

Uttarakhand Disaster Preparedness and Resilience Project

Site Specific Labor Management Procedures (LMP)

July 2025

By

M/S UMASHANKAR CONSTRUCTION

Project Title:

1. *Construction of 30m span Intermediate lane motor bridge & its approach in Km-2 of Ujjwalpur to Gwad Dungri Jaspur Motor Road in District Chamoli.*
2. *Constructions of 36m span Intermediate lane motor bridge & its approach in Km-2 of Gairsain to Devalkot Motor Road in District Chamoli.*
3. *Constructions of 54m span Intermediate lane motor bridge & its approach in Km-1 of Meeng Gadera to Gadhani Motor Road in District Chamoli.*

Description of Sub Project

The Government of Uttarakhand plans to build the new bridges and repair the bridges which was damaged and have been washed away in disaster of June 2013 with the help of World Bank funding. In view of which motor bridge has been proposed in the World Bank funded UPREPARE Project which is to be constructed over Meeng Gadera for Gadhani Motor Road, Ujjwalpur Gwad dungri Jaspur MR and Devalkot to Gairsain MR in District Chamoli. The proposal is to construct a new bridge which is urgently required to provide access for the school across the bridge and it will also provide improved access to market, healthcare facilities and education facilities for the villagers. The topography of project area is hilly terrain.

The Labour Management Procedures (LMP) set out the way in which project workers would be managed, in accordance with the requirements of National and State's regulations along with World Bank's Environmental & Social Standards. Accordingly, LMP for the Contractor has been developed in adherence to applicable National/State regulations and World Bank's Environmental & Social Standard and Working Conditions.

1. Primary Objective of LMP

- To promote safety and health at work.
- To promote the fair treatment, non-discrimination and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, migrant workers, contracted workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To provide project workers with accessible means to raise workplace concerns.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The key labor risks anticipated under the project primarily stem from construction activities, particularly the construction of bridges. These include:

- Occupational Health and Safety (OHS) risks, such as working at height, working near heavy machinery, and handling construction materials in potentially hazardous environments.
- Non-compliance with national labor laws and regulations, particularly in relation to wage payments, working hours, social security benefits, and grievance redress mechanisms.
- Informal labor practices, including the potential engagement of unregistered or subcontracted labor without proper documentation.
- Poor working and living conditions for laborers, especially migrant workers, including lack of sanitation, drinking water, or adequate rest facilities at work sites or labor camps.

- Lack of awareness or enforcement of worker rights, particularly among vulnerable categories such as female workers, unskilled labor, or workers from marginalized communities.
- Sexual exploitation and abuse (SEA), sexual harassment (SH) risks, especially in remote or mixed-gender workforce camps.

Labor influx: In contrast, the majority of the unskilled labor force is expected to be drawn from local communities. Nevertheless, some unskilled and semi-skilled workers may also be mobilized from other Indian states such as Bihar, Uttar Pradesh, West Bengal, Chhattisgarh, Jharkhand, and Madhya Pradesh. Given this context, the project is expected to experience a moderate level of labor influx. This influx may result in several social and environmental risks, including:

- Potential conflicts between migrant and host communities,
- Pressure on local infrastructure and services,
- Increased risk of the spread of communicable diseases,
- Risk of illicit behavior, petty crime, and substance abuse,
- Potential risks of sexual exploitation and abuse (SEA) and gender-based violence (GBV).

To address these risks, the Contractor will implement appropriate labour influx management measures, including:

- Screening and registration of all incoming workers,
- Establishment of dedicated labour camps with adequate OHS, sanitation, and security provisions,
- Enforcement of a strict Code of Conduct for all workers,
- Implementation of awareness training on community interaction, SEA/SH prevention, and communicable disease control,
- Coordination with local governance bodies and grievance redress mechanisms to manage and mitigate potential conflicts.

Child & Forced labor: Although the risk of child or forced labor under this project is considered low based on the nature of project activities and sectoral practices, the Contractor shall strictly prohibit any engagement of child or forced labor in compliance with national laws and the World Bank's Environmental and Social Standard.

No person under the age of 18 shall be employed in any project-related activities, especially in hazardous work environments such as construction sites. All workers will be required to submit legally verifiable age documents, such as Aadhaar card, school leaving certificate, or birth certificate, to confirm that they meet the minimum age requirement.

To ensure compliance, the Contractor will implement the following measures:

- Maintain a register of all workers with verified age records;
- Include a clause prohibiting child and forced labor in all subcontractor agreements;
- Conduct periodic audits to verify age compliance on site;
- Provide training to Engineer staff and Contractor personnel on applicable labor laws and ESS2 requirements;
- Immediately terminate the engagement of any worker found to be underage or involved in forced labor;
- Establish and publicize a confidential grievance mechanism for reporting any suspected cases of child or forced labor.

These measures shall be documented and monitored throughout the project lifecycle to ensure that labor recruitment and management practices remain fully compliant with applicable national legislation and international good practices.

SEA/SH: There is a moderate risk of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), particularly during peak construction periods where large numbers of male workers may be deployed near vulnerable communities.

The potential SEA/SH risks include:

- (a) Risks of SEA/SH to community members, particularly women, adolescent girls, and children, due to interaction with contractor's and subcontractor's workers.
- (b) Risks of sexual harassment at the workplace, including within worker camps, offices, and at construction sites, perpetrated by co-workers or supervisors.

To prevent and mitigate such risks, the Contractor shall implement the following key measures:

- **Code of Conduct (CoC):**
All workers—including those of subcontractors—shall be required to sign and adhere to a Code of Conduct that clearly outlines prohibited behaviors, including any form of SEA/SH. The CoC shall be translated into local languages and explained to workers at the time of induction.
- **Training & Awareness:**
Mandatory induction and periodic refresher training shall be conducted for all workers and supervisory staff on acceptable behavior, gender sensitivity, consequences of misconduct, and reporting channels related to SEA/SH.
- **Worker & Community Sensitization:**
Awareness campaigns shall be organized in nearby communities and with project-affected persons (PAPs), particularly women, to inform them about their rights, available safeguards, and the grievance redress mechanism.
- **Dedicated Grievance Redress Mechanism (GRM):**
A confidential and gender-sensitive GRM shall be established to receive, address,

and escalate SEA/SH-related complaints. Complaint boxes and helplines shall be placed at campsites and construction zones.

- **Supervision & Enforcement:**

Dedicated gender and social safeguards personnel shall be deployed to monitor adherence to SEA/SH protocols and undertake field-level verification. Immediate action shall be taken in case of non-compliance or reported incidents.

- **Labour Camps and Site Planning:**

Worker accommodation shall be planned to avoid encroachment on community spaces and ensure well-lit, secure, and gender-segregated facilities with separate toilets for female workers.

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

The guidance on the terms and conditions of employment/ engagement for all categories of workers is presented below:

Type of Worker	Terms and Condition
Contracted workers	<p>These will include (a) Construction and civil workers, their supervisors and managers hired by civil contractors; and (b) Consultancies hired for technical support such as preparation of DPRs, ESF instruments and third-party verification of results, or various studies.</p> <p>These contracts will be governed by all ESS2 requirements and applicable labor and employment laws/regulations set out in their contracts.</p>
Primary Supply Workers	<p>The project will need procurement of equipment and materials from suppliers for civil works. The primary suppliers of construction material to the project will be oriented to ensure that they do not engage children, forced or bonded labor and apply all measures to ensure workers safety, in line with provisions of ESS2.</p>
Community Workers	<p>The project is not expected to engage any community workers.</p>

4. RESPONSIBLE STAFF

The Contractor shall be primarily responsible for the implementation of this Labour Management Plan (LMP) at all bridge construction sites. A dedicated team of personnel shall be assigned to ensure adherence to applicable labor laws, World Bank's ESS2 and ESS4, and the project-specific environmental and social management frameworks.

The following staff and their respective responsibilities are outlined below:

1. Project Manager

- Ensure overall implementation of this LMP at site level.
- Supervise contractor and subcontractor compliance with labour and occupational health and safety (OHS) requirements.
- Coordinate with the Engineer-in-Charge and PMU/PIU for LMP-related compliance.

2. Health & Safety (OHS) Officer

- Monitor all OHS provisions on construction sites, including use of Personal Protective Equipment (PPE), safe working practices, scaffolding, height protection, etc.
- Conduct routine toolbox talks, safety briefings, and site inspections.
- Report and investigate incidents, injuries, and near misses, including SEA/SH-related incidents.
- Maintain accident and illness records and oversee immunization and first aid provisions.

3. Social Safeguards Expert

- Ensure that all contracted and subcontracted workers are registered and issued ID cards.
- Facilitate training and awareness sessions on worker rights, Code of Conduct (CoC), grievance redressal, SEA/SH risks, and behavioral conduct.
- Monitor implementation of the signed Code of Conduct by all workers.
- Maintain communication with local communities and support grievance redressal efforts.

5. Grievance Redress Focal Point

- Establish and manage a worker-level grievance redress mechanism (GRM), ensuring it is accessible, confidential, and functional.
- Log and track resolution of complaints, including SEA/SH or gender-based grievances.
- Submit monthly reports on grievances to the Contractor's senior management and the PIU/PMU as required.

The Contractors for civil works will be responsible for the following:

- Comply with the requirements of the national and state legislations, labor management procedures, including those by their sub-contractors.
- Maintain records of recruitment and employment process of contracted workers.
- Clearly communicating the job description and employment conditions to the workers.

- Follow a real-time system for regular review and reporting on labor, and ESHS performance.

The standard clauses for inclusion in civil works contracts include (but not limited to):

- General obligations of the contractor with respect to maintaining the health and safety of the workers.
- Preparation and implementation of a site-specific C-ESMP for managing construction related occupational health and safety.
- Ensuring no child labor and/or forced-bonded labor for any works.
- Equal pay/wage for men and women workers, including registration and insurance.
- All workers engaged at construction site to be provided with the required Personal Protection Equipment (PPE) and regular health check-ups etc.
- Construction sites to be provided with adequate barricading and safety signages.
- Providing health and safety training/orientation to all workers and staffs.
- Steps necessary to prevent worker harassment or discrimination, including sexual exploitation and abuse, sexual harassment (SEA/SH), gender-based violence (GBV).
- Basic facilities at worksites such as segregated toilets, canteen, drinking water, creche facilities (if required), etc.
- Establishing Grievance Redress Mechanism (GRM) for workers for any complaint/grievance received from workers and ensuring workers' awareness about GRM.

5. POLICIES AND PROCEDURES

Policy and Procedure for Workers: The following labor policies and procedures will apply to all direct and contracted workers engaged by the Contractor and its subcontractors for bridge construction activities:

1. Minimum Age Requirement

- No person below the age of **18 years** shall be employed for any activity related to the project, especially for hazardous construction work.
- Age verification shall be conducted using legally accepted documents such as Aadhaar Card, Voter ID, School Certificate, or Birth Certificate.

2. Occupational Health and Safety (OHS)

- All workers shall receive mandatory induction training on:
 - Safe working practices at construction sites.
 - Emergency response procedures (e.g., in case of fire, fall, or equipment failure).

- Use of Personal Protective Equipment (PPE) such as helmets, gloves, harnesses, safety shoes, etc.
- First aid and basic health hygiene practices.

5. Worker Amenities

- Workers shall be provided access to:
 - Safe drinking water.
 - Clean and separate toilets for men and women.
 - Rest shelters at work sites.
 - Proper lighting at night in camps and work zones.
 - Childcare or crèche facility at labor camps where applicable.

6. Grievance Redress

- Workers shall have access to a confidential and effective Grievance Redress Mechanism (GRM).
- Awareness sessions will be conducted to inform workers about the GRM process and how to lodge complaints.
- Complaint boxes and focal persons shall be designated at camps and construction sites.

6. GRIEVANCE MECHANISM FOR LABOR ENGAGED IN CONSTRUCTION WORK

The Contractor shall establish a functional and accessible Grievance Redress Mechanism (GRM) at each bridge construction site to ensure that complaints and concerns raised by workers are addressed in a timely, fair, and confidential manner.

1. Structure and Responsibilities

The grievance focal person will register the grievances in a formal manner in a register or in electronic format to be easily tracked for its resolution. The GRM will include the process of screening, investigation, resolution of grievances, documentation, and reporting of grievances as the steps mentioned below.

A **Grievance Focal Person** shall be appointed by the Contractor at each construction site.

This individual will be responsible for:

- Receiving complaints (oral, written, or via complaint boxes),
- Registering and maintaining a log of grievances,
- Ensuring initial resolution within **7 working days**,
- Escalating unresolved issues to the Site Engineer or Contractor's Project Manager.

2. Grievance Handling Process

The GRM shall follow these steps:

1. **Submission:**
Grievances can be submitted by workers directly to the Grievance Focal Person, through complaint boxes, or anonymously.
2. **Registration:**
All grievances shall be recorded in a **Grievance Register** (manual or digital) with date, description, worker details (if not anonymous), and action taken.
3. **Screening & Acknowledgment:**
The grievance shall be reviewed **within** 2 working days and acknowledged to the complainant.
4. **Investigation & Resolution:**
Investigation will be completed and a resolution shall be proposed within **7 working days** of grievance receipt.
5. **Escalation:**
If the grievance is not resolved at the Contractor's level, it shall be referred to the concerned authority (e.g., PIU Engineer or Independent Monitor) for further action.
6. **Closure & Feedback:**
Once resolved, the complainant shall be informed of the outcome. A signed closure note shall be obtained where possible.

Annex-1

Employment, Health and Safety Conditions Monitoring

Sub-Project :

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Contractor's name: M/S UMA SHANKAR CONSTRUCTION

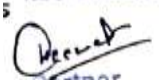
Date: 15.07.2025

No.	Monthly Checklist: ESHS items	Available	Unavailable	Type of evidence	Comment
1	Current Employee List	(v)		Site-wise updated employee register with name, designation, ID proof	Maintained and updated regularly; includes skilled, semi-skilled, and unskilled workers, including subcontractor staff.
2	Valid Labor License	(v)		Labor license issued under Contract Labour (Regulation & Abolition) Act	License renewed and available onsite; covers total labor strength as per law.
3	Valid Labor Insurance	(v)		Group personal accident insurance, WC Policy copy	Insurance covers all workers as per statutory requirements.
5	Identity card of Labors along with their emergency contact number and person name and address details.	(v)		Laminated ID cards, labor register with contact and emergency contact info	All laborers issued photo ID with unique ID number and emergency contact. Maintained by Admin/HR.

6	Attendance Record of Labor and other Staff	(v)		Daily attendance register, biometric attendance (if used), manual muster rolls	Updated daily by timekeeper/site supervisor; used for wage processing.
7	Wages Details of Labor and other Staff	(v)		Wage register, payment receipts, bank transfer records	Payments made via bank transfer; wage slip shared with all workers.
8	Inductions—all contractor staff	(v)		Induction register, signed attendance sheets, photos of sessions	Induction includes OHS, CoC, SEA/SH awareness, PPE usage, site rules.
9	Routine OHS talk—all staff	(v)		Toolbox talk register, session photos, topic-wise briefing records	Weekly toolbox talks held on site; topics include PPE, fall protection, first aid, etc.
10	Reporting: Incidents accidents tracker/register.	(v)		Incident/Accident register, near-miss logbook, incident investigation reports	All incidents logged and reported to PMU/PIU. Follow-up action documented.
11	Grievance redress mechanism	(v)		Grievance register, complaint box photo, focal person list, awareness posters	GRM functional at site. Focal person appointed. Complaints resolved within 7 days. SEA/SH cases handled confidentially. Posters displayed onsite.
12	Rest Rooms with Raised Beds with proper ventilation and lighting.	(v)		Labor Camp Photos,	Labor camps have raised platform beds, cross ventilation, LED lighting, and fans.
13	Sanitary facilities: toilets (separate for men and women),hand washing facilities, waste collection points.	(v)		Photos of toilets, handwashing stations.	Separate male/female toilets with regular cleaning.
14	PPE(boots, gloves, helmets, masks, and additional equipment as required for specific tasks): branded & properly all times.	(v)		PPE stock register, issue register, on-site photos	All workers provided with ISI-marked PPE. Daily PPE checks conducted.

15	Awareness on SGBV and STD	(v)		Training attendance register, IEC material, posters in local language	Awareness sessions held on GBV, SEA/SH, and STD prevention. IEC posters displayed in labor camps and rest areas.
16	Valid First Aid Kit	(v)		First aid box with checklist, expiry dates record, photos	First aid kits available at site office and work zones.
17	Valid Fire extinguishers	(v)		Fire extinguisher service tag, photos, fire safety inspection log	Fire extinguishers installed at labor camps, material storage, and fuel areas.
18	The incident register	(v)		Incident/accident register, near-miss logbook, incident investigation reports	Register maintained for all incidents, injuries, and near-misses. Includes date, time, cause, corrective measures, and reporting to PIU if required.
19	Training on Health and Safety	(v)		Training attendance sheets,	Monthly safety training conducted for all workers covering fall prevention, equipment handling, emergency response, etc.
20	Training on Gender Sensitization	(v)		Attendance records, photos, IEC materials, trainer details	Gender sensitization training provided to both male and female workers. Focus on respectful behavior, SEA/SH prevention, and equality at workplace.
21	Training on Labor Laws and Rights	(v)		Training materials, attendance log,	Workers oriented on minimum wages, working hours, leave entitlements, grievance process, and other statutory rights.

Thanks&Regards

M/s Umashankar Singh Rawat

 Partner

Partner