



Private Infrastructure
Development Group



Safeguarding Rules

**Respecting the human
rights of our projects'
workers and host
communities**

Introduction

The HSES safeguarding rules are a set of ten rules designed to ensure safeguarding processes are in place across all our projects, protecting the fundamental rights and wellbeing of workers and the worker-community interface, specifically with regard to incidents of gender based violence and harassment (GBVH), modern slavery, and child labour arising in our projects and supply chain.

The rules have been established to provide mechanisms and controls to mitigate against human rights risks in our projects. They are not intended to be exhaustive, but rather to seek to ensure that we have the fundamental controls and mitigations in place, which can help minimise risk and provide a safe place of work, protect the rights and wellbeing of workers, and ensure safe and respectful interaction between workers and communities. The rules complement the PIDG life-saving rules designed to protect the health and safety of our projects' workers.

All rules are derived from requirements already defined across our PIDG Health, Safety, Environmental and Social Management System (HSES MS) and recognised Good International Industry Practice (GIIP). They aim to provide focused emphasis and awareness across our project portfolio



on these essential safeguarding requirements. These rules cannot be implemented in isolation but must form an integral part of the HSES governance across PIDG Group and our projects.

PIDG HSES governance starts with our HSES policies. Safeguarding risks are assessed as part of our due diligence processes, detailed in our due diligence guidelines and checklists. These risks are then managed through this set of safeguarding rules and in further detail in our PIDG Local Employment and Labour Management Standard, PIDG Gender Equality Standard, PIDG Stakeholder Engagement Standard and PIDG Grievance Mechanism Standard and in our projects' HSES processes aligned to these standards.

The rules are aligned with the IFC Performance Standards¹. The rules also draw on the requirements of the ETI Base Code², and are informed by best practice guidance on GBVH^{3,4}, modern slavery⁵, child labour⁶ and workers' accommodation⁷.

These safeguarding rules relate primarily to labour management processes. Safeguarding risks also arise in other project community interactions, particularly with regard to land acquisition processes, the requirement for security provision, through the act of providing community services and benefits and through the broader changes a project brings to local society. We must therefore always ensure that we risk assess our projects and that the implementation of these rules forms an essential part but not all of our risk mitigation. Considered together we can successfully safeguard our projects.

1. IFC, 2012. *Performance Standards on Environmental and Social Sustainability*.

2. *Ethical Trading Initiative (ETI) (2018) Base Code*.

3. World Bank, 2018. *Good Practice note. Addressing Gender Based Violence in Investment Project Financing involving major civil works*.

4. IFC, EBRD and CDC. *Gender based violence and harassment: A good practice note for the private sector (forthcoming)*.

5. IFC, CDC, EBRD and DFID (2018). *Managing risk associated with modern slavery: A good practice note for the private sector*.

6. EBRD (2017). *Performance Requirement 2 – Labour and working conditions: Children, young people and work – Guidance note*.

7. EBRD/IFC (2009) *Workers' accommodation: processes and standards – Guidance note*.

HSES safeguarding rules

4

Responsible investment requires strong Health, Safety, Environmental and Social (HSES) governance. We at PIDG recognise that to meet our values and to be able to deliver the investment that we believe in, we must seek to ensure that strong HSES governance runs across all our companies and is at the heart of all our operations.

PIDG recognises that for all projects a strong worker-management relationship, good working conditions, and assuring workers' wellbeing are key to the success and sustainability of a company. A constructive relationship with our people creates tangible business benefits. where the workforce is from the local communities, it enhances community relations and strengthens the project's social licence to operate.

- We consider a constructive relationship as one that respects the rights, dignity and wellbeing of every worker.
- We are committed to gender equality and non-discrimination through all our HSES processes.
- We will not tolerate gender based violence and harassment (GBVH) in any form.
- We are committed to reducing the risk of modern slavery and child labour in the workforce, contractors and primary supply chain.
- We seek to ensure that all workers understand both, PIDG expectations and their rights.
- We will provide reporting and response mechanisms to support any safeguarding concerns.

This is enshrined in our Safeguarding Policy and set out in these HSES safeguarding rules.



**01. Human resource
policies**



**02. Project safeguarding
Code of Conduct**



**03. Recruitment
plan**



**04. Employment terms
and conditions**



**05. Training and
communication**



**06. Working
environment**



**07. Freedom of
association**



**08. Security
management**



**09. Community interactions
and stakeholder
engagement**



**10. Grievance
mechanisms**



HSES safeguarding rules

- 6 How our project companies recruit and manage workers and procure contractors and suppliers, establishes how they manage the rights and wellbeing of their people.

There are HSES processes which are required across all projects, whatever the type, size or location, which are essential for protecting the fundamental rights of workers, and which can reduce the risk of GBVH, modern slavery and child labour. These processes have therefore been established as safeguarding rules for implementation by every project at all times.

The safeguarding rules are applicable to all:

- **PIDG people**
- **PIDG companies**
- **PIDG projects^a**

The complexity and scope of these HSES processes are defined

by the particular project risks for which detail is provided in the PIDG HSES Standards. They shall be implemented, monitored and reported on as part of the PIDG, Company or Project HSES MS.

In all instances, the wellbeing of our projects' people and the communities they interact with is paramount. A suspected or actual human rights violation of GBVH, modern slavery or child labour, will be treated as a serious incident by PIDG and shall be escalated immediately through the HSES 004-001 PIDG Incident Reporting Procedure to the appropriate response mechanism within PIDG.

Safeguarding is an integral part of delivering positive impact through our investments. At PIDG, we aim to change lives for the better, so we must 'protect lives' and seek to ensure that all the people across all our portfolio are treated with respect and dignity.

8. In which PIDG and its companies are the investor/lender including consultants and contractors.





Basic requirements

The following are basic requirements which need to be in place to ensure effective implementation of the safeguarding rules.

- Encourage a positive and inclusive organisational structure with diverse representation at all levels, including project workers, senior management and board.
- Provide appropriate leadership on safeguarding – there should be an identified focal point in the top tier of management with responsibility for safeguarding, supported by an appropriate number of champions within the company.
- The focal point should be responsible for ensuring that the project has robust management systems in place to implement the safeguarding rules, including training of these rules and ongoing monitoring and review processes.
- The focal point should seek to develop a workplace culture where workers know their rights and feel comfortable and supported to raise any concerns.
- Establish clear channels for communication and engagement between management and workers, including being encouraged to get to know each other.
- Provide safe and confidential grievance mechanisms for workers and communities to report safeguarding concerns.
- All safeguarding processes shall be implemented and monitored as part of the HSES MS.
- Encourage teams to talk to each other to improve understanding and complying with the safeguarding rules, and to approach line managers with any questions.



Rules:

10



01. Human resource policies

There are clear policies to define the project company's commitment to good labour management practices, gender equality and non-discrimination, and the prevention of GBVH, modern slavery and child labour.

Requirement

Human resource (HR) policies must be put in place to communicate with workers and to establish a consistent approach to managing performance and needs across the company. Policies must be clearly written and posted in all places of work in the main language(s) spoken by the workforce.

Policies must include commitments to:

- Equality and non-discrimination
- Zero tolerance of GBVH
- Reducing risks of modern slavery and child labour

Policies must also include the requirement for:

- A recruitment plan
- Terms and conditions of employment
- Clear, objective and merit-based criteria for promotions, and bonus and award schemes, with decisions to be authorised by at least two people

- Worksite (and accommodation and travel where applicable) plans which consider health and safety, gender and worker welfare and
- A sexual harassment policy.

Where specific GBVH risks have been identified, a standalone GBVH policy should be developed.

Adherence to the policies must be a requirement of all project contract and procurement processes.

11

To-do if you're part of the management

Ensure policies are in place, endorsed and up-to-date.

Ensure that policies are clearly communicated to all managers, supervisors and workers and are implemented consistently.

Ensure contractors and primary suppliers are aware of policies.

Ensure policies are clearly displayed at all worksites, and workers receive training on all policies.

To-do if you're a worker

Read and understand the HR policies.

Engage constructively in induction and refresher trainings.

Actively adhere to and use the policies to protect yourself and others.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard, HSES 003-011 PIDG Gender Equality Standard.



02. Project safeguarding Code of Conduct

Every worker, contractor and primary supplier is aware of the behaviour that is expected of them under the project safeguarding Code of Conduct and the sanctions for breaching the project safeguarding Code of Conduct.

Requirement

All workers, contractors, subcontractors and primary suppliers⁹ must be made fully aware of the expected behaviour both at work and outside working hours by reading and signing the project safeguarding Code of Conduct. It covers activities on all worksites, in work-related accommodation or during work-related travel, and during any form of work-related meetings, consultation, communications or engagement.

The project safeguarding Code of Conduct must stipulate the project company's commitment to:

- Equality and non-discrimination
- Zero tolerance of GBVH
- Reducing risks of modern slavery and child labour

9. Primary suppliers are those suppliers who, on an ongoing basis, provide goods or materials essential for the core business processes of the project.

The project safeguarding Code of Conduct must define or include reference to appropriate sanctions for any breaches by the workers of the Company Code.

To-do if you're part of the management

Ensure you have read, understood and signed the project safeguarding Code of Conduct.

Ensure you understand the behaviour expected of you. If you are unsure about any aspects of the project safeguarding Code of Conduct, ask PIDG HSES.

Ensure all workers (employees, contractors and primary suppliers) have read and signed the project safeguarding Code of Conduct.

To-do if you're a worker

Ensure you have read, understood and signed the project safeguarding Code of Conduct.

Ensure you understand the behaviour expected of you. If you are unsure about any aspects of the project safeguarding Code of Conduct, ask your supervisor or manager.

If you are concerned that anyone may be violating the project safeguarding Code of Conduct discuss this with your line manager, or report it using the grievance mechanism.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard, HSES 003-011 PIDG Gender Equality Standard and HSES 005-007 PIDG Project Safeguarding Code of Conduct Guidance.



03. Recruitment plan

The recruitment process is fair, transparent, documented in a plan and free of charge to workers.

Requirement

Project recruitment processes must be documented in a recruitment plan.

Contractors are required to develop and implement a recruitment plan.

The recruitment plan will define the processes of hiring and recruitment which will:

- Be fair, transparent and non-discriminatory
 - Set out the number of jobs required, and clear and objective hiring criteria for each role
 - Outline local labour requirements
 - Ensure that any related consultations include adequate consultation with women
 - Ensure that job opportunities are accessible for women and men alike
 - Define the screening and interview process, including relevant background checks and a selection panel of at least two persons at each interview
 - Require safety risk assessments and health monitoring for any worker under the age of 18 (and over the age of 15)
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- Be free of charge to applicants, and
- Consider safeguarding where there will be an influx of workers from outside the community.

The use of external labour agencies should be limited as far as practical. If required, they must ensure that recruitment fees are not charged to workers and worker documentation is not retained.

Recruitment processes shall, where possible, include the requirement to verify the dates of birth of all workers by official documentation.

To-do if you're part of the management

Ensure the recruitment plan is in place and is implemented systematically.

Monitor recruitment practices of labour providers or agencies, where used.

Make sure that fees are not charged to workers and worker documents are not retained.

To-do if you're a worker

Be aware of the recruitment

plan and ask to see the recruitment plan.

Report to management or raise concerns via the grievance mechanism if there are concerns regarding anyone experiencing any form of GBVH during recruitment.

Report to management or raise concerns via the grievance mechanism if you are aware of workers being charged recruitment fees or having their documents retained.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard and HSES 003-011 PIDG Gender Equality Standard.



04. Employment terms and conditions

All workers and contractors have documented employment terms and conditions, which explain their rights at work in a language that they understand and that comply with all national laws.

Requirement

All workers (including temporary workers) and contractors must be provided with written terms and conditions of employment that comply with national legislation and company standards.

Terms and conditions of employment must specify:

- The duration of employment
 - Wages and remuneration that are in line with national laws and appropriate to the location/sector
 - Method and frequency of pay
 - Working hours that are not excessive
 - Overtime arrangements, including conditions for overtime, compensation and maximum limits that are not excessive
 - Leave entitlements, including parental leave
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- Any company benefits
- Disciplinary procedures and termination of employment, and
- Reference to HR policies and, where applicable, collective agreements.

The terms and conditions of employment must be in a language understood by the worker and they must be explained verbally to them.

To-do if you're part of the management

Ensure all workers (including temporary workers) and contractors have been provided with written terms and conditions of employment and that they understand their terms and conditions of employment.

To-do if you're a worker

Understand the terms and conditions of your employment and know your rights.

If you have any questions, ask your supervisor or manager.

If you are unsure about or not happy with any of your terms of employment, including the amount you are paid and when, your hours of work and any overtime arrangements, or any other work-related matter, discuss it with your supervisor or manager or raise the issue using the grievance mechanism.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard and HSES 003-011 PIDG Gender Equality Standard.



05. Training and communication

All workers and contractors will receive sufficient training and information to understand safety and welfare requirements, their rights, the expected behaviour and how to report any concerns or complaints.

Requirement

All workers and contractors shall receive an induction training prior to starting work. It shall cover at a minimum:

- Companies HSES policies
 - The project safeguarding Code of Conduct, and consequences for breaching the Code
 - General and job-specific health and safety information that is necessary for carrying out jobs safely, including core PIDG life-saving rules or equivalent
 - General terms of employment, disciplinary procedures and workers' rights under national and international law
 - Child labour and modern slavery
 - Non-discrimination, gender equality, bullying, protection against GBVH
 - Required lawful conduct in host communities and consequences for failing to comply
 - Cultural sensitisation regarding interaction with local communities and
 - The use of the project-specific grievance mechanism.
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Where specific safeguarding risks have been identified in a project, management teams should put in place focused training to raise awareness in risk identification, mitigation and reporting of concerns and complaints.

All projects should communicate their commitment to respect workers' rights and to provide a safe place of work throughout all work-related sites.

To-do if you're part of the management

Ensure all workers and contractors receive induction training.

Understand the safeguarding risks of your projects and seek appropriate training to support the type and level of identified risk.

Provide easy-to-understand information (such as posters) addressing the project commitment to respect workers' rights and to provide a safe place of work.

Ensure that individuals responsible for dealing with GBVH complaints have the training that they need to handle complaints responsibly, without creating risks for complainants.

To-do if you're a worker

Ensure that you have attended induction training and that you have understood all of the material covered, including expected behaviour during and outside working hours.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard and HSES 003-011 PIDG Gender Equality Standard.



06. Working environment

All work sites and work-related accommodation are safe, hygienic and considerate of the workers' wellbeing.

Requirement

All companies must provide a safe, healthy and respectful place of work.

Consideration must be given to the wellbeing of workers in workplace design. Consider the personal safety of female and male workers, including how women and men are distributed throughout the workplace, lighting and open access.

All workers must receive the personal protective equipment (PPE) that they need to do their job safely and be trained in how to use it correctly. All PPE must be gender-appropriate.

Adequate and easily accessible toilet and washroom facilities must be provided separately for both male and female workers, with lockable doors for privacy.

If workers' accommodation is provided, it must be safe and hygienic, provide single-sex

accommodation and bathroom facilities, and ensure that there are adequate lights, doors and locks to support adequate security in its design.

Potable water must be provided free of charge at work and in workers' accommodation.

If transport is provided, it must be safe and minimise the possibilities of GBVH in its operation and provision.

All projects must conduct a GBVH risk assessment at each work site, which must be updated for each phase of work.

To-do if you're part of the management

Ensure that the workplace requirements are met.

Facilitate the provision of a safe and respectful place of work.

To-do if you're a worker

Respect your place of work and help to make it safe and pleasant for your fellow workers.

Be mindful of the language you use and the manner in which you address your colleagues.

Do not bring anything to work or use any form of posters or screen saver which have the potential to cause offence.

Be vigilant. If you see any poor health and safety practices or suspect any wrongdoing, discuss it with your supervisor or manager or report it using the grievance mechanism.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard and HSES 003-011 PIDG Gender Equality Standard.



07. Freedom of association

All workers, contractors and primary suppliers are free to form or join trade unions or workers associations, without negative consequences.

Requirement

The right of every worker, contractors and primary suppliers, to form or join organisations of their choosing must be respected, in line with national law.

Those who engage in trade union activities must not be subject to retaliation, discrimination or penalty on the basis of these activities.

Where national law provides for collective bargaining rights, these must be respected. Collective agreements must be complied with where these are in place.

Worker representatives should be provided with access to the workplace to enable them to carry out their representative functions.

To-do if you're part of the management

Establish clear structures for regular and open dialogue with the workers and, where they are present, worker representatives.

Seek to ensure that all voices are heard in any dialogue with the workers, including those of women, migrant workers and other vulnerable groups.

Engage with workers' organisations in accordance with national law and provide them with information needed for meaningful negotiations.

Not interfere if workers (including groups of women, migrant workers and other vulnerable groups), want

to meet freely without management presence.

Do not try to control or influence the activities of trade unions or worker representative bodies.

Do not discriminate against workers on the grounds of trade union membership or activity.

To-do if you're a worker

Understand your rights regarding worker organisations and discuss these with other workers.

Identify whether there are any trade unions or worker representatives in your workplace and any collective agreement that applies to you.

Related Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard.



08. Security management

A security management plan is prepared for any security provision and considers the human rights risks to the workforce and host communities.

Requirement

The security services and activities related to a project must be assessed to consider the potential human rights risks posed by private and public security forces in relation to workers and host communities.

Consideration must be given to planned private and public security operations and to the potential responses from public security in the event of possible security threats.

Contracted private security should be required to carry out appropriate training for their personnel and put in place appropriate protocols in relation to issues such as the use of force, searching and other high-risk activities.

Security assessments shall pay particular attention to women and the risks of GBVH

from the security services to women and girls within the company and within the communities of the project.

A security management plan must be developed in line with the Voluntary Principles on Security and Human Rights (VPSHR)¹⁰.

To-do if you're part of the management

Ensure that there is a security management plan in place that meets the VPSHR.

Ensure that all security personnel have received training on the project safeguarding Code of Conduct and safeguarding requirements, particularly those related to GBVH.

Ensure that security arrangements are communicated to communities.

To-do if you're a worker

The role of security is to protect the project and workforce from threats to their safety and well-being.

Security is there to make you safe. If you feel in any way threatened or intimidated by a security provider, or witness this behaviour towards others, report it immediately using the grievance mechanism.

Familiarise yourself with your place of work (and accommodation) and the entrances and exits. Do not work or travel alone. Support your colleagues in managing their security too.

Related HSES Standards: HSES 003-010 PIDG Local Employment and Labour Management Standard and HSES 005-008 PIDG Project Security Management Guideline.



09. Community interactions and stakeholder engagement

All workers and contractors are expected to respect the rights, dignity and wellbeing of people in local communities, as set out in the project safeguarding Code of Conduct. All project-related stakeholder engagement is controlled through a transparent stakeholder engagement plan that defines the conduct, processes and reporting of all engagement activities.

Requirement

All interactions with communities must be carried out in a way that respects their rights, dignity and wellbeing, with particular care paid to interactions with indigenous or traditional communities, and other vulnerable groups such as women, children and ethnic minorities.

All community engagement must be controlled through the stakeholder engagement plan, defining the conduct and processes of engagement and the reporting of all engagement activities. All meetings with members of host communities should be conducted by a

minimum of two project representatives (for meetings with women, at least one representative should be female).

Women should be adequately represented in stakeholder consultation and engagement. All project decisions taken with regard to host communities must be signed off by at least two people, including decisions relevant to recruitment, livelihood and resettlement, community programmes and any other project-related matters.

Gender considerations must be included and documented in these decisions.

Workers must always comply with the project safeguarding Code of Conduct, particularly with respect to GBVH, and respect local cultural sensitivities. They must not engage in sex work or transactional sex of any form, even if permitted by national law. They must not engage in any kind of sexual activity with children under 18 years of age (except for pre-existing marriages).

To-do if you're part of the management

Ensure that the stakeholder engagement plan is in place and is being implemented and updated regularly.

Ensure that workers are aware of the behaviour expected of them regarding community interactions, both during and outside of working hours.

Be quick to listen to and address project-related concerns that are raised by local communities. Establish safe mechanisms to collect regular feedback from local communities (including local women's groups) to ensure that communication channels and grievance mechanisms are working effectively.

To-do if you're a worker

Treat host communities with respect and be aware of local cultural norms. Always act in accordance with the project safeguarding Code of Conduct, and do not engage in behaviour that could bring the company into disrepute.

Understand the behaviour that is expected of you both during and outside working hours and ask your line manager if you have any questions.

If you see or hear about any inappropriate behaviour by workers or security, talk to your line manager or use the grievance mechanism to report it. Do not meet community members for any project-related business without prior approval from management.

Related HSES Standards: HSES-003-008 PIDG Stakeholder Engagement Standard.



10. Grievance mechanisms

All workers, contractors and host communities have access to fair, transparent and confidential grievance mechanism routes that address concerns promptly and are sensitive to the needs of vulnerable groups, including women and girls.

Requirement

All workers and contractors must have ready access to a documented, clear and transparent workers' grievance mechanism.

All host communities of projects must have ready access to a documented, clear and transparent community grievance mechanism.

Grievance mechanisms must be in place from the start of the project and clearly communicated to all workers and communities. They must clearly set out the process for receiving and addressing concerns and complaints, and the timeframe for responses.

There must be an appropriate level of management involved.

Confidentiality must be assured, and it must be possible to lodge grievances anonymously. The safety of those raising complaints must be paramount, alongside protection from retaliation.

All workers and host communities must receive training on how to use the grievance mechanism.

The grievance mechanism must, commensurate with the level of risk, include measures to address any known or suspected incident of GBVH, modern slavery or child labour and provide survivors with linkages to local NGO or service

providers, where available. Any of these incidents must be escalated to PIDG Group as serious incidents and shall be responded to accordingly. The primary consideration prior to any investigation should be the need to safeguard the wellbeing of any person who may have been subject to GBVH, modern slavery or child labour.

To-do if you're part of the management

Ensure workers and communities are aware of the grievance mechanism and that it is readily accessible at all times.

Understand who in the company is responsible for receiving grievances and how and when they are escalated to PIDG.

Ensure that there is a written record of all grievances.

Ensure that all grievances are handled with sensitivity and personal details are kept confidential.

Ensure that there are options for workers to lodge grievances with individuals who are not their line managers, and to choose male or female contact points.

To-do if you're a worker

If you have any concerns about work or persons associated with work, use the grievance mechanism. Your anonymity and/or confidentiality will be respected, and there will be no negative repercussions for raising genuine concerns.

By speaking out, you are not only protecting yourself but protecting those around you.

Related HSES Standards: HSES-003-009 Grievance Mechanism Standard.



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