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**GPSA CARIBBEAN—COLLABORATIVE SOCIAL
ACCOUNTABILITY FOR IMPROVED GOVERNANCE IN
PROTECTING BIODIVERSITY HOTSPOTS PROJECT (P173017)**

Instituto Tecnológico de Santo Domingo (INTEC) and Integrated Health
Outreach (IHO) Labor Management Procedures

Dominican Republic, Antigua and Barbuda, Jamaica, Saint Lucia

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Instituto Tecnológico de Santo Domingo (INTEC) and Integrated Health Outreach (IHO) Stakeholder Engagement Plan (SEP) Labor Management Procedures (LMP)

1.0. INTRODUCTION

The Labor Management Procedures (LMP) was developed in support of the GPSA Caribbean Project. The procedures seek to ensure that measures are in place to manage risks associated with employment under the project. The LMP identifies the main labor requirements under the project and establishes parameters to ensure that engagement is undertaken in accordance with the requirements established in ESS2- Labor and Working Conditions and the Labor Laws in countries in which the project will be implemented.

The labor-related risks for the project are fairly low. They are understood and are expected to have a limited impact on the project once managed by the procedures outlined in this plan. The Implementing Agency, Instituto Tecnológico de Santo Domingo (INTEC) and its partner Integrated Health Outreach (IHO) are both committed, on a continuous basis throughout the project's life cycle, to evaluate the risks and impacts and have in place adequate measures and procedures to manage any adverse impacts.

The LMP is a live document and can be updated to meet any changes in the demands of the project.

2.0. OVERVIEW OF LABOR USE ON THE PROJECT

The LMP is applicable to all project workers, whether full-time, part-time or temporary. This section describes the project's labor requirements, based on available information.

The project will employ local workers from each of the implementing countries. It is expected that these workers will mainly be females over the age of eighteen. It is not anticipated that the project will employ any migrant workers. The breakdown of project workers is as follows in **Table 2.0**:

Table 2.0: Overview of Labor Use on The Project

Role	Country	Number of workers	Timing of worker engagement	Contracted Workers
Project Manager	Dominican Republic (DR)	1	September 2020 to September 2024	Alain Astacio
Project Manager	Antigua and Barbuda (A/B)	1	September 2020 to September 2024	Nicola Bird, PhD
Climate Change and Social Specialist	Dominican Republic	1	September 2020 to September 2024	Solhanlle Bonilla
Gender, Youth and Minority Specialist	Dominican Republic	1	September 2020 to September 2024	Fatima Lorenzo
Climate Change and Social Specialist	Antigua and Barbuda	1	September 2020 to September 2024	Ruth Spencer
Monitoring and Evaluation Specialist- International Consultant	All countries	1	September 2020 to September 2024	TBD: TORs will be advertised with the profile of the consultancy requirements being recruited.
Project Coordinator/Local M&E	Dominican Republic	1	September 2020 to September 2024	TBD: TORs will be advertised with the profile of the consultancy requirements being recruited.
Monitoring and Evaluation Specialist	Antigua and Barbuda	1	September 2020 to September 2024	TBD: TORs will be advertised with the profile of the consultancy requirements being recruited.
Consultant	Jamaica	1	September 2021 to September 2024	TBD: TORs will be advertised with the profile of the consultancy requirements being recruited.

Consultant	Saint Lucia	1	September 2021 to September 2024	TBD: TORs will be advertised with the profile of the consultancy requirements being recruited.
Total		12		

2.1. Number of Project Workers

12

2.2. Characteristics of Project Workers

Project workers will be local workers from each country participating in this project. It is anticipated that they most will be female workers, 30-years or older. INTEC has institutional policy—Sexual Harassment Prevention and Attention Policy (Política de Prevención Y Atención Al Acoso Sexual)—that protects civil and gender rights.

2.3. Timing of Labor Requirements

The Project Managers, Climate Change and Social Specialist, Gender, Youth and Minority Specialist, Monitoring and Evaluation Specialists, and Administration in Dominican Republic and Antigua and Barbuda will be engaged in the project from inception to completion (September 2020 to September 2024). The Consultants in Jamaica and Saint Lucia will commence engagement in the project from September 2021 to 2024. The Monitoring and Evaluation Specialist International Consultant will be involved from October 2020 to September 2024.

2.4. Contracted Workers

1. 1 X international monitoring and evaluation specialist will be contracted to oversee the project from inception to completion. TORs will be advertised with the profile of the consultancy requirements being recruited.
2. 1 X consultant in Jamaica to be contracted in Year 2 of project to completion. TORs will be advertised with the profile of the consultancy requirements being recruited.
3. 1 X consultant in Saint Lucia to be contracted in Year 2 of project to completion. TORs will be advertised with the profile of the consultancy requirements being recruited.

3.0. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The project is conceived of as part of a broader set of inter-connected interventions—alongside the Critical Ecosystem Partnership Fund (CEPF)—aimed at improving the conservation of biodiversity in the Caribbean. The World Bank Critical Ecosystem Partnership Fund—Caribbean Hotspot Project seeks to

improve the capacity of civil society organizations in the conservation and management of globally important biodiversity in selected Key Biodiversity Areas in the Caribbean Biodiversity Hotspots. Specifically, the GPSA project will complement these interventions by utilizing social accountability mechanisms and tools to address challenges across the biodiversity conservation delivery chain. The project is set to start in September 2020 until September 2024. Public input will be sought through collaborative social accountability mechanisms between governments, citizens and civil society organizations (CSOs).

The project will be located in four Caribbean countries: Dominican Republic and Antigua and Barbuda with adaptive replication in Jamaica and Saint Lucia.

Project Manager: Responsibilities include the coordination and completion of projects on time within budget and within scope. Oversee all aspects of projects. Set deadlines, assign responsibilities and monitor and summarize progress of project. Prepare reports regarding status of project.

Climate Change & Social Specialist: Responsibilities include project implementation, monitoring, training, community outreach.

Gender, Youth & Minority Specialist: Responsibilities include project implementation, monitoring, training, community outreach, capacity building.

Climate Change & Social Specialist: Responsibilities include project implementation, monitoring, training, community outreach, capacity building.

Monitoring and Evaluation Specialist-International Consultant: Responsibilities include providing oversight for the project's planning, evaluation, knowledge management and monitoring. S/he will identify performance indicators, develop quality assurance strategies, train project staff, maintain contact with project partners and ensures all project aspects comply with project requirements.

Project Coordinator/Local M&E: Responsibilities include administration, project coordination, providing support to Monitoring, Evaluation and Learning activities especially supporting independent evaluator and coordination with other countries.

Monitoring and Evaluation Specialist-A/B: Responsibilities include providing support to Monitoring, Evaluation and Learning activities especially supporting independent evaluator and coordination with other countries.

Consultant-Jamaica: Responsibilities include providing support to project manager and team to retrofit the project's strategy in their country.

Consultant-Saint Lucia: Responsibilities include providing support to project manager and team to retrofit the project's strategy in their country.

Administrative Assistant: Responsibilities include providing support to project manager and staff, assisting in project needs and managing general administrative activities.

3.1. Covid-19 Considerations

There is a risk of project workers contracting Covid-19, particularly if their work in remote areas of the project countries where access to testing and treatment may be low. There is also a risk of contraction if project workers may have to travel to other project countries.

Generally, labor risks associated with this project are low. The project does not involve any physical works nor the procurement of equipment and activities will focus on consulting activities. Any labor risks may likely to be related to equal opportunity, non-discrimination and transparency in terms of conditions of employment. There is also the risk of Covid-19 contraction; however, with proper prevention and mitigation practices, this risk can be controlled.

4.0. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Project workers in Dominican Republic, Antigua and Barbuda, Jamaica, and Saint Lucia will be paid on a regular basis as required by their national laws and labor management procedures. 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. 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.

4.1. Dominican Republic

INTEC complies with the Labor Legislation in force in the Dominican Republic. Labor relationships in the Dominican Republic are governed by Law No. 16-92 of May 29, 1992, commonly known as the Labor Code, its implementing regulations and related laws. The Labor Code is characterized by its strong and sometimes inflexible protection of the rights of the individual employee. Dominican labor legislation is territorial in nature: any foreigner in the Dominican Republic, whether an employer or an employee, benefits from the rights and is subject to the obligations established in the Labor Code.

Non-discrimination labor relationships in the Dominican Republic is characterized by its strong and sometimes inflexible protection of the rights of the individual employee.

Any relationship by which a person is obliged to provide a personal service to another, under the dependency and immediate or delegated direction of the latter, in exchange for remuneration, is considered an employment contract.

The normal duration of the workday cannot be more than 8 hours per day or 44 hours per week. However, employees who hold management or inspection positions in the company may remain in their jobs for longer. Hours worked in excess of 44 hours per week must be paid with an increase of 35% of the normal time.

At least 80% of all company personnel must be Dominican. Likewise, the salaries received by Dominican workers in a company must together add up to not less than 80% of the total value of the payroll.

The age of majority in labor matters is acquired at 16 years. The salary is freely negotiated between the employer and the employee but cannot be less than the legally established minimum wage.

4.2. Antigua and Barbuda

The Antigua and Barbuda Labour Code was established in 1975. The basic feature of Antigua's labour law is that the rights and obligations of the worker and the employer are mediated through a contract of employment between the two. Consultants will be hired as Independent Contractors responsible for all taxes. This Agreements will be governed and construed in accordance with the laws of Antigua and Barbuda which has a set minimum wage and a standard workday that shall not be more than eight hours and the standard work week not more than forty-eight hours.

No child under 14 is to be employed. A young person between ages 14 to 18 shall be employed unless she or he has been found fit for the work he or she is expected to perform. A person shall not employ a young person who is within the compulsory school age during school hours. No woman shall, merely by reason of her Equal pay for women, be employed under terms or conditions of employment less favourable than that enjoyed by male workers employed in the same occupation and by the same employer.

The Antigua and Barbuda Labour Code explicitly prohibits racial discrimination, and the Education Act also provides specific protection against discrimination. According to the legal structure of Antigua and Barbuda, the provisions of an international human rights instrument are not automatically determined to be national law unless active measures are taken to adopt them into national law.

4.3. Jamaica

The Jamaica Labour Relations Code (L.N. 310/76) was established in 1976. The Jamaican Minimum Wage Act provides all employees with the right to a minimum wage. The Ministry of Labor and Social Security, upon advice from the Minimum Wage Commission, sets different minimum wage rates for workers carrying out specific roles. Employers who fail to comply with the minimum wage rates may be fined by the resident magistrate.

Under the provisions of the flexi-work bill and based on the agreements between the parties, workers can do shifts of greater than eight hours but not in excess of 12 hours in any one workday.

Jamaica has ratified all eight core ILO labour Conventions. Jamaica ratified Convention No. 100 on Equal Remuneration and Convention No. 111 on Discrimination (Employment and Occupation), both in 1975. Jamaica ratified Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour, both in 2003. The minimum age for admission to work is 15 years of age and the law prohibits all types of employment for children younger than 13 years of age. There is no law that forbids discrimination against disabled persons and discrimination in their employment occurs.

The Employment (Termination and Redundancy Payments) Act provides for minimum periods of notice for employees who have been working for four weeks or more. Employers must give at least two weeks' notice in writing to employees who have been working for less than five years.

Protective Legislations include: Minimum Wage Act, Factory Act (Occupational Safety and Health Act), Equal Pay (for Men and Women) Act, Maternity Leave Act and Employment (Termination and Redundancy) Payments Act

4.4. Saint Lucia

Saint Lucia Labour Code, no. 37 of 2006 outlines the conditions of employment with a view to improving the terms and conditions upon which workers are employed. The Labour Code makes it mandatory for employers to provide employees with written details of employment stating, hours of work, leave entitlement, job description, grievance procedures, benefits, health and safety etc. Within this legislation there are provisions relating to: Fundamental principles of employment-Part II; Contracts of employment-Division 1; Hours of Work-Division 3; Wages and minimum wages-Division 4&5; Leave entitlements (annual leave, sick leave, maternity leave, bereavement leave etc.)-Divisions 6, 7 and 2; Employment of Children and Young persons-Division 9; Termination of Employment-Division 10; Duties of Employers, workers and other persons-Part IV Division; Occupational Health and Safety-Part IV; Equality of opportunity and treatment in employment-Part V Division 1, Trade Unions and employers organizations-Part VII.

Part II of the Code under Fundamental Principles of Employment number 7 states that “an employer shall not discriminate against any employee on the grounds of race, colour, sex, religion, national extraction, social origin, ethnic origin, political opinion or affiliation, age, disability, serious family responsibility, pregnancy, marital status or HIV/AIDS, in respect of recruitment, training, work facilities or service, promotion, terms and conditions of employment or benefit arising out of the employment relationship”. The Code also makes provision on how the matter of discrimination can be addressed.

Para 285.—(1) states that, without prejudice to the provisions under this Division, an employer shall not refuse to employ a person, demote or dismiss a female employee, alter the terms and conditions of her contract of employment, refuse her promotion or training or in other way discriminate against her because she is or was pregnant or for any reason connected with pregnancy.

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

In this section are the key aspects of national policies and labor legislation with regards to occupational health and safety in each country. The occupational health and safety (OHS) measures of the project will be designed based on the guideline provided in the Environmental and Social Framework of the project.

5.1. Dominican Republic

The Dominican Social Security system established by Law No. 87-01 contemplates insurance for health and labor risks and an incapacity/retirement fund, to be funded by salary-based contributions to be made by both employee and employer.

In the Dominican Republic, employers must withhold the following from their employees' salaries and disburse the following:

Income tax. Withholdings and disbursements must be made in accordance with the Income Tax (ISR) scale for natural persons. Salaries of up to 34,106.75 pesos per month are exempt.

Social Security. Law 87-01 on the Social Security System requires employers and their employees to contribute to the system, which provides for three types of assistance:

(a) health insurance;

(b) old-age, disability and survival insurance (pension fund); and

(c) insurance against occupational hazards. The contribution is made on the basis of the employee's salary in the proportion outlined **Table 5.1:**

Table 5.1: Insurance against occupational hazards

Benefit	Employer Contribution	Employee Contribution	Total Contribution
Health insurance	7.09%	3.04%	10.13%
Work risk insurance	1.25% + 0.06%	0%	1.25% + 0.06%
Pension Fund	7.10%	2.87%	9.97%

5.2. Antigua and Barbuda

Division D, Part 2 of the Antigua and Barbuda Labour Code for Occupational Health and Safety (D10-17) provides for preventative health measures, protective devices and equipment, medical examinations, notification of employment injuries and diseases, training, etc. This Act obligates the employer to ensure the safety and health of all employees and to mitigate risk of exposure to any hazards in the work environment. The Labour Code for Safety stipulates that for the purpose of ensuring the safety of persons employed in or performing any duty in workplaces, safety provisions shall apply to every workplace.

5.3. Jamaica

Jamaica's Occupational Safety and Health Legislation,— the Occupational Safety and Health (OSH) Bill (2017) is still in draft form. The legislation requires employers operating workplaces to observe certain regulations regarding the safety and health of their workers. Its objectives are: (a) the prevention of injury and illness caused by conditions at the workplace, (b) the protection of workers from risks to their safety, health and welfare arising out of or in connection with activities in their workplaces and (c) the promotion of safe and healthy work places. Until it is approved, other legislation that applies to Occupational Health and Safety in Jamaica include the Factories Act (1943), the Labour Officers (Power)

Act (1943), the Building Operations and Works of Engineering Construction (Safety, Health and Welfare) Regulations, the Docks (Safety, Health and Welfare) Regulations and the Women (Employment of) Act (1942).

5.4. Saint Lucia

Part four of the Saint Lucia Labour Code also speaks to occupational health and safety in the workplace. Under Part four, Divisions 1-4 provides for preventative health measures, protective devices and equipment, medical examinations, notification of employment injuries and diseases, training, etc. This Act obligates the employer to ensure the safety and health of all employees and to mitigate risk of exposure to any hazards in the work environment. Division three of the Code clearly outlines the procedures to be followed in relation to notification of accidents, occupational diseases and other diseases. Division four specifically speaks to the responsibilities of employers, employees and other persons in adhering to health and safety regulations. The Code also clearly outlines the circumstances where employees may refuse to work on health and safety grounds and the procedures for how such matters should be addressed.

5.5. Covid-19 Considerations

The Project will also adhere to international guidelines related to Covid-19. These include:

- ILO Occupational Safety and Health Convention, 1981 (No. 155)
- ILO Occupational Health Services Convention, 1985 (No. 161)
- WHO International Health Regulations, 2005
- WHO Emergency Response Framework, 2017

The project will also ensure that adherence is made to the WHO's specific guidelines on Covid-19, along with the World Bank's guidance note, "Covid-19 Considerations in Construction/ Civil Works Projects".

6.0. RESPONSIBLE STAFF

- The Project Manager will engage and manage project workers
- The Project Manager will engage and manage contractors/subcontractors
- The Project Manager will be responsible for ensuring occupational health and safety (OHS)
- The Climate Change & Environmental Specialist, Gender, Youth & Minority Specialist, and Social and Climate Change Specialist will be responsible for training of workers.
- The Project Manager will be responsible for addressing worker grievances.

7.0. POLICIES AND PROCEDURES

Given the nature of the project, no major labor-related risks are expected. However, the Bank's provisions on Labor and Working Conditions apply given that the project will engage with direct workers and may also hire specialized consultants. Therefore, any contracts must also be consistent with the labor provisions outlined in the World Bank's Environmental and Social Framework. Mitigation measures will be established by incorporating standardized clauses in the contract documents so that all workers are aware of the project's Environment and Social obligations. The project implementation agency, INTEC and its partner IHO will ensure compliance with the clauses. These clauses will include non-tolerance of gender-based violence (GBV), sexual harassment and sexual exploitation and abuse (SEA), discrimination. Project workers will be employed on the basis of equal opportunity and there will be no discrimination as it relates to compensation, working conditions and terms of employment. All project workers will be given and receive training on the Code of Conduct as well as any OHS measures required under ESS2.

7.1. Covid-19 Considerations

The project will ensure the following:

- OHS training will include training for project workers on hygiene and other preventative measures.
- A communications strategy for regular updates on Covid-19 related issues and status of any workers that may be affected by the illness.
- Virtual sessions, including with project communities, will be conducted where viable.
- Where virtual sessions are not viable and sessions must be held in person, the project will ensure that proper Covid-19 protocols will be adhered (refer to the bank's guidance note as well as WHO's guidance).
- Project workers will be provided with the adequate PPE required to safely carry out their duties.
- A protocol will be developed in the event any project worker contracts Covid-19.

8.0. AGE OF EMPLOYMENT

- The minimum age for employment on the project is 18-years of age
- The process that will be followed to verify the age of project workers is two pieces of ID, such as driver's license or passport. All potential hires will be required to present these to the Project Manager prior to being employed.
- The procedure that will be followed if underage workers are found working on the project: If any consultant is found hiring persons under the age of eighteen, he/she will be immediately relieved of their duties.
- The procedure for conducting risk assessments for workers aged between the minimum age and 18: The implementing agency and its partner will conduct regular monitoring to ensure that no

one is employed under the age of eighteen and that all the requirements of ESS2 are being adhered.

9.0. TERMS AND CONDITIONS

Under this Project all consultants will be provided with a written contract, in accordance with the Labour Code of each country, outlining terms and conditions for executing the particular work that they have been contracted for. The terms and conditions of employment will make adequate provisions for periods of rest per week, annual holiday, sick, maternity and vacation and bereavement leave as stipulated in the Labour Code as per the terms and conditions consistent with labor code in each of the countries:

- All wages are contract-based with a set amount for each year of work delivered.
- Staff will be both full-time and part-time.
- The maximum hours are 40-hours per week.
- Contracts will be signed with each staff member with an outline of responsibilities and a code of conduct.

Project consultants will also be provided with a Code of Conduct.

9.1. Dominican Republic

The Terms and Conditions for employment shall be guided by the Dominican Republic Labour Code. As a general rule, any and all relationships in which one person obliges him or herself to provide any form of service to another, in exchange for remuneration and under the direction and/or supervision of the latter, are considered to be employment contracts and subject to the provisions of the Labor Code (Arts. 1 and 2).

Such contracts, which may be verbal or written, are presumed to exist in every such case, unless proven otherwise by the employer. Given this presumption, it is quite possible for a person considered a private contractor in other jurisdictions to qualify as an employee in the Dominican Republic.

Any party to an employment contract may require the other to prepare and/or sign a written version of a previously verbal agreement (Art.19). If in writing, any modifications made to it must be in writing as well (Art. 20). Written agreements are recommended since they foster a clear and sound work relationship.

9.2. Antigua and Barbuda

The Project shall be guided by the Antigua and Barbuda Labour Code (Amendment) Bill 2019: “C7A. Contract workers (1) Subject to subsection (2), a contract worker who is recruited by an employer shall

perform his or her duties under a fixed term contract. (2) A fixed term contract shall not be issued to an employee for a position which is permanent in nature or which is covered by a collective bargaining agreement. (3) A fixed term contract shall outline in writing— (a) the specific tasks and responsibilities of the employee; (b) the period of employment; (c) the terms and conditions of the employment arrangement; and (d) any other information which is relevant to the employment arrangement. (4) A fixed term contract may be renewed by mutual agreement between the employer and the contract worker. (5) A contract worker shall be deemed to be a full time employee if that worker’s fixed term contract— (a) has been renewed by the employer on two or more occasions after the initial issuance; and (b) the total contractual period for which the worker has been employed amounts in aggregate to one year or more.”

9.3. Jamaica

The Project will be guided by the Jamaica Labour Code PART 111-Personnel Management Practices. Section 9 states that employment policies need to be clear, comprehensive and non-discriminatory, which is primarily the responsibility of employers, but they should be developed in consultation or negotiation with workers or their representatives. Employment policies should- (i) provide for proper recruitment and selection, having regard to the qualification and experience needed to perform the job; (ii) have regard to the need for workers to advance themselves in the undertaking; (iii) make clear to the workers the requirements, terms and conditions of employment including inter alia- (a) general conditions of employment; (b) job requirements and the person to whom the worker is directly responsible; (c) disciplinary rules and the procedures for the examination of grievances; (d) opportunities for promotion and training; (e) social welfare services, such as medical care, canteens, pensions, etc.; (f) occupational safety health and welfare regulations; (g) methods of consultation. Employers should not be influenced by conditions relating to age, sex or other personal factors except where relevant to the job.

9.4. Saint Lucia

The Project will be guided by the Saint Lucia Labour Code which guides and regulates the terms and conditions of employment. Division 1 “Contracts of Employment” applies to all persons engaged under contracts of employment. The Act mandates that “Within fourteen days from the date on which employment commences, an employer may prepare a written contract correctly describing the terms and conditions of employment that have been agreed upon by the employer and employee”. The Code also states that “where a contract of employment is not written the employer shall explain to the employee the contents of the contract of employment...”. The Code further states that “upon written request to the employer, an employee who is not employed under a written contract shall be given, within one month of the request, a written contract.

The Labor code, para. 27.— (1) states that subject to subsections (2) and (3), an employer shall not require any employee to work for more than forty hours during any week, excluding overtime. In para. 265. — (1) It also states, that an employer shall not — (a) dismiss or threaten to dismiss an employee;

(b) discipline or suspend or threaten to discipline or suspend an employee, (c) impose any penalty upon an employee; (d) intimidate or coerce an employee; or (e) discriminate against an employee in any way.

10.0. GRIEVANCE MECHANISM

The Grievance Mechanism for all Project staff or contractual employees is as follows:

The Project Manager and Social Specialists will be the point of contact for all Grievances. Contact information (Table 10.1) will be provided to workers upon signing of contract.

Upon receipt of Grievances (not channeled through the project manager,) the staff will notify the Project Manager and/or Social Specialist within 24 hours of receiving complaint. In the case of issues with project management staff, the Project Manager may be required to exclude her or himself if the complaint directly involves him or her.

All received grievances will be recorded in a grievance register within 24 hours of receipt by the Project Manager/ or Social Specialist. The Project Manager or Social Specialist will attempt to address and resolve the grievance within the established time frame of three-weeks upon receipt. In cases of matters which require more urgent attention, a period of a minimum of twenty-four hours and a maximum of fifteen days will be allotted for addressing and resolving the grievance. Grievances can be made in person, by telephone call, or in writing. Grievances can be made anonymously. A dedicated email and telephone number will be provided for all Grievances. For grievances made via telephone or in person, grievances will be recorded a grievance register within 24 hours of receipt by the Project Manager/ or Social Specialist and the complainant asked to sign same.

All workers will be made aware on employment contracts of the grievance mechanisms that are in place and what those consist of. Workers will have access to the following grievance information:

- The option of either verbal or written grievance complaint.
- Contact information for grievance submission
- Timelines for grievance response: minimum 24-hours, maximum 3-weeks.
- Grievance forms will be simple and easily available: the workers describe the actual grievance, allow the organization to track the investigation, conciliation and remediation steps, and be available to all workers.
- The possibility to hold an open and constructive meeting about a grievance with their immediate manager/supervisor.
- The right to appeal to another manager/supervisor against a decision made by their manager.
- The workers' right to be accompanied by a fellow worker or support of her/his own choice when attending the meeting to discuss a grievance.

The complainant will be informed in writing of the measures taken to address the grievance by the Project Manager or the Social Specialist of the complaint is against the project manager.

If issues cannot be resolved, the issue will be referred to the Ministry of Labour of the respective country for their action and pronouncement. The Ministry of Labour’s ruling would be the final tier of the grievance mechanism.

If unresolved, either party may seek redress in the courts of the Country. Parties involved will be advised that they can directly contact the Project Office Ministry.

All received grievances received by the project shall be logged and filed.

Table 10.1. Contact names for grievance complaints

Name	Title	Phone	Email	Country
Alain Astacio	Project Manager	(O) 809-567-9271 x396 (C) 809-723-6113	Alain.astacio@intec.edu.do	Dominican Republic
Nicola Bird	Project Manager	(C) 268-724-4842	nicolabird@gmail.com	Antigua and Barbuda
Solhanlle Bonilla	Social and Climate Change Specialist	(O)809-567-9271 x581 (C) 829-986-5112	solhanlle.bonilla@intec.edu.do	Dominican Republic
Ruth Spencer	Social and Climate Change Specialist	(C) 268-783-7286	ruthspencer5@gmail.com	Antigua and Barbuda

10.1. Addressing gender-based violence

The Grievance Redressal Mechanism (GRM) will specify and train an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers in each country, which will be defined prior to the contracting of workers, will be kept available by the GBV trained individual, the Project Managers, Project Coordinators, and Social Specialists. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV-related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,

- If possible, the age and sex of the survivor.

Any cases of GBV brought through the GRM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GRM will primarily serve to:

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

The GRM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR**.

11.0. CONTRACTOR MANAGEMENT

Project consultants will be managed according to the terms and conditions outlined in their signed contract. The Project Managers at INTEC and IHO respectively will be responsible for providing oversight over the execution of contracts. The Project Managers will also be responsible for ensuring that all consultants or individuals hired for the project are implementing project activities according to their agreed upon Terms of Reference which will form part of the contract document. Additionally, a copy of the workers' Grievance Redress Mechanism and Code of Conduct will be made available to all workers hired as part of the project.

12.0. COMMUNITY WORKERS

It is not anticipated that the project will employ any community workers.

13.0. PRIMARY SUPPLY WORKERS

Not applicable to this project. No physical work will be carried out in this project.