

**WEST BENGAL ACCELERATED DEVELOPMENT OF MINOR
IRRIGATION PROJECT - WBADMI**

LABOUR MANAGEMENT PROCEDURES

**DEPARTMENT OF WATER RESOURCES INVESTIGATION AND
DEVELOPMENT (DWRID)**

GOVERNMENT OF WEST BENGAL

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Contents

1. Introduction	3
1.1 Project Component	3
1.2 Proposed Improvement	7
2. Overview of Labour Use in WBADMI Project	8
2.1 Labour Requirements.....	8
3. Assessment of Key Potential Labor Risks.....	11
4. Brief Overview of Labour Legislation: Terms and Conditions.....	11
4.1 Applicable Labour Regulations	12
5.0 Brief Overview of Labour Legislation: Occupational Health and Safety (OHS)	16
6.0 Responsible Staff	16
6.1 Occupational Health and Safety.....	16
6.2 Labour and Working Conditions.....	17
6.3 Worker Grievances	17
6.4 Additional Training.....	17
6.5 Raising awareness	17
5. Policies and Procedures	17
7.1 Incidents and Accident	18
7.2 Occupational Health and Safety (OHS).....	18
Mitigation Majors for Possible Issues and Impacts.....	19
7.3 Gender Based Violence (GBV), Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) related	23
7.4 COVID-19 Considerations	23
8. Age of Employment	24
8.2 Contract Workers	24
9. Terms and Conditions	26
9.1 Specific Wages	26
9.2 Work Hours and Maximum Number of Work Hours	26
10. Grievance Redress Mechanism	27
10.1 Grievance Channels:.....	28
11. Contract Management	29

1. Introduction

1. West Bengal is richly endowed with water resources but has struggled to harness these effectively in agriculture. The State's water resources account for 7.5 percent of India's total; however, 76 percent of the annual rainfall (1,740 mm) falls in the three to four monsoon months. The State has around 56 million ha in cultivable land that could utilize more than 70 billion cubic meters (BCM) annually in irrigation. However, the State has only been able to develop surface storage structures of 19.8 BCM out of a total surface water potential of 111 BCM. While surface water development has been slow in the State, West Bengal has been more proactive in utilizing its groundwater potential of 29.33 BCM, particularly in northern and southern regions where alluvium aquifers are very rich in ground water resources.

2. The World Bank-funded West Bengal Accelerated Development of Minor Irrigation ("WBADMI Phase I") project, implemented from 2011 to 2019, provided a successful model for developing minor irrigation schemes to enhance agricultural production. In addition to initiating the construction of small storage structures in western districts and other irrigation infrastructure in the rest of the state, it strengthened community-based irrigation management, supported agricultural development and services, encouraging crop diversification and new technologies, and created new income-generating opportunities. Overall, the project reached 124,700 beneficiaries, of which 111,203 were small and marginal farmers – approximately two per cent of West Bengal's over six million small and marginal farmers. Implementation tools, technologies and principles designed under the WBADMI project also informed the State flagship program "Jal tirtha" on minor irrigation schemes in the Western Districts and the "Matir-Sristi" mixed-fruit plantation on wastelands. Notwithstanding the achievements of the WBADMI Phase I project, Jaltirtha and related programs, there remains a vast unmet demand, estimated at over 20 BCM, for surface irrigation services and water use efficiency.

3. The WBADMI Phase II promotes more resource-efficient, inclusive, and diversified growth in the rural sector and enhances competitiveness and enables job creation. The proposed Project is also aligned to transform by increasing agricultural productivity in targeted areas, improving incomes of small and marginal farmers, and contributing directly to ending extreme poverty and promoting shared prosperity. The Project will also aim to leverage private sector investments by enabling access to finance and building market access. The activities will support gender equality and empowerment through targeted training of women in modern agricultural, horticultural and fishery methods, as well as by encouraging female plot holders to take up an active role in Water User Associations (WUAs), and thus in the planning, implementation and management of minor irrigation schemes supported by the project

1.1 Project Component

4. The proposed project will extend the achievements of the WBADMI Phase I Project by expanding minor irrigation services to more small and marginal farmers, mainstreaming modern agricultural techniques and institutionalizing the participatory WUA approach to irrigation and water management. The project will also provide financing for existing minor irrigation schemes to support value additions and more efficient water management. These activities are expected to improve irrigation for up to 60,000 hectares (ha) of farmland, thus benefitting up to 150,000 farmers.

5. The proposed project will draw on the lessons from WBDMI Phase I to enhance its effectiveness, notably integrating infrastructure with agricultural support services. It will ensure better access to irrigation translates into higher yields and incomes; the clustering of schemes in a watershed-based development approach to facilitate efficient implementation and monitoring; improving the capacity of implementing institutions to improve planning, design and monitoring using modern GIS-based tools.

6. The project will consist of four components: The first component will focus on streamlining community-based institutions – particularly Water User Associations (WUAs) – across the State and institutionalizing support for these arrangements to enable the sustainable management of minor irrigation schemes. The second component will carry out capital investments to harness approximately 160 million cubic meter (MCM) of water for irrigation and other agricultural uses, including rainwater harvesting, spring shed management, ponds for fisheries and a limited number of tube-wells. The third component will support agricultural support services to enable the adoption of more efficient, productive, and climate-friendly technologies and practices in agriculture, horticulture, and fisheries, including improved market access. The fourth component will finance project management and strengthen the responsible government department to provide services through a multi-disciplinary team equipped with advanced technology, thus enabling improved planning, design, and monitoring in the long term. The detailed components are as under:

Component 1: Strengthening community-based institutions (US\$14M). The component aims to mobilize, engage, and empower farmers by building and strengthening transparent, inclusive, and self-sustaining WUAs. The focus is on poor and vulnerable farmers who are small, marginal farmers or sharecroppers. Those who are in the climatologically stressed watersheds and, therefore, are currently managing their livelihoods through rainfed, single-cropped subsistence farming will be targeted especially.

Subcomponent 1.1: Developing WUAs for new schemes. WUAs for new schemes will be prioritized in agro-climatically and socio-economically constrained watersheds. The activities include initially sensitizing, mobilizing, and building WUAs that have empowered general body and accountable, responsive management committees, as well as establishing linkages with existing self-help groups and common interest groups (CIGs). WUAs will be supported to strengthen and develop their skills and competencies to plan, monitor, execute continued O&M of irrigation services in a gender-sensitive way. To do so, the Project will hire support organization (SOs) to engage with farmers throughout the

process. They will help deliver participatorily developed Watershed and/or village (or equivalent cluster) Development and Management Plans; set up a performing irrigation service fee collection, recording, and accounting system for WUAs; develop an equitable and sustainable water sharing and utilization system; and make WUAs perform in the governance procedures, social accountability mechanisms, and sustainable systems for water resources management.

Subcomponent 1.2: Strengthening WUAs for existing schemes. With a focus on capacity-building activities to address climate change-exacerbated risks and improve water management, this sub-component will target existing schemes encompassing both WUAs formed during Phase 1 and WUAs in existing irrigation service facilities established outside Phase 1 by state funding. The activities include mapping and assessing WUAs' performance, identifying reasons for different levels of performance, and recommending and implementing organizational development activities to address performance challenges to revamp and rejuvenating them into vibrant, well-performing WUAs. The focus will be on capacity building through SOs with regard to WUA governance, system building for accounting and record keeping, social accountability including gender, sustainable water resources management, and O&M of irrigation services. WUAs that have acquired technical, financial, and managerial skills required for planning and O&M of irrigation services during Phase 1 will also be identified and hired to facilitate peer-to-peer learning. Additionally, the subcomponent will support the design and delivery of core training modules on operationalizing women's consistent representation and decision-making in WUAs and social audit tools for existing schemes. Further, guidelines for existing schemes will be reviewed to strengthen women's representation in WUAs reflect women's participation in Executive Committees.

Subcomponent 1.3: Establishing internal and external linkages. Connecting WUAs both among themselves and with other entities can maximize impacts through collective actions and economy of scale, allowing to build institutional linkage and partnership for enhanced sustainability of higher value livelihoods. The Project facilitates this process, for example, by linking WUAs with the private sector for marketing of produces and supply of inputs and financial institutions for savings and loans. The activities will include: (i) facilitating vertical aggregation of WUAs to function as a collective organization; and (ii) capacity building of WUAs and its vertical structure on management and entrepreneurs through exposure visits, trade fairs, structured learning.

Component 2: Minor irrigation services (US\$141M). The component aims to improve access to water for agricultural irrigation and other livelihood activities. The focus is on developing rainwater harvesting (storage) structures in watersheds that are water-stressed and currently cultivated under rainfed conditions, while a limited number of tube wells will be included to pilot innovations and safeguard plantation-based crops. These investments will significantly strengthen small and marginal farmers' resilience to climate change-exacerbated risks such as more irregular rainfall, droughts, or temperature extremes. Areas considered for borehole investments fall either in the periphery or outside the transboundary aquifer, and those schemes will use solar powered pumps to facilitate access in remote areas, reduce operation costs, and lower the Project's carbon footprint. Water management interventions will include improved conveyance and application systems, such as flexible piped water supply, sprinkler, and drip irrigation systems that are more efficient with low-energy demand. Successful measures from Phase I will be adopted for fine-tuning and scaling-up, including standardized design models, use of technology such as GIS and remote sensing, participatory identification of site-specific

constraints, and water security and livelihood planning tools at the watershed level. Investments will be tailored to the geo-climatological and agro-ecological zones of West Bengal to maximize returns for the farmers.

Western districts. Micro watersheds of less than 20 km² will be prioritized. Integrated watershed plans, which will be prepared based on existing land use, cropping patterns, and water storage capacity, will guide investment in a wide range of water harvesting structures, varying in size and command area.¹ These structures will be used for irrigation and developing fisheries where possible.

Northern hilly districts. Springshed management, which is a combination of landscape, watershed, and recharge management will be the focus in these areas. Integrated springshed development plans will be prepared accordingly.

Coastal regions. Water detention structures with a storage capacity of less than 0.1 MCM will be main investments. They will be used for both fisheries and agriculture, with potential command areas of up to 200 ha. Small ponds for fisheries will be supported as well.

Groundwater-rich alluvium zones in northern plateau and the south. The focus will be on water management practices, particularly of existing tube wells, and creating and rehabilitating surface ponds for use in fisheries and agriculture.

Component 3: Agricultural support services (US\$35M). The component aims to improve agricultural, horticultural, and fisheries production by promoting climate resilient measures, raising water productivity with sustainable water management practices, and accessing market opportunities thereby increasing the resilience of farmers and WUAs to droughts and water stress by helping them adapt to rising temperatures and changing rainfall patterns. The focus is on promoting high value crops requiring less water, diversifying farmer income, spreading the use of climate smart agriculture (CSA) technologies (including hydro informatics for farming decisions), optimizing inputs, resource management and reuse, and realizing better price. Smallholder producers in the command area of irrigation services will be targeted to capitalize from the improved availability of water, where WUAs and its vertical structure will serve as the institutional platform. This component also mitigates climate change with activities that increase soil and vegetation carbon stock through targeted fruit tree plantations and soil health management practices, while also reducing energy demand for water application through micro irrigation and integrated soil fertility management. The Project's net GHG emissions from this component over its economic lifetime are estimated to be -X tCO₂e or -X t/CO₂e/ha/yr.

Agricultural crops. It will invest in providing agricultural advisory services for field crops that are demand-driven and pluralistic. They include promoting high yielding crop varieties, better agronomic practices, and water resources conservation technologies including micro irrigation, integrated soil fertility and nutrient management, integrated pest management and organic farming techniques, and other good agricultural practices.

Horticulture. It will help poor and vulnerable farmers participate in the fruit, vegetable, and floriculture supply chain that is of higher value. Farmers will be risk profiled, and the results will guide them to select horticultural crops according to market demand. Advisory services will follow, including accessing innovative technologies such as precision farming, procuring critical inputs such as hybrid seeds and planting materials, managing soil fertility and pest, formulating buy back arrangements and other contract farming in

¹ The size of storage structures will vary with the terrain of the watershed and may range from small ponds of 100 m² in elevated areas to storage structures as large as 40,000 m² in low lying areas, serving a command area of up to 10 ha.

partnership with reputed companies, and promoting other good agricultural practices. Given the importance of a post-harvest management system that helps meet market standards of produce quality and minimize losses, WUAs' vertical structure will be supported to pilot post-harvest facilities for grading, packing, branding, storing, and transporting produce.

Aquaculture. Inland fish production in tanks, ponds, and other inland water bodies can provide alternate livelihood to landless and marginal farmers. Extended water storage structures, resulting from Component 2 investments, provides excellent opportunity to cater to the vast demand for fish in state and local markets. Project activities will demonstrate and distribute modern technology practices, such as enhanced production models using fast growing fish varieties, formulated fish feed with locally available ingredients, fingerling production and supply, cage fish culture, and culture-cum-capture models. There will also be interventions to promote storing, transporting and marketing of fish. The fish producing farmers will be organized into commodity interest groups, which will work as an extended arm of WUAs specializing in fish production.

Component 4: Project management (US\$21M). The component aims to strengthen the DWRID to spearhead project implementation at all levels. The focus is on reinforcing the project implementation vehicles already set up during Phase I by improving workflows, bridging skill gaps, and internalizing institutional setups.

Subcomponent 4.1: Project management and coordination. It will support the SPMU and DPMUs so that they can carry out daily tasks. The investments will include hiring and deployment of staff, including FM and procurement specialists; provision of computers, servers, software, and other IT equipment to supplement the existing infrastructure; furnished office and office equipment as required; support for the project steering committee (PSC), DLIC, and other coordinating meetings and workshops as required; and technical assistance and other outsourced services for the smooth implementation of the Project.

Subcomponent 4.2: M&E, learning, and communications. In addition to the conventional progress tracking and impact evaluations at the mid-term and end of the Project, it will facilitate mobile application based advisory services and GIS and remote sensing-based MIS, which allows online planning, digital documentation, and impact mapping. Quarterly thematic learning forums will be organized at the district and state levels on technology, livelihoods, and farmer institutions, including WUAs. The key learnings from the districts will be consolidated at the state level, and best practices will be scaled up across the state. Communications strategy will play a key role in disseminating them.

Subcomponent 4.3: Organizational development. The DWRID will be supported to institutionalize the implementation arrangements, processes, and design standards that were proven successful during Phase I. The activities include producing and adopting design and planning manuals that embed the use of GIS and remote sensing; and assisting the GoWB to develop relevant policies, rules, and procedures that can institutionalize participatory irrigation management through WUAs.

1.2 Proposed Improvement

The key improvement which is being targeted under this program include:

- Increase in the number of operational water user associations created and / or strengthened
- Increase in the amount of water harnessed (MCM)
- Increase in production of major outputs – Rice, Oilseed and Pulses (metric tons/year)
- Increase the number of beneficiaries provided with new/improved irrigation and drainage services (number). The following category would be in focus: i) small and marginal farmers, ii) farmers belonging to tribal communities, iii) female farmers

This Labor Management Procedure (LMP) addresses the risks and impacts of labor engagement in the project. The LMP sets out the Project’s approach to meeting national requirements as well as the World Bank’s (WB) Environmental and Social Framework (ESF), specifically Environmental and Social Standard 2: Labor and Working Conditions (ESS2). The overall environment and social risk of the project is rated Moderate. Several small-scale contracts will be executed through local contractors using mostly local labor; therefore, the risk of gender-based violence/SEA/SH, child/bonded labor, and hazardous work and/or accidents is assessed as low. To address any potential labor risks and impacts, this LMP is prepared proportional to the potential labor risks of the project. This LMP is a living document and will be updated as and when labor conditions are altered for project activities.

Adhering to these procedures, Program contractors will be required to prepare a Labour Management Plan for larger works. For smaller contracts, ADMI may prepare specific procedures to be inserted in the contract as part of contractors’ legal obligations. The approach will be assessed as part of the initial screening of environmental and social risks and impacts carried out by District Project Management Unit (DPMU).

2. Overview of Labour Use in WBADMI Project

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. This LMP is applicable, as per ESS2, to the Project in the following manner:

- i. Direct Workers:** People employed or engaged directly by ADMI project
- ii. Contracted Workers:** People employed or engaged by contractors to perform work related to the core function of the program, regardless of location
- iii. Primary Supply Workers:** People employed or engaged by project’s primary suppliers.
- iv. Community workers:** the project will not engage any community works that meet the ESS2 definition of community workers.

2.1 Labour Requirements

- 2.1.1 **Direct workers** will include staffs who are working on contractual basis as part of the State Project Management Unit (SPMU) and District Project Management

Unit (DPMU). The consultants will be engaged by the Project to undertake both long- and short-term assignments as necessary. These consultants are guided by specific contractual agreements between them and DWRID in line with state government's regulations

2.1.2 Contracted Workers: Based on the requirement in every component the SPMU/DPMU will employ contractors who will hire contracted workers based on their level of skills and project needs. Project will recruit contractors for civil works to be implemented and will include immediate provision of small works contracts (e.g., Renovation and management of existing water storage structures; Creation of Water Detention Structures (WDS) including construction of small ponds, diversion and conveyance structures, and small check dams. Project will also hire services of Support Organization at sub project level.

2.1.3 Primary Supply workers: The project would also procure equipment such as solar panels and solar pumps from the vendors. These vendors and their suppliers form part of the primary supply workers. Labour and working conditions in the supply chain will be investigated and compliance with labour and working conditions of the primary supply workers will be assured.

2.1.3 Timing of labour requirement

S.No.	Type	Numbers	Locations	Duration
1	Direct Workers			
c.	Consultants	20	SPMU	Throughout
d.		120	DPMU	Throughout
2	Contracted Workers			
a.	Support organizations	5 number of villages to be covered by one SO	Sub project level	60 months
b.	M&E consultants	6	Kolkata	06 Months for mid-term and 06 months for end term
c.	Construction Workers	Maximum 10 at one check dam location. Probable number of check dams are 300 to be constructed over a period of 5 years across	ADMI Project Area	03 months in one location for check dams and

		project districts. Other minor irrigation investments will not require more than 3 to 4 local labourers at any given point of time. Total such locations will be around 2000		10 days at one location for other investments.
3	Primary Supply Workers			Throughout

Information on Contracted Workers: DWRID, Government of West Bengal through State Project Management Unit will maintain information on engagement of contracted workers of all categories and will be obligated to consider the following from COVID-19 considerations

Sensitization of all contracted workers about COVID-19, and precautions to be taken like social distance of minimum 2 meter during all work situations, use of face masks or cotton cloth, use of sanitizers and frequent washing of hands, avoid spitting in public, maintain hygiene, reporting of flu like illness symptoms, avoid use of chewing gum, tobacco in all forms, and creation of isolation/quarantine rooms, for any workers showing COVID-19 symptoms, until shifted to COVID-19 care centers or hospitals.

3. Assessment of Key Potential Labor Risks

The project will largely work with the local labourers baring 6 to 10 skilled workers at any given point of time who may come from neighbouring areas in case that skill set is not available locally. The skilled labourer will be required largely during the construction of in water detention structures and /or installation of solar panels. These labourers will be housed in temporary accommodation away from the villages for a period of maximum three months. Total number of water detention structures will not be more than 300 to be constructed over a period of five years across the project districts.

Following are the key labor risks that have been identified:

- Employment practice that are not compliant with either GoI labour laws or ESS 2. For example, not providing written documents of assignments, wages disproportionate to tasks performed or industry standards, excess workload without provision of adequate rests and leisure, lack of hygiene facilities, discrimination towards women and labour with disability, unlawful termination and withholding of benefit etc.
- Assignment of child and forced labour and use of unscrupulous labour practice
- Lack of Occupational Health and Safety (OHS) practice and procedures
- Community health and safety issues, especially alteration of power dynamics, shifting the economic power balance, rise of communicable diseases
- Generation of solid, liquid, and fecal wastes, especially around labour camps and toilet areas

4. Brief Overview of Labour Legislation: Terms and Conditions

The labour laws derive their origin, authority, and strength from the provisions of the Constitution of India. The relevance of the dignity of human labour and the need for protecting and safeguarding the interest of labour as human beings. Labour law reforms are an ongoing and continuous process, and the Government has been introducing new laws and amending the existing ones in response to the emerging needs of the workers in a constantly dynamic economic environment. As per the Second National Commission on Labour, the Ministry of Labour and Employment, has simplified and rationalized the relevant provisions of the existing 40 Central Labour Laws for Labour Codes viz. the Code on Wages: the Code on Industrial Relations, the Code on Occupational Safety, Health & Working Conditions & the Code on Social Security. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. This Act also contains:

- Contracts of employment
- Leave entitlements, i.e., annual leave, sick leave, maternity leave and compassionate leave.

- The protection of wages (prohibition against unlawful deductions)
- Retrenchment procedures
- Fair and unfair reasons for termination of employment
- Grievance mechanism

4.1 Applicable Labour Regulations

Sl. No.	GoI Regulations	Objective
1	Minimum Wages Act, 1948	The Minimum Wages Act was enacted primarily to safeguard the interests of the workers engaged in the unorganized sector. The Act provides for fixation and revision of minimum wages of the workers engaged in the scheduled employments. Under the Act, both central and State Governments are responsible, in respect of scheduled employments within their jurisdictions to fix and revise the minimum wages and enforce payment of minimum wages.
2	Payment of Wages Act, 1936	The Payment of Wages Act, 1936 is a central legislation which has been enacted to regulate the payment of wages to workers employed in certain specified industries and to ensure a speedy and effective remedy to them against unauthorized deductions and/or unjustified delay caused in paying wages to them. It applies to the persons employed in a factory, industrial or other establishment or in a railway, whether directly or indirectly, through a sub-contractor.

3	Equal Remuneration Act, 1976	<p>In today's globalized liberalized scenario, women form an integral part of the Indian workforce. In such an environment, the quality of women's employment is very important and depends upon several factors. The foremost being equals access to education and other opportunities for skill development. This requires empowerment of women as well as creation of awareness among them about their legal rights and duties. In order to ensure this, the Government of India has taken several steps for creating a congenial work environment for women workers. A number of protective provisions have been incorporated in the various Labour Laws. To give effect to the Constitutional provisions and also ensure the enforcement of ILO Convention the Equal Remuneration Act, 1976 enacted by the Parliament.</p>
4	Workmen's Compensation Act, 1923	<p>The passing of the Workmen's Compensation Act renamed as Employees' Compensation Act, 1923 was the first step towards social security of workmen. It aims at providing financial protection to workmen and their dependents in case of accidental injury by means of payment of compensation by the employers. The Employees' Compensation Act, 1923 provides for payment of compensation to the employees' and their dependents in the case of injury by industrial accidents including certain occupational diseases arising out of and in the course of employment resulting in death or disablement.</p>
5	Contract Labour (Regulation and Abolition) Act, 1970	<p>Contract Labour is a significant and growing form of employment. It is prevalent in almost all industries and allied operations and also in service sector. It generally refers to workers engaged by a contractor for user enterprise. Contract labour have very little bargaining power, have little or no social security and are often engaged in hazardous occupations endangering their health and safety. The exploitation of workers under the contract labour system has been a matter of deep concern for the Government. The Government enacted the Contract Labour (Regulation and Abolition) Act in 1970 and it came into force on 10.2.71. The Act applies to every establishment/ contractor in which twenty or</p>

		<p>more workmen are employed or were employed on any day of the preceding twelve months as contract labour. Every establishment and contractor, to whom the Act applies, has to register themselves or obtain a license for execution of the contract work.</p>
6	Maternity Benefit Act,1961	<p>The Maternity Benefit Act, 1961 regulates the employment of women in factories, mines, the circus industry, plantations and shops or establishments employing 10 or more persons except the employees who are covered under the Employees' State Insurance (ESI) for certain periods before and after childbirth and provides for maternity and other benefits. The Employees' State Insurance Act, 1948 (ESI Act) which also provides for maternity and certain other benefits. The coverage under the ESI Act is, however, at present restricted to factories and certain other specified categories of establishments located in specified areas. The Maternity Benefit Act, 1961 still applicable to women employees employed in establishments which are not covered by the ESI Act, as also to women employees, employed in establishments covered by the ESI Act, but who are out of its coverage because of the wage-limit.</p>
7	The Child Labour (Prohibition and Regulation) Act, 1986	<p>Child labour is a concrete manifestation of violations of a range of rights of children and is recognized as a serious social problem in India. Working children are denied their right to survival and development, education, leisure and play, and adequate standard of living, opportunity for developing personality, talents, mental and physical abilities, and protection from abuse and neglect. Even though there is increase in the enrolment of children in elementary schools and increase in literacy rates, child labour continues to be a significant phenomenon in India. As per Article 24 of the Constitution, no child below the age of 14 years is to be employed in any factory, mine or any hazardous employment. Further, Article 39 requires the States to direct its policy towards ensuring that the tender age of children is not abused and that they are not forced by economic necessity to enter avocations unsuited to their age or strength. Recently, with the insertion of Article 21A, the State has been entrusted with</p>

		the task of providing free and compulsory education to all the children in the age group of 6-14 years.
8	The Sexual Harassment of Women at Workplace (Prevention, Protection and) Act, 2013	The Act came into force on December 9, 2013 and is framed to provide protection to women at the workplace against sexual harassment. The Act lays down rules for the prevention and redressal of sexual harassment complaints by female workers. It ensures that every organization, public or private, having more than 10 employees is committed to provide a safe and congenial work environment to its employees and ensure that they are not subject to any form of sexual harassment. Further every entity is duty bound to create a safe and secure working environment for all persons employed or engaged by them.

5.0 Brief Overview of Labour Legislation: Occupational Health and Safety (OHS)

There are basically two components of OHS. One is the physical safety of project communities who are exposed to the project activities during construction and operation, including risks of accidents and risks of violence due to increase in crimes and cultural conflict between locals and migrant population. The other pertains to the exposure and/or increased risks of diseases by the community due to influx of people during construction and operation including pollution and ecological change. The physical safety aspects are partly addressed by the OHS provisions of Labour Act. Other laws have specific provisions that address part of ESS4. The National Policy on Safety, Health, and Environment at Workplace (NPSHEW) was declared by the Ministry of Labour and Employment, GoI in February 2009. NPSHEW draws guidance from the Indian Constitution. The goal of the NPSHEW is to build and maintain a national preventative safety and health culture and improve the safety, health, and environment at workplace through elimination of the incidence of work-related injuries, diseases, fatalities, disasters etc. The policy objectives are to achieve:

- Continuous reduction in the incidence of work-related injuries, fatalities, diseases, disasters, and loss of national assets.
- Improved coverage of work-related injuries, fatalities and diseases and provide for a more comprehensive data base for facilitating better performance and monitoring.
- Continuous enhancement of community awareness regarding safety, health and environment at workplace related areas.
- Continually increasing community expectation of workplace health and safety standards
- Improving safety, health and environment at workplace by creation of “green jobs” (According to ILO - Green jobs are decent jobs that contribute to preserve or restore the environment, be they in traditional sectors such as manufacturing and construction, or in new, emerging green sectors such as renewable energy and energy efficiency) contributing to sustainable enterprise development.

6.0 Responsible Staff

The overview of responsible staff and oversight mechanisms are described in further detail in the ESMF. This is an overview – the details will flow from the ESMF and can be taken further forward during the implementation. ADMI State Project Management Unit inter alia the Project Director (PD) has the overall responsibility to oversee all aspects of the implementation of the Labour Management Procedures, and to ensure its compliance.

6.1 Occupational Health and Safety

Contractors must engage a minimum of one safety representative. Smaller contracts may permit for the safety representative to carry out other assignments as well. The safety representative ensures the day-to-day compliance with specified safety measures and records of any incidents. Minor incidents are reported to respective project management units on a monthly basis and

reflected in the quarterly progress reports, whereas serious incidents are reported immediately.

6.2 Labour and Working Conditions

Contractors will keep records in accordance with specifications set out in this LMP. ADMIP may at any time require records to ensure that labour conditions are met. The State Project Management Unit will review records against actual at a minimum monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

6.3 Worker Grievances

Contractors will be required to present a worker grievance redress mechanism which responds to the requirements in this LMP. The Project Management Unit's (SPMU/DPMU) designated Officer will review records on a monthly basis. Where worker concerns are not resolved, State Project Management Unit will keep records of resolutions and reflect in quarterly reports to the World Bank.

6.4 Additional Training

Contractors are required to ensure that the assigned workers are adequately trained and briefed with overall safety arrangement, use of equipment, Grievance Redressal Mechanism (GRM) procedure, working conditions of the project. Training on Gender Based Violence and preparation and obtaining signed code of conduct are also Contractor's responsibility.

6.5 Raising awareness

The project will take initiative to organize sessions on raising awareness of the communities on issues relevant to the project's compliance and standards (e.g., labour standards, gender-based violence etc.). This, in addition to project's Communication Strategy, will ensure effective and efficient participation of different stakeholders of the project.

5. Policies and Procedures

As specified in the Labor Act and ESS 2 of WB ESF, the employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion, or termination of employment. Most environmental and social impacts of subprojects resulting from activities directly under the control of contractors will be mitigated directly by the same contractors. Therefore, ensuring that contractors effectively mitigate project activities related impacts is the core of the Program's approach. DWRID through State Project Management Unit will incorporate standardized environmental and social clauses in the tender documentation and contract documents, for potential bidders to be aware of environmental and social performance

requirements that are expected from them, are able to reflect that in their bids, and required to implement the clauses for the duration of the contract. DWRID will enforce compliance by contractors with these clauses. As a core contractual requirement, the contractor is required to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the DWRID appointed officials under the project. The contractual arrangements with each project worker must be clearly defined in accordance with national law/state regulations. A full set of contractual requirements related to environmental and social risk and impact management will be provided in the Programs' Environmental and Social Impact Assessment. All environmental and social requirements will be included in the bidding documents and contracts in addition to any additional clauses, which are contained, in the Programs environmental and social instruments. Under no circumstances will DWRID, Contractors, suppliers or sub-contractors engage forced labour. Forced labour includes bonded labour (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government- issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work in a non- voluntary basis can be referenced or annexed to the LMP, together with any other supporting documentation.

The Policies and Procedures are segregated to include the following:

- Incidents and Accident
- Occupational Health and Safety (OHS)
- Gender Based Violence (GBV), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) related
- COVID-19 considerations.

7.1 Incidents and Accident

The contractor will promptly notify to the ADMIP DPMU within 24 hours any incident including GBV/SEA/SH (though not envisaged) or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, tangible cultural heritage, the affected communities, the public or workers. They will provide sufficient details regarding the incident or accident, indicating immediate measures taken to address it, and including information provided by any contractor and supervising entity in the format suggested in ESIRT of World Bank.

7.2 Occupational Health and Safety (OHS)

The OHS measures applying to the project will be set out in the legal agreement with the contractors and in the Environmental and Social Commitment Plan (ESCP). The OHS of

workers and related issues arising during construction works will be under direct control of the contractors. The contractors will be responsible and liable for safety of the workers. The requirement for the preparation of an OHS Plan by Contractor, as part of Contractor’s-Environment Social Management Plan (CESMP) will be integrated in the contract documents. The Contractor shall be obligated to include COVID Response and Management measures in OHS Plan that will be part of the CESMP submitted to the ADMIP DPMU.

In ADMIP, construction activity will undertake in following (not limited to) activities:

- Renovation and management of existing Water Storage Structures
- Creation of water detention structures (WDS) including construction of small ponds, diversion and conveyance structures, and small check dams.
- Shallow / deep borewells

In view of mitigating the anticipated impacts which can arise due to the construction activities, Construction Management Plan (CMP) will be drafted for ADMIP. Diligent implementation of the CMP is mandatory for the Contractor. The Contractor will be responsible for non-compliance of CMP, violation of any Stipulated Environmental / Labour Acts & Rules, any accidents or damage to environment / social, negligence etc.; Environmental, Social, Health and Safety (ESHS) in totality.

Mitigation Majors for Possible Issues and Impacts

Sr. No.	Possible Environmental Issue	Mitigation Measure
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1.	Occupational health and safety issues of the construction workers during construction	<ul style="list-style-type: none"> ▪ Regular health checkup and monitoring of the labourers and their families staying at the labour camp. ▪ Contractor to ensure that all the labourers must follow the COVID-19 precaution/guidelines. ▪ Provide First aid kit at construction site and labour camp. ▪ Contact number of the nearest Primary health centers or medical facility/centers/staff must be displayed at a convenient place in a manner visible to all. ▪ Contractor must provide all the possible safety equipment like hard hats, safety goggles, nose masks, ear plugs, hand gloves, hard shoes etc. for on-site workers. ▪ With all the safety equipment, provide reflective jackets in case of night works ▪ Store all the flammable/hazardous material in a secured room away from labour camp. In case any such material is stored at site, provide fire extinguishers, and educate labourers, how to use it, at the time of accident. ▪ Develop plan for containing oil spills. ▪ Undertake site visit and prepare assessment report for each area along with detailed construction plan. ▪ Ensures measures to avoid the risk of fire incidences while using flammable fuels like kerosene oil, petrol, etc. ▪ Separate Toilets/Washrooms must be provided to men and women.
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Mitigation Measures for Possible Labour / Social Issues:

Sr. No.	Possible Labour / Social Impacts	Mitigation Measures
1.	Employment creation during construction phase – opportunity for local labourers	<ul style="list-style-type: none"> ▪ The contractors shall use local labour as far as possible. ▪ Equal wages shall be given for equal work. ▪ Contractor must follow the Government stipulated guidelines for labour wages & over-time wages. ▪ Time of work must be according to the Government stipulated guidelines.

2.	Employment Vulnerable to	<ul style="list-style-type: none"> ▪ SC and ST shall be given employment. ▪ Women shall be given employment. ▪ No discrimination for transgender and persons with disabilities, serious disease or illness (such as cancer, HIV-AIDS etc.) ▪ Equal wages shall be given for equal work. ▪ Contractor to ensure that there shall be no sexual exploitation, abuse or harassment to workers. ▪ Separate play place shall be provided for the kids of the labour accompanying them to site. ▪ Separate space shall be provided to lactating mothers.
3.	Child Labour	<ul style="list-style-type: none"> ▪ Individual below the age of 18 years shall not be engaged for works.
4.	Prominent break time	<ul style="list-style-type: none"> ▪ Labour shall be given prominent Break/ lunch and teatime.
5.	Insurance	<ul style="list-style-type: none"> ▪ Group Insurance (under the workmen compensation Act) of the labour shall be undertaken by the contractor. ▪ ESIC facility shall be provided to the labour.
6.	Record Keeping	<ul style="list-style-type: none"> ▪ Contractor shall maintain registers of daily attendance, wages, accounts, measurements books etc.
	Labour influx and impact on local population during construction	<ul style="list-style-type: none"> ▪ The contractor will preferably engage the local labour force except for the labourers requiring special skills and the non-availability of such skilled laborers from the local area. ▪ Awareness raising of laborers/ workers on societal norms, taboos, and other cultural practices ▪ Organize awareness creation and educational programs for all workers and the general public on the behavioural changes required to prevent the spread of HIV/AIDS and other STDs ▪ The 'Labour Influx and Construction Workers Campsite Management Plan' proportionate to small labour risk will be implemented ▪ The project will incorporate the ESMP into the civil works contract. The responsibilities for managing these adverse impacts will be clearly reflected as a contractual obligation, with a mechanism for addressing non-compliance. ▪ Employment of any person under 18 years of age will be strictly prohibited. The contractor will maintain a labour register with name, age, and sex with supporting document (preferably copy of Aadhar card or voter's ID card). This will be monitored by the Environmental and Social office of contractors. ▪ Contractor and labourers will sign a code of conduct to maintain good manners with the community and avoid GBV ▪ Project will undertake awareness raising program for the

		workers and community on the risk of labour influx.

DWRID is committed to:

1. Complying with legislation and other applicable requirements which relate to the occupational health and safety hazards.
2. Enabling active participation in OHS risks elimination through promotion of appropriate skills, knowledge, and attitudes towards hazards.
3. Continually improving the OHS management system and performance.
4. Communicating this policy statement to all persons working under ADMIP Project and in the control of DWRID with emphasis on individual OHS responsibilities.

Under the ADMIP Project DWRID will ensure:

- Identify potential hazards
- In collaboration with the employer, investigate the cause of accidents at the workplace
- Inspect the workplace with a view to ascertaining the safety and health of employees provided that the employer is informed about the purpose of the inspection
- Make recommendations to the employer in respect of safety and health matters affecting employees,
- Follow the World Bank’s interim note on “COVID-19 Considerations in Construction/Civil Works

Further to avoid work related accidents and injuries, the contractor will:

1. Provide occupational health and safety training to all employees involved in works.
2. Provide protective masks, helmet, overall and safety shoes, and safety goggles, as appropriate.
3. Provide workers in high noise areas with earplugs or earmuffs.
4. Ensure availability of first aid box.
5. Provide employees with access to toilets and potable drinking water.
6. Provide safety and occupational safety measures to workers
7. Properly dispose of solid waste at designated permitted sites landfill allocated by the local authorities

Further to enforcing the compliance of environmental management, contractors are responsible and liable of safety of site equipment, labourers, and daily workers attending to the construction site and safety of citizens for each subproject site, as mandatory measures.

7.3 Gender Based Violence (GBV), Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) related

Contractors will - maintain labour relations with local communities through a Code of Conduct (CoC). The CoC commits all persons engaged by the contractor, including sub- contractors and suppliers, to acceptable standards of behavior. The CoC shall include sanctions for noncompliance, including non-compliance with specific policies related to Gender Based Violence, Sexual Exploitation and Sexual Harassment (e.g., termination). The CoC shall be written in Bengali (understood by both mainstreamed population and tribal) and in a reader-friendly style and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract.
- CoC has been explained to them as part of induction process.
- Acknowledged that adherence to this CoC is a mandatory condition of employment.
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.
- Signage on “Zero Tolerance” against GBV / SEA/SH around the work site

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in Hindi.

Contractors shall address the risk of gender-based violence, through:

- Mandatory annual training by service providers and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women and girls. Training may be repeated;
- Informing workers about national laws that make sexual harassment and gender- based violence a punishable offence which is prosecuted;
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence;

A system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints / issues shall be developed. The mechanism will be disseminated among the workers as well as among the local community.

This process shall be under the portfolio of a designated Officer who shall identify and engage the relevant stakeholders on GBV issues.

7.4 COVID-19 Considerations

- COVID-19 related safety measures and contingency plan is a realistic requirement. All the contractors will be requested to provide details in writing regarding the measures

being taken to address the risks. This should include but not limited to the following aspects

- a. Conducting pre-employment health checks
 - b. Controlling entry and exit from site/workplace and maintaining the safe working distance, staggering the entry and exit timings of different workers
 - c. General hygiene, cleaning and waste disposal
 - d. Adjusting work practices
 - e. Reviewing contract durations, to reduce the frequency of workers entering/exiting the site
 - f. Providing appropriate forms of Personal Protective Equipment (PPE)
 - g. Use of technology to reduce in person contact wherever possible.
 - h. Safety training and communication with workers and community members
- Contractor to convene regular meetings with the project health and safety specialists and medical staff (and where appropriate with local health authorities), and to take their advice in designing and implementing the agreed measures.
 - Site supervisor to be responsible for monitoring and reporting on COVID-19 issues and liaising with competent authorities designated by the State Government at project area / location.
 - Check with Contractors on whether the workers are informed /encouraged to use the existing COVID-19 related health and safety protocols.

8. Age of Employment

8.1 Direct Workers

The Direct workers will be technically qualified, with age ranging between a minimum of 18 years and maximum 60 years. The credentials of direct workers would be duly verified by the SPMU and DPMUs, at the time of recruitment.

8.2 Contract Workers

The age of the technically qualified and or skilled contract workers can be range between a minimum of 18 years and maximum 55 years; whereas the age of unskilled workers can range between 18 to 50 years and in no case it can be expected to exceed 60 years.

The age of the personnel recruited from open market / deployed by ADMIP could be verified by SPMU through valid document verification at the time of recruitment for all categories appointments.

Under no circumstance, children less than 14 years of age will be engaged for any kind of work and is a prohibited activity as per GoI and State Government norms. The same is in accordance

with the Child Labour Prohibition Act, 1986 and Child Labour (Prohibition and Regulation) Amendment Rules 2017 framed there under.

In case, it is detected by SPMU/DPMU officials, contractor will be immediately issued show cause notice for termination of contract and matter will be duly reported to the SPMU and concerned authorities at State / District level.

9. Terms and Conditions

In LMP terms and conditions of employment are governed by the Labour Act. The Act makes it mandatory for employers to give its employees a copy of the written particulars of employment, signed by both parties. For this program, contractors will be required to provide all its employees with written particular of employment.

9.1 Specific Wages

The wages of technically qualified, skilled, unskilled workers, to be engaged by the Contractor are determined by Department of Labour and Employment, subject to the provisions of Minimum Wages Act, 1948. There will not be any discrimination of wages paid to male and female workers and same wages will be paid for equivalent work to all workers in conformity with the Provisions of Equal Remuneration Act, 1976.

9.1.1 Specific wages of Direct Workers: The Direct workers, engaged for ADMI Project are the contractual staff hired by the PIU to support implementation of the project whose salary and other emoluments will be as per the agreement with the DWRID and in conformity to the Rules and Regulations as issued by GoWB.

9.1.2 Specific wages of Contracted Workers: The wages of consultants/personnel recruited for ADMI SPMU/DPMU or other consultancy firms for various studies are contracted services and determined through two stage competitive bidding (technical and financial) procedure and determined by prevalent market rates.

Contractors will also be required to comply with the most current regulation of wages which is issued by the Government and reviewed on a regular basis. The order specifies the minimum wages, hours of work, overtime pay, leave entitlements, travelling and subsistence allowances and the issue of protective clothing.

9.2 Work Hours and Maximum Number of Work Hours

9.2.1 Direct Workers: The Direct workers at ADMIP Project will work as per State Government Rules, which will be in compliance with the relevant notification by the GoWB.

9.2.1 Contracted Workers: The work hours for contracted workers recruited in the ADMIP Project SPMU/DPMU will follow the relevant norms of the GoWB for work hours.

In ensuring full compliance with the law in regard of wages and work hours, contractors will be required to furnish DWRID with copies of the Written Particulars of Employment or copies of contract of all its workforce.

10. Grievance Redress Mechanism

An effective grievance redressal mechanism allows the organization to implement specific measures to ensure good governance, accountability, and transparency in managing and mitigating a particular project's environmental and social issues. This consists of defining the process for recording/receiving complaints and their redressal regarding environmental and social matters.

An integrated system will be established with Grievance Redressal Cell (GRCs), with necessary officers, officials, and systems at the state and district level. Grievances, if any, may be submitted through various mediums, including in person, in written form to a noted address, e-mail, or through direct calls to concerned official/s. The Environmental Officer in the concerned agency shall be responsible for the coordination of grievances/complaints received

The grievance redress mechanism should be in place to identify Schemes and WUA and civil construction activities in the area. A platform for grievance redressal should be organized, and regular meetings may be conducted to allow people to express their grievances. It will help the appropriate authority to find solutions and amicably address the issues. The project, apart from the web-based mechanism, will have a three-tier grievance redressal mechanism, i.e., (1) at the project site level (up to DPMU level), (2) State level (SPMU level) and (3) at the Judiciary level.

Web-based grievance mechanism: In case of grievances received through a toll-free number or web-based system, a person will be made in-charge of screening and resolution of the same /communicating with the concerned divisions for resolution. Based on the nature of the complaint, the person in charge will forward the same to the concerned official. A ticket or a unique number will be generated for all such complaints. The complainant will follow up based on that unique number. All calls and messages will be responded to within two weeks. If a response is not received within 15 days, the complaint will be escalated to the project head.

- **Tier I:** Under this project, the WUA, local Gram Panchayat and the officer of the DPMU on site will serve as the first-tier mechanism to handle complaints and grievances. The local Pradhan of the Gram panchayat would be the key person. The Support Organization will be the focal point to receive, address, and record the complaints and feedback. The grievance focal point will first review the grievances submitted. If grievances or disputes cannot be solved at the GP level within 30 days of submitting the grievances, the issue will be brought to the DPMU level for mediation. DPMU is expected to inform aggrieved persons or parties to disputes of the resolution in 30 days.
- **Tier II:** If the aggrieved person is not satisfied with the verdict of the local level grievance cell, they can escalate the grievance to the district level grievance cell. The tier II cell will be under the Chairmanship of the Executive Engineer. The other members will include the Institutional Development Specialist and Environmental Specialist at the district level. The second level of the grievance cell will provide its view within 30 days of receiving the grievance.
- **Tier III:** If unsatisfied with the verdict given by the district grievance cell, the aggrieved person will have the right to approach the State level Mechanism. The tier III cell will be under the Chairmanship of the Chief engineer. The other members will include the Environmental and Institutional Development Specialist of the SPMU. The second level of the grievance cell will provide its view within 30 days of receiving the grievance.

If not satisfied with the verdict given by State level grievance cell, the aggrieved person will have the right to approach the Judiciary. The project will help the aggrieved person if a person wants to

approach the judiciary.

10.1 Grievance Channels:

Project beneficiaries and stakeholders will be able to submit their grievances, feedback and inquiries to the Project through multiple channels that are summarized below.

- State Government Portal. The state government has its own grievance portal which is managed and monitored by the office of Chief Minister. Apart from the web site (cmo.wb.gov.in) where one can also register the grievance through email (*wbcmro@gmail.com*), SMS (9073300524) and a Toll-Free number (18003458244)
 - Project specific Portal. Project will maintain a portal with dedicated mechanisms for receiving stakeholder grievances. All grievances, feedback and queries received through the project portal will be collated and compiled by the State Social Expert and included in the progress report. The portal will also provide relevant information on the multiple channels that can be used for submitting grievances to the project.
 - Grievance Registers. Grievance Registers will be maintained at District/sub project levels to record, track and report on the inflow of stakeholder grievances, enquiries and feedback. The Grievance Registers will help with monitoring and evaluation of the functioning of GRMS.
39. Grievance Process. All grievances, enquiries and feedback received through the multiple channels will be tracked through a grievance log that would be maintained through the MIS. Grievances will be directed to the competent nodal grievance officer at the state, district, and block levels for resolution, with recommended timelines. The concerned Grievance Officer will be responding to the grievance/query through phone calls, meetings and letters, in order to resolve the issues. If needed site visits will be undertaken to appraise the exact nature of the stakeholder concerns. The Complainant will be made part of the grievance resolution process and kept updated of the resolution process through phone calls and formal letters. Information material on GRM will also inform the stakeholders about grievance escalation hierarchy that would help the complainant to escalate any unresolved issues to higher level officers, as well as the existing state level GRM channels of government portal and grievance committee chaired by the district collectors. The grievance redress process will be a continuous, transparent and participatory process that would be an integral part of the project's accountability and governance agenda.
40. GRM Monitoring and Reporting. The functioning of the GRM will be monitored by the IDS of SPMU and the PD. Status and function of the GRM will be documented and shared by the IDS of SPMU through quarterly reports and review meetings. GRMs will also be tracked through the project MIS. GRM Review Meetings will held every three months chaired by the PD and convened by the IDS of SPMU. The IDS will be responsible for presenting status of all matters/ grievances received during the last quarter/month, and the action taken to resolve them. The GRM mechanism will be notified to the public and stakeholders within 6 months of project effectiveness. The project website will be posting the status of the GRM every month on the website of the project.

Assistance for aggrieved persons belonging to vulnerable groups for accessing legal recourse

41. If an aggrieved person is not satisfied with the results of grievance redress by the project grievance redress mechanism, such a person can approach the Courts, under the laws of the Country, and the verdicts of the Courts will be final, as per the judicial processes established in India. In general, the legal system is accessible to all such aggrieved persons. However, there might be cases where vulnerable sections face hurdles in accessing the legal recourse system. These hurdles usually include the cost of litigation, knowledge about the legal system, or the lack of awareness about formal legal procedures. To help citizens to access the legal recourse system, each State has an operational mechanism called the Legal Aid Centre, which provides free services including services of lawyers without any cost to the litigants. The IDS of SPMU will engage with State legal Aid Centre to provide such services to the aggrieved persons. As part of the partnership, the project will reimburse all additional costs that accrue to the State Legal Aid Centers. This facilitation will be available to the aggrieved person(s) if they fulfil the following two conditions: (1) that such aggrieved person(s) belong to any of the following vulnerable sections of the society - below poverty line families, scheduled castes, scheduled tribes; or is disabled, women headed households; and (2) such a person or persons those who have exhausted the provisions of GRM.
42. Grievance mechanism for SEA/SH: Though the risk of SEA/SH is low in the project, in case of any such incident the Institutional Development Specialist of SPMU will be the first level of contact. The IDS will be specially trained for handling SEA/SH related grievances. The IDS in turn will inform the Project Director. The IDS will get in touch with the service provider / all women police station in the district for necessary support to the victim. The name and cell phone number of IDS will be displayed in all work sites especially at check dam sites.

11. Contract Management

As part of the process to select construction Contractor who will employ contracted workers, the ADMIP SPMU will review the following information:

- Information in public records, for example, corporate registers and public documents relating to violations of applicable labour law, including reports from labour inspectorates and other enforcement bodies;
- Business licenses, registrations, permits, and approvals
- Documents relating to a labour management system, including OHS issues, for example, Labour Management Procedures
- Identification of labour management, safety, and health personnel, their qualifications, and certifications;
- Workers' certifications/permits/training to perform required work
- Records of safety and health violations, and responses; recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth);

- Accident and fatality records and notifications to authorities;
- Records of legally required worker benefits and proof of workers' enrolment in the related project;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings;
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting/ materially consistent with ESS2.

The contracts with selected Contractor will include provisions related to labor and occupational health and safety, as provided in the World Bank Standard Procurement Document (SPD) and Labour Act. The bid document will make it mandatory for the contractors to annex a Contractor's ESMP (CESMP) which will include work program, Code of Conduct, and Labor Influx Management Plans, among others.

The ADMIP SPMU will manage and monitor the performance of the Contractor in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties). This may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by contractors. Contractors' labor management records and reports may include:

- A representative sample of employment contracts or arrangements between third parties and contracted workers.
- Records relating to grievances received and their resolution.
- Reports relating to safety inspections, including fatalities and incidents including project related SEA/SH cases and implementation of corrective actions.
- Records relating to incidents of non-compliance with national law; and (e) records of training provided for contracted workers to explain labour and working conditions and OHS for the project.