

# Labour Management Procedures

Sudan SANAD – Emergency Crisis Response  
Safety Nets Project (P505963)



World Food  
Programme

SAVING  
LIVES  
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# SANAD: Labour Management Procedures

## Executive Summary

The SANAD Labour Management Procedures document sets out provisions on working conditions, management of workers' relationships, occupational health and safety (OHS) (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labour, child labour, efficient grievance arrangements for Project Workers, and applicable requirements for Contractors and subcontractors.

The forms of labour planned for the SANAD project include:

Direct workers – WFP staff working on SANAD (organogram at Annex 1)

Contracted workers – Staff in Co-operating Partners (CPs) working on SANAD. There are 8 CPs expected for SANAD

Primary supply workers – Staff of financial service providers (FSPs) working on this project. There are expected to be 8 FSPs

Community workers – Volunteers recruited by CPs to support distributions, and small retailers subcontracted by larger retailers

A range of risks have been identified, with corresponding mitigation & monitoring measures, for all forms of labour (see Table 2).

Labour-related policies and procedures covering wages, deductions and benefits, as well as occupational health and safety, are described for WFP, and will be added for CPs once these are on board.

There will be ESS capacity assessments for each CP and FSP, which will identify gaps and actions to address those gaps. CPs and FSPs will report on the implementation of these actions. This will include ESS 2 requirements relating to management of labour and OHS. A template for the ESS capacity assessment is attached to the LMP. There will be a specific annex to CP and FSP contracts that set out the ESS flow down requirements including ESS 2 requirements. If CPs engage subcontractors, the ESS 2 requirements will also flow down to these sub-contractors. CPs are annually assessed for performance, which includes OHS issues.

The minimum age of employment for the SANAD project is 14, based on ESS2. There are specific conditions on people aged 14-18. Specific actions will be taken to verify age of different types of project workers.

A Grievance Redress Mechanism (GRM) will be established for the project, which will be available to beneficiaries, WFP and CP staff and community workers.

## I. Introduction

The World Bank's Environmental and Social Review Summary of SANAD (6<sup>th</sup> July 2024) classified the SANAD project as high risk (social risks) due to the ongoing conflict in Sudan. Specific risks related to labour and working conditions related to inappropriate working conditions and Occupational Health and Safety (OHS), and discrimination as well as risks related to unexploded ordinances. This Labour Management Procedures (LMP) instrument is a disbursement requirement within the Environmental and Social Commitment Plan (ESCP), under ESS 2. The ESCP states that the LMP should include provisions on working conditions, management of workers' relationships, occupational health and safety (OHS) (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labour, child labour, efficient grievance arrangements for Project Workers, and applicable requirements for Contractors and subcontractors.

The objective of this LMP is to set out the range of project workers engaged on this project, and the different risks and mitigation measures relating to these different categories of project workers. It sets out the policy and legal frameworks relating to the different categories of workers and explains the process of contractor management. It sets out specific approaches to child labour, and how the project's Grievance Redress Mechanism is relevant to the different categories of project workers. This LMP draws on the World Bank LMP template (Sept 2018).

This LMP is part of a suite of Environmental and Social Safeguard (ESS) Instruments, including:

1. Environmental and Social Commitment Plan
2. Stakeholder Engagement Plan
3. Social Assessment and Social Development Plan
4. GBV/SEA/SH Action Plan
5. Security Management Plan

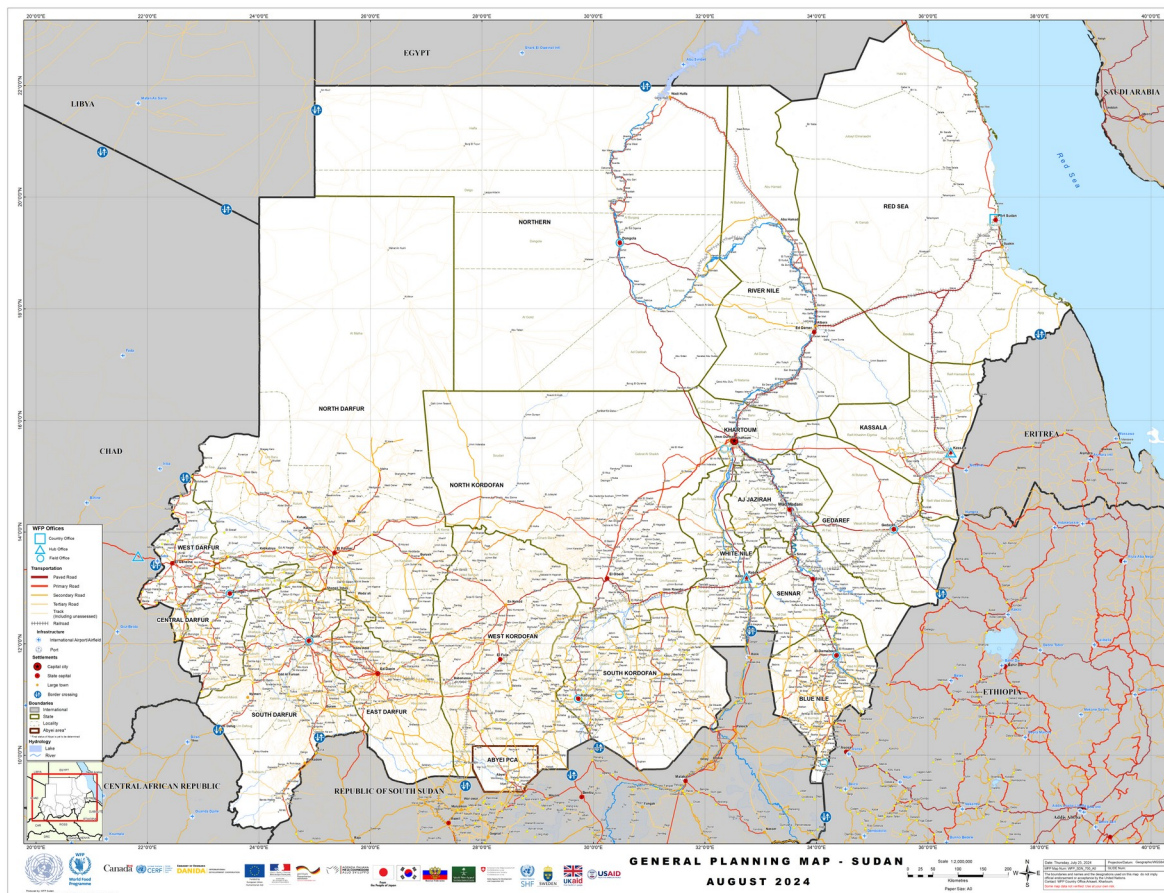
The approach taken is to avoid repetition / duplication between documents, and to cross reference as much as possible. Plans for Emergency Preparedness and Response are covered in detail in the Security Management Plan, and thus are not covered here.

The project partners are still being on-boarded, and this document will be updated with further details once the CPs and FSPs contracting is completed.

### 1.1 Project components

The SANAD project aims to provide Emergency Safety Nets support to vulnerable and food insecure populations in selected areas of the Republic of Sudan. It has a total funding of US\$85m, which will provide unconditional cash support to 552,500 individuals for 12 months each. The project has a two-year lifecycle. The project has three components:

**Component 1:** Unconditional Cash Transfers (US\$66.3m) is implemented by WFP in areas classified as IPC4 and IPC3 to help cope with multiple shocks protecting human capital in the short term. It will be implemented in 16 food insecure localities across Blue Nile, Gedaref, Kassala, Northern, River Nile, White Nile, West Darfur, North Kordofan, Khartoum and Red Sea States. It will be targeted towards high-risk areas that are exposed to natural / climate disaster, and within areas that have a minimum level of accessibility to enable community-based targeting.



**Diagram 1: Map of Sudan**

It will provide cash transfers of US\$10 equivalent in SDG per beneficiary per month, for 12 months per person. There is no household size cap. The cash transfers will use a range of delivery mechanisms – direct cash (approx. 65%), e-vouchers (approx. 25%), and mobile money, bank account transfers (approx. 10%). The delivery mechanism will be determined according to access, financial delivery assets and infrastructures and functional markets. It will build on and enhance social protection system development under SFSP (Sudan Family Support Programme) and SESNP (Sudan Emergency Safety Nets Programme), with a particular focus on systems building in Grievance Redress Mechanism, electronic biometric registration and accountability through third party monitoring. All beneficiaries to be served through bank agents will receive a SCOPE Card or QR Card.

Community-based targeting will apply targeting criteria to support female / child headed households, households with children under 5, households with disabled person(s). WFP’s Co-operating Partners will facilitate the community mobilisation and targeting process. 50% of primary grant recipients (household member receiving the benefits on behalf of the household) should be women. Emergency Food Security Assessments may be undertaken if there are significant changes from the IPC classification. The transfer of \$10 per person per month is meant to support individuals cope with the effect of multiple shocks it also enhances feasibility of sustainability in the event of the GoS managing the project. Financial service providers will be contracted to deliver the cash transfer to beneficiaries.

**Component 2:** Human capital sensitive cash transfers (US\$11.7m) is implemented by UNICEF providing cash transfers to vulnerable and food insecure pregnant and lactating women (PLW) linked with health and nutrition services. It will provide cash transfers to pregnant and lactating women of \$30 per month for 1 year, in Red Sea, River Nile and Kassala States. The project will also work with Mothers Support Groups as a platform for social and behavioural change.

**Component 3:** Project management – providing financing for the implementation of components 1 and 2 above.

## II. Overview of Labour use on the project

The following table sets out the different forms of labour (project workers) involved in the SANAD project.

**Table 1: Project Workers in SANAD**

<p><b>DIRECT WORKERS</b> people employed or engaged directly by WFP to work specifically in relation to the project</p> <p><i>Direct contract employed relationship</i></p>	<p>Direct workers for SANAD comprise staff at WFP working on this project: see Annex 1 for indicative organogram. The project will be led by a full time Project Manager (international), who will be supported by a cross functional team comprising of staff based in the hubs and country office. 16 national staff will be recruited to work on the project, of whom 10 will be 100% working on the project.</p> <p><i>Timing: throughout project</i></p>
<p><b>CONTRACTED WORKERS</b> people employed or</p>	<p>Contracted workers for SANAD comprise staff in Co-operating Partners (CP) working on this project. This includes any</p>



<p>engaged through third parties to perform work related to core functions of the project, regardless of location</p> <p><i>Third party has direct contracted relationship</i></p>	<p>individuals recruited locally at project sites who are paid for their work. Given the wide geographical reach of the project, there will be a number of CPs, although the selection is yet to be completed. CPs are expected to include:</p> <ul style="list-style-type: none"> <li>• Islamic Relief Worldwide</li> <li>• World Relief</li> <li>• Welthungerhilfe</li> <li>• CARE International</li> <li>• Sudanese Red Crescent Society</li> <li>• Catholic Relief Services</li> <li>• Addition for Disasters Assistance</li> <li>• Samaritans Purse</li> <li>• Sadagaat Charity Organisation</li> <li>• NIDAA - Sudanese Development Call Organisation</li> </ul> <p><i>Timing: throughout project</i></p>
<p><b>PRIMARY SUPPLY WORKERS</b> people employed or engaged by WFP's primary suppliers</p> <p><i>Primary supplier has contracted relationship</i></p>	<p>Primary suppliers for SANAD comprise staff in Financial Service Providers (FSPs), and large retailers working on this project. Given the wide geographical reach of this project, there will be a number of FSPs and large retailers, although selection is yet to be completed. FSPs are expected to include:</p> <ul style="list-style-type: none"> <li>• Bank of Khartoum</li> <li>• Blue Nile Mashreg Bank</li> <li>• Western Union International</li> <li>• MTN</li> <li>• Cashi</li> <li>• Red Rose</li> </ul> <p><i>Timing: throughout project</i></p> <p>NOTE: Staff in FSPs and large retailers are categorised as primary supply workers, rather than as contracted workers due to different relationships, contracts and levels of influence WFP has for CPs vs FSP.<sup>1</sup> This also shapes WFP's influence over the working conditions and treatment of workers in each type. For instance the inclusion of specific roles and their respective pay is included within budgets submitted to WFP by CPs, while this</p>

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<sup>1</sup> The nature of WFP's contract with, and the level of influence over, CPs and FSPs are significantly different. Co-operating Partners have humanitarian mandates that are much aligned with WFP, our contractual relationship is through a 'Field Level Agreement' which is a co-operation agreement between the two entities. FSPs are commercial entities, working for a profit motive, and our relationship is through a business contract. FSPs have a wide market, whereas CPs are much more reliant on WFP. While both sets of organisations go through competitive processes and due diligence, the procurement rules differ.

	detail is not provided by, nor negotiated with, FSPs.
<p><b>COMMUNITY WORKERS</b> people employed or engaged in providing community labour</p>	<p>Community workers fall into two categories for SANAD:</p> <ul style="list-style-type: none"> <li>a) CPs may recruit volunteers to support distributions, such as crowd control and site management. A key characteristic is that these are <i>unpaid</i> volunteers who work on a voluntary basis.</li> <li>b) Large retailers may subcontract smaller retailers where value vouchers are the selected modality.<sup>2</sup> NOTE: it is not yet determined whether small retailers will be engaged in the project.</li> </ul> <p><i>Timing: throughout project</i></p>

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<sup>2</sup> Smaller retailers re defined as community workers *not* primary suppliers since:

- WFP does not have any contractual relationship with the smaller retailers, instead the smaller retailers act on behalf of a primary supplier;
- Smaller retailers are not suppliers to the project, but instead are vendors of commodities provided by the primary supplier

### III. Assessment of key potential labour risks

*Responsible body included in italics*

**Table 2: Risks, mitigation and monitoring measures**

<b>Risk title</b>	<b>Risk description</b>	<b>Mitigation measure</b>	<b>Monitoring measures</b>
Risk of engaging child labour as community workers	Internally Displaced Persons (IDPs) that fled Khartoum and now also Wad Medani may have lost their national identity (ID) cards, contributing to further vulnerability. This makes it hard to verify age and heightens the risk of child labour.	Where people hold national ID cards these can be used to verify age. Where age cannot be verified, individuals will be asked their age / date of birth. <i>CPs</i>  Training to be provided on prohibited practices (child / forced labour) to <i>CPs</i> , large retailers and <i>FSPs WFP / CPs / FSPs</i>	Records of community workers, including age / date of birth, engaged in the project as community labour <i>CPs</i>  Spot checks at distribution sites will include checking on age, and if child labour if found this will result in suspension. <i>CPs / WFP field monitors</i>
Risk of engaging child labour in small retailers	Small retailers are likely to be small family-run businesses. Children often work in family businesses.	<i>CP</i> to provide capacity building to small retailers on prohibition on child labour and forced labour. <i>CPs</i>  Small retailers to sign Memorandum of Understanding (MOU) recognising the prohibition on child labour (below 14) and of forced labour <i>CPs / small retailers</i>	Evidence of completed capacity building events <i>CPs / small retailers</i>  Compilation of signed MOUs <i>CPs / small retailers</i>  Research report <i>WFP</i>

		<p>It is acknowledged that children sometimes work in family-run small businesses. Awareness raising to be provided that children supporting small scale family shops should have non-hazardous working conditions, and their work on a family business should not interfere with school attendance. <i>CPs</i></p> <p>Investigation of grievance / incidents of child labour, which may lead to suspend work <i>large retailer, CP, WFP</i></p> <p>Conduct research to understand what work children do in small scale family businesses, identifying any hazardous work, and establish prohibitions on these <i>WFP</i></p>	<p>Monitoring visits will assess if child labour is being used in small scale retailers <i>CPs / WFP</i></p>
<p>Risk of injury or ill-health through poor working conditions for people working in large or small retailers</p>	<p>Occupational health and safety standards may not be understood or valued, which could result in injury or illness for people working in retailers, especially small family-run retailers with very low levels of capital</p>	<p>CPs to provide capacity building to small retailers on ESS, including relevant occupational health and safety standards, and actions small retailers can take to strengthen their occupational health and safety performance <i>CPs</i></p>	<p>Monitoring visits will assess OHS in small scale retailers <i>CPs / WFP</i></p>
<p>Risk of pressure</p>	<p>With community workers</p>	<p>Capacity building to</p>	<p>Monitoring visits</p>

placed on community workers by other community members	(supporting CPs or small-scale retailers) being recruited locally, they may come under pressure from other community members to allow them to skip queues etc	community workers by CPs CPs / community workers	to observe processes at distributions and small scale retailers CPs / WFP
Risk of forced community labour	Risk that community workers may not be voluntary labour	Sensitisation meetings with communities to emphasise the voluntary nature of engagement of community workers	Monitoring visits to assess the voluntary nature of community workers CPs / WFP
Risk of exploitative relationships between larger retailers and smaller retailers	Relationships between larger and smaller retailers may be informal (without contracts etc), and this may create opportunities for exploitative practices	CPs to provide information to small retailers concerning the project and arrangements with large retailers so small retailers are well informed CPs / small retailers	Periodic KIIs with small retailers to assess if this risk is materialising WFP
War spreads into programme operational area creating physical safety and security risks for staff, contractors, and everyone	While the programme states have been chosen in locations of relative calm, there is a risk that the war between RSF and SAF expands into these areas. This would put everyone at risk of violence.	Please see SANAD Security Management Plan (SMP) for a separate table on security risks and mitigation measures (section 6), and for details on flow down of security arrangements to FSPs and CPs (section 4). Each FSP and CP to develop their own mini SMP to be integrated to WFP's overarching SMP.	Please see SANAD Security Management Plan (SMP)
Risk of injury or death through transport	Staff, contractors, community workers and primary suppliers will all need to move to project sites. There is a risk of accidents during	Application of road safety prevention measures: <ul style="list-style-type: none"> <li>• Compulsory use of</li> </ul>	Continued use of vehicle tracking system and weekly reporting to assess

	movement.	<p>seatbelts</p> <ul style="list-style-type: none"> <li>• Prohibition on use of mobile phones while driving</li> <li>• Respect local speed limit and national road safety regulations</li> <li>• Maximum driving time with specified rest breaks</li> <li>• Vehicles kept in clean and road worthy conditions</li> <li>• Extensive recruitment, assessment and on-going training processes for drivers</li> </ul> <p><i>WFP / CPs / FSPs</i></p>	speeding and rest breaks <i>WFP / CPs / FSPs</i>
Sexual and Gender Based Violence at work	Risk of violence against particularly women community workers in the workplace committed by other community members	Please see separate table of risks and mitigation measures (section 5) in GBV/SEA/SH Action Plan	Please see separate GBV/SEA/SH Action Plan
Sexual Exploitation and Abuse of beneficiaries	Risk of sexual abuse or harassment by WFP staff or partners (CPs/FSPs)	Please see separate table of risks and mitigation measures (section 5) in GBV/SEA/SH Action Plan	Please see separate GBV/SEA/SH Action Plan
Please see Security Risk Assessment / Security Management Plan for discussion of security personnel			

## IV. Brief overview of labour-related policies and procedures

The national Labour Act of Sudan (1997) are translated and annexed at Appendix 1.

### 4.1 Direct workers

As an international organisation, WFP has developed a set of global policies and procedures for labour management and working conditions, including for wages, deductions and benefits, and for occupational health and safety. These will be described here. WFP's policies and procedures are described in the FAO Staff Rules and Regulations, WFP Human Resources Manual, WFP Occupational Health and Safety Policy. The FAO regulations, which underpin WFP's regulations and policies, are in compliance with ILO standards. All categories of staff must sign the WFP code of conduct (see Appendix 3)

WFP has three different categories of staff:

- Fixed term (indefinite contract) – which can be internationally or nationally recruited long-term staff;
- Consultants/STP (temporary contracts of up to 11 months) – to provide specific technical competencies not normally available among fixed term staff;
- Service Contract or Special Service Agreement or Casual Labour – for short term services to be hired in the locality – national short-term employees.

#### 4.1.1 Wages, deductions, benefits

Standardized salary scales and benefits are applied to different categories of workers employed under similar contracts. The salary scale for international staff is set out in the International Civil Service Salary Commission: <https://icsc.un.org/Home/SalaryScales>. Benefits are outlined in the WFP Human Resources Manual. For national staff the local salary scales, benefits and entitlements are outlined in WFP's staff handbook. If salaries and benefits for national staff fell below the national minimum wage then WFP would increase to match that minimum. Deductions are made for contributions to medical services, amounting to between 1-5% of salary.

#### 4.1.2 Occupational health and safety

WFP has an Occupation Health and Safety (OHS) Standard Operating Principle, as set out in the Executive Director's Circular of 2<sup>nd</sup> Feb 2016 WFP's Policy on Occupational Health and Safety which is included at Appendix 2. WFP's occupational health and safety policy applies to all categories of its employees and forms part of an OHS management system, comprising of:

- Advisory Committee on Occupational Safety and Health – the OHS oversight body in WFP;
- OHS 2016 Policy;
- Risk Management, with templates for Risk Assessment and Risk Register;
- Incident Reporting System and Fact Finding Process;
- OHS standards and guidance, in particular in relation to elevated work, housekeeping and forklift safety;
- OHS Compliance mechanism and internal audit;
- Capacity Building.

WFP must also comply with the UN Security Management System Guidance on Occupational Health and Safety, and WFP also follows international standards on OHS ISO 45001. All employees are provided coverage against service incurred injuries and compensation as detailed in the UN Staff Regulations and Rules manual for each category of employees (see )

#### 4.2 Contracted workers

Similar to above, as a global organisation, WFP has a global set of policies and procedures for working with CPs, which are captured in a Field Level Agreement (FLA), the contract between WFP and the Co-operating Partner. The FLA includes a set of standard requirements for all CP contracts, which includes commitments to WFP's Environmental and Social Standards, including WFP's Policy on Occupational Safety and Health (2016) for contracted workers, as well as a commitment to the implementation and reporting on the ESCP, including the LMP, and will also include a specific annex to ensure the flowdown of the new enhanced ESS requirements set out in the ESCP (see at Annex 3).



#### **4.2.1 Wages, deductions, benefits**

*This section will be completed once CPs are contracted*

#### **4.2.2 Occupational health and safety**

*This section will be completed once CPs are contracted*

### **4.3 Primary supplier workers**

WFP will engage Financial Service Providers (FSPs) for the provision of cash in via bank, cash in hand, e-vouchers through contracted retailers or Business to Business model, or value vouchers through contracted retailers. This will follow WFP's procurement policy, the UN Supplier Code of Conduct, and will also include a specific annex to ensure the flowdown of the new enhanced ESS requirements set out in the ESCP (see at Annex 4).

The use of child labour will be prohibited among primary supply workers, and this will be set out in the contractual agreement – not only in the ESS annex but also as specific conditions within the contract. If a grievance / incident report is raised concerning the use of child labour at a primary supplier, WFP will refer the issue to the supplier for prompt investigation and action, reporting findings and action to WFP. WFP will determine if the matter is resolved or further escalation is required, including possibility to seek alternative supplier.

The expected FSPs include:

1. Blue Nile Mashreg Bank
2. Bank of Khartoum
3. MTN
4. Cashi
5. Red Rose
6. AIGT

### **4.4. Community Workers**

Community workers fall into two categories for SANAD: a) volunteers recruited by CPs to support distributions b) small retailers subcontracted by large retailers where value vouchers are utilised.

#### **4.4.1 Volunteers recruited by CPs to support distributions**

CPs will utilise contracts for locally recruited volunteers, setting out terms and conditions for their voluntary labour. CPs will establish these terms and conditions.

CPs will ensure no child labour, no forced labour, and adequate occupation Health and Safety for community labour.

#### 4.4.2 Smaller retailers subcontracted by larger retailers

Where value vouchers are being used, larger retailers will likely establish subcontractor relationship with smaller retailers, with whom beneficiaries can redeem their vouchers to obtain commodities. CPs will provide information to the selected small scale retailers about the project, and will provide some capacity building on a) prohibition of child labour and forced labour, b) OHS as relevant to small scale retailers, including actions to enhance OHS, and c) ESS more broadly. Small scale retailers will be required to sign an MOU recognising the prohibition on child labour and forced labour. Monitoring visits will assess if child labour is being used in small scale retailers.

If a grievance / incident report is raised concerning the use of child labour at a small scale retailer, WFP will refer the issue to the larger retailer for prompt investigation and action, reporting findings and action to WFP. WFP will determine if the matter is resolved or further escalation is required, including possibility to seek alternative small scale retailer.

#### 4.4.3 Contractual arrangements

*This section will be completed once contracts with CPs / large retailers are in place*

#### 4.4.2 Occupational health and safety

*This section will be completed once contracts with CPs / large retailers are in place*

## V. Responsible staff

The responsible staff for implementation of these Labour Management Procedures are as follows:

**Table 3: Responsible staff**

<b>Responsibility</b>	<b>Role</b>
Overall compliance with LMP	Social Safeguards Specialist - WFP
Oversight of implementation of LMP at state level	Environmental and Social Safeguards Focal Point - Farchana, Dongola, Port Sudan, Kosti and Kassala hub

Direct workers - Addressing worker grievances, Occupational Health and safety	Human Resources - WFP
Contract workers - Addressing worker grievances, Occupational Health and safety	Human Resources - CPs
Primary supply workers - Addressing worker grievances, Occupational Health and safety	Human Resources - FSPs
Community workers - Addressing worker grievances, Occupational Health and safety	CPs field teams

## VI. Capacity assessment, monitoring and reporting

An ESS capacity assessment will be conducted for each CP and FSP at project start up. Capacity gaps will be identified, and action identified and implemented to address gaps. An ESS capacity assessment tool has been developed (See Annex 4). CPs and FSPs will report to WFP on the implementation of actions as part of regular reporting.

Reporting on implementation of mitigation measures in this LMP covering all forms of labour will form part of the regular bi-annual E&S reporting to the WB, as set out in the ESCP. At project start up, monitoring tools for ESS risk management will be developed to feed into the ESS reporting, which can work alongside existing Post Distribution Monitoring tools.

CPs will investigate, address and report to WFP any occupational health and safety incidents resulting in injury or death, or that breach commitments in the LMP. WFP will review the case, and escalate to the World Bank as required in the ESCP. The reporting arrangements are set out in the ESS annex to CP FLAs and FSP contracts, stating the specific time periods and processes for reporting.

## VII. Age of employment

The minimum age for employment under WB ESS 2 is 14. Sudan Labour Act (1997) has a number of age-variegated provisions for working children at ages 12, 14 and 16 years old. The provisions may be difficult to fulfil, and thus , for the purpose of this project the minimum age of employment shall be 18.

Where children are working within a small retailer family business, the following provisions from the Sudan Legal Act, supplemented by WB ESS2 where this is more stringent, will be explained to the family members:

1. No child under 14 should work in connection with this project, even in a family business
2. The work must not be not hazardous, interfere with the child's education, or be harmful to the child (physical / mental health, spiritually, moral or social development)
3. The child should not carry heavy weights or maintain machinery

In the current context of Sudan, some IDPs who fled Khartoum / Jazeira will not have national identity documents, as these were lost in flight. It is worth noting that prior to April 2023 while many people held a national ID, a significant fraction did not, in particularly women<sup>3</sup>. This can create difficulties for proving age. Ensuring that someone is over the minimum age for employment will be achieved through:

For Direct and contracted workers all are assumed to have identity documents, age is verified through identity checks during hiring processes.

For Primary supply workers this will be established through the specific Child Labour Clause in the contractual agreement.

For community workers hired by CPs, where there is no national ID, volunteers will be asked for their date of birth, their national ID (if they have it) and spot checks will include inquiries on age.

For small scale retailers (community workers, engaged by larger retailers) the commitment on not using child labour and forced labour will be set out in a written memo which larger retailers will be required to have signed by smaller retailers, with a clear stipulation that the use of child labour (below 14) is prohibited. NOTE: It is generally understood that children often contribute and support family members in family business, including small scale retail outlets. The specific concern is the employment of children. Awareness raising will be integrated into ESS trainings the children supporting small scale family shops should have non-hazardous working conditions, and their work on a family business should not interfere with school attendance.

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<sup>3</sup> This is discussed in the Social Assessment under financial inclusion

If a grievance / incident report is raised concerning the use of child labour at a small-scale retailer, WFP will refer the issue to the larger retailer for prompt investigation and action, reporting findings and action to WFP. WFP will determine if the matter is resolved or further escalation is required, including possibility to suspend working with the smaller retailer. Monitoring visits will also assess if there are workers present under 14, and escalate as for grievance reporting.

## VIII. Grievance mechanism

Within WFP there are a range of mechanisms direct workers can use to raise grievances. These include:

- Human Resources – at Country Office level, who can make determinations on specific issues.
- WFP staff relations- who can guide managers relating to grievances and disciplinary matters;
- Office of Investigations – receives and investigates complaints in a confidential manner;
- Office of the Ombudsman – for confidential discussion.

The CPs internal grievance mechanisms are as follows: *This section will be completed once contracts with CPs are in place*

For both WFP and CP staff, the SANAD project GRM will be available if needed. It is for staff to determine which GRM to select.

For Community Workers, the GRM is the key vehicle for grievance redress. The GRM is extensively documented in the Stakeholder Engagement Plan and will not be replicated here.

For primary suppliers (FSPs), most work-related grievances should be handled by their employer. However the GRM would be relevant for the reporting of violation of project requirements, including child labour, forced labour and occupational health and safety. Information concerning the GRM will be made available at distribution sites and so all contact points will be known to FSP staff.

The GRM mechanism is described in the SEP, under section 6.1

## IX. Contractor management

### 9.1 Selection

WFP has global corporate guidance for CP selection, as set out in WFP Management of NGO Partnerships and Corporate Guidance on NGO Partnership Management. As part of its internal partnership management process, WFP regularly conducts partner mapping and analysis to identify and determine potential partner organizations, their availability and eligibility, along with their capacity to deliver on specific programmes. The mapping is done in close consultation with relevant Clusters. Selection of Cooperating Partners (NGOs) is done through a competitive process. WFP assesses possible partnerships through a Call for Proposals. Potential partners are then invited to submit their applications which are reviewed to determine sufficient capacity for the project under interest. All submissions undergo a technical review for programmatic, logistical, and financial solvency and NGOs that meet the criteria are shortlisted and put on a roster, which is regularly updated. As and when required, shortlisted NGOs are invited to submit full proposals that also undergo a competitive process based on a technical review with recommended proposal(s) presented to the Cooperating Partner Committee (CPC) which is comprised of representatives from different units. The CPC acts as a neutral body, levying checks and balances on the verification processes and ensures country office-level processes and corporate requirements are followed.

### 9.2 Contractual provisions for management of Labour issues and OHS

As set out above at 4.2, the flow down of obligations to the CP is established through the FLA, which will include a specific annex setting out ESS flowdown requirements. ESS2 identifies that paragraphs 9 to 33 of ESS 2 are applicable to contracted workers, covering the following provisions (in summary):

- Staff are provided with information on pay and conditions
- Staff are paid regularly
- Staff are given written notice of termination of contract in a timely manner
- Non-discrimination and equal opportunity in employment
- Protection and assistance to vulnerable workers
- Allow collective bargaining
- Ensure no child labour or forced labour
- Provide an internal grievance redress mechanism
- Ensure occupational health and safety for staff
- And if there are subcontracts awarded these also apply these provisions

### **9.3 Performance management**

The FLA establishes the expected qualified personnel put forward by the CP for the implementation of the work. As the project shifts into implementation, awareness raising / capacity building activities will be undertaken with CPs to ensure strong understanding of commitments under the ESCP, including the LMP and OHS.

There are regular meetings between field offices and CPs – performance management meetings – to help identify and address issues in real time. CPs are annually assessed for performance, which includes performance against OHS, among many other topics. On OHS this includes performance against policies, staffing and resource, and accidents / injuries reported. If a CP scores unsatisfactory overall the contract could be suspended. For those identified as in need of improvement, capacity building will be provided, including in OHS if required. WFP field staff will accompany the CP during implementation, providing onsite supervisory support. Spot checks will also be undertaken as noted above.

### **9.4 Flow down to sub contractors**

Where a CPs contracts a sub-contractor on SANAD, the CP remains responsible for all services and obligations performed by the sub contractor(s). The terms of the sub contract will be subject to, and construed in accordance with, the terms of conditions of the contract between WFP and CP. As such the sub-contractor will be integrated into the processes for ESS implementation and reporting, as set out in the ESCP and the ESS annex to the FLA.

## Acronyms

CP	Co-operating Partner
CPC	Co-operating Partner Committee
ESCP	Environmental and Social Commitment Plan
ESS	Environmental and Social Safeguards
FLA	Field Level Agreement
FSPs	Financial Service Providers
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
ID	National Identity (card)
IDPs	Internally Displaced Persons
IPC	Integrated Phase Classification
LMP	Labour Management Plan
MOU	Memorandum of Understanding
OHS	Occupational Health and Safety
SA	Social Assessment
SDP	Social Development Plan
SDG	Sudanese currency
SEA	Sexual Exploitation and Abuse
SESNP	Sudan Emergency Safety Nets Programme
SFSP	Sudan Family Support Programme
SH	Sexual Harassment
SMP	Security Management Plan



## Annex 1 Direct Workers on SANAD (WFP)

### Project Management and Implementation

- **Head of Programme and Project Coordinator:** Manage overall implementation, coordinating with field Heads of Hubs.
- **Cash-Based Transfer (CBT) Coordinator:** Handles cash transfer operations, liaising with the Heads of Finance and Procurement.

### Partnerships and Coordination

- **Head of Strategic Partnerships:** Manages coordination with the World Bank and oversees reporting.

### Digitalization, Finance, and HR

- **Head of Digitalization:** Oversees beneficiary registration and digital systems.
- **Head of Finance:** Manages finances and reporting.
- **Head of Budget and Programming:** Tracks budget utilization.
- **Head of Human Resources:** Oversees HR management.

### Stakeholder Engagement and Risk Management

- **Head of CFM and Community Engagement:** Oversees risk identification, AAP planning, and stakeholder engagement.
- **Risk Officer:** Provides risk assessment and compliance advice.
- **Environmental and Social Safeguard Experts & Conflict Sensitivity Advisor:** Mitigate risks to the project.

### Supply Chain, Procurement, and IT

- **Head of Procurement:** Manages procurement processes for goods and services.
- **Head of Supply Chain:** Oversees logistics services.
- **Head of IT:** Handles IT infrastructure and communication.

### Field and Country Office Support

Additional national staff (6 field-based and 10 in the country office) will support project implementation.

### Specialized Roles

- **Programme Policy Officers:**
  - **IDM:** Focuses on digital identity systems.
  - **CP Management:** Manages cooperating partner processes and compliance.
  - **CBT:** Develops cash-based delivery systems and reporting.
- **Programme Associates:**
  - **CBT:** Implements CBT interventions.
  - **CFM:** Manages complaint mechanisms and stakeholder engagement.
- **Logistics Roles:**

- o **Officer (vouchers):** Oversees voucher operations and retailer activities.
- o **Associate (vouchers):** Supports vendor contracting and logistics.
- **Finance Roles:**
  - o **Officer CBT:** Develops financial processes and ensures compliance.
  - o **Associate CBT:** Provides technical financial support.

### **Monitoring and Evaluation**

- **M&E Officer:** Plans and implements project monitoring, contributing to decision-making and learning.

Each role aligns with a specific function, ensuring effective coordination and implementation of project objectives.

## Annex 2 – SANAD - ESS capacity assessment tool for Co-operating partners and financial service providers

Proposed process:

Step1 - CP / FSP to *self assess* and provide completed self assessment to WFP

Step 2 – WFP E&S Safeguards Specialists to conduct KII(s) with CP or FSP to discuss the self assessment and further develop the details and agree proposed actions

NOTE: some lines of enquiry are also covered in other CP capacity assessment processes, and integration will be required.

	Findings	Score <sup>4</sup>	Proposed actions to enhance capacity
<b>FOR CO-OPERATING PARTNERS AND FOR FINANCIAL SERVICE PROVIDERS</b>			
<b>POLICIES AND CAPACITIES</b>			
What policies and capacities exist to apply environmental and social risk management as required in SANAD? Is there dedicated ESS support?			
What is the level of understanding & buy-in across staff of ESS and the requirements of ESS for SANAD? What training has been conducted?			
<b>INCIDENT/ACCIDENT REPORTING</b>			
What incident/accident reporting mechanisms are in place?			
What SEA/SH incidents/allegations reporting mechanisms are in place? What trainings have been provided to staff to that end?			
<b>GRIEVANCE REDRESS MECHANISM/COMMUNITY FEEDBACK MECHANISM</b>			

<sup>4</sup> Scoring should use RED / AMBER / GREEN traffic light system

Is the organization linked into a functioning GRM for SANAD or integrated/familiar with WFP's own Community Feedback mechanism? If not, are there agreed steps to achieve this?			
<b>CHILD &amp; FORCED LABOUR</b>			
What measures exist to ensure there is no child labour? What measures exist to ensure there is no forced labour?			
<b>OCCUPATIONAL HEALTH AND SAFETY</b>			
What occupational health and safety risks (OHS) could occur in the implementation of SANAD by this CP/FSP?			
How are the above mentioned OHS risks being managed?			
For SANAD-related transport, what road safety prevention measures exist and are applied?			
<b>SECURITY</b>			
What security team capacities exist?			
What security risk assessments and security risk management processes are in place?			
Is there an adequate budget for security risk management?			
<b>SOCIAL RISKS</b>			

What local languages are spoken in the project area and does the FSP/CP have staff who can communicate in this language?			
What is the level of understanding of local conflict dynamics?			
<b>PREVENTION OF SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARRASSMENT</b>			
Have all staff signed a code of conduct with specific provisions on SEA/SH? <sup>5</sup>			
What PSEA/SH management and reporting mechanisms are in place? <sup>6</sup>			

<b>FOR CO-OPERATING PARTNERS ONLY</b>			
<b>LABOUR MANAGEMENT</b>			
<p>Are policies / procedures in place that meet the following ESS working conditions for staff, and are they implemented?<sup>7</sup></p> <ul style="list-style-type: none"> <li>• Staff are provided with information on pay and conditions</li> <li>• Staff are paid regularly</li> <li>• Staff are given written notice of termination of contract in a timely manner</li> <li>• Non-discrimination and equal opportunity in employment</li> <li>• Protection and assistance to vulnerable workers</li> <li>• Allow collective bargaining</li> <li>• Provide an internal grievance redress mechanism</li> </ul>			

<sup>5</sup> Cross-reference to existing CP capacity assessment tool

<sup>6</sup> Cross-reference to existing CP capacity assessment tool

<sup>7</sup> Cross-reference to existing CP capacity assessment tool

<ul style="list-style-type: none"> <li>• And if there are subcontracts awarded these also apply these provisions</li> </ul> <p>If volunteers are locally recruited to support the project provisions must also be in place to ensure:</p> <ul style="list-style-type: none"> <li>• Terms and conditions are clear and understood</li> <li>• There is no child labour or forced labour</li> <li>• Adequate occupational Health and Safety</li> </ul> <p>What process is used to engage voluntary community labour and what mechanisms ensure it is voluntary (and not coerced)?</p>			
<b>STAKEHOLDER CONSULTATION</b>			
<p>What form and frequency of stakeholder consultations with communities are undertaken?</p>			
<b>SUB CONTRACTING</b>			
<p>Is the CP planning to work with any local NGOs in implementing SANAD? What ESS capacity assessment has been conducted of the LNGO?</p>			

<b>FOR FINANCIAL SERVICE PROVIDERS ONLY</b>			
<b>LABOUR MANAGEMENT</b>			
<p>What is the proportion of male to female bank teller staff?</p>			
<p>What is the rate of turnover of bank teller staff, and what capacity building is in place to ensure refreshers in ESS?</p>			

