

United Nations Children's Fund (UNICEF)

**Emergency Social Protection Enhancement and COVID-19
Response Project (ESPECRP), First Additional Financing
(P177020) Second Additional Financing
(P180358)**

**Updated Environmental and Social Management
Framework**

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Table of Contents

Acronyms	1
Executive Summary	1
1. INTRODUCTION.....	4
2. PROJECT DESCRIPTION.....	5
3. ENVIRONMENTAL AND SOCIOECONOMIC BASELINE OF THE PROJECT LOCATION.....	6
3.1. Physical Environment.....	6
3.2 Biological Environment.....	7
3.3 Socioeconomic Environment.....	7
4. LEGAL AND REGULATORY FRAMEWORK.....	8
4.1 National Legislation, Policies and Regulations relevant to the Project	8
4.1.1 Labor Law.....	8
4.3 UNICEF's Environmental and Social Safeguards.....	9
4.4 World Bank Requirements.....	10
5. SOCIAL AND ENVIRONMENTAL IMPACTS AND RISKS	11
5.1 Antropogenic and natural hazards	14
5.1.1 Activities That May Result in Security Risks.....	14
5.1.2 Management Measures	14
5.2. Exclusion of vulnerable beneficiaries	15
5.2.1 Activities That May Result in Social Risks	15
5.2.2 Management Measures	15
5.3 Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA).....	16
5.3.1 Activities that may result in GBV/SEA risks.....	16
5.3.2 Management Measures	16
5.4 Child Labour	17
5.4.1 Activities that may result in Child Labour Risk	17
5.4.2 Management Measures	17
5.5 Community and Occupational Health and Safety (OHS) Risks.....	17
5.5.1 Activities That May Result in Community and OHS Impacts and Risks.....	17
5.5.2 Management Measures	17
6. PROCEDURES TO ADDRESS SOCIAL AND ENVIRONMENTAL RISKS & IMPACTS . Error! Bookmark not defined.	
6.1 Project Screening and Classification	Error! Bookmark not defined.
7. INSTITUTIONAL ARRANGEMENTS AND CAPACITY BUILDING	18
7.1 General Management Structure and Responsibilities	18
7.1.1 World Bank.....	18
7.1.2 UNICEF.....	18
7.1.3 Social Fund for Development (SFD)	19

7.1.4	19
Biannual Technical Supervision Missions	19
7.1.5 Third Party Monitoring Organization.....	19
7.1.6 Other Service Provider Organizations	19
7.1.7. Technical Working Committees (TWC)	20
7.1.8. Consultative Committees	20
7.2 Capacity Building and Training.....	21
8. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE	22
8.1 Principles for Meaningful, Effective and Informed Stakeholder Engagement.....	22
8.2 Information Disclosure.....	22
8.3 ESPECRP Systems in Place for Stakeholder Engagement and Information Disclosure	23
9. GRIEVANCE MECHANISM.....	25
10. MONITORING AND REPORTING OF ESMF IMPLEMENTATION	26
11. CHALLENGES FACED AND KEY LESSONS.....	Error! Bookmark not defined.
12. DISCLOSURE	27
Annex 1. Yemen ESPECRP Revised SES Screening.....	28
Annex 3. Stakeholder Engagement Plan.....	34
Annex 4. Environmental and Social Commitment Plan	34
Annex 5. GBV Assessment and Action Plan	34
Annex 6. Comparison of ESS2 requirements and requirements under the Yemeni Labour Code Law 95/05	35

Acronyms

GM	Grievance Mechanism
IDP	Internally Displaced Person
MIS	Management Information System
NGO	Non-Governmental Organization
OHS	Occupational, Health and Safety
PAD	World Bank's Project Appraisal Document
RoY	Republic of Yemen
SES	Social and Environmental Standards
SESP	Social and Environmental Screening Procedure
SFD	Social Fund for Development
SWF	Social Welfare Fund
TPM	Third-Party Monitoring
UN	United Nations
UNICEF	United Nations Children's Fund
UCT	Unconditional Cash Transfer
WHO	World Health Organization
YECRP/ECRP	Yemen Emergency Crisis Response Project
ESPCERP	Emergency Social Protection Enhancement and COVID-19 Response Project

Executive Summary

This Environmental and Social Management Framework (ESMF) was prepared by UNICEF to ensure the Emergency Social Protection Enhancement and COVID-19 Response Project (ESPERCP- parent project P173582) and is consistent with both the UNICEF's Environmental and Social Standards¹ (ESS) and the World Bank's Environmental and Social Framework (ESF) ([World Bank ESF](#)). The ESMF has been updated twice – as part of the First Additional Financing (AF1- P177020) and then as component of the Second Additional Financing (AF2- P180358) of the ESPERCP. The Social and Environmental Screening Procedure (SESP) requires that all UNICEF projects consider the potential environmental and social opportunities that a project may generate and ensure that adverse social and environmental risks and impacts are avoided, minimized, mitigated and managed for the duration of the ESPERCP.

The ESMF is intended to serve as a practical tool to guide the identification and mitigation of potential environmental and social impacts of proposed investments and as a platform for consultations with stakeholders and potential project beneficiaries. The ESMF provides the following:

Description of the project (Section 2): UNICEF and UNDP in partnership with the World Bank, developed the Yemen Emergency Social Protection Enhancement and COVID-19 Response Project (ESPERCP) to step up current efforts of the international community to assist a population hard hit by the conflict, notably the poorest households in all Governorates of Yemen. Within the ESPERCP, the Unconditional Cash Transfers (UCT) component delivers unconditional cash transfers to the Social Welfare Fund (SWF) beneficiaries who were left without assistance in 2015 when the SWF halted its operations due to the conflict – continuing the work already initiated under the previous World Bank Emergency Crisis Project (ECRP). Beneficiaries in the SWF list (1.5 million households, representing over 9.35 million individuals) were identified prior to the conflict based on a combination of poverty-targeting - using a Proxy Means Test (PMT) - and categorical targeting (elderly, female headed households, orphans and people with disabilities).. Under the ECRP, and a number of risk mitigation measures were introduced including the requirement to verify the identities of the beneficiaries prior to them collecting the cash .

Environmental and socioeconomic baseline of the project location (Section 3): This section provides a brief description of the environmental and socioeconomic baseline of Yemen.

Overview of the legal and regulatory framework (Section 4): Key national laws and regulations applicable to social and environmental risk management include the National Environmental Action Plan, Environmental Protection Law, and Labor Law. In the context of the ESPERCP, UNICEF's Environmental and Social Standard (ESS) and the [World Bank's Environmental and Social Safeguards Framework \(ESF\)](#) apply.

Overview of project activities and key social and environmental risks (Section 5): This section summarizes key social and environmental risks and indicative management measures for the UCT Component. The section was prepared as per UNICEF Social and Environmental Principles and Standards, WB's ESF requirements, and national regulations that have been triggered based on completion of the project-level Social and Environmental Screening Procedure (SESP, see Annex 1). The E&S Risk Classification of this project was categorized as 'High' 'High' per the [World Bank's Project Appraisal Document \(PAD\)](#) and Appraisal [Environmental and Social Review Summary](#). Key risks include those related to human rights and conflict, gender and social inclusion, community health, natural hazards, safety and working conditions (including occupational health and safety). The identification of project level risks provides an indicative

¹ UNICEF's Environmental and Social Safeguards (ESS)and system is planned to be finalized in Q3 2023 and is planned to be implemented by mid-2024. .

assessment to be elaborated further through screening, assessment and risk management (see Section 5). Therefore, the project screening and site-specific assessments and management plans will be essential.

Procedures for screening, assessment and management (Section 6): The project was screened for social and environmental risks and impacts (including OHS risks) applying UNICEF screening tools at appraisal time. Screening and classification was completed prior to signing of the original Financial Agreement between the World Bank and UNICEF (December 2020).

Institutional arrangements and capacity building (Section 7): The World Bank provides financing for the project and as such has an oversight role. The World Bank has established a senior management task team to oversee the progress of the programme and, whenever needed, advise on potential remedies, in collaboration with UNICEF and SFD, and in compliance with the ESMF. Under the ECRP, the design and implementation of the UCT component was done by UNICEF. As agreed with the World Bank, under the ESPECRP parent project and AF1, the implementation of the facilitation, field monitoring, Grievance Mechanism and payment elements of the UCT Component were transferred to the Social Fund for Development (SFD), with UNICEF remaining as Grant Recipient and maintaining the oversight functions of data management, fraud investigation, third party monitoring, Foreign Exchange (FX) strategy and external communications. As part of the AF2 the contracting and management of the financial service providers (FSPs) will transition back to UNICEF. UNICEF as grant recipient is responsible for the revision or updates of this document during project implementation, in consultation with SFD and the World Bank. Both UNICEF and SFD are responsible for the implementation of the ESF instruments. UNICEF will ensure that capacities for ESMF implementation are built on an ongoing basis through dedicated ESF trainings.

Stakeholder engagement and information disclosure (Section 8): UNICEF in collaboration with SFD will ensure meaningful, effective and informed stakeholder engagement in the design and implementation of the project. Stakeholder engagement supports the development of strong, constructive, and responsive relationships that are critical for sound project design and implementation, enhances project acceptance and ownership and strengthens the social and environmental sustainability and benefits of supported interventions. Information disclosure refers to the provision of timely, accessible information regarding the project and its potential social and environmental impacts to stakeholders in order to facilitate their meaningful, effective and informed participation in project design and implementation. Stakeholders require access to the relevant project information to understand potential project-related opportunities and risks and to engage in design and implementation. In addition to have access to general project information, stakeholders need access to the cleared ESF documents. This information is to be disclosed in a timely manner, and in a form and language understandable to affected persons and other stakeholders.

The Stakeholder Engagement Plan (SEP) for the ESPECRP has been updated for AF2 and disclosed. The SEP recognizes the importance of an open and transparent engagement between the Recipient and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks.

Grievance Mechanism (Section 9): UNICEF and SFD have been addressing complaints through a dedicated Grievance Mechanism (GM) that will continue to be implemented under the AF2. The GM supports beneficiaries, community members but also the service provider personnel to raise complaints and disagreements related to social, environmental and OHS impacts and standards. SFD as the implementing partner (and when applicable, UNICEF) adheres to follow-up and address any complaints. All grievances have been and will continue to be filed in the Project's Management Information System (MIS). The GM is gender- and age-inclusive and responsive, to address potential access barriers to women, the elderly, the people with

disabilities, youth and other potentially marginalized groups as appropriate to the Project. The GM does not impede access to judicial or administrative remedies as may be relevant or applicable and will be easily accessible to all stakeholders at no cost and without retribution. Information about the GM and how to make a complaint and/or grievance is communicated during the stakeholder engagement process and placed at prominent places for the information of the key stakeholders.

All complaints and/or grievances regarding social and environmental issues, or other Project related matters, can be received through making a call using the dedicated Project Call Center number (8003090); or through field-deployed staff equipped with a mobile application with online and offline capabilities. These grievances are registered in the Grievance Module of the MIS within the appropriate grievance type, to ease the analysis and redressal.

Monitoring and reporting (Section 10): The ESMF and its procedures are to be reviewed and updated on a regular basis by UNICEF and SFD to reflect knowledge gained during project delivery. These updates are informed by the continuous monitoring done by UNICEF and SWF which include analysis of GM data as reported by beneficiaries, field monitoring by SFD and UNICEF staff, Third-Party Monitoring (under UNICEF), data analysis (leveraging the Project's Management Information System that records all interactions of the cash recipients with the project). Under AF2, a review of the current monitoring system will be conducted to identify opportunities to enhance monitoring of, and strengthen, environmental and social safeguard elements. Reporting is done through incident reports shared on a need basis, donor narrative reports and supervision missions. World Bank, UNICEF and SFD regularly discuss the challenges and lessons learned and identify ways to strengthen the implementation of ESF measures.

1. INTRODUCTION

This Environmental and Social Management Framework (ESMF) was prepared by UNICEF to ensure the Emergency Social Protection Enhancement and COVID-19 Response Project (ESPECRP parent project P173582) is consistent with both the UNICEF's Environmental and Social Standards² (ESS) and the World Bank's Environmental and Social Framework (ESF) and was approved in February 2021. This ESMF is being updated as part of the ESPECRP Second Additional Financing (AF2- P180358) agreement. The ESS require that all UNICEF projects consider the potential environmental and social opportunities that a project may generate and ensure that adverse social and environmental risks and impacts are identified, avoided, minimized, mitigated and managed. In the context of the Emergency Social Protection Enhancement and COVID-19 Response Project (ESPECRP), UN Model Approach and UNICEF's ESS and the World Bank's Environmental and Social Safeguards Framework apply.

Because the details of proposed activities are designed at the UCT Component level, an ESMF is necessary to ensure policies and procedures are in place for consistent safeguards implementation, and as required by UNICEF's ESS and the World Bank's ESF.

The ESMF is intended to serve as a practical tool to guide identification and mitigation of potential environmental and social impacts of proposed investments and as a platform for consultations with stakeholders and potential project beneficiaries. The ESMF identifies the policy triggers for the project, the screening criteria of the project, the potential environmental and social impacts, and the mitigation measures to mitigate the identified risks, and assessment of the institutional capacity and measures for capacity-filling gaps. As well as stakeholder consultation, disclosure and grievance mechanism.

The ESMF was developed through a consultative process led by UNICEF in close coordination with the World Bank, and provides the following:

- Description of the project (Section 2)
- Environmental and socioeconomic baseline of the project location (Section 3)
- Overview of the legal and regulatory framework (Section 4)
- Overview of project activities and key social and environmental risks (Section 5)
- Procedures for screening, assessment and management (Section 6)
- Institutional arrangements and capacity building (Section 7)
- Stakeholder engagement and information disclosure (Section 8)
- Grievance Mechanism (Section 9)
- Monitoring, reporting and evaluation (Section 10)
- Challenges faced and key lessons (Section 11)

² UNICEF's Environmental and Social Safeguards (ESS) are expected to be finalised in late 2023 and learning from this project has informed the development.

2. PROJECT DESCRIPTION

The ongoing conflict in Yemen has resulted in a catastrophic humanitarian emergency with an increasing toll of civilian deaths and casualties across the country. Over 80 percent of Yemen's population is estimated to need humanitarian assistance and more than 4.3 million Yemenis have become internally displaced with an estimated 3.3 million requiring assistance. The ongoing conflict has destroyed much of the institutional ability of key ministries, governorates and local authorities to deliver essential social services to citizens. Public service restoration is also essential for a smooth transition to recovery, as a political agreement is being negotiated.

In this context, UNICEF and UNDP, in partnership with the World Bank, developed the Emergency Social Protection Enhancement and COVID-19 Response Project (ESPECRP) to step up current efforts of the international community to deliver critically needed livelihood support and service delivery to a population hit hard by the conflict. The ESPECRP is aimed at improving the social and economic livelihoods of the most vulnerable people in Yemen and mitigating the collective impacts of the conflict, COVID-19 and climate-related shocks in Yemen. The project focuses on targeting food insecure households and the required interventions to tackle food insecurity and builds on the previous World Bank Emergency Crisis Project (ECRP).

The ESPECRP includes an Unconditional Cash Transfer (UCT) component, where cash is delivered to the poorest and most vulnerable households affected by the conflict and COVID-19. The UCT component targets those in the Social Welfare Fund (SWF) beneficiary list, who were already amongst the poorest in Yemen prior to the conflict and whose resilience further eroded when the SWF halted its operations; and is the single largest social protection or humanitarian program in Yemen, covering close to 1.5 million households. This cash assistance was initiated under the previous World Bank Emergency Crisis Project; and is being continued under the ESPECRP. Under the AF2, two payment cycles will be implemented.

The implementation of the UCT component under the ECRP was under UNICEF's responsibility. Under the ESPECRP parent project and AF1, the implementation of some of the elements of the UCT component (notably the facilitation, grievance mechanism, field monitoring and management of payment agencies) was transferred to the Social Fund for Development (SFD). The transfer of implementation of the program to SFD, and enhanced collaboration with the SWF, also ensures the national ownership of the systems that are built to deliver the program.

Below are the components that will be managed by UNICEF as grant recipient:

Component 1: Cash transfers

- Sub-component 1.1: Unconditional Cash Transfers
 - Includes the benefit amount transferred to SWF beneficiaries; payment fees and services; facilitation/ outreach/communication; field monitoring; grievance mechanism; and SFD direct and indirect costs
- Sub-component 1.2: Digital Payment Pilot and Financial Literacy (introduced in AF2)
 - Includes the costs of piloting digital payments

Component 3: Project management, monitoring and evaluation

- Sub-component 3.1:
 - It includes UNICEF direct and indirect costs; capacity building of SFD, third-party monitoring (TPM) and fraud investigation

3. ENVIRONMENTAL AND SOCIOECONOMIC BASELINE OF THE PROJECT LOCATION

3.1. Physical Environment

Topography

Yemen is characterized by five major land systems, as follows (EPC, 1995): 1. Hot and humid coastal plain, 2. Temperate Highlands, 3. High Plateaus (Hadramawt and Mahra Uplands), 4. Desert interior, and 5. Islands. Some of Yemen's ecological zones are confined to small areas (e.g., islands) with human communities, flora and fauna highly adapted to subsist within them. Other zones are much larger (e.g., Temperate Highlands) and support the majority of the country's agricultural production.

Climate

Rainfall varies widely across the country, from less than 50 mm along the coast, rising with the topography to between 500 and 800 mm in the Western Highlands, and dropping again to below 50 mm in the desert interior. Precipitation occurs primarily in spring and summer and is determined by two main mechanisms: the Red Sea Convergence and the Inter Tropical Convergence Zone. The temperature depends primarily on elevation, and in the coastal areas, is determined by distance from the sea. Mean annual temperatures range from less than 12°C in the Temperate Highlands (with occasional freezing) to 30 °C in the coastal plains. Temperatures have increased, the result is frequent prolonged hotter droughts during the last three decades interrupted by occasional flooding.

Climate-related hazards in Yemen include extreme temperatures, floods, landslides, sea level rise, sea water intrusion and drought. Most of these risks exacerbate the country's water scarcity and pose serious threats to development and food security, and the intensity and frequency of climate related hazards are likely to increase due to climate change.

Climate change challenges^{3,4,5}

Climate change poses a significant threat to Yemen's development across many sectors. Challenges include: (a) Short-burst, intense rainfall which often leads to flash floods, which can result in significant damage and high losses in urban areas due to their concentrated physical assets and population, additionally much of the infrastructure is not climate resilient. Rainfall intensity, and therefore flooding, is projected to increase with climate change; (b) Greater rainfall variability could result in prolonged drought periods and increased water demand. Yemen's water crisis ranks among the worst in the world, and water stress is observed to be increasing, with groundwater reserves projected to be mostly depleted in two to three decades regardless of climate change; (c) The vast majority of the urban poor are vulnerable to rockslide and landslide risks as they typically live on marginal and environmentally sensitive land; and (d) A rise in sea levels would result in increased coastal flooding, saline intrusion and possible damage to infrastructure and groundwater quality and supply. In response to these threats, improved urban infrastructure, water and waste management are key priorities. The project will help mitigate the potential impacts of these threats in relevant activities.

Water resources and hydrology

³ World Bank Group. Climate Change Country Brief: Yemen. Retrieved from <http://globalpractices.worldbank.org/climate/Pages/CountryBriefs/Yemen.aspx>

⁴ World Bank Group. Climate Change Knowledge Portal: Yemen Dashboard. Retrieved from http://sdwebx.worldbank.org/climateportal/index.cfm?page=country_historical_climate&ThisRegion=Asia&ThisCCode=YEM

⁵ World Bank Group. (2011, April). Climate Risk and Adaptation Country Profile: Yemen.

The main water source in the country is groundwater. Yemen, a country located in a dry and semi-arid region, is already facing a severe water crisis in which several major cities already experiencing chronic water shortages. This is compounded by high population growth, inefficient agricultural use and poor regulation of water abstraction, traditional irrigation practices and type of cropping patterns, a lack of law enforcement to regulate water use, and vulnerability to climate change, the crisis may soon reach catastrophic levels. Yemen's acute water scarcity poses a serious threat to the country's stability and security.

3.2 Biological Environment

Biophysical Environment

Yemen is a country with rich natural habitats, species and genetic diversity, including many endemic species resulting from the variant altitudinal topography, climate, and geographical landscapes. The unique geographical position of Yemen with the variant climatic and topographical features is favorable for the existence of diverse ecosystems, natural habitats, and great marine, coastal, and terrestrial biodiversity. The flora of Yemen is very rich and heterogeneous. According to the Gap Analysis of Natural Plant Biodiversity of Yemen (2011), about 2,810 plant species were recorded in Yemen in which endemic and near endemic plants were estimated to be approximately 604, of which, 455 are endemic (307 in Socotra), constituting of about 16% of the flora which does not occur elsewhere (National Biodiversity Strategy and Action Plan, NBSAP II 2015).

On the other hand, Yemen has very limited natural resources including for instance - arable land, water, fishery, and green cover which evidently experience constant degradation. The arable lands do not exceed 3% of the total natural area which is dominated by desert and mountains. The arable lands experienced continuous deterioration of approximately 1.8% annually during the period 1999-2006 as a result of the water erosion, desertification, salinization, and urbanization. The total land area covered by forests is estimated to be about 1.5% in 2005. Desertification impacts more than 50% of total land of the country. Desertification of agricultural land ranges from 3-5% annually, whereas the area of deteriorated land due to soil erosion and salinity is estimated to be 12 million hectares and another 3.8 million hectares, respectively. The situation is further worsened as a result of encroachment of sand dunes (NSES 2005-2015). The potential for greater desertification is high considering several factors including changes in socio-economic patterns and farming practices and increasing demand for fuel, abandonment of terraces, overgrazing and depletion of tree cover and water erosion problems.

3.3 Socioeconomic Environment

Yemen is ranked 183 out of 191 countries in the Human Development Index with a score of 0.455 in 2021/2022⁶. Millions of people in Yemen continue to suffer from the compounded effects of more than eight years of armed conflict, ongoing economic crisis, recurrent natural hazards, COVID-19 pandemic, and disrupted public services. More than 80 per cent of the country's population struggles to access food, safe drinking water and adequate health services⁷. Most public sector employees, including teachers and healthcare workers, have not received a regular salary in years. In 2022, an estimated 23.4 million people, almost three-quarters of the population, including 12.9 million children, needed humanitarian assistance and protection, with over 4 million people, including 2 million children, displaced⁸. Yemen therefore remains one of the world's largest and complex humanitarian crises.

⁶ UNDP, 2021/2022 Human Development Report, 2022

⁷ OCHA, Yemen Humanitarian Needs Overview 2023, December 2022

⁸ OCHA, Yemen Humanitarian Needs Overview 2023, December 2022

The political environment changed in April 2022 after the assumption of power by the Presidential Leadership Council and announcement of the UN-brokered truce. The subsequent six-month period, up to the truce's expiry on 2 October 2022, resulted in decreased civilian casualties and displacement, a steady flow of fuel imports through the Al Hodeidah port and commercial flights through Sana'a International Airport. Notwithstanding these overarching benefits, localised clashes continued in some areas, and landmines and explosive remnants of war (ERW) posed heightened risks. Despite extensive efforts, an agreement to extend the truce had not been reached by the end of 2022.

The operating environment in Yemen remains extremely complex. Insecurity, bureaucratic impediments, and dual-authority structures pose significant challenges in delivering critical life-saving services to vulnerable children and families. Development and humanitarian partners in Yemen continued to engage with the authorities in Yemen to address these challenges for sustained, safe and principled delivery of programmes.

Reliable information on the economy is unavailable, as official statistics are no longer produced. Competing monetary policies by the two conflicting authorities have resulted in a large divergence of the exchange rate of the Yemeni rial (YER) between the southern and northern governorates. The continued fragility of Yemen's economy in 2022 exacerbated vulnerabilities among poor families. Being largely reliant on imported food and goods, Yemen is extremely vulnerable to fluctuations in global prices. Throughout the course of the year, pressures on international supply chains, stemming from the crisis in Ukraine, heightened global food insecurity and contributed to increased food prices in Yemeni markets. The continued depreciation of the YER has resulted in a high rate of inflation, meaning a sharp increase in the prices of food, fuel and other basic commodities. The national poverty rate is estimated to be approximately 80 per cent in 2022, up from 49 per cent in 2014⁹.

4. LEGAL AND REGULATORY FRAMEWORK

The ESMF is prepared to:

- meet the requirements of the World Bank's Environment and Social Framework (ESF), including the World Bank Group Environment, Health and Safety (EHS) Guidelines, most particularly, the General Guidelines.
- meet the principles and standards of the UN Model Approach¹⁰ and are aligned with the UNICEF's Environmental and Social Safeguards¹¹ (ESS) relevant policies, procedures and guidelines .

4.1 National Legislation, Policies and Regulations relevant to the Project

4.1.1 Labor Law

The Republic of Yemen (RoY) Labor Law, Act No.5 of 1995, includes OHS requirements for workplaces that needs to be applied in the project.

- The Labor Law (Law 5/1995) states that women are equal to man in all aspects without any discrimination, and that equality should be maintained between women and men workers in recruitment, promotion, wages, training, social insurance. It also regulates work time for pregnant women.
- The Labour Law regulates the rights and wages of workers, their protection, occupational health and safety. In addition, the Social Insurance Law regulates retirement compensation.
- Yemen has ratified ILO Convention Number 138 on Minimum Age for Admission to Employment (Law 7/2001). The Convention establishes a minimum age for admission to employment.

⁹ UNDP, Assessing the Impact of War in Yemen on Achieving the Sustainable Development Goals, 2021

¹⁰ <https://unemg.org/modelapproach/>

¹¹ UNICEF's Environmental and Social Safeguarding Policy (ESS policy) and the related procedures are expected to be finalised in 2023, and learning from this project has informed the development .

- Yemen has also ratified the ILO Convention 182 on the Worst Forms of Child Labour. It refers to child labour as work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school, by obliging them to leave school prematurely; or by requiring them to attempt to combine school attendance with excessively long and heavy work.

Issues related to income tax, insurance, social security, health insurance, workers' compensation, retirement fund, severance and other similar payment are also described in Yemeni law, however the implementation and enforcement of these laws are limited and almost non-existent for small and medium enterprises.

A comparison of ESS2 requirements and requirements under the Yemeni Labour Code Law 95/05 is available at annex 6. UNICEF contracting is done in line with relevant UNICEF Terms and Conditions of Contracts (Services) on its section 7 related to Ethics Standard.

4.3 UNICEF's Environmental and Social Safeguards

UNICEF's Environmental and Social Safeguards (ESS) are applied to all UNICEF projects, including the ESPECRP. The application of the ESS, which are broadly consistent with those of the World Bank, will help identify and mitigate potentially high adverse social and OHS impacts stemming from the implementation of the UCT program.

The ESS underpin UNICEF's commitment to mainstream social and environmental sustainability across all programming to support sustainable development. Through the application of the ESS, UNICEF enhances the consistency, transparency and accountability of its decision-making and actions, improves performance, and strengthens achievement of sustainable development outcomes. The objectives of the safeguards are to:

- Strengthen the quality of programming by ensuring a principled approach
- Identify and avoid adverse impacts to people and the environment
- Minimize, mitigate, and manage adverse impacts where avoidance is not possible
- Strengthen UNICEF and partner capacities for managing social and environmental risks
- Ensure full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people

The ESSs are an integral component of UNICEF's quality assurance and risk management approach to programming (Table 1).

Table 1. Key Elements of UNICEF's ESS

Overarching Policy	UNICEF Standards	Implementation Procedures: Social and Environmental Management System Requirements
<p>Principle 1: Leave No One Behind</p> <p>Principle 2: Human Rights Approach, Gender Equality and Women's Empowerment</p> <p>Principle 3: Sustainability and Resilience</p> <p>Principle 4: Accountability</p>	<p>Standard 1: Labor and Working Conditions</p> <p>Standard 2: Resource Efficiency and Pollution Prevention</p> <p>Standard 3: Community Health, Safety, and Security</p> <p>Standard 4: Land Acquisition/Displacement and Involuntary Resettlement</p>	<p>Approach to Implementation</p> <p>Application of the Standards to Donor Proposals</p> <p>Use of Country or Partner Safeguard Systems</p> <p>Stakeholders Engagement and Accountability</p> <p>Monitoring, Reporting and Compliance</p>

	Standard 5: Biodiversity, Conservation and Sustainable Natural Resource Management Standard 6: Indigenous People Standard 7: Cultural Heritage Standard 8: Climate Changes and Disaster Risks	
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4.4 World Bank Requirements

World Bank Environmental and Social Framework

The ESPECRP will follow the World Bank’s Environmental and Social Framework (ESF) which sets out the World Bank’s commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards (ESSs) that are designed to support the Project, with the aim of ending extreme poverty and promoting shared prosperity. Listed below are the standards of the World Bank:

- Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts (relevant to the project).
- Environmental and Social Standard 2: Labor and Working Conditions (relevant to the project)..
- Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management (not relevant to the project).
- Environmental and Social Standard 4: Community Health and Safety (relevant to the project).
- Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (not relevant to the project).
- Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources (not relevant to the project).
- Environmental and Social Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (not relevant to the project).
- Environmental and Social Standard 8: Cultural Heritage (not relevant to the project).
- Environmental and Social Standard 9: Financial Intermediaries (not relevant to the project); and
- Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure (relevant to the project).

Environmental and Social Standard 1 (ESS1) is relevant to all projects for which Bank Investment Project Financing is sought. ESS1 establishes the importance of:

- A. the Recipient’s existing environmental and social framework in addressing the risks and impacts of the project.
- B. an integrated environmental and social assessment to identify the risks and impacts of a project.
- C. effective community engagement through disclosure of project-related information, consultation, and effective feedback; and
- D. management of environmental and social risks and impacts by the Borrower throughout the project life cycle.

The Bank requires that all environmental and social risks and impacts of the project be addressed as part of the environmental and social assessment conducted in accordance with ESS1.

The other relevant Environmental and Social Standards, as per the Environmental and Social Review Summary (ESRS) are the following: ESS2, ESS4 and ESS10. They set out the obligations of the Recipient in identifying and addressing environmental and social risks and impacts that may require particular attention. These Standards establish objectives and requirements to avoid, minimize, reduce and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts. For further details on the applicable standards and their relevance to the project, please refer to the [ESRS](#) .

5. SOCIAL AND ENVIRONMENTAL IMPACTS AND RISKS

This section summarizes key social and environmental risks and indicative management measures for the project. The identification of project level E&S risks provides an indicative assessment to be elaborated further through project screening, assessment and risk management (see Section 5).

The following section describes the UNICEF Social and Environmental Safeguards Principles and Standards that have been identified as relevant based on completion of the Project Social and Environmental Screening Note (SESN, see Annex 2).

Table 2 below summarizes key principles and standards that were triggered after pre-screening of the project and the ESS requirements for the project, as identified in the UNICEF ESS. This table addresses the principles and standards that have triggered both Low and Substantial level risks. UNICEF's ESS system is currently being finalized and final documents are expected to be released in late 2023 and implemented by all programmes from mid-2024. The principles and UNICEF ESS standards are based on the UN Model Approach, which has been published and in use (<https://unemg.org/modelapproach/>)

Table 2: Summary of Key UNICEF ESS Requirements for the ESPECRP

ESS Principle or Standard	Summary of Relevant ESS Requirements
<p>Principle 1: Leave No One Behind</p>	<p>Commitment of all UN Member States to eradicate poverty in all its forms, end discrimination and exclusion, and reduce the inequalities and vulnerabilities that leave people behind and undermine the potential of individuals and of humanity as a whole.</p> <p>Prioritization of programmatic interventions to address the situation of those most marginalized, discriminated and excluded.</p>
<p>Principle 2: Human Rights Based Approach, Gender Equality and Women's Empowerment</p>	<p>Human rights</p> <ul style="list-style-type: none"> • Recognize centrality of human rights to sustainable development, poverty alleviation, and ensure fair distribution of development opportunities and benefits and commit to supporting universal respect for, and observance of, human rights and fundamental freedoms for all; • Uphold principles of accountability and rule of law, participation and inclusion, and equality and non-discrimination; • Adhere to the UN Development Group Statement of Common Understanding of the Human Rights-Based Approach to Development Cooperation and Programming; • Refrain from providing support for activities that may contribute to violations of a State's human rights obligations and the core international human rights treaties; <p>Gender Equality and Women's Empowerment</p> <ul style="list-style-type: none"> • Promote design and implementation of gender responsive projects; • Ensure supported activities do not discriminate against women and girls; • Promote equal opportunities and fair treatment of women and men; • Conduct gender-sensitive stakeholder analysis and strengthen women's participation in decision-making; • Adopt measures that seek to prevent and appropriately respond to incidences of sexual harassment, gender-based violence and/or sexual exploitation and abuse of women, men, girls and boys that may occur in connection with programming.

<p>Principle 3: Sustainability and Resilience</p>	<p>Support efforts to reduce risks and vulnerabilities associated with natural and human-made hazards; climate change; violence, conflict, political and social instability, economic volatility.</p> <ul style="list-style-type: none"> • Conduct sound environmental and social risk assessment of proposed initiatives and apply environmental and social safeguards to avoid, and where avoidance is impossible, minimize and mitigate adverse impacts to people and the environment per the mitigation hierarchy; • Include underlying risk drivers in environmental and social risk assessments of proposed initiatives to avoid unforeseen long-term adverse impact to people and the environment and to strengthen resiliency; • Apply a precautionary approach¹² to addressing significant environmental and social challenges; • Identify and address vulnerability of people, and in particular vulnerabilities of marginalized and disadvantaged groups, to potential climate change impacts and disaster risks; and • Identify and address interconnections among issues related to the environment, human rights, conflict, crises and vulnerability, where relevant. • Apply a precautionary approach to address significant environmental and social challenges
<p>Principle 4: Accountability</p>	<p>Comply with applicable national laws and host country obligations under international law (hereinafter “Applicable Law”)</p> <ol style="list-style-type: none"> (i) enabling active local community engagement and participation in decision-making¹³, particularly those at risk of being left behind; (ii) ensuring transparency of programming interventions through provision of timely, accessible and functional information regarding supported activities, including on potential environmental and social risks and impacts and management measures; (iii) ensuring stakeholders can communicate their concerns and have access to rights-compatible complaints redress processes and mechanisms; and (iv) ensuring effective monitoring—and where appropriate, participatory monitoring with stakeholders—and reporting on implementation of social and environmental risk management measures.

¹² See Principle 15 of the [Rio Declaration on Environment and Development](#), (1992) noting that the lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent serious threats of environmental degradation.

¹³ The [Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters](#) and its [Almaty Guidelines](#) support key dimensions of the accountability guiding principle

<p>Standard 1. Labour and Working Conditions</p>	<ul style="list-style-type: none"> • Promote, respect and realize fundamental principles and rights at work¹⁴ through preventing the use of child labour and forced labour, and discrimination; • Protect and promote the safety and health of workers; • Ensure that the project complies with national employment and labour laws and international commitments; and • Leave no-one behind by protecting and supporting workers in disadvantaged and vulnerable situations, including a special focus, as appropriate, on women workers, young workers, migrant workers and workers with disabilities. <p>Specific requirements: non-discrimination and equal opportunity, child labour shall not be used, OSH measures are in place to address the safety and health of project workers, use of workplace grievance mechanism, conduct due diligence to ascertain that the third parties who engage project workers are legitimate and reliable entities and have in place human resources management policies and process and applicable OSH management systems.</p>
<p>Standard 3. Community Health, Safety and Security</p>	<p>Avoid or minimize the risks and impacts to community health, safety and security that may arise from project-related activities, with particular attention given to disadvantaged and marginalized groups.</p> <ul style="list-style-type: none"> • Anticipate and avoid adverse impacts on health and safety of affected communities during the programming life cycle • Avoid or minimize community exposure to disaster risks, diseases and hazardous materials associated with programming activities; • Ensure the safeguarding of personnel and property minimizes risks to communities and is carried out in accordance with international human rights standards and principles; and • Have in place effective measures to address emergency events, whether human-made or natural hazards. <p>Specific considerations:</p> <p><u>Community Health and safety and exposure to health issues:</u> UNICEF will ensure that the project evaluate the risks to, and potential impacts on, the safety of the communities during the implementation of the UCT Component, establish preventive measures and plans to avoid or minimize potential exposure by cash recipients and personnel to health risks (specifically COVID-19) notably at the payment sites.</p> <p><u>Emergency Preparedness:</u> UNICEF will ensure that the implementing partners will be prepared to respond to accidental and emergency situations in a manner appropriate to prevent and mitigate any harm to people and/or environment.</p> <p><u>Security-related issues:</u> Security arrangements should be provided in accordance with the UNSMS, in a manner that does not violate human rights standards or principles or jeopardize the community's safety and security.</p>

¹⁴ [ILO Declaration on Fundamental Principles and Rights at Work](#) (1998).

Standard 8. Climate Change and Disaster Risks	<p>The Sustainable Development Goals, the UNFCCC and Paris Agreement, and the Sendai Framework on Disaster Risk Reduction¹⁵ require parties to integrate climate change and disaster risk considerations into projects, programmes, plans, and policies in order to strengthen resilience and to reduce potential exposure and vulnerability of communities.</p> <p>Disaster risk reduction measures primarily with weather-related or hydrometeorological hazards to be addressed.</p> <p>Ensure programming integrates climate change adaptation considerations and does not exacerbate vulnerability of communities to climate change impacts or disaster risks.</p>
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NOTE: This provides a summary of key relevant requirements, the full UNICEF ESS (currently under revision) should be referenced for a comprehensive list of requirements.

Stakeholders' engagement and information disclosure is not among the 8 UNICEF ESS standards; however, it is a core cross cutting component of UNICEF ESS Policy. Indeed, an inclusive process of engaging stakeholders applies to all programmes and activities. It will involve the following: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

The main risks identified through the ESS are summarized below along with minimum requirements that need to be considered and indicative management measures.

5.1 Antropogenic and natural hazards

5.1.1 Activities That May Result in Security Risks

In 2015, Yemen entered a war opposing rival forces loyal to the Internationally Recognised Government (IRG), Ansar Allah or other parties, that lasts to date. Over the past eight years, the country has experienced active fighting including indiscriminate acts against the population. Weapons are readily available and mine laying has substantially increased further increasing security and safety concerns. The ongoing conflict in Yemen requires the project to be implemented using a conflict sensitive approach to ensure activities do not exacerbate or generate tensions or violence. The greatest risks in many locations are the threat of physical violence for cash recipients or workers implementing the UCT Component notably at payment sites during the cash distribution, or while traveling to payment locations particularly due to the risk of being impacted by landmines. The concerns increase during the rainy season which can lead to possible movement of unexploded ordinance (UXOs) due to flooding furthering the access challenges to payment sites.

The potential impact of natural hazards (heatwaves, heavy rains, floods, cyclones, etc.) on the people involved in the project – both workers and affected community – should also be considered, through the prevention and management of the related risks. The effects of climate change are being felt across the world, and Yemen is no exception. Strong heat waves are affecting different areas of the country, which is also prone to natural disasters such as heavy rains, floods and cyclones. These affect populations and result in possible health and safety risks for beneficiaries waiting at payment sites, or even access barriers preventing them from reaching these payment sites. These also result in possible health and safety risks for local workers making payments at payment sites and all other workers involved in monitoring, facilitation and all other relevant activities during the implementation of the project.

5.1.2 Management Measures

The management measures put in place include:

- Implementing a clear mechanism to identify security threats to the project and to communicate changes

¹⁵ See [Sendai Framework on Disaster Risk Reduction 2015-2030](#).

in threat levels to the various parties involved in project implementation;

- Establishing communication and facilitation arrangements to secure the support of all relevant political and community actors at the national, governorate, and local levels to promote safe and politically neutral implementation of the project;
- Suspending project activities in areas where political and governance risks cannot be effectively managed;
- In areas with active conflict or affected by natural hazards, establishing outreach payment sites whose mobility enables to ensure that the cash process takes place only when and where it can be delivered in a safe manner;
- In areas impacted by landmines, (1) ensuring updated mapping of potentially affected areas, (2) ensuring that all project workers are duly trained on the security measures to be implemented by outreach (mobile) payment teams working in conflict affected areas, with a focus on mine risk education, (3) ensuring continual coordination between the facilitation and payment service providers at field level.
- Applying a protocol to temporarily close payment sites in a coordinated manner in case of security threats;
- Establishing clear implementation arrangements which emphasize the independence of decision making by any political and/or public-sector entity. These arrangements are communicated to all parties and stakeholders on a regular basis;
- Ensuring availability of a functional grievance redressal mechanism which can be used as reporting channel. A description can be found in the Stakeholder Engagement Plan.
- Diligently monitor the weather conditions and develop response plans to ensure the safety of beneficiaries and service provider staff;
- Request payment agencies to ensure that payment sites have appropriate shading at waiting areas.
- Where of heat waves occurring during payment cycles in a number of locations: adapted working hours at sites to avoid payment during times of high temperatures and increased capacity at sites.
- Occurrence of floods: strengthened facilitation efforts to identify alternative payment locations which can be safely accessed by beneficiaries and payment teams.

5.2. Exclusion of vulnerable beneficiaries

5.2.1 Activities That May Result in Social Risks

The UCT component uses the pre-conflict SWF list, and UNICEF and World Bank agreed on the principle of maintaining the integrity of the list due to sustainability, technical and budgetary factors. This means that no beneficiaries can be added or removed from the list. The targeting done by SWF used a combination of proxy-means test and categorical targeting to identify the chronic poor with limited employment opportunities including persons with disabilities, low literacy levels, female headed households, among others. Vulnerable groups of beneficiaries with access constraints to payment sites derived from physical impediments or socio-cultural barriers, can be excluded from the UCT Component benefit. Additionally, as the program requires that beneficiaries present a program accepted ID to go through the process of verification of identity and payment, those without IDs may be excluded from the program.

5.2.2 Management Measures

The management measures put in place include:

- Ensuring the availability of payment services through the home outreach modality applicable for beneficiaries with physical impediments or socio-cultural barriers that prevent them from accessing the payment sites; and clearly communicating about the existence of the home outreach payment service, eligibility criteria, and channel to place a request to benefit from this service;

- Maintaining a protocol to ensure provision of priority services to pregnant women, elderly and people with disabilities who collect at a payment site.
- Operating a functional grievance mechanism.
- Maintaining a community-based mechanism to support beneficiaries in obtaining a program accepted ID, free of cost. This mechanism leverages on the administrative roles allocated to officially designated community leaders as per the existing Yemeni law (“Amin” or “Aqil” as mentioned hereunder).

Note: Beneficiaries are from the original beneficiary list that cannot be modified at this time but that complementary measures are being undertaken by the project under the other activities implemented by UNDP (Cash for Nutrition and Cash for Work)

5.3 Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA)

5.3.1 Activities that may result in GBV/SEA risks

With persistent gender gaps existing even prior to the conflict – i.e., in education, legal restrictions on mobility and decision-making, barriers to female participation in the labour force and in political life, and few opportunities for voice, paid work and entrepreneurial activity – women are more vulnerable to the economic, social and security challenges that result from the conflict and should thus be proactively reached for access to cash to improve their purchasing power for food and basic necessities. The stark gender gaps are influenced by and set within the context of conservative and strict gender norms. Cultural constraints in some governorates make it difficult for many women to go to sites to collect their benefits, which leads to many of them assigning someone else to collect, which can create an opportunity for fraud and/or collective payment. Also, this UCT component includes activities that entail risk of sexual exploitation and abuse (SEA) due to the high vulnerability of beneficiaries, compounded by poverty and, for many, displacement status - and thus the high need to access the UCT component benefits. While many of the systems in place to select beneficiaries and distribute benefits are automated or otherwise quite structured, activities that involve a differential of power between programme staff and vulnerable women/girl beneficiaries have been identified as posing potential risks of SEA.

5.3.2 Management Measures

UNICEF is currently implementing a series of measures to mitigate these gender-related risks, which will continue to be applied by all the stakeholders involved in the proposed UCT component. These measures include:

- Strengthening the direct communication with female beneficiaries, by establishing female networks to facilitate the dissemination of information about the programme to females, as a way to overcome the barriers to physical participation of females in the community meetings organized by the program;
- Requiring the presence of at least a female cashier or female cashier assistance at each payment site, to ensure that both males and females have a chance to collect the cash; Screening officers, including females, are also engaged at payment sites to support in crowd management, which includes organizing segregated male-female queues at waiting areas.
- In more conservative areas, establishing female-only payment sites operated by female payment staff.
- Gender-sensitive third-party monitoring arrangements, including female focus group discussions to provide more insight into the context and nature of these potential risks, as well as further ideas to increase the safety of women/girls and ensure their equal access to UCT Component benefits.
- Ensuring availability of a functional grievance redressal mechanism which can be used as reporting channel.
- Conducting staff training on gender and SEA/SH and GBV.

5.4 Child Labour

5.4.1 Activities that may result in Child Labour Risk

The dire humanitarian situation may lead families to adopt negative coping mechanisms, including child labour.

5.4.2 Management Measures

To mitigate the risk of child labour, the Project has put the following management measures in place:

- Ensure the existence of contractual requirements on prevention of child labor, minimum age and age verification protocol for each implementing entity and corrective measures implemented where they are observed/reported.
- Verify documentary evidence (passport, identity card or birth certificate) of all workers prior to involving them on activities of the project.
- Ensuring that the worker log is available for verification of the labour force at different worksites.
- Ensuring availability of a functional grievance redressal mechanism which can be used as a reporting channel and corrective measures implemented.

5.5 Community and Occupational Health and Safety (OHS) Risks

5.5.1 Activities That May Result in Community and OHS Impacts and Risks

The COVID-19 pandemic added a layer of risk to the Project as beneficiaries and project personnel implementing project activities will need to interact at different levels during outreach, payment, grievance redressal and monitoring activities which would increase the risk of exposure to the COVID-19 virus. Further to WHO's determination that COVID-19 is now an established and ongoing health issue which no longer constitutes a public health emergency of international concern, these measures were revisited for AF2. The measures were adjusted to ensure the occupational health and safety of workers vis a vis communicable diseases.

The Project requires workers to travel to conduct facilitation and outreach activities, case management and disburse cash; and beneficiaries to travel to collect the cash. There are therefore concerns associated with road safety heightened by the often challenging topography in Yemen and access constraints in remote areas served by narrow and unpaved roads.

5.5.2 Management Measures

In response to the global COVID-19 pandemic, UNICEF has embedded different protection measures across all stages of the Project to protect project workers including:

- As and when applicable, embed awareness raising messages on communicable diseases and other public health concerns in all outreach and communication material clarifying the preventative measures to be adopted by both beneficiaries and workers (e.g. hand washing, distancing...)
- Scheduling payments to avoid overcrowding at payment sites; clear communication to beneficiaries on the limited number of daily payments and compliance to scheduling at sites as part of the disseminated messaging; Where possible, adopt a payment token system at sites where overcrowding is anticipated;
- Provision of hand-sanitizer or handwashing facilities at all payment sites, with a requirement for all beneficiaries to clean their hands.
- Ensure that cashiers correctly handle bank notes and instruct beneficiaries to do the same. This includes:
 - Persons processing cash (cash handlers) should wash their hands with soap and water regularly. That is, at intervals during and after handling of banknotes and coins. Using a hand sanitizer of at least 60 percent alcohol concentration is also effective.

- Cash handlers should avoid touching banknotes and then touching their eyes, nose, or mouth areas.
- Cash handlers and the public should avoid "licking" their fingers to aid in the manual banknote counting/sorting process.
- Always follow public health guidance on the safe ways to cough or sneeze.
- Rules should be strictly enforced to keep sick employees at home and away from the workplace.
- Work surfaces that may be exposed to banknotes and coins should be disinfected regularly—at least daily and at greater frequency during the day of intensive operations. All public facing areas should be disinfected regularly, at the beginning, during, and the end of operations, without causing alarm to beneficiaries.
- Ensure all drivers receive the 'ERW Drivers Awareness Safety Briefing' before departing on mission. This includes field trip planning checklist; potentially dangerous areas; evacuation instructions; safety rules.
- Assess the risks associated with each travel plan and decide on the most adequate vehicle for transportation.
- All motorcycle drivers are required to use helmets.

6. INSTITUTIONAL ARRANGEMENTS AND CAPACITY BUILDING

6.1. General Management Structure and Responsibilities

6.1.1 World Bank

The ESPECRP is funded by the World Bank. A World Bank senior management task team has been established to oversee and make decisions about remedies in connection with the UCT program. In particular, the World Bank task team's functions/responsibilities consist of: (a) reviewing periodic financial progress and results reports measured by targets and benchmarks agreed at the time of project approval; (b) applying the agreed process for dealing with serious issues, including significant social and environmental issues; (c) reviewing progress reports on actions taken to address a serious situation and results obtained, including details of any recovery of funds or write-off of losses; and (d) exercising remedies of suspension and termination in accordance with the provision of the Legal Agreement, if necessary (see World Bank document, PAD P173582). The World Bank is also engaged in the Biannual Technical Supervision Missions (see Section 7.1.5).

6.1.2 UNICEF

UNICEF as grant recipient is responsible for oversight, quality assurance, supervision and technical support to SFD as well as systems strengthening. UNICEF is to carry out objective and independent project oversight and monitoring functions, ensuring that appropriate project management milestones are managed and completed. This entails responsibility for data management (management information system), third-party monitoring, fraud investigation, FX strategy and external communications; and under payment cycle 7 of AF2, the contracting and management of the financial service providers (previously transferred to SFD) will also come back under the responsibility of UNICEF. This role is performed by a dedicated team within the Yemen Country Office with support from UNICEF Regional Office and Headquarters, which will provide corporate oversight and management support including finance, human resources, audit and investigations.

UNICEF ensures compliance with UNICEF's ESS and implementation of the requirements of this ESMF working closely with SFD. This includes (a) ensuring the availability of resources essential to establish,

implement, maintain and improve implementation of the ESMF; (b) defining roles, allocating responsibilities and accountabilities, and delegating authorities to facilitate effective ESMF implementation; (c) monitor, review and update the ESMF when necessary in consultation with SFD and the World Bank.

6.1.3 Social Fund for Development (SFD)

SFD is UNICEF's implementing partner for the facilitation, field monitoring, grievance mechanism and management of payment agencies (until cycle 6 of AF2). SFD undertakes direct implementation of the facilitation component, to make local actors, local communities and beneficiaries understand, accept, and support the CT component of the programme. It also ensures that beneficiaries are made aware of the UCT component parameters and the schedules of attendance to payment sites by village/locality, to facilitate their orderly access to the assigned sites based on correct and up to date programme information.

SFD also undertakes direct implementation of the Project's Grievance Mechanism and maintains a dedicated call center for this purpose as well as team working on the redressal.

SFD is responsible for the implementation of the requirements of this ESMF in the project areas under its responsibility.

6.1.4 Biannual Technical Supervision Missions

UNICEF, World Bank and SFD will meet bi-annually to review and endorse the Annual Work Plans (AWPs), provide strategic direction and oversight, review implementation progress and financial status of the UCT component. The Technical Supervision Missions will be convened by World Bank on a 6-monthly basis.

6.1.5 Third Party Monitoring Organization

The Third-Party Monitoring Organization (TPMO) is contracted by, and reports directly to, UNICEF. A Monitoring and Evaluation Specialist will work closely with the TPMO, providing technical guidance and monitoring performance as manager for this contract. The TPMO supports UNICEF, World Bank and SFD with mechanisms to ensure learning from field experience, improved service delivery to beneficiaries, planning and allocating resources, and demonstrating results.

6.1.6 Other Service Provider Organizations

To implement the UCT component of the proposed programme, Service Provider Organizations (SPO) will be contracted to fulfill responsibilities for specific operational components. The Service Provider Organizations coordinate closely on implementation and participate in the National Technical Working Committee and Field Technical Working Committee meetings.

- **Financial Service Providers**

Financial Service Providers are entities that are contracted to deliver the benefits to CT beneficiaries on a quarterly basis. Financial Service Providers can be Banks and/or Microfinance Institutions (MFIs) which, through their branches or sub-contracted payment agents, disburse cash benefits to CT component beneficiaries against the presentation of a photo ID accepted by the programme, in respect of payment flags presented in the payment list; carry out the reconciliation process and transfer electronic payment data to the MIS (Management Information System).

- **Quality Implementation Support Services (QISS)**

The QISS function is implemented by an independent third-party service provider which will not implement any other function in the same programme to minimize the conflict of interest and reports directly to UNICEF. The QISS organization will have the capacity to access all governorates and districts covered

by the UCT component to which the services are being provided to investigate cases of fraud, corruption and collusion.

6.1.7. Technical Working Committees (TWC)

Technical Working Committees are inter-agency committees, functioning at (i) National and (ii) Field Level.

- **The National Technical Working Committee**

The National Technical Working Committee comprises of one or more representatives of UNICEF, SFD, and Payment Agencies and is to be chaired by SFD. The Third-Party Monitoring Organization can be invited to attend a meeting, as required.

It is the overall task of this committee to secure sufficient coordination and collaboration between the various stakeholders in the preparation phase as well as throughout the entire implementation of the UCT component.

The National Technical Working Committee is the forum to discuss required adjustments to operational plans when needed and agree on mechanisms to resolve outstanding issues which were not resolved at the field level. In addition, joint decision-making happens at the level of the National Technical Working Committee. Recommendations for changes to operations can be made to the National Technical Working Committee from the Field Technical Working Committee; and decisions are made and communicated to the Field Technical Working Committee.

Using the framework of the National Technical Working Committee, a number of coordination meetings led by SFD are held prior to the start of each payment period to assess preparedness and address challenges, followed by daily meetings during the payment period to assess implementation progress and take corrective actions on identified challenges.

- **The Field Technical Working Committees**

The Field Technical Working Committee with SFD focal point participation at hub level (chair) and Payment Agencies' Supervisors. SWF may attend if feasible and UNICEF Chief of Field Office may support when needed.

The main responsibilities of the Field Technical Working Committees are: (i) to coordinate the every-day activities of all participating Service Provider Organizations Service Provider Organizations in the respective geographic region; and (ii) to respond to any possible upcoming crisis situation through immediate actions.

6.1.8. Consultative Committees

The Consultative Committees acts as a platform through which the UCT Component could receive feedback from relevant Government ministries and provide updates on the programme in a coordinated manner. The Committee is a consultative forum through which UNICEF and SFD receive observations from Ministry of Social Affairs and Labour (MOSAL) and Social Welfare Fund (SWF), Ministry of Planning & International Cooperation (MoPIC) and Supreme Council for the Management and Coordination of Humanitarian Affairs (SCMCHA) on the UCT Component implementation and share updates during the payment cycle with the objective of improving the quality of implementation.

This is done through:

1. Participating in the regular Consultative Committee meetings.
2. Joint monitoring missions of SWF, MoPIC, MoSAL where applicable in close collaboration with UNICEF and SFD to report back to the Consultative Committee on areas requiring improvement.

The Consultative Committee **is an advisory/consultative meeting platform**. The meeting is chaired by SFD.

7.2 Capacity Building and Training

UNICEF has the responsibility for ensuring that systems are in place so that relevant employees, contractors and other workers are aware of the environmental and social risks and requirements for project implementation, including the ESMF; and for ensuring that SFD as implementing partner has the information and resources for the same. UNICEF and SFD shall ensure that persons under their responsibility performing tasks related to environmental and social risk management are competent on the basis of appropriate education, training or experience, and shall retain associated records. The design of training materials must consider differing levels of responsibility, ability, language skills, literacy and risk exposure.

The following capacity building and training programmes are in place:

- Capacity building of UNICEF and SFD staff (led by UNICEF): To impart awareness on essential regulatory and other requirements and elements of the ESMF, to help understand the importance of social and environmental management from design stage through implementation.
- Training and awareness of service provider personnel (led by the SFD and UNICEF as applicable): A training on relevant ESMF requirements, including social, health and safety requirements, will be embedded in the training of all service provider personnel conducted prior to the start of each payment cycle.

Under the parent project and AF1, the following trainings took place:

- Training module on ESF embedded in the training package delivered to all workers implementing the project prior to each payment cycle. Topics include ethical conduct (including PSEA and GBV messaging), GM awareness, safety rules and COVID-19 preventative measures
- Specific training on PSEA and other GBV risks delivered to Third-Party Monitoring staff and GM staff (133 participants)
- Landmine risk training for workers in areas affected by landmines (400 participants)

Indicative costs of ESMF capacity building activities			
	Per PC	Under AF2	Comments
Trainings and workshops			
Training of project personnel on safeguarding including PSEA	60,000 USD	120,000 USD	Training of personnel
Landmine education			
Training of stakeholders			
Information			
Awareness raising of communities and consultations/focus group discussions	75,000 USD	150,000 USD	Channels to raise awareness and learn from the households particularly the most vulnerable
Total	135,000 USD	270,000 USD	

8. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

8.1 Principles for Meaningful, Effective and Informed Stakeholder Engagement

UNICEF in collaboration with SFD will ensure meaningful, effective and informed stakeholder engagement in the design and implementation of the UCT program. The key stakeholders are crucial partners for project delivery and advancing sustainable development.

Stakeholder engagement supports the development of strong, constructive, and responsive relationships that are critical for sound project design and implementation. Effective stakeholder engagement enhances project acceptance and ownership and strengthens the social and environmental sustainability and benefits of supported interventions. It is both a goal in itself – upholding the rights of citizens and others to participate in decisions that may affect them – as well as an effective means for achieving project outcomes, including those related to democratic governance, protecting the environment, promoting respect for human rights, and preventing and resolving conflict.

Meaningful, effective and informed stakeholder engagement will possess the following characteristics:

- Free of external manipulation, interference, coercion, and intimidation.
- Gender and age-inclusive and responsive.
- Culturally appropriate and tailored to the language preferences and decision-making processes of each identified stakeholder group, including disadvantaged or marginalized groups.
- Based on prior and timely disclosure of accessible, understandable, relevant and adequate information, including draft documents and plans.
- Initiated early in the project design process, continued iteratively throughout the project cycle, and adjusted as risks and impacts arise.
- Addresses social risks and adverse impacts, and the proposed measures and actions to address these.
- Seeks to empower stakeholders, particularly marginalized groups, and enable the incorporation of all relevant views of affected people and other stakeholders into decision-making processes, such as project goals and design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.
- Documented and reported in accessible form to participants, in particular the measures taken to avoid or minimize risks to and adverse impacts on the project stakeholders.
- Consistent with States' duties and obligations under international law.

During the parent project and AF1, the consultations took place prior and during each payment cycle, as part of the facilitation and TPM, and all year round through the GM arrangements. This practice will be maintained under AF2. These consultations involve beneficiaries, authorities, local actors and other community members, as well as project workers. The outcomes of these consultations are presented in the TPM reports, SEP and WB donor narrative reports.

8.2 Information Disclosure

Information disclosure refers to the provision of timely, accessible information regarding the project and its potential social and environmental impacts to stakeholders in order to facilitate their meaningful, effective and informed participation in project design and implementation. Stakeholders require access to the project information in order to understand potential project-related opportunities and risks and to engage in design and implementation.

In addition to having access to general project information, stakeholders should have access to the relevant documentation concerning the project.. This information is to be disclosed in a timely manner, in an accessible

place, and in a form and language understandable to affected persons and other stakeholders. These elements of effective disclosure are briefly elaborated below:

- **Timely disclosure:** information on potential project-related social and environmental impacts and mitigation/management measures should be provided in advance of decision-making. ESS instruments must be disclosed in UNICEF's website and consulted on prior to implementation of activities that may give rise to potential adverse social and environmental impacts. All messages relevant to the ESS implementation, including on PSEA/GBV and GM, are embedded in the communication and outreach materials used to communicate with beneficiaries; and the training materials used for the training of project workers.
- **Accessible information:** Stakeholders need to be able to readily access information regarding assessments and management plans. Means of dissemination considered include posting on UNICEF website, community meetings, radio broadcasting, banners, SMS, social media and training sessions..
- **Appropriate form and language:** Information is disseminated in a form and language that is readily understandable and tailored to the target stakeholder group, taking into account different literacy levels. Local dialects (Mahari, Socotri) will be considered in addition to Arabic. The communication is done using a combination of written, audio and visual content to cater for different audiences and reach potentially marginalized and disadvantaged groups.; and specific channels for females are being strengthened (e.g. WhatsApp female groups, female only community meetings, focus group discussions with females)

The stakeholder engagement process is an excellent moment to solicit from stakeholders on the types of information they want and need and the most appropriate formats and languages and mechanisms for dissemination. For further detail on UNICEF's ESS stakeholder engagement and information disclosure requirements refer to the SEP.

8.3 ESPECRP Systems in Place for Stakeholder Engagement and Information Disclosure

A Stakeholder Engagement Plan (SEP) for the UCT component of the ESPECRP has been developed under the Parent project, and updated for AF1 and for AF2 building on the ECRP arrangements. The overall objective of the SEP is to define a plan of action for stakeholder engagement, including technically and culturally appropriate approaches to public consultation and information disclosure, throughout the entire project cycle. The SEP recognizes the importance of open and transparent engagement between the implementing agency and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful planning and implementation of the cash transfers to beneficiaries. Where properly planned and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks.

The SEP focuses on:

- Ensuring confidentiality and social protection to the disadvantaged and marginalized groups through the GM that provides an opportunity for affected people to highlight any concerns and seek an adequate response for any problems and concerns, confidentiality, and anonymously and effectively;
- Mainstreaming human rights, women's empowerment, full participation, transparency, information disclosure, and environmental sustainability in all the project's actions; and
- Maintaining robust, innovative and transparent MIS that reflect all activities and which are implemented in accordance with the project identification and proposal.

As reflected in the SEP, the Project established different channels for communication with beneficiaries and other stakeholders, through which people can raise concerns, provide feedback, or make complaints about

project activities. Consultation with beneficiaries, project workers and stakeholders happens continuously and with each payment cycle through community meetings, third-party monitoring surveys, post-distribution monitoring (including focus group discussions) and a functional GM working all year round.

9. GRIEVANCE MECHANISM

Throughout the life of the UCT programme, a person or group of people may perceive or experience potential harm, directly or indirectly due to the programme's activities. The grievances that may arise can be related to social issues such as eligibility criteria and entitlements, payment processes, non-receipt of cash and other social and cultural issues. Should such a situation arise, there must be a mechanism through which affected parties can resolve such issues in a cordial manner with the project personnel in an accessible, efficient, unbiased, transparent, timely and cost-effective manner. To achieve this objective, a Grievance Mechanism has been included in the ESMF for this project. This mechanism builds on the one established under the ECRP since the launching of the UCT component, and has been strengthened over the years. The last example under AF1, is the introduction of an interactive voice response (IVR) in the GM to address the issue of call center non-responsiveness during peak periods. IVR is an automated phone system that allows beneficiaries to access project related information via a pre-recorded voice response system without the need to speak to a live agent. The system ultimately enabled a higher response rate to grievance calls during payment cycle 5.

The Grievance Mechanism:

- a. provides a legitimate process that allows for trust to be built between stakeholder groups and assures stakeholders that their concerns will be assessed and addressed in a fair and transparent manner;
- b. allows simple and streamlined access to the Grievance Mechanism for all stakeholders and provide adequate assistance for those that may have faced barriers in the past can raise their concerns openly;
- c. provides clear and known procedures for each stage of the Grievance Mechanism process, and provides clarity on the types of outcomes available to individuals and groups;
- d. ensures equitable treatment to all concerned and aggrieved individuals and groups through a consistent, formal approach that is fair, informed and respectful to the raised concerns, complaints and/or grievances;
- e. provides a transparent approach, by keeping any aggrieved individual/group informed of the progress of their complaint, the information that was used when assessing their complaint and information about the mechanisms that will be used to address in a fair and consistent way; and
- f. enables continuous learning and improvements to the Grievance Mechanism. Through continued assessment, the learnings may reduce potential complaints and grievances.

The GM is gender- and age-inclusive and responsive and address potential access barriers to women, the elderly, the people with disabilities, youth and other potentially marginalized groups as appropriate to the Project. The GM doesnot impede access to judicial or administrative remedies as may be relevant or applicable and will be readily accessible to all stakeholders at no cost and without retribution.

Information about the Grievance Mechanism and how to make a complaint and/or grievance is embedded in the outreach/communication activities to beneficiaries and community members, and the training to project workers, undertaken in each payment cycle.

All complaints and/or grievances regarding social and environmental issues can be received through two main channels:

1. Through a toll-free call center (8003090) with trained call center agents (both females and males);
2. Face to face through field deployed personnel (both females and males) equipped with a mobile application for grievance collection which was developed with offline functionality to ensure beneficiaries and non-beneficiaries living in areas with limited network connectivity were still able to submit complaints or grievances.

All grievances collected through these two channels are registered in the Grievance module of the MIS within the appropriate grievance type, to ease the analysis and redressal. The following information is recorded:

- a. Description and location of inquiry, concern, complaint and/or grievance;
- b. Personal information of the complainant including name, location and contact number (optional)
- c. Analysis and actions taken in response;

- d. Information of the users filing and acting on the grievance/inquiry/feedback, as well as date and time when the action took place.

The GM will handle anonymous complaints, though the extent to which action can be taken to address them will depend on the information the caller is willing to provide. Where the complainant is not satisfied with the resolution, grievances can also be escalated to the UNICEF Yemen senior management, Regional Office or Headquarters.

The UCT Project's GM is now under the responsibility of SFD, with UNICEF maintaining the responsibility for the redressal of grievances of fraud and SEA. Any SEA related allegations are handled by the PSEA Focal Point of YCO. Once a SEA-related grievance is received by the Project, it is immediately referred to the PSEA Focal Point, who will conduct the analysis, information gathering and risk assessment, before reaching survivors with necessary assistance referral. At the same time, according to UNICEF's internal reporting Standard Operating Procedure (SOP), the allegation is reported to UNICEF's Office of Internal Audit and Investigation (OIAI) for their review and investigation (in the event that the alleged perpetrator is UNICEF staff) or technical support (in case alleged perpetrator has been engaged by other organizations or service providers).

10. MONITORING AND REPORTING OF ESMF IMPLEMENTATION

The ESMF and its procedures are to be reviewed under each new additional financing to reflect knowledge gained during the course of project delivery and to reflect new knowledge. These updates will take into account:

- (a) Learning from monitoring and implementation of ESF measures in previous payment cycles
- (b) Relevant changes to social and environmental conditions or generally accepted management practices; or
- (c) New or previously unidentified social and environmental risks are identified; or
- (d) Information from the project monitoring and surveillance methods indicate that current control measures require amendment to be effective; or
- (e) Changes to legislation that are relevant to the project; or
- (f) Requests made by a relevant regulatory authority.

Monitoring mechanisms:

UNICEF, SFD and World Bank will continuously monitor the progress of implementation of ESMF. Data will be gathered through different sources, including Third-Party Monitoring, Grievance Mechanism, Data Analysis processes, etc. Under AF2, a review of the current monitoring system will be conducted to identify opportunities to enhance monitoring of, and strengthen, environmental and social safeguard elements.

- UNICEF contracts an independent Third-Party Monitoring Organisation (TPMO). The TPMO is expected to provide an independent perspective and extend the reach of UNICEF during the project implementation to monitor compliance with the project's design, standards and parameters, including on the ESMF implementation, throughout the UCT Component cycle. The TPMO is contracted for each payment cycle and during the contract period, provides monthly reports and end of cycle reports to UNICEF. During the cash disbursement period, the TPMO also reports daily on the main highlights arising during their field visits, including issues requiring immediate corrective action, and which feed into the broad monitoring mechanism put in place for the UCT program. This has proved to be an effective practice to support timely adjustments that enhance the quality of service delivery. Reporting templates/checklists incorporate social and environmental risk monitoring, including monitoring implementation of agreed management measures and will be revised under AF2 where needed to strengthen the monitoring of ESF measures.

- UNICEF will continue to conduct programmatic visits and other field monitoring visits to monitor the compliance with the safeguarding measures. UNICEF will maintain and keep all administrative and social and environmental records including grievances and inquiries (recorded in the Project's Management Information System – MIS – managed by UNICEF) as well as significant incidents and records of any measures taken to mitigate the cause of the complaints or significant incidents. The MIS provides an important mechanism to track information on environmental and social safeguard implementation, notably with regards to the payment data (e.g., records on number of payments done to home outreach beneficiaries) and the provision of a platform for GM that keeps track of all grievances and inquiries submitted for the Project, as well as of the actions taken, and their status (open, closed, under review).
- SFD as implementing partner and the service provider organisations will continue to assign at least one Safeguard Focal Point at central level who will be responsible for monitoring and reporting on compliance with all safeguards measures, including the establishing of a daily monitoring and reporting mechanism at field level which can enable the activation of immediate measures. This Safeguard Focal Point will liaise directly with UNICEF and where applicable SFD.

Reporting:

UNICEF will maintain and further strengthen the monitoring of ESF related activities and regularly report to the World Bank through the donor narrative reports (submitted every 6 months); bi-annual supervision missions; and incident reports as they arise. Third-Party Monitoring reports will be shared with the World Bank.

UNICEF, SFD and WB will leverage the bi-annual supervision missions and any other opportunities as they arise, to discuss challenges linked to the ESF implementation and explore ways to further strengthen ESF measures.

12. UPDATE OF IMPLEMENTATION AND KEY LESSONS

The safeguarding measures identified under the Parent Project and AF1 were implemented and found suitable to mitigate risks. There was however a need to further strengthen the measures related to road safety, and the use of helmet was made mandatory for all staff using motorcycles. An assessment of the road conditions is also being done by SFD prior to staff movement to decide on the best vehicle to be used.

Stakeholder engagement remained a critical element of the Project, implemented through the existing facilitation and outreach arrangements reaching every location in Yemen during the payment cycles, a GM functional throughout the year with a call center operating from 8am to 9am (with over 90 per cent of grievances under Parent Project and AF1 closed) and monitoring arrangements before, during and after payment. Despite the continuous efforts to raise awareness on the GM, stakeholder awareness of the GM is still beyond the desired levels among UCT households largely due to the low literacy levels of these households. UNICEF and SFD will continue to invest in new ways to raise this awareness.

Training on safeguarding is embedded in the overall training package of service providers which is delivered prior to each payment cycle, and ESS focal points are trained on incident reporting. The establishment of a Safeguarding Unit within the UNICEF Yemen Country Office has enabled a further strengthening of the capacity building element, moving beyond the Project personnel to also cover other key stakeholders such as SWF.

13. DISCLOSURE

All safeguard instruments are disclosed in English and Arabic in country (UNICEF website) and WB website.

Annex 1. Yemen ESPECRP Revised SES Screening

Project Information	
1. Project Title	Emergency Social Protection Enhancement and COVID-19 Response Project (ESPECRP)
2. Project Number	P173582
3. Location (Global/Region/Country)	Sana'a, Republic of Yemen

Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability

QUESTION 1: How Does the Project Integrate the Overarching Principles in order to Strengthen Social and Environmental Sustainability?

Briefly describe in the space below how the Project mainstreams the human-rights based approach

The project upholds the principles of accountability and the rule of law, participation and inclusion, and equality and non-discrimination based on gender, age, religion, political views or affiliation to parties to the current conflict, social or geographical origin, birth or other status. UNICEF will also ensure the meaningful, effective and informed participation of stakeholders in the formulation, implementation, monitoring and evaluation of the UCT component of the ESPECRP. The UCT program also establishes a dedicated grievance mechanism and capacity to ensure that the duty-bearers are accountable to the rights-holders for the actions undertaken in the course of the project.

Briefly describe in the space below how the Project is likely to improve gender equality and women's empowerment

The project recognizes that amid the current crisis in Yemen, women are adversely affected and at the same time asked to take on new and additional roles as heads of households or income-earners. During the UCT program implementation, UNICEF and SFD will deploy the needed resources to ensure that the female beneficiaries feel safe and protected when receiving their cash assistance, all project female workers are treated equally, and that the GBV/SEAH Risk Mitigation Action Plan is fully implemented. UNICEF will put in place the required contractual requirements to ensure that female project workers are recruited by contractors and sub contractors both to provide work opportunities to women from local communities (considering the culturally accepted tasks, jobs and schedules) and to create an enabling environment for female beneficiaries to meaningfully participate in the programme (e.g., outreach activities, focus group discussions, etc.)".

Briefly describe in the space below how the Project mainstreams environmental sustainability

An Environmental and Social Management Framework, Labor Management Plan, Stakeholder Management Plan and Environmental and Social Commitment Plan (ESCP) is prepared for this project. This will ensure that social and environmental sustainability standards are applied to help mitigate potentially high adverse social impacts in the implementation of the UCT program, which UNICEF will also closely monitor through Third Party Monitoring and other monitoring mechanisms.

Part B. Identifying and Managing Social and Environmental Risks

QUESTION 2: What are the Potential Social and Environmental Risks?	QUESTION 3: What is the level of significance of the potential social and environmental risks?			QUESTION 6: What social and environmental assessment and management measures have been conducted and/or are required to address potential risks (for Risks with Moderate and High Significance)?
<i>Risk Description</i>	<i>Impact and Probability (1-5)</i>	<i>Significance (Low, Moderate, High)</i>	<i>Comments</i>	<i>Description of assessment and management measures as reflected in the Project design. If ESIA or SESA is required note that the assessment should consider all potential impacts and risks.</i>
<p>There is a risk associated with the ongoing conflict which may impose threat of physical violence for individuals involved in the implementation of the UCT component</p>	<p>I = 3 P = 4</p>	<p>Moderate</p>		<p>There are security risks associated with the ongoing conflict which remain relevant under the proposed program. The greatest security risks in many locations are the threat of physical violence for individuals involved in the implementation of the UCT Component such as payment agents, beneficiaries contractors and their workers, potential damage to property of implementing agencies and contractors, and the risk of forced expropriation of CT funds from beneficiaries and payment agents. This includes road safety risks during the distribution of the cash transfer or community outreach activities, such as the potential of landmines.</p> <hr/> <p>Measures that are being undertaken include implementation of a mechanism to identify security threats and to communicate changes in threat levels to the various parties involved in the project implementation; established communication and facilitation arrangements to secure the support of all relevant political and community actors at the national, governorate, and local levels to promote safe and politically neutral implementation of the UCT Component; suspending the activities in areas where political and governance risks cannot be effectively managed and establishing payment sites in alternative neighbouring locations safely accessible to beneficiaries; in areas with active conflict, using outreach payment sites whose mobility enables to ensure that the cash process takes place only when and where it can be delivered in a safe manner, possibly with convoys; in areas impacted by landmines, (1) ensuring updated and real-time mapping of roads and potentially affected areas, (2) ensuring that all project workers are duly trained on the security measures to be implemented by outreach</p>

				(mobile) payment teams working in conflict affected areas, with a focus on mine risk education, (3) ensuring continual coordination between the Facilitation and payment service providers at field level; applying a protocol to temporarily close payment sites in a coordinated manner in case of security threats; established clear implementation arrangements which emphasize the independence of decision making by any political and/or public-sector entity.
The Project may potentially create social tensions	I= 1 P=2	Low		<p>The UCT Component delivers cash transfers using the pre-conflict SWF beneficiary list generated based on categorical targeting and proxy-means test (PMT), without enrolment of new recipients. With the increasing deterioration of the socio-economic situation in the country, many may feel unfairly excluded; therefore, tensions between the Social Welfare Fund “SWF” beneficiaries and SWF non-beneficiaries may arise.</p> <p>The project is implementing a series of measures to mitigate these social risks, including establishing communication and facilitation arrangements to secure the support of all relevant political and community actors at the national, governorate, and local levels to promote safe and politically neutral implementation of the program; implementing focused outreach activities to disseminate information about the timing and location of the payment delivery to beneficiaries by facilitators; clearly articulate and widely communicate the UCT Component goals and objectives including targeting criteria and that the cash transfer represents a resumption of an existing transfer scheme rather than a new transfer and hence no new names to be added to reduce any false expectations of SWF beneficiaries and non-beneficiaries; ensuring the availability of a functional Grievance Redressal Mechanism that can be accessible for free by both program beneficiaries and non-beneficiaries.</p>
Exclusion of vulnerable beneficiaries	I=3 P=2	Moderate		<p>Vulnerable groups of beneficiaries with access constraints to payment sites derived from physical impediments or sociocultural barriers, can be excluded from the UCT Component benefit. Additionally, as the program requires that beneficiaries present a program accepted ID to go through the process of verification of identity and payment, those without IDs may be excluded from the program.</p> <p>The Project is currently implementing a series of measures to mitigate these exclusion risks, including ensuring the availability of payment services through the home outreach modality, and clearly communicating about the existence of this service, eligibility criteria, and channel to place a request to benefit from this service; establishing a protocol to ensure provision of priority services to pregnant</p>

				women, elderly and people with disabilities who collect at a payment site, a community-based mechanism to support beneficiaries in obtaining a program accepted ID, free of cost. This mechanism leverages on the administrative roles allocated to officially designated community leaders as per the existing Yemeni law (“Amin” or “Aqil” as mentioned hereunder).
Gender discrimination and SEA risks	I = 2 P = 3	Moderate		<p>Cultural constraints in some governorates make it difficult for many women to go to sites to collect their benefits, which leads to many of them assigning someone else to collect, which can create an opportunity for fraud and/or collective payment. While many of the systems in place to select beneficiaries and distribute benefits are automated or otherwise quite structured, activities that involve a differential of power between program staff and vulnerable women/girl beneficiaries do pose a risk of SEA.</p> <p>The Project is currently implementing a series of measures to mitigate this risk, which include strengthening the direct communication with female beneficiaries, by establishing female networks to facilitate the dissemination of information about program to females; requiring the presence of at least a female cashier or female cashier assistance at each payment site; screening officers, including female are engaged at payment sites to support in crowd management; in more conservative areas, establishing female-only payment sites operated by female payment staff; gender-sensitive third-party monitoring arrangements, including female focus group discussions to provide more insight into the context and nature of these potential risks; ensuring availability of a functional grievance redressal mechanism which can be used as reporting channel; conducting staff training on gender and SEA/SH and GBV.</p>
Risks associated with transmission of communicable diseases, including COVID_19, cholera and other communicable diseases	I = 3 P = 5	High		Learning from the COVID-19 pandemic and cholera which has heavily impacted Yemen, the Project is currently implementing a series of measures to mitigate any further outbreak of communicable diseases. These include: messaging with preventative measures (key hygiene messages, social distancing...) disseminated through all communication channels; scheduling, token systems, and other crowd management systems; provision of hand-sanitizer or handwashing facilities at all payment sites; use of face coverings; and explore alternatives for the provision of payment services as needed.
Risks associated with using child labor	I = 2 P = 2	Low		This risk is being mitigated by contractual requirements on prevention of child labour, minimum age and age verification protocol for each implementing entities. These measures will continue to be applied to the proposed program. Code of Conducts with a specific clause on the fight against child labor are signed by all

				project workers, including the subcontracted ones. Awareness raising on this topic is also delivered.
Risks associated with natural disasters	I = 3 P = 3	Moderate		<p>Strong heat waves are affecting different areas of the country, which is also prone to natural disasters such as heavy rains, floods and cyclones. These affect populations and result in possible health and safety risks for beneficiaries waiting at payment sites, or even access barriers preventing them from reaching these payment sites, but also for project workers.</p> <p>The Project is currently implementing a series of measures to mitigate these risks. These measures include: diligently monitoring the weather conditions and developing response plans to ensure the safety of beneficiaries and payment staff; request payment agencies to ensure that payment sites have appropriate shading at waiting areas; adapting working hours at sites to avoid payment during times of high temperatures and increased capacity at sites to reduce waiting time for beneficiaries. Occurrence of floods: strengthened facilitation efforts to identify alternative payment locations which can be safely accessed by beneficiaries; deployment of outreach payment teams to serve the affected beneficiaries.</p>

QUESTION 4: What is the overall Project risk categorization?

Select one		Comments
<i>Low Risk</i>	<input type="checkbox"/>	
<i>Moderate Risk</i>	<input type="checkbox"/>	
<i>High Risk</i>	<input checked="" type="checkbox"/>	

QUESTION 5: Based on the identified risks and risk categorization, what requirements of the SES are relevant?

Check all that apply		Comments
<i>Principle 1: Leave No One Behind</i>	<input checked="" type="checkbox"/>	
<i>Principle 2: Human Rights Approach, Gender Equality and Women's Empowerment</i>	<input checked="" type="checkbox"/>	

Principle 3: Sustainability and Resilience	X	
Principle 4: Accountability	X	
Standard 1: Labor and Working Conditions	X	
Standard 2: Resource Efficiency and Pollution Prevention		
Standard 3: Community Health, Safety, and Security	X	
Standard 4: Land Acquisition/Displacement and Involuntary Resettlement		
Standard 5: Biodiversity, Conservation and Sustainable Natural Resource Management		
Standard 6: Indigenous People		
Standard 7: Cultural Heritage		
Standard 8: Climate Change and Disaster Risks		X

Annex 3. Stakeholder Engagement Plan

(attached separately)

Annex 4. Environmental and Social Commitment Plan

(attached separately)

Annex 5. GBV Assessment and Action Plan

(attached separately)

Annex 6. Comparison of ESS2 requirements and requirements under the Yemeni Labour Code Law 95/05

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
A. Working Conditions and Management of Worker Relationships (Section A of ESS2)		
Terms and Conditions of Employment		
<p><i>Paragraph 10</i></p> <p>Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.</p> <p>The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of this ESS.</p> <p>This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.</p>	<p><i>Article 30</i></p> <p>A written individual contract of employment shall be drawn up in three copies, the original being given to the worker, a copy to the employer and a copy to the competent office of the Ministry. All copies shall be signed by both parties. In the absence of a written contract, it shall be up to the worker to establish his rights by any admissible evidence.</p> <p>A contract of employment shall basically specify the amount of remuneration, the type of work, the place of work and the date of commencement and duration of employment.</p> <p>Yemeni Law does not include any equivalent provision</p>	<p>The Yemeni Labour Code fulfils ESS2 requirements</p> <p>The Yemeni Labour Code fulfils ESS2 requirements</p> <p>In addition to the requirements of Article 30 of the Labour Code, The UNICEF will ensure that the requirement under Paragraph 30 of ESS2 are met if there is any material change to the terms or conditions of employment</p>

¹⁶ All quotes are verbatim from ILO's NATLEX translation of the 1995 Labour Code. <http://arablegislation.smarthostonline.com/Lists/Asset/Attachments/4656/Labour%20Code%20Yemen.pdf>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p><i>Paragraph 11</i></p> <p>Project workers will be paid on a regular basis as required by national law and labor management procedures.</p>	<p><i>Article 55</i></p> <ul style="list-style-type: none"> • The minimum wage payable to a worker shall not be less than the minimum wage paid by the state administration. • The average daily minimum wage of a worker remunerated on the basis of production piece rates shall not be less than the daily minimum wage specified for the occupation or industry concerned. The daily wages of workers not paid on a monthly, weekly or daily basis shall be calculated on the basis of the average wages earned by their counterparts for days effectively worked for the same employer over the past year or during their period of service if less than one year. <p><i>Article 56</i></p> <p>Wages for overtime work shall be calculated according to the following rates:</p> <ul style="list-style-type: none"> • one-and-a-half hours' basic wages per hour of overtime on normal working days; • two hours' basic wages per hour of overtime at night, on the day of weekly rest, and on official holidays and leave, in addition to entitlement to standard wages for such holidays. <p><i>Article 57</i></p> <ul style="list-style-type: none"> • A worker performing night work shall be entitled to an allowance equivalent to 15 per cent of his basic wages, in addition to his entitlement for normal working hours. • A worker performing shift work, shall be entitled to an allowance equivalent to 10 per cent of his basic 	<p>The Yemeni Labour Code fulfils ESS2 requirements</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<p>wages, in addition to his entitlement for normal working hours.</p> <ul style="list-style-type: none"> • A worker shall be entitled to a night work allowance or a shift work allowance if he works on either basis for a period exceeding ten consecutive or non-consecutive days in a month. It shall be forbidden to combine a night work allowance with a shift work allowance. <p><i>Article 58</i> A worker shall be paid his basic wages if he joins a training or rehabilitation course approved by his employer, whether inside the Republic or abroad.</p> <p><i>Article 59</i> Subject to the provisions of articles 99 and 100 of this Code, a worker shall be entitled to his full wages for any period spent in detention because of a work-related case, provided that the amount paid to him during such period of detention is not less than 50 per cent of his basic wages, the balance of his full wages being paid to him after his innocence is established. The employer may recover the amount paid during the period of detention if the worker is convicted under a final judgement.</p> <p><i>Article 60</i> A worker employed on the basis of monthly wages may not be transferred without his consent to a category of workers whose wages are calculated on a weekly, daily or hourly basis or on the basis of production or piece rates.</p>	

Article 61

Wages and other entitlements due to workers shall be paid in legal currency, on a working day and at the workplace:

- once a month in respect of workers remunerated on a monthly basis, to be paid not later than the sixth day of the following month;
- once every fortnight in respect of workers remunerated on a fortnightly basis, to be paid not later than the third day after the end of every fortnight.
- at least once a week in respect of workers whose remuneration is calculated on an hourly, daily or weekly basis,
- as agreed between the two parties in respect of workers remunerated on the basis of production or piece rates.

Article 62

Employers shall not in any way restrict the freedom of their workers to dispose of their remuneration or oblige their workers to purchase goods produced by them nor to buy goods from specified sources.

Article 65

Wages shall be paid on the day following the termination of the contract. If a worker leaves the service at his own initiative, his wages shall be paid to him within six days of the date of his leaving the service.

Article 66

- Employers shall make out the necessary documents for payment of wages, wherein they shall record the details concerning the workers' wages, any deductions effected, and the net wages

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<p>paid. These documents shall not contain any blanks, deletions or additions.</p> <ul style="list-style-type: none"> Employers shall be deemed to have discharged their obligation to pay a worker's wages only after the worker has signed or finger-printed the document showing his wage entitlements and annexes thereto, whether or not these are mentioned in the signed documents. <p><i>Article 67</i></p> <ul style="list-style-type: none"> Women shall be entitled to wages equal to those of men if they perform the same work under the same conditions and specifications. Employers shall pay equal wages to Yemenis and non-Yemenis if their working conditions, qualifications, experience and competence are equal. <p><i>Article 68</i></p> <p>Where a worker is sent to perform a specific task in an area which is remote from his workplace, whether inside the Republic or abroad, he shall be entitled to receive allowances according to the nature of his task and related to his representation, travel or residence as the case may be. The Council of Ministers shall, acting on a submission by the Minister and a Recommendation from the Labour Council, make special regulations governing allowances.</p> <p><i>Article 69</i></p> <p>Every employer shall provide his workers with means of transportation from their place of residence or a specified assembly point to their workplace or pay them an allowance for that purpose.</p>	

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<p><i>Article 70</i></p> <p>Employers shall in accordance with standards to be specified by order of the Minister, provide their workers with adequate housing and food if they work in places remote from inhabited areas.</p>	
<p>Deductions from payment of wages will only be made as allowed by national law or the labor management procedures, and project workers will be informed of the conditions under which such deductions will be made.</p>	<p><i>Article 63</i></p> <p>It shall be forbidden to withhold the wages due to a worker in accordance to this Code, except by a final judicial decision, unless the employer and the worker have agreed otherwise.</p> <p><i>Article 64</i></p> <p>Subject to provisions of article 99, the monthly instalments paid by a worker as compensation for such damage or material loss as he may have caused his employer by reason of a shortcoming or negligence shall not exceed 25 per cent of his basic wages.</p>	<p>The Yemeni Labour Code fulfils ESS2 requirements</p>
<p>Project workers will be provided with adequate periods of rest per week, annual holiday and sick, maternity and family leave, as required by national law and labor management procedures.</p>	<p>Working Hours</p> <p><i>Article 71</i></p> <ul style="list-style-type: none"> • Official working hours shall not exceed eight hours per day or 48 hours per week. Weekly hours of work shall be distributed over six working days followed by one day of rest with full pay. • Official working hours during the month of Ramadhan shall not exceed six hours per day or 36 hours per week. • Official working hours in respect of certain occupations, jobs and industries where working conditions are arduous or harmful to health may be reduced by order of the Minister. Such order shall specify the said occupations and jobs and the 	<p>The Yemeni Labour Code fulfils ESS2 requirements</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
	<p>reduced hours, after consultation with the parties concerned including the representatives of the workers and employers.</p> <ul style="list-style-type: none"> • Official working hours shall be broken by one or more periods not exceeding one hour to be devoted to rest, including prayers and meals. Such period(s) of rest shall be so determined as to ensure that any continuous period of work does not exceed five hours. Such period(s) shall not be counted as working time. Where a worker reports for work at the specified time and is ready to start working but cannot do so for reasons attributable to the employer, he shall be considered to have effectively performed his work. <p><i>Article 73</i></p> <ul style="list-style-type: none"> • Work shall be considered night work if it is performed between 8 p.m. and 5 a.m. No worker shall be continuously assigned to night work for more than one month. • Night work shall include hours of day-time work that overlap with night hours at the end of the day for at least half an hour. <p><i>Article 74</i></p> <ul style="list-style-type: none"> • Workers may be employed during periods of daily rest, on days of weekly rest and on official holidays if necessary, to increase production or to provide public services and in the event of a disaster or to prevent a disaster, or to maintain work-related or industrial equipment or in the public interest. • Working hours, whether normal or overtime shall not exceed 12 hours per day. 	

Article 75

- Subject to the provisions of article 56 of this Code, any worker employed over time shall regardless of his occupation, be entitled to compensatory rest periods with pay calculated on the basis of the following rates:
 - one-and-a-half times for overtime on normal working days;
 - double time for overtime night work.
- Employers shall grant workers the prescribed compensation for the day of weekly rest and official holidays and leave within a period not exceeding one month.

Article 76

Employers shall post at the worker's main entrance to the workplace and in a visible place inside the workplace a table showing weekly closing times, working hours and periods of rest and leave.

Article 77

Friday shall be the day of weekly rest. However, this day may be exchanged for another day of the week for all or some workers if work so requires.

Leave

Article 78

Workers shall be entitled to leave with full pay on all official holidays in accordance with the laws in force.

Article 79

- Workers shall be entitled to leave of not less than 30 days with full pay for each year of effective service, to be calculated on the basis of at least two-and- a-half days for each month.

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<ul style="list-style-type: none"> • Official holidays and days off falling within a worker's period of leave shall not be counted as part of his annual leave. • Leave granted to a worker from his annual leave entitlement shall not be less than two days at a time. • Employers shall grant workers the leave they are entitled to annually. However, an employer may, for reasons related to the interests of both parties, carry over half a worker's leave entitlement to the following year. • Any more favourable conditions concerning worker's leave entitlements and rates shall continue in force. • No worker shall waive his annual leave in consideration of financial compensation. • Rates of entitlement to leave may, by order of the Minister, be increased for certain occupations and categories of workers. <p>Sick Leave</p> <p><i>Article 80</i></p> <ul style="list-style-type: none"> • In case of sickness, workers shall be entitled to continuous or non-continuous sick leave on the following basis: <ul style="list-style-type: none"> ○ sick leave with full pay for the first and second months of sickness; ○ sick leave with 85 per cent of wages for the third and fourth months of sickness; ○ sick leave with 75 per cent of wages for the fifth and sixth months of sickness; ○ sick leave with 50 per cent of wages for the seventh and eighth months of sickness. 	

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<ul style="list-style-type: none"> • A worker may, in addition to his sick leave entitlement, use up the balance of his annual leave entitlement. If he exhausts both he shall be granted leave without pay until he recovers or the competent authorities establish that he is no longer medically fit for work. • Any period a worker spends in hospital for treatment shall be considered as sick leave. <p><i>Article 81</i></p> <ul style="list-style-type: none"> • Sick leave shall be granted on the following conditions: <ul style="list-style-type: none"> ○ if, in cases of ordinary sickness, it is certified by the doctor appointed by the employer to treat his workers or by the medical institution with which the employer has concluded an agreement for that purpose; ○ if, where the employer has not appointed a doctor or medical institution to treat his workers, it is certified by a medical establishment in the Republic; ○ if it is certified by an emergency clinic at any place or by other hospitals in the area where the worker is taken to or where he spends his annual leave. • Where a worker's sick leave is certified by a private medical practice or institution, the employer may request its confirmation by the competent medical authorities. 	

Article 82

- An employer may approve a worker's sick leave and not deduct it from his annual leave if the worker falls sick during his leave;
- Annual leave interrupted by sick leave approved in accordance with the provisions of the previous paragraph shall resume thereafter.
- The employer may request a medical authority or his appointed doctor to certify such sick leave if it exceeds ten days.

Article 83

- A worker who contracts an occupational disease or sustains an injury during the performance of his work or as a result thereof shall be entitled to sick leave with full pay on a recommendation by the competent medical committee pending the examination of his condition in accordance with the Social Insurance Act.
- The competent Minister shall, in consultation with the parties concerned and with the representatives of workers and employers, make an order to establish the competent medical committees and specify their functions and place of work.

Leave with or without pay

Article 84

Workers who have spent four years of effective service with an employer shall have the right to 20 days' leave with pay to perform the Hadj, including the Id Al Adha holiday. This leave shall be granted once during the service of a worker. Employers shall have the right to ensure that such leave is used for its intended purpose.

Article 85

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<p>Employers may grant workers contingency leave with pay for not more than ten days a year.</p> <p><i>Article 86</i></p> <p>An employer may, upon a worker's request grant him leave without pay for such reasons and in such circumstances as he deems fit.</p> <p><i>Article 87</i></p> <p>A working woman shall be entitled to leave with pay for 40 days if her husband dies. Such leave shall be counted as from the date of death. She may also be granted leave without pay for not more than 90 days to complete the period of "Idda" (a period of time during which a Moslem woman should be in mourning after the death of her husband).</p> <p><i>Article 88</i></p> <p>No worker shall engage in a paid employment during any of his paid leave as provided for by this Code. If it is established that a worker worked during his paid leave, his employer may claim reimbursement of the worker's pay for the said leave, provided that this does not lead to termination of employment.</p>	
<p><i>Paragraph 12</i></p> <p>Where required by national law or the labor management procedures, project workers will receive written notice of termination of employment and details of severance payments in a timely manner.</p> <p>All wages that have been earned, social security benefits, pension contributions and any other</p>	<p><i>Article 38</i></p> <p>If a contract is terminated by one of the parties thereto in accordance with article 36, the party wishing to terminate the contract shall give the other party prior notice of termination equivalent to the period prescribed for the payment of wages or pay the wage for such period in full in lieu of notice.</p> <p><i>Article 39</i></p>	<p>The Yemeni Labour Code fulfils ESS2 requirements</p> <p>The Yemeni Labour Code fulfils ESS2 requirements</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p>entitlements will be paid on or before termination of the working relationship, either directly to the benefit of the project workers.</p> <p>Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments.</p>	<p>Should the employer rescind the contract of employment arbitrarily or if the contract is terminated in accordance with the provisions of paragraph (2) of article 35, the worker shall, in addition to his entitlement to wages, for the period of notice and any other entitlements provided for in this Code and the labour legislation giving effect to it, be entitled to special compensation for damages sustained as a result of termination. In all cases, the amount of such compensation shall be determined by the competent Arbitration Committee, subject to a ceiling of six months' wages.</p> <p><i>Article 40</i></p> <p>Should the contract of employment be terminated by the expiry of its specified term while negotiations are being conducted to renew or extend it, the contract shall continue to be valid during such negotiations for a maximum period of three months. If within the said period, the negotiations fail to produce results securing continuity of the contract, the contract shall be considered terminated.</p>	<p>There is no Yemeni equivalent to this requirement.</p>
<p>Non-discrimination and Equal Opportunity</p>		
<p>Paragraph 13</p> <p>Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will</p>	<p>Article 42</p> <p>Women shall be equal with men in relation to all conditions of employment and employment rights, duties and relationships, without any discrimination. Women shall also be equal with men in employment,</p>	<p>The Yemeni Labour Code fulfils ESS2 requirements</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p>be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</p> <p>The labor management procedures will set out measures to prevent and address harassment, intimidation and/or exploitation. Where national law is inconsistent with this paragraph, the project will seek to carry out project activities in a manner that is consistent with the requirements of this paragraph to the extent possible.</p>	<p>promotion, wages, training and rehabilitation and social insurance. The requirements of job or occupational specifications shall not be considered as discrimination.</p> <p>Yemeni Law does not include any provision</p>	<p>UNICEF will require all workers to sign a Code of Conduct as per Annex 1</p>
<p><i>Paragraph 14</i></p> <p>Special measures of protection and assistance to remedy discrimination or selection for a particular job based on the inherent requirements of the job or the objectives of the project will not be deemed as discrimination, provided they are consistent with national law.</p>	<p>Yemeni Law does not include any provision</p>	<p>UNICEF will apply the ESS2 requirement</p>
<p><i>Paragraph 15</i></p> <p>The Borrower will provide appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as women, people with disabilities, migrant workers and children (of working age in accordance with this ESS). Such measures may be necessary only for specific periods of time,</p>	<p><i>Article 43</i></p> <ul style="list-style-type: none"> • Women's working time shall be five hours a day as from their sixth month pregnancy and, if breast-feeding, until the end of the sixth month after childbirth. Such working time may be further reduced for health reasons on the basis of a certified medical report. 	<p>The Yemeni Labour Code fulfils ESS2 requirements</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
<p>depending on the circumstances of the project worker and the nature of the vulnerability.</p>	<ul style="list-style-type: none"> • The working time of women breast-feeding their children shall be reckoned from the day following the end of maternity leave to the end of the sixth month after the birth of the child. <p><i>Article 44</i></p> <p>It shall be forbidden to assign a woman to overtime work as from the sixth month of her pregnancy and during the first six months following her return to work after maternity leave.</p> <p><i>Article 45 (amended by Law 2008/15) ¹⁷</i></p> <ul style="list-style-type: none"> • A pregnant worker shall have the right to maternity leave with full pay for 70 days. • A pregnant woman shall not, under any circumstances, be employed during her maternity leave. • The pregnant working woman shall be granted a further 20 days leave, in addition to the days mentioned above, in the following cases: <ul style="list-style-type: none"> ◦ If her labor (delivery) was difficult, as certified by a medical certificate ◦ If she gives birth to twins • The working woman shall never be dismissed from her job during her maternity leave" <p><i>Article 46</i></p> <ul style="list-style-type: none"> • It shall be prohibited to employ women in industries and occupations which are hazardous, arduous or harmful to their health or social standing. The occupations prohibited under this paragraph shall be specified by order of the Minister. 	

¹⁷ From the ILO NATLEX database: https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=93409

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	<ul style="list-style-type: none"> It shall be forbidden to employ women at night, except during the month of Ramadhan and in the jobs which shall be specified by order of the Minister. <p><i>Article 47</i> An employer who employs women shall post in a visible place at the workplace the regulations governing the employment of women.</p>	
Worker's Organizations		
<p><i>Paragraph 16</i></p> <p>In countries where national law recognizes workers' rights to form and to join workers' organizations of their choosing and to bargain collectively without interference, the project will be implemented in accordance with national law. In such circumstances, the role of legally established workers' organizations and legitimate workers' representatives will be respected, and they will be provided with information needed for meaningful negotiation in a timely manner.</p> <p>Where national law restricts workers' organizations, the project will not restrict project workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The Borrower should not seek to influence or control these alternative mechanisms.</p> <p>The Borrower will not discriminate or retaliate against project workers who participate, or seek to participate, in such workers' organizations and collective bargaining or alternative mechanisms.</p>	<p><i>Article 151</i></p> <ul style="list-style-type: none"> Workers and employers shall have the right freely to establish and join organizations with the aim of protecting their interests, defending their rights and representing them on bodies, councils and meetings and in all matters concerning them. Trade unions and employers' organizations shall have the right to carry on their activity in total freedom, without any interference in their affairs or outside influences. <p>Not relevant given article 151</p> <p><i>Article 152</i> Subject to the provisions of article 35 of this Code, workers' representatives on a trade union committee shall not be dismissed or otherwise disciplined for</p>	<p>The Yemeni Labour Code fulfils ESS2 requirements</p> <p>The Yemeni Labour Code fulfils ESS2 requirements</p>

ESS2 Requirements (Direct quote from ESS2)	Yemени Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
	carrying out their trade union activities in accordance with this Code, the Trade Unions Act and the rules and regulations made thereunder.	
B. Protecting the Work Force		
Child Labor and Minimum Age		
<p><i>Paragraph 17</i></p> <p>A child under the minimum age established in accordance with this paragraph will not be employed or engaged in connection with the project. The labor management procedures will specify the minimum age for employment or engagement in connection with the project, which will be the age of 14 unless national law specifies a higher age.</p>	<p><i>Article 2</i></p> <p>"young person": any male or female person under 15 years of age;</p>	<p>The Project will not employ anyone under the age of 18.</p> <ul style="list-style-type: none"> • UNICEF will require all contractors and consultants to verify official documentation for all workers involved in their respective activities, such as a birth certificate, national identification card, passport, or medical or school record. • If a child under 18 is discovered working on the Project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.
<p><i>Paragraph 18</i></p> <p>A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions:</p> <p>(a) the work does not fall within paragraph 19 below;</p> <p>(b) an appropriate risk assessment is conducted prior to the work commencing; and (c) the</p>	<p><i>Article 51</i></p> <p>Employers employing young persons shall:</p> <ul style="list-style-type: none"> • keep a record of young persons and their social and occupational status indicating their names, age, name of guardian, date of entry into service, place of residence and any other information prescribed by the Ministry; • have them undergo a preliminary medical examination and regular examinations whenever 	<p>The Project will not employ anyone under the age of 18.</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p>Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of this ESS.</p>	<p>necessary to ensure their medical fitness and keep a medical record for each young person containing all the information related to their medical history;</p>	
<p><i>Paragraph 19</i></p> <p>A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.</p>	<p><i>Article 48</i></p> <ul style="list-style-type: none"> • It shall be forbidden to employ a young person for more than seven hours per day or 42 hours per week. Weekly hours of work shall be distributed over six working days followed by one day of rest with full pay. • Daily hours of work shall be broken by a period of rest of not less than one hour. A young person shall not work continuously for more than four hours. • It shall be forbidden to make a young person work overtime or at night except in those jobs to be specified by order of the Minister. • The hours a young person spends in training during his daily hours of work shall be considered as official working time. • It shall be prohibited to make a young person work during his weekly periods of rest, official holidays and other leave. 	<p>The Project will not employ anyone under the age of 18.</p>
<p>Forced Labor</p>		
<p><i>Paragraph 20</i></p> <p>Forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty, will not be used in connection with the project. This prohibition covers any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. No trafficked</p>	<p>Yemeni Law does not include any provision</p>	<p>UNICEF will ban all forms of forced labour under the Project</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
persons will be employed in connection with the project.		
C. Grievance Mechanism		
<p><i>Paragraph 21</i></p> <p>A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements
<p><i>Paragraph 22</i></p> <p>The grievance mechanism will be proportionate to the nature and scale and the potential risks and impacts of the project. It will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner. The grievance mechanism may utilize existing grievance mechanisms, providing that they are properly designed and implemented, address concerns promptly, and are readily accessible to such project workers. Existing grievance mechanisms may be supplemented as needed with project-specific arrangements.</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
<p><i>Paragraph 23</i></p> <p>The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</p>	<p>Yemeni Law does not include any provision</p>	
D. Occupational Health and Safety (OHS)		
<p><i>Paragraph 24</i></p> <p>Measures relating to occupational health and safety will be applied to the project. The OHS measures will include the requirements of this Section, and will take into account the General EHSGs and, as appropriate, the industry specific EHSGs and other GIIP. The OHS measures applying to the project will be set out in the legal agreement and the ESCP</p>	<p><i>Article 113</i></p> <p>An employer who commissions any new enterprise shall ensure that it meets occupational safety and health requirements. The competent Ministry shall ensure compliance with appropriate occupational safety and health requirements and conditions.</p> <p><i>Article 114</i></p> <p>Employers shall observe the following rules:</p> <ul style="list-style-type: none"> • Workplace health and safety conditions shall be maintained in conformity with occupational safety and health requirements. • Workplaces shall be properly ventilated and adequately lighted during working hours in accordance with the standards established by the authorities responsible for occupational safety and health. • The necessary precautions shall be taken to protect workers from such damage to their health as may be caused by gas, dust, smoke or any other emissions or waste likely to be discharged by the industry. • The necessary precautions shall be taken to protect workers against the hazards of equipment and 	<p>In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General Environmental Health and Safety Guidelines. meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
	<p>machinery and the hazards of conveyors and handling, including any risks of collapse.</p> <ul style="list-style-type: none"> • The necessary precautions shall be taken against natural hazards and damage, including health, humidity and cold. • The necessary precautions shall be taken against the hazards of excessive light, noise, harmful or dangerous radiation, vibration, variation in atmospheric pressure inside the workplace, including any risk of explosion. • Easily accessible lavatories and washrooms shall be provided, and separate lavatories and washrooms shall be provided for women workers if women are employed on the premises. • An adequate and easily accessible supply of drinking water shall be provided for the worker's use. • The necessary precautions shall be taken to deal with fires and provide fire-fighting equipment, including emergency exits, which shall be maintained in working order at all times. • Industrial accidents and occupational diseases shall be recorded in a register and notified to the competent authorities and statistics on industrial accidents and occupational diseases shall be kept for submission to the Ministry upon request. 	
<p><i>Paragraph 25</i></p> <p>The OHS measures will be designed and implemented to address: (a) identification of potential hazards to project workers, particularly those that may be life threatening; (b) provision of preventive and protective measures, including modification,</p>	<p><i>Article 118</i></p> <ul style="list-style-type: none"> • The employer shall: <ul style="list-style-type: none"> ◦ advise and inform workers, before their engagement, on work-related and occupational hazards and on the preventive procedures which must be observed at work; 	<p>In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General Environmental Health and Safety Guidelines.</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p>substitution, or elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, deaths, disability and disease.</p>	<ul style="list-style-type: none"> ○ provide continuous guidance to workers and control their observance of occupational safety and health; ○ display in a visible place instructions, guidance and posters explaining work-related and occupational hazards and methods of preventing them and use all possible illustrative means to that end; ○ increase worker's awareness of occupational safety and health protection and make them participate in training courses and seminars on these matters. <p>....</p>	<p>meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.</p>
<p><i>Paragraph 26</i></p> <p>All parties who employ or engage project workers will develop and implement procedures to establish and maintain a safe working environment, including that workplaces, machinery, equipment and processes under their control are safe and without risk to health, including by use of appropriate measures relating to chemical, physical and biological substances and agents. Such parties will actively collaborate and consult with project workers in promoting understanding, and methods for, implementation of OHS requirements, as well as in providing information to project workers, training on occupational safety and health, and provision of personal protective equipment without expense to the project workers.</p>	<p><i>Article 115</i></p> <p>Employers shall take the necessary precautions to protect workers and ensure their safety against such hazards as may arise from their work and the machinery in use. The employer shall not deduct any amount from their wages in consideration of:</p> <ul style="list-style-type: none"> • the provision of protective devices, equipment and clothing to protect workers from exposure to occupational injuries and diseases; • any allowances granted to workers for working in conditions harmful to their health, or any meals provided to them in compliance with occupational safety and health requirements. • expenses incurred on account of workers' medical examinations, regular or otherwise, as necessitated by occupational safety and health requirements; • the provision of first aid equipment at the workplace. 	<p>In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General Environmental Health and Safety Guidelines. meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p><i>Paragraph 27</i></p> <p>Workplace processes will be put in place for project workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.</p>	<p>Yemeni Law does not include any provision</p>	<p>In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General Environmental Health and Safety Guidelines. meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.</p>
<p><i>Paragraph 28</i></p> <p>Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs.</p>	<p><i>Article 114</i></p> <ul style="list-style-type: none"> • • Easily accessible lavatories and washrooms shall be provided, and separate lavatories and washrooms shall be provided for women workers if women are employed on the premises. • 	<p>In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General Environmental Health and Safety Guidelines. meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.</p>
<p><i>Paragraph 29</i></p> <p>Where project workers are employed or engaged by more than one party and are working together in one location, the parties who employ or engage the workers will collaborate in applying the OSH</p>	<p>Yemeni Law does not include any provision</p>	<p>In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General</p>

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
requirements, without prejudice to the responsibility of each party for the health and safety of its own workers.		Environmental Health and Safety Guidelines . meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.
<p><i>Paragraph 30.</i></p> <p>A system for regular review of occupational safety and health performance and the working environment will be put in place and include identification of safety and health hazards and risks, implementation of effective methods for responding to identified hazards and risks, setting priorities for taking action, and evaluation of results.</p>	Yemeni Law does not include any provision	In addition to meeting the requirements of Chapter IX of the Labour Code, UNICEF will require contractors to comply with the relevant OHS measures in the World Bank Group General Environmental Health and Safety Guidelines . meet the relevant Project ESHS requirements in Annex 2. These cover all of the issues raised in Paragraph 24 of ESS2.
E. Contracted Workers		
<p><i>Paragraph 31</i></p> <p>The Borrower will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place labor management procedures applicable to the project that will allow them to operate in accordance with the requirements of this ESS, except for paragraphs 34–42.</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements
<p><i>Paragraph 32</i></p> <p>The Borrower will establish procedures for managing and monitoring the performance of such third parties in relation to the requirements of this ESS. In addition, the Borrower will incorporate the requirements of this ESS into contractual agreements with such third parties, together with appropriate noncompliance remedies. In the case of</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation ¹⁶	Recommended Actions
subcontracting, the Borrower will require such third parties to include equivalent requirements and noncompliance remedies in their contractual agreements with subcontractors.		
<p><i>Paragraph 33</i></p> <p>Contracted workers will have access to a grievance mechanism. In cases where the third party employing or engaging the workers is not able to provide a grievance mechanism to such workers, the Borrower will make the grievance mechanism provide under Section C of this ESS available to the contracted workers.</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements
F. Primary Supply Workers		
<p><i>Paragraph 39</i></p> <p>As part of the environmental and social assessment, the Borrower will identify potential risks of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers.</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements
<p><i>Paragraph 40</i></p> <p>Where there is a significant risk of child labor or forced labor related to primary supply workers, the Borrower will require the primary supplier to identify those risks consistent with paragraphs 17 to 20 above. The labor management procedures will set out roles and responsibilities for monitoring primary suppliers. If child labor or forced labor cases are identified, the Borrower will require the primary supplier to take appropriate steps to remedy them.</p>	Yemeni Law does not include any provision	UNICEF will apply ESS2 requirements

ESS2 Requirements (Direct quote from ESS2)	Yemeni Labour Code Requirements Direct quote from ILO translation¹⁶	Recommended Actions
<p><i>Paragraph 41</i></p> <p>Additionally, where there is a significant risk of serious safety issues related to primary supply workers, the Borrower will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.</p>	<p>Yemeni Law does not include any provision</p>	<p>UNICEF will apply ESS2 requirements</p>
<p><i>Paragraph 42</i></p> <p>The ability of the Borrower to address these risks will depend upon the Borrower's level of control or influence over its primary suppliers. Where remedy is not possible, the Borrower will, within a reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements of this ESS.</p>	<p>Yemeni Law does not include any provision</p>	<p>UNICEF will apply ESS2 requirements</p>