses	

Summary of OHS observations:
_____
_____
_____

4. Worker Grievances

Category	Received	Resolved	Pending
Wage Issues			
OHS Complaints			
Harassment			
Other			

5. Code of Conduct and SEA/SH Compliance

All workers signed Code of Conduct: ☐ Yes ☐ No
Any Code of Conduct violations: ☐ Yes ☐ No
SEA/SH allegations received: ☐ Yes ☐ No
If yes, confirm confidential referral initiated: ☐ Yes

Signed: Contractor Representative: _____
Signature: _____ Date: _____

Annex 5: Child Labor Verification Checklist

For Contractor Use – EXCEL Project

SECTION A: WORKER VERIFICATION

Item	Verified (Yes/No)	Comments
National ID or Birth Certificate reviewed		
Age confirmed ≥ 18 years		
Copy of ID retained in file		
Worker included in payroll register		

SECTION B: RANDOM SITE VERIFICATION (By PDT)

Worker Name	ID Verified	Age Confirmed	Compliant (Yes/No)

SECTION C: DECLARATION

I confirm that no worker under 18 years of age is engaged in hazardous work under this contract.

Contractor Representative: _____

Date: _____