INTERNATIONAL RESCUE COMMITTEE Lebanon

Support for Social Recovery Needs of Vulnerable Groups Phase II (SRP 2) Project (P506127)

Labor Management Procedures

Updated in June 2025

ABBREVIATIONS AND ACRONYMS

CoC Code of Conduct

ECU Ethics and Compliance Unit

ESS2 Environmental and Social Standard 2: Labor and Working Condition

FT Fixed Term

GBV Gender-Based Violence

GBVIMS Gender-Based Violence Information Management Systems

GM Grievance Mechanism HR Human Resources

IIA Intermediary Implementing Agency
ILO International Labor Organization
IRC International Rescue Committee
LMP Labor Management Procedures
LRR Lebanon Recruitment Request
mhGAP Mental Health Gap Action Program
MHPSS Mental Health and Psychosocial Support

MoL Ministry of Labor

MOSA Ministry of Social Affairs MOPH Ministry of Public Health MMU Mobile Medical Units

NMHP National Mental Health Program

NCLW National Commission for Lebanese Women

OHS Occupational Health and Safety

PHC Primary Health Care

SBS Step-by-Step

SDC Social Development Centers SOP Standard Operating Procedures

SH+ Self Help Plus

SGBV Sexual and Gender Based Violence

ToR Terms of Reference

UNICEF United Nations International Children's Emergency Fund

WB World Bank

WHO World Health Organization

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INTRODUCTION

Labor Management Procedures. Under the World Bank Environmental and Social Standard 2 (ESS2: Labor and Working Conditions), the Recipient is required to develop labor management procedures (LMP). The purpose of the LMP is to identify the main labor requirements and risks associated with the project, and help the Recipient to determine the resources necessary to address project labor issues. The LMP will enable different project-related parties, for example, staff of the project implementing unit, contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labor issue. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

Project Description. The August 4, 2020 Port of Beirut explosion exacerbated Lebanon's already severe economic, political, and social crises, disproportionately impacting vulnerable populations in Beirut. In the immediate aftermath, civil society organizations played a central role in emergency response, recovery, and rehabilitation efforts. Phase I of the project contributed to these efforts by supporting the delivery of essential social services to affected groups. However, despite these initiatives, several challenges continue to undermine the effectiveness, inclusivity, and sustainability of the broader recovery process. These include weak coordination among actors, the short-term or ad hoc nature of many interventions, and limited institutional capacity to ensure continuity and scale-up of support.

Phase II of the project builds upon the initial emergency response and aims to address the continuing needs of vulnerable populations—both in Beirut and in other areas impacted by compounding crises, including the deteriorating socio-economic conditions and displacement resulting from the 2024 conflict. While maintaining a strong focus on Beirut, Phase II expands geographically and programmatically to enhance the impact of social recovery interventions across Lebanon.

Supporting Social Recovery Services for Vulnerable Groups:

The project will continue to prioritize reducing vulnerabilities among three key groups:

- (i) survivors of Gender-Based Violence (GBV);
- (ii) individuals experiencing deteriorated psychosocial wellbeing; and
- (iii) persons with disabilities and older persons facing limitations in accessing services and exercising their rights.

Under Phase II, targeted interventions will be scaled up and extended to additional areas affected by conflict and economic hardship. Grant financing will be provided to a selected number of qualified NGOs to deliver essential social services, including case management, psychosocial support, specialized care, and community-based protection activities. This approach aims to strengthen the resilience and wellbeing of affected individuals while promoting inclusive and sustainable recovery mechanisms. To achieve this, the project will support nongovernmental stakeholders with a demonstrated track record in delivering social recovery services and engaging with vulnerable groups. Support will focus on enhancing their capacity to participate meaningfully in the broader social recovery and reconstruction processes, thereby contributing to more coordinated, effective, and durable solutions.

The World Bank has selected the International Rescue Committee (IRC) to act as the Intermediary Implementing Agency (IIA) to implement the Supporting Beirut's Social Recovery Services project. The IRC will take on project management, grant provision and/or procurement of services from NGOs, and will be responsible for the fiduciary supervision of the selected NGO partners.

LABOR MANAGEMENT PROCEDURES

1. OVERVIEW OF LABOR USE ON THE PROJECT

This section describes the following, based on available information:

Number of Project Workers: The total number of workers to be employed on the project, and the different types of workers: direct workers and contracted workers, and this will be continually updated as per the progress, project phase, and needs. As per IRC Processes, a *Lebanon Recruitment Requisition (LRR)* template will be completed detailing the length of assignment, contract type, budget codes, reporting lines and other related information in addition to the *Job Description* template.

Table 1: Project workers

Workers Type	Number of Workers	Local Residents	Imported/ Foreign Workers	Staff Under 18	Type of Job or Skills
Direct Workers (PMU)	17 full time workers, 7 part time technical specialists ¹	24	0	0	Management and specialist staff
Contracted Workers (employees of partner organizations)	155	155	0	0	Delivery staff
Community Workers	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Characteristics of Project Workers: Project workers will be local Lebanese citizens. The project workers will be as well of balanced gender ratio and adults above the age of 18 years old.

The determined skillset of the potential candidates will be closely screened and assessed by the recruitment team and the project stakeholders based on approved job descriptions. The skillset needed for this project include the following:

- Significant experience leading the management of complex donor funded programmes.
- Extensive leadership experience in managing a diverse team of professionals and partners.
- Experience and ability to provide leadership and direction in harnessing the multi-disciplinary skillsof the technical personnel and partners;
- A proven track record of leading partnership and stakeholder relationships;

¹ These workers are financially covered by both IRC and the WB.

- Prior experience in operating effectively within complex and high-risk environments and managing the needs of multiple stakeholders;
- Developed understanding of business and partnering standards required to create a high performing and accountable partnership environment.
- Previous experience in developing donor compliant partnering and stakeholder engagement tools, templates and trainings.
- Technical expertise and service provision experience in Gender-Based Violence (GBV), mental health, and supporting persons with disabilities and the elderly.

Timing of Labor Requirements: The skills required for project labor will be determined during the early stages and outlined in job descriptions, ensuring compliance with IRC's minimum requirements. Deployment and sequencing of labor will be based on evolving project needs. These requirements were defined at the project start and will be regularly updated throughout implementation to align with ongoing needs.

Contracted Workers: Until now, this project includes 10 partner organizations whose employees are considered contracted workers. They are: Nusroto, Embrace, Mousawat, IDRAAC, Lebanese Center for Civic Education (LCCE), KAFA, TABITHA For Relief & Development, ShareQ, The LEE Experience, and Caritas. Agreements are yet to be finalized with Caritas, and one additional partner is yet to be selected.

Migrant Workers: Not applicable.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

This section describes the following, based on available information:

2.1. Project activities

The project consists of three main components:

- Component 1: Support for Social Services for Vulnerable Groups
- Component 2: Capacity Building
- Component 3: Project Management

Component 1: Support for Social Services for Vulnerable Groups (US\$ 4.2 million)

This component will finance selected NGOs and CSOs to provide social services to vulnerable groups, including survivors of GBV, individuals with deteriorated psycho-social wellbeing, and persons with disabilities and older persons. Refugees and migrant domestic workers will also be targeted across these groups. Funding will flow through grants and service agreements between IRC and local NGOs/CSOs.

Sub-Component 1.1: Enhanced Support for Survivors and those at Risk of GBV (US\$ 1.6 million)

This sub-component will focus on continuing support for social services to survivors and those at risk of GBV, as well as children under judicial protective measures.

Activities include:

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- Operating critical services for survivors of GBV, including case management, psychosocial support, medical and legal assistance, and urgent needs support.
- Holistic recovery services to promote empowerment, such as life skills sessions, psychotherapy, legal counselling, educational opportunities for children, and economic empowerment initiatives for survivors.
- Public sensitization and awareness campaigns to improve visibility of GBV issues.
- Contribution to child protection services, including education and healthcare for children under judicial protection.
- Supporting emergency shelters and safe spaces.
- Provision of legal assistance for the reunification of juveniles with families or long-term housing solutions.
- Training and mentoring for service providers in both the public and non-government sectors.
- Support for the use and dissemination of GBV information management systems.
- Community-based awareness and outreach campaigns, including through social media

Sub-Component 1.2: Enhanced Support for Psychosocial Wellbeing (US\$ 1.2 million)

This sub-component invests in improving access to and quality of psychosocial services across Lebanon. Key activities include:

- Sustaining and enhancing the National Mental Health Hotline ("Lifeline").
- Operating the Step-by-Step digital intervention platform.
- Expanding the Self Help Plus (SH+) stress management course and promoting mental health in the workplace.
- Improving the availability of mental health services within NGO-run Primary Healthcare Centers (PHCCs).
- Training staff and volunteers supporting the national hotline.
- Rollout of mental health services to target groups via online/multimedia delivery and in-person interventions.
- Awareness campaigns to promote access to mental health support among refugees, host communities, and vulnerable populations.

Sub-Component 1.3: Enhance Support for Older Persons and Persons with Disabilities (US\$ 1.4 million)

Support will be provided through specialized NGOs to improve healthcare access for older persons and people with disabilities through outreach, at-home health services, and physiotherapy.

Activities include:

- Advancing Community-Based Inclusive Development (CBID) services.
- Offering specialized health services, including rehabilitation and assistive devices.
- Enhancing sustainability of CBID in Lebanon through updates to the digital CBR portal and improved dissemination in collaboration with MoSA and or MoPH.
- Improving accessibility of homes and public spaces and supporting inclusive education.
- Providing lifesaving items and cash assistance.
- Conducting awareness, recreational, and psychosocial activities.
- Training caregivers and frontline workers in basic care techniques.

Component 2: Sub-grantee Capacity Building for Impact & Sustainability (US\$ 0.5 million)

This component focuses on enhancing the capacity of NGO sub-grantees implementing activities under Component 1.

Capacity building activities include:

- Project management, financial management, and environmental and social safeguards support.
- Introduction of a capacity building "graduation process" for sub-grantees, ensuring they are equipped to independently manage resources and attract funding post-project.

Component 3: Project Management (US\$ 0.9 million)

This component covers the operating and management costs associated with the project. It includes:

- Project oversight and implementation activities.
- Fiduciary, environmental, and social standards management.
- Monitoring and reporting of project activities to ensure transparency and visibility of results.

2.2. Key Labor Risks

The following are the key labor risks associated with the implementation of this project:

- 1. Community Acceptance: The acceptance of specific projects at the local level, including affected populations, key local stakeholders and local authorities is important to ensure an environment of collaboration and acceptance for project workers, and to ensure the effectiveness of project activities. IRC gets community buy in through involvement in activities from the planning stage and throughout implementation, hiring local staff; messaging about the activities and the organizational goals and objectives; avoid raising expectations that cannot be met. IRC has established and maintained relationship with local stakeholders, consulted and involved them in project design to ensure an environment of collaboration and cooperation.
- 2. Occupational health and safety: Risks related to safety and health in the work environment could arise when workers are providing services on-site in the project shelters, social service provision locations, or mobile medical units. The IRC has robust occupational, health and safety (OHS) measures in place which will be implemented throughout the duration of the project and will work with implementing partners to ensure that staff remain safe while working on-site. These procedures (described under section 6 of this document) are reflected in the *Staff Health* page on IRC Portal (staff access only) which is available to all staff and is updated and shared periodically through a newsletter and Safety and Security communication. These procedures and guidance include:
 - a. Preventing Illness and Injury at Work
 - b. Managing Injuries and Illness while working at IRC
 - c. Health Risk Education
 - d. Primary Health Care Services for IRC Staff and Family
 - e. Travel Health
 - f. Mental Wellbeing

The global Staff Health team and dedicated Staff Health Advisor provides guidance to all staff on Staff Health policies, practices and the training materials related to personal health of staff and the health

and safety of IRC workplaces.

In addition, the IRC has developed the following dedicated website to guide staff on the support they can receive, including COVID-19 specific resources: https://doc.rescue.org/staff/. IRC also shared with all its staff IRC's consolidated cholera guidance Cholera Outbreak.

3. Security Risks

Related to Cash Payments: staff being paid in cash might impose a direct risk on them
and their families. IRCcommunicates regularly on precautionary measures to mitigate this
risk.

Due to Hostilities:

Due to ongoing hostilities and instability in certain project-targeted areas—particularly in parts of the Beqaa, there are heightened security risks for staff, especially those working in the field. To mitigate these risks, implementing partners should conduct regular security risk assessments, apply and share updated safety protocols, and ensure that all staff are briefed on contingency measures. These include evacuation procedures, secure communication protocols, and emergency response plans.

- **4. Staff turnover and workload**: Due to the economic crises in Lebanon, programs and support departments might lose staff to seek opportunities outside of Lebanon. Losing key staff members poses additional strains on existing staff, leading to work overload and potential burn out. To mitigate this risk, the IRC has succession plans in place in order to provide backups to key roles and provide opportunities for staff to Act in other positions. Other measures include implementing a rotational schedule and access to mental health support to deal with stress or anxiety.
- 5. Psychological Stress and Mental Health Risks: Given the project's focus on vulnerable groups and Lebanon's complex socio-political context, including recent conflicts and the ongoing economic crisis, project workers may face high levels of psychological stress and secondary trauma. This can negatively impact their mental wellbeing and productivity. IRC will continue to provide mental health support, counseling, and stress management resources to mitigate this risk.
- **6. Mobility and Access Risks:** Project staff may face challenges in safely and regularly accessing workplaces due to security checkpoints, conflict zones, and unstable transport infrastructure. These factors may disrupt project implementation and affect staff wellbeing. IRC will explore alternative arrangements such as flexible working hours or remote work options when necessary or possible.

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

APPLICABLE LAW

Beyond the provisions of the Employee Handbook, each employment relation is governed by the Lebanese Labor Law, the Social Security Law and the individual employment contract. In addition to Lebanese Laws and Regulation of relation.

The primary instrument that governs employment in the private and mixed sectors in Lebanon is the Labor Law of 1946.

Other domestic sources include:

- the Law on Regulating Foreigners' Employment, enacted by Decree 17561/1964;
- the Social Security Law, enacted by Decree 13955/1963;
- the Collective Agreements, Mediation and Arbitration Law, enacted by Decree 17386/1964;
- the Occupational Emergencies and Injuries Law, enacted by Decree-Law 136/1983;
- the Occupational Health, Safety and Welfare Law, enacted by Decree 11802/2004;
- the Code of Obligations and Contracts of 1932; and
- the Penal Code enacted by Decree-Law 340/1943.

In addition, governmental decrees and decisions issued by the Ministry of Labor and customary practices further regulate employment in Lebanon.

Sexual Harassment:

- A standalone Law no. 205² criminalizing sexual harassment was passed in December 2020. This law targets all types of sexual harassment, in any setting, and especially in the workplace.
- Per the law, perpetrators can be sentenced to up to two years in prison and fined up to 20 times the value of the minimum wage, which stands at18 million Lebanese pounds³, according to Lebanese rightsgroup Legal Agenda.
- The punishment increases to between six months and two years in prison and a fine of between 10 and 20 times the minimum wage if there is a "relationship of dependency" or work between the perpetrator and the victim; if the perpetrator uses their position of power over a colleague; or if the harassment occurs at a range of state institutions, universities, schools or on transport services.
- Maximum penalties are reserved for harassment in the workplace, public institutions, or educational facilities.
- In addition, relevant measures as per the World Bank's Good Practice Note on addressing sexual exploitation and abuse and sexual harassment (SEA/SH) will be referred to.

Grievance Mechanism:

As there are no current statutory requirements on grievance mechanisms (GM), the GM for the project workers will be established following the World Bank's Guidance Note for Borrowers on Environmental and Social Standard 2 (ESS2) for Labor and Working Conditions which is also outlined in <u>section9</u> of this document.

Employment Contract: Employment contracts may be oral or written. Written contracts are more common such as IRC is practicing.

² In practice, enforcement of this law remains limited, especially outside of formal employment settings. Project-level mechanisms, such as SEA/SH procedures are key to ensuring compliance.

³ Decree #13164 – Aldic – Lebanon

The employment contract is governed by the labor law of September 23rd 1946.

The employment relation is based on three criteria:

- (a) Financial dependency of the employee towards the employer
- (b) Direct and constant supervision of the employer over the work of the employee, and
- (c) continuous presence at the working place to allow the employer to guide the work of the employee.

When the above conditions are met (or at least two of them), the relation is a work relation governed by the provisions of the labor law, and therefore the parties are bounded by an employment contract.

<u>Types of Employment Contracts</u>: Employment contracts may be either Fixed Term (FT) or indefinite in duration.

Fixed-term contracts are executed for a specific period or for the performance of specific work. Such contracts are not subject to the severance pay and termination notice obligations. Nonetheless, in the case of renewal of a fixed-term contract, either by a renewal agreement or by continued execution of the contract, the employee shall be entitled to the same severance pay as would be payable under an indefinite-term contract as per Article 23 of Convention 1/1966 on Labor Standards.

Content of the employment contract:

The contract specifies the following:

- employer's name and address
- information about worker related to name and father's name and family name
- address, educational degree
- salary, transportation allowance and overtime
- Obligations of worker
- Duration of Contract, Trial Period, Working Hours, Annual Leave
- Social Security and Medical Insurance
- Taxes Social Security Contributions
- Election of domicile Notifications
- Applicable laws Competent Courts

Notice for termination of contract

<u>Termination ((i) fixed-term and indefinite contracts (ii) economic reasons)</u>

As a matter of fact, fixed-term and indefinite contracts abide by different regimes when it comes to termination:

- (i) Notice period and compensation for fixed-term and indefinite term contracts:
- a- Fixed-term contracts: Fixed-term contracts can be terminated at any time and at-will by the employer

or by the employee, with the respect of a notice period (statutory or contractually). However, if such termination is deemed to be abusive, and/or in the event of any damage caused by said termination, the terminating party is required to compensate the other party in accordance with Article 248 of the Lebanese Code of Obligations and Contracts (CoC)⁴.

b- Indefinite term contracts:

Notice Period	Duration of employment
One month	Less than three years
Two months	Between three to six years
Three months	Between six to twelve years
Four months	More than twelve years

Pursuant to Article 50 of the Lebanese Labor Law, in the event of a wrongful <u>termination by the employer</u> of an indefinite term contract, a compensation shall be paid and assessed in accordance with the following criteria:

- The nature of employment;
- The employee's age, employment period, family status, health condition;
- The magnitude of the caused damage.

In the aforementioned case, the compensation shall vary between a two (2) months and a twelve (12) months salary, without prejudice to any other indemnity to which the employee can be legally entitled.

In the event of a wrongful <u>termination by the employee</u> that caused a damage to the employer, the compensation shall vary between a one (1) month and a four (4) months salary, without prejudice to any other indemnity to which the employer can be legally entitled.

(ii) Termination for economic reasons

Pursuant to Article 50 paragraph (F) of the Lebanese Labor Law, the employer is entitled to terminate all or part of the employment contracts if the company is encountering economic and financial complications or in the event of the occurrence of a force majeure.

Accordingly, the Lebanese legislator gave the right to the employer to terminate employment contracts for economic reasons and without paying any compensation.

Nevertheless, there is a <u>mandatory procedure</u> that the employer must follow, the latter is required to:

i. Notify the Ministry of Labor (the "MoL") of the employer's intention to terminate all or part

⁴ Refer to Annex 1 for the IRC Code of Conduct

of the employment contracts before one (1) month of said termination. The said notification shall take form of a letter (the "Letter" sometimes referred to as "Letter of Negotiations"); and

- ii. Negotiate with the MoL by creating a termination program related to the employees that shall be dismissed. The said program shall take into consideration the following criteria of the employees in the company:
 - a- Seniority;
 - b- Specialization;
 - c- Age;
 - d- Family and social status.

Finally, the employer and the MoL must set the means deemed necessary for an eventual re-employment, if possible.

Moreover, kindly note that the dismissed employees shall benefit from a right of preference to be reemployed in the event of a financial recovery of the company.

Minimum wages: The statutory minimum wage in Lebanon was originally set at LBP 675,000 under Decree No. 7426/2012. However, due to inflation and the devaluation of the Lebanese pound, the official minimum wage was increased to LBP 18 million⁵ per month as of April 2024. While this remains the official rate, many employers, including NGOs, apply higher wages due to inflation and the devaluation of the Lebanese pound. Compensation is often pegged to USD or adjusted to reflect market conditions.

Working hours and overtime: Pursuant to Article 31 of the Lebanese Labor Law, the maximum legal duration of work shall not exceed forty-eight (48) hours per week.

However, and under urgent circumstances, the daily maximum working hours may be increased to twelve (12) hours, if the following conditions are fulfilled:

- the Ministry of Labor shall be notified within twenty-four (24) hours of the matter and of the time needed to accomplish the work; and
- the wage pertaining to overtime hours is equal to one and a half times the usual hourly wage; and
- the above should follow paragraphs 2 and 3 of Article 23 when it involves minor employees.

During Ramadan, IRC's working hours during are determined each year by senior management. However, Ramadan working hours shall not exceed Seven (7) hours a day.

<u>Annual leaves:</u> Pursuant to Article 39 of the Lebanese Labor Law, each employee is entitled to an annual leave of fifteen (15)days in full pay, if he/she has been employed for a minimum of one (1) year. Employees cannot be terminated during their annual leave unless the employee has been employed by

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⁵ Decree #13164 – Aldic – Lebanon

another employer during such period. The provisions of the Labor Law regarding annual leave are mandatory. However, an employee may benefit from more favorable terms included in his or her employment contract. Annual Leaves at the IRC are depicted in the Internal Regulation of Article 8.5.

<u>Sick leaves:</u> Any sickness contracted by the employee as a result of his or her job or any occupational accident shall be subject to the Occupational Emergencies and Injuries Law. As for other sicknesses and accidents not related to the job, the Labor Law grants the employees the right to a yearly sick leave, also as depicted in IRC Handbook Article 8.6.

<u>Maternity leave</u>: In accordance with ESS2, the project must comply with Lebanese labor law provisions, which require a minimum of 10 weeks of paid maternity leave for project workers. However, at IRC, a woman is entitled, upon submission of a medical certificate indicating the expected delivery date, to 98 days (approximately 14 weeks) of fully paid maternity leave. This policy exceeds the national legal requirement and aligns with the International Labour Organization (ILO) Convention No. 183 on Maternity Protection⁶, which recommends a minimum of 14 weeks of maternity leave.

<u>Fringe Benefits:</u> Eligible employees are entitled to a Schooling Allowance as per the National Social Security Fund (NSSF) for children aged between 3–21 years of age.

<u>Non-discrimination and equal opportunities:</u> Article 26 prohibits employers to discriminate employees on gender basis regarding the nature of the work, the amount of the salary, the hiring, the promotion, clothing etc.

JURISDICTION

Lebanese courts have jurisdiction to settle labor disputes.

In the event of a dispute, the parties will endeavor to settle their differences amicably, before taking the matter to court.

COMPENSATION AND BENEFITS

The IRC follows a comprehensive system for compensation and benefits globally, that is amended locally to adhere to the local labor laws and other laws of relation. A thorough explanation of the topic is provided in the 'IRC Compensation and Benefits' internal document.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

Decree No. 11802 is pursuant to the International Labour Organization (ILO) Conventions has been signed by the Government of Lebanon. It sets out key aspects regulating occupational prevention, safety and Healthin all enterprises subject to the Code of Labor. The Decree comprises the following chapters:

- Chapter 1: Prevention and safety
- Chapter 2: Health
- Chapter 3: Safe use of chemicals at work
- Chapter 4: Prevention from the dangers of working with benzene

⁶ C183 - Maternity Protection Convention, 2000 (No. 183)

• Chapter 5: General provisions

The said decree sets that the employer should:

- Install safety provisions and measures to prevent any risks to the health and safety of the workers
 and limit the maximum time allowed to workers' exposure to din, noise and vibrations and limit the
 period of exposure as per the limits set in the said Decree. The employer shall also resort to possible
 scientific means for eliminating or reducing noise.
- The employer shall provide the workers with the appropriate personal prevention and protection uniforms and gears, ensure their maintenance and preserve them in good conditions for later use, without the workers being liable to pay any costs.
- The employer shall take the general measures of health protection in the workplace, especially in relation to safety, lighting, ventilation, aeration, drinking water, lavatories, evacuation of dust and smoke, and hygiene measures to protect workers from pollution by pathological biological factors.
- Workers should be given sufficient and appropriate information on the risks related to their work.

Article 61 of the Lebanese Labor Law provides that institutions that fall within the scope of the said Law must always be clean and meet the necessary health and rest requirements for employees. The institution should be equipped to ensure the safety of the employees. Mechanical machinery, parts, mobility devices, tools must be considered in their installation and preservation with the best possible safety conditions.

According to Article 62 to the above-mentioned law, the Council of Ministers has the authority to promulgate decrees related to the overall measures of health protection.

While the legal framework is clear, enforcement of Decree No. 11802 has faced increasing challenges due to limited labor inspections and weakened institutional capacity, especially in the context of Lebanon's prolonged economic crisis and the 2024 conflict in the South. In practice, the full implementation of OHS measures tends to be limited to formal enterprises or international donor-funded projects.

5. RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for.

- A Dedicated Environmental and Social (E&S) Focal Point assigned to this project will manage the engagement and management of project workers and will be supported by a dedicated Project Lead and Project Management Team. The IRC's E&S Focal Point will also be responsible for ensuring compliance with World Bank ESS2 requirements, including the monitoring of Labor Management Procedures (LMP) and reporting to the Project Implementation Unit (PIU).
- The IRC Project Management team and the IRC Partnerships and Supply Chain department will manage the engagement and management of contractors/subcontractors.
- The IRC Safety and Security team and the Human Resources Department will oversee the occupational health and safety (OHS) and the environment and social assessment.
- The IRC Human Resources Department and supporting functions will manage the training of workers.
- All related functions as well as a third-party provider, EthicsPoint, will address worker grievances

- see section on Grievances mechanism and reporting channels in section 9 below.

All direct workers involved in the project are hired in compliance with the Lebanese Labor Law and IRC's internal HR policies. Each partner organization (contracted workers) is required to comply⁷ with the Lebanese Labor Law, this Labor Management Procedure (LMP), and to establish a grievance mechanism (GM) for their workers.

For Direct Workers

The IRC Human Resources Department, in collaboration with the Project Lead and the Environmental and Social (E&S) Focal Point, is responsible for the following:

- Implementing the labor management procedures for project workers.
- Establishing and implementing a procedure for documenting specific incidents such as project-related occupational injuries, illnesses, and lost time accidents. These records must be maintained and will provide regular reviews of OHS performance and working conditions.
- Ensuring that a grievance mechanism for project workers is established, and monitoring and reporting on its implementation.
- Maintaining records of the recruitment and employment processes of direct workers.
- Monitoring the implementation of the Workers' Code of Conduct for all project workers.
- Monitoring the training of project workers on Occupational Health and Safety (OHS), SEA/SH prevention, and any other required courses.
- Ensuring that a dedicated SEA/SH grievance mechanism is established and effectively monitored.
- Implementing disciplinary measures in instances of sexual exploitation, abuse, or sexual harassment misconduct.
- In cases of medium, severe, fatal, or mass accidents, notifying the law enforcement bodies and the Labor Inspectorate.

For Contracted Workers

A designated HR focal point or Project Manager (with adequate skills) within each partner organization, supported by the IRC Human Resources Department and in collaboration with the Environmental and Social (E&S) Focal Point, will be responsible for implementation at the respective partner level. Their responsibilities include:

- Ensuring that the requirements of the LMP and ESS2 are reflected in the contractual arrangements with staff.
- Preparing and implementing internal labor management procedures or HR policies, in line with the Lebanese Labor Law, the IRC's project LMP, and applicable OHS requirements.
- Establishing a grievance mechanism for project workers and monitoring and reporting on its implementation. This mechanism should align with World Bank and IRC standards and include channels to address SEA/SH-related complaints.
- Establishing and maintaining a system for documenting specific incidents such as project-related occupational injuries, illnesses, and lost time accidents. These records will contribute to OHS reviews.
- Reporting medium, severe, fatal, or mass accidents to law enforcement bodies as required by Lebanese law.
- Monitoring and reporting on the implementation of the organization's labor management procedures.
- Ensuring compliance with obligations toward contracted and sub-contracted workers, in line with ESS2

⁷ Refer to Annex 2, which constitutes the format for the Report on Compliance with Conditions of Work under ESS2 and the Labor Management Procedure (LMP).

- and national labor regulations.
- Ensuring that the employment process is carried out in accordance with this LMP and the Lebanese Labor Law.
- Monitoring that occupational health and safety standards are met in all workplaces, in compliance with national legislation, ESS2, and the project's Occupational Health and Safety Plan.
- Monitoring the training of project workers on OHS, SEA/SH prevention, and other relevant areas.
- Monitoring the implementation of the Workers' Code of Conduct.
- Ensuring the establishment of a dedicated SEA/SH grievance mechanism and reporting on its implementation.
- Implementing disciplinary measures in instances of sexual exploitation, abuse, or sexual harassment misconduct.

6. POLICIES AND PROCEDURES

Health and Safety

The following protocols from IRC's Safety and Security team are important for the health and wellbeing of IRC staff. The IRC encourages staff to review the following key protocols and to speak with the office level Safetyand Security advisor for more information.

- Fire Safety Protocol
- Road Traffic Accident
- Staff Travel Checklist
- Pre-arrival briefings outline the safety and security risks of each country including important health considerations you should know about before you travel.
- IRC's recommended <u>First Aid Kit for Offices and Vehicles</u>

Working from Home- Guidance on how to avoid injury

Staff members recruited to work from home full-time or staff who find themselves working in their house temporarily may find it a little difficult without a dedicated office set up. Staff who are having trouble, such as muscle pain, are encouraged to speak with their line manager or HR representative about equipment to help relieve muscular skeletal strain.

For information about how to prevent injury while working from home, workers can access the following pages in the IRC portal (staff access only):

- Ergonomic Tips to Reduce Musculoskeletal Strain When Working from Home
- <u>Tips for Reducing Digital Eye Strain</u> While Working from Home
- IRC's Workstation check list to Reduce Musculoskeletal Strain
- Staff Health slide deck on Ergonomic Tips for Working from Home
- Recorded session on Ergonomic Tips to Reduce Musculoskeletal Strain When Working from Home
- Staff Health Advisor.

Workplace Health and Safety Policy

The health, safety and general well-being of IRC Employees are of paramount importance to the organization. Accordingly, the IRC has adopted this policy to assure that potential risks are minimized, and that Employees

work in a safe and secure environment free from alcohol and drugs, and violent and threatening behavior.

Employees can contribute a great deal to this effort to maintain the highest standards of safety in the workplace by recognizing and reporting potential hazards in and around their work area in a timely manner and by complying with the safety rules.

The IRC provides first aid kits in each office and residence and the vehicles are equipped with basic items for primary first aid response. Periodic first aid training will be arranged by Operations Lead for all Employeesin each location.

The IRC strictly prohibits the manufacture, possession, use or distribution of illegal substances in any workplace or while on IRC business. The IRC also prohibits Employees from being under the influence of alcohol or controlled substances in an IRC office, worksite or while on IRC business.

The IRC is also committed to maintaining a work environment free of violence, threats of violence, harassment, intimidation and other disruptive behavior and these will not be tolerated in the workplace. All reports of such incidents will be taken seriously and will be dealt with appropriately.

Unacceptable behavior is determined at management's sole discretion and may include (1) verbal or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm; (2) intentional destruction of or threatening to destroy IRC property; (3) unauthorized possession of firearms or weapons; (4) harassing surveillance or stalking; and (5) hitting, shoving or otherwise physically assaulting an individual.

Employees who engage in violent or threatening behavior or who are found to be in possession of illegal substances on IRC premises, or are under the influence of controlled substances or intoxicated while on IRC premises or on IRC business will be suspended and subject to disciplinary/corrective action up to and including termination of employment; where appropriate, the incident may be referred to law enforcement, taking into account article 74 of the labor law.

In an effort to further reduce the risk of physical harm to Employees and to maintain the highest standards of safety, the IRC requires that all Employees comply with the following safety rules while conducting business or in an IRC office or field location:

- Keep work areas clean and neat at all times.
- Do not remove or bypass any safety guards on any machinery at any time.
- Be aware of the security environment and familiar with the Security Management plans for your office.
- Use the appropriate safety equipment for the task. Employees must ask their supervisor if he/she needs additional equipment or instruction to get a job done safely.
- Review IRC's security guidelines and country specific health and safety information before visiting IRC's field offices.

Anti-Harasment Policy

The IRC has a long-standing policy of ensuring a work environment that is free from all forms of harassment based on the employee's race, gender, religion, color, national or ethnic origin, citizenship, marital status, sexual orientation, age, disability, veteran status, or any other characteristic protected by federal, state or

local law. Harassing conduct in violation of this policy, whether based on sex or otherwise, will not be tolerated. This policy applies to interactions between Employees of the IRC, independent contractors and consultants, temporary agency workers, interns, volunteers, and vendors or suppliers. Conduct by any of these individuals and/or companies that violate this policy will not be tolerated. Code of Conduct (IRC Way) is to be acknowledged and signed by all identified project workers.

The Anti-Harassment Policy is aligned with the World Bank's Good Practice Note on Addressing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). The policy covers SEA/SH both within the workplace and in interactions with beneficiaries and community members. All staff and contractors will undergo mandatory SEA/SH training and sign a Code of Conduct with specific clauses addressing these risks.

Prohibited Harassment

Prohibited harassment includes unwelcome verbal or physical conduct when such conduct is based upon an Employee's race, gender, religion, color, national or ethnic origin, citizenship, marital status, sexual orientation, age, disability, veteran status, or any other characteristic protected by law, and has the purpose or effect of unreasonably interfering with that Employee's work performance and/or creating an intimidating, hostile or offensive working environment.

Examples include without limitation: making inappropriate or disrespectful comments about a person's age, physical condition or sexual orientation; using racial slurs or epithets; negative stereotyping; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group based on their protected class status (including, but not limited to, via e-mail, text or instant messaging); removing accommodations or corrective devices provided to or used by a disabled individual; and excluding individuals from the use of or making them feel uncomfortable in their use of IRC facilities because of protected characteristics.

All reported incidents of harassment will be handled in accordance with IRC's global safeguarding procedures and in coordination with the Ethics and Compliance Unit, with strict confidentiality and survivor-centered approaches.

AGE OF EMPLOYMENT

This section sets out details regarding:

- Candidates selected to vacancies at IRC are required to provide verification documents that may include original or a copy of: National ID, Passport, Judiciary Certificate, that would validate the age of birth and the actual age of any potential candidate.
- IRC follows very strict protocols concerning Child Safeguarding, including Child labor. The Child Safeguarding policy applies to IRC staff, Visitors, Sub-grantees, suppliers/subcontractors, and implementing partners.⁸
- The procedure for conducting risk assessments for workers aged between the minimum age and 18 are nonexistent, as IRC refrains from hiring staff below the age of 18.
- In line with World Bank ESS2 and Lebanese legal provisions, contractors and suppliers are also required to certify that no child labor (under 18) is used at any level of project implementation, and

⁸ Child Safeguarding Policy (3.1.1.k)

this will be verified through random audits and spot checks.

7. TERMS AND CONDITIONS

Wages that apply to the project

The IRC uses salary scales and bands to determine compensation, and each position is assigned to a band corresponding to increasing requirements in qualifications, work experience and responsibilities.

Some of the bands are divided into two levels: A and B. B is the default band while A is used to differentiate positions with greater complexity, impact, compliance risk and/or scope. Each band includes a minimum, midpoint and maximum salary. Where an individual's salary is situated on the scale between minimum and maximum depends on the variation in work experience, technical qualifications, availability of skills in the market, scope of work, and/or length of service.

However, IRC ensures that all wages paid to project workers meet or exceed the national minimum wage and comply with the Lebanese Labor Law. Wages are paid regularly, transparently, and through secure financial channels.

Regular Working Hours

The normal work schedule for most Employees is Monday through Friday from 8:00 AM to 5:00 PM, including an hour break. The one-hour break is not considered as a working hour and cannot be used to reduce working hours.

Due to the nature of some jobs, a different work schedule may be required, yet this work schedule should not exceed 48 hours per week. Furthermore, due to operational and programmatic requirements, some positions may require Employees to work on shifts or on a schedule other than the standard working hours; this will be documented, and Employees will be informed with every intention to give advance notice.

(Working hours during Ramadan will be determined each year by senior management. However, Ramadan working hours shall not exceed Seven (7) hours a day.)

Maternity leave, annual leave, and sick leave, follow the Lebanese Labor law.

The rest days per week are considered Saturday and Sunday, which maybe be altered should the function deem necessary.

Labor Relations

The ongoing labor relations will be governed by the Lebanese Laws and especially the Labor Law and the Social Security Law

Other Terms and Conditions

IRC project management will ensure compliance with terms and conditions set in the agreement with the WorldBank and in compliance with IRC placed policies and procedures of relation. The Labor Management

Procedures (LMP) and any collective labor agreements (where applicable) will be periodically reviewed to ensure alignment with evolving risks, particularly in areas affected by conflict, economic hardship, and large-scale displacement.

8. GRIEVANCE MECHANISM

This section sets out details of the grievance mechanism that will be provided for all direct and contracted workers and describes the way in which these workers will be made aware of the mechanism. The IRC operates a comprehensive reporting, handling, and investigations mechanism to ensure a survivor-centered approach to safeguarding misconduct. This is reflected in IRC Guidelines for a Survivor-Centered Approach to Reporting Safeguarding Misconduct, which is part IRC's Beneficiary Safeguarding Policy. The grievance system is also aligned with the World Bank's ESS2 and ESS10, ensuring workers' access to safe and confidential mechanisms to raise concerns without fear of retaliation. The process is overseen by IRC's Ethics and Compliance Unit (ECU), which counts with one of the largest teams of of investigators in the NGO sector. Details on how all project stakeholders can access this mechanism is provided below, and this information is communicated to all staff when they are hired, as well as through regular refresher trainings, materials and newsletters.

Safeguarding protection and obligations are for:

- All IRC Workers: employees, interns, incentive workers, volunteers, contracted workers, consultants, and independent contractors
- Visitors: individuals hosted by the IRC, who are visiting IRC and are not IRC workers (journalists, photographers, board members, and others)
- Sub-grantees, suppliers, and implementing partners
- Beneficiaries, adults and children

How to seek assistance or raise a concern at the IRC:

If you find yourself in a situation that raises concerns, or you're facing a dilemma where the right choice is not clear, the IRC has many resources that can help you:

- Your supervisor; country, regional, executive directors; or unit leader
- Human Resources Department
- Ethics and Compliance Unit (ECU): integrity@rescue.org
- Online Form
- Legal Department
- Subject matter experts (e.g. Audit, Finance, Gender Equality, Procurement, Security)
- IRC maintains an "Open Door Policy" for reporting staff concerns, meaning that any IRC staff member can inform his or her supervisor or other trusted leader of any suspected inappropriate or illegal activities, or any other concerns.

In addition to the above, IRC provides all affiliates with contacts for EthicsPoint (an independent vendor) that confidentially receives issues reported through the webform or by phone, and takes needed steps to follow

up and review.

All allegations of violations of the IRC Way, IRC policies, procedures, and the law received by the Ethics and Compliance Unit (ECU) will be reviewed and investigated as appropriate, in accordance with IRC processes and as required by law.

When a report is made to the ECU:

- A reporter will receive an acknowledgement of the allegations received. An ECU investigator may contact the reporter for additional information.
- Complaints are reviewed and a decision made whether to conduct a full investigation. Not every complaint results in a full investigation. The reporter is advised if there is to be a full investigation.
- Investigations by the ECU are handled professionally, objectively, thoroughly and in a confidential manner.
- The ECU works with HR on allegations or inquiries relating to HR matters (workplace misconduct, sexual harassment), and as appropriate with country teams to conduct reviews.
- The names of the reporter, victims, witnesses and subjects are kept confidential by the ECU
 throughout the process, and only disclosed to authorized persons, when necessary, to protect those
 who may need help, to carry out an investigation, or as required by law.
- Those interviewed or contacted during an investigation are specifically instructed to maintain confidentiality and not to discuss the matter. It is the responsibility of all staff to respect the confidentiality of investigations.
- Final reports of investigations may be provided to the donor (as required by our contracts),
 Country/Regional Management, Functional Unit Management. Names of current staff are not disclosed in these reports.
- Due to the confidentiality of investigations, the outcome of an investigation will not always be communicated to the reporter. The reporter will be advised that the review has been completed.

When a report is made to the ECU through the IRC Ethics Hotline:

The reporter is given a private key number that they can use to follow up for investigation status updates. The reporter may obtain updates on the status of the matter (e.g., ongoing or completed) by calling the IRC Ethics Hotline, checking the web reporting site, or contacting the investigator directly. Updates are limited to the status of the matter (ongoing, completed).

IRC Global Reporting Guidelines - ECU team

The time to complete an investigation depends upon its complexity, and the availability of witnesses and documents. ECU attempts to complete low risk matters within 90 days. Complex investigations may take longer to complete. ECU works with the locations to ensure that immediate threats or risks are addressed and mitigated pending the completion of an investigation.

All reports and investigations are monitored by the Chief Ethics and Compliance Officer (CECO). The CECO reports into the General Counsel, Chief Executive Officer and Audit Committee of the Board of Directors at IRC.

What happens if I contact ECU with a question, to seek advice, or if I am not sure if an issue should be reported?

You should not hesitate to contact ECU through integrity@rescue.org or by phone. ECU is here to provide advice and assistance as well as a place to report concerns. An ECU staff member will contact you to discuss the matter.

All project staff as well as IRC staff learn about IRC policies, including the Grievance standard practice during their onboarding sessions, and with frequent internal communication and newsletters, in addition to rescue.net (the web portal of IRC).

Contract workers, visitors, supplies, and other stakeholders of IRC are encouraged to use the same guidelines for Grievance Mechanism as detailed above. The grievance mechanism under the LMP is applicable to all project workers and not only to IRC staff.

Guidelines for Grievance are formally shared in the case of Contract workers (during the onboarding process), Visitors and Suppliers are also informed about Ethics Point specifically when an incident occurs and/or a complaint needs to be raised. Periodic refreshers are used to remind stakeholders that they may always use Ethics point to raise complaints.

A **dedicated log of labor-related grievances** (distinct from safeguarding cases) is maintained in compliance with ESS2 and is periodically reviewed to detect systemic issues and ensure timely resolution.

Introduction of Partner Workers' Grievance Mechanism / Grievance Mechanism for Contracted Workers under Phase II

Under Phase II, the project will adopt a more sustainable and decentralized approach by enabling each partner organization to develop and operationalize its own grievance mechanism for contracted workers. These mechanisms will be tailored to the specific context and capacity of each partner but will adhere to the core principles of the World Bank's Environmental and Social Standard 2 (ESS2) and the IRC's safeguarding policies.

Each grievance mechanism will include dedicated, safe, and confidential channels for contracted workers to report concerns related to labor conditions, workplace behavior, occupational health and safety, and other relevant matters. Where feasible, anonymous reporting options—such as secure drop-boxes, dedicated hotlines, or digital platforms—will be made available to safeguard complainants against retaliation. In cases involving sensitive matters such as sexual exploitation and abuse/sexual harassment (SEA/SH) or discrimination, appropriate referral pathways for psychosocial, legal, or protection support will be integrated into the response procedures.

To ensure effectiveness and alignment with project standards, IRC will provide technical assistance, standardized templates, training, and follow-up coaching to all implementing partners. These efforts will support partners in designing, implementing, and monitoring their grievance mechanisms in a consistent and rights-based manner.

This capacity-building initiative is designed to institutionalize grievance handling beyond the duration of the project, thereby enhancing sustainability and local ownership. Contracted workers will be oriented on the use of their respective partner's grievance mechanism during onboarding and

through regular communication efforts led by the partner NGOs. These mechanisms will be subject to periodic review and monitoring by the Project Implementing Unit (PIU) and the IRC to ensure compliance and effectiveness.

9. CONTRACTOR MANAGEMENT

This section sets out details regarding:

- The service provision contract (or consultant agreement) is governed by article 624 paragraph 3 of the Code of Obligations and Contracts, which stipulates that "the contract by virtue of which a person exercising a liberal profession or art, provide their services to their customers. Thus, the SP are contracted under a Service Provider agreement defining the payment terms and the accomplishment of work. There is no legal subordination (no defined working schedule or annual leaves. The SP must submit an invoice and the amount paid to them should be declared to the Ministry of Finance and are subject to income tax.
- The contracts of the SP can be extended and/or renewed through a new SP contract, or through an addendum.
- The SP contracted by the IRC are asked to sign a Non-disclosure agreement
- All service providers engaged with IRC are to follow all the policies and procedures of relation, including Code of Conduct, Health and Safety Standards and Policies, Harassment-Free Workplace Policy, Adult Safeguarding Policy, and other policies of relation.
- IRC uses the Individual Consultant Form to request the needed Service Providers/ Individual Consultants and Terms of Reference (TOR).
- Service Providers are oriented on IRC's grievance mechanism and reporting channels at the start of their engagement, and they are periodically reminded of their right to use the mechanism.
- IRC screens service providers, when feasible, for prior involvement in misconduct, including SEA/SH or labor violations. Service agreements may include termination clauses for breach of IRC policies or applicable law.

10. ANNEX 1 IRC Code of Conduct⁹



⁹ Note that the Code of Conduct (CoC) does not include a signature page, as all staff are required to complete and pass the CoC training courses within the first month of joining the organization.

11. ANNEX 2: Compliance Monitoring Report on Conditions of Work in Line with ESS2 (for Partner Organizations Engaging Contracted Workers)

Assignment Details

Assignment name:

Contract/Grant Ref. No.:

Contract/Grant Period:

Start date (DD/MM/YYYY):

End date (DD/MM/YYYY):

Partner Organization Name:

Reported Period:

Date of Report:

Name & Signature of Authorized Representative:

SECTION A: STAFFING & EMPLOYMENT CONDITIONS

Total number of staff involved in project activities

Disaggregation by gender (M/F)

Number of full-time vs part-time staff

Number of staff with signed employment contracts

Number of staff covered under national social security

Number of staff receiving salaries monthly

Number of new hires during this reporting period

Number of staff exits during this reporting period

Average working hours per week (non-shift workers)

Overtime worked (monthly average per worker, if any)

SECTION B: HEALTH, SAFETY & WELLBEING

Number of occupational injuries during this reporting period

Number of fatalities (if any) since contract start

Number of mental health incidents reported (if applicable)

Number of reported cases of violence or threats at the workplace

Number of reported cases of harassment, including SEA/SH

SECTION C: GRIEVANCE MECHANISM (GM)

GM established and operational for staff (Y/N)

Number of grievances raised in this period

Number of grievances resolved

Number of unresolved grievances (open >30 days)

Number of SEA/SH complaints (if any)

SECTION D: LEGAL / ADMINISTRATIVE ISSUES

Number of labor-related legal complaints or cases filed Number of disputes resolved through internal or external mediation Number of labor/OHS inspections or audits conducted (if applicable)

SECTION E: COMPLIANCE CHECKLIST

Condition	Compliant? (Y/N)	Notes/Justifications
All Project Workers have		
written contracts or		
agreements		
All Project Workers are paid		
monthly and on time		
Project Workers do not		
exceed standard working		
hours (40/week for non-shift		
roles)		
Project Workers have access		
to rest periods and leave		
entitlements		
Project Workers were trained		
on OHS and SEA/SH		
prevention		
SEA/SH Code of Conduct		
signed by all relevant Project		
Workers		
Grievance mechanism is		
known and accessible to		
Project Workers		
Any cases of discrimination,		
abuse or misconduct were		
reported		
Partner policies align with		
national labor law and		
project LMP		
Any incidents of non-		
compliance with LMP		
reported in this period		