

Dominica Geothermal Development Company

Government of Commonwealth of Dominica

## **Dominica Geothermal Risk Mitigation II Project Construction of Transmission Lines and Substations**



### **Labor Management Plan (LMP)**

November 2023

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Annex 1. DGDC's Internal Grievance Mechanism

## List of Acronyms

C-ESMP	Contractor’s Environmental and Social Management Plan
DGDC	Dominica Geothermal Development Company
DGPP	Domestic Geothermal Power Plant
DGRMP	Dominica Geothermal Risk Mitigation Project I
DGRMP II	Dominica Geothermal Risk Mitigation Project II
DOMLEC	Dominica Electricity Services Ltd.
E&S	Environmental and Social
EHS	Environmental Health and Safety
EMF	Electromagnetic Fields
ESCP	Environmental and Social Commitment Plan
ESIA	Environment and Social Impact Assessment
ESF	Environment and Social Framework
ESS	Environment and Social Standard
FSI	Transmission line network from Fond Cole substation to Sugarloaf substation
GLI	Transmission line network from the geothermal power plant to Laudat substation
GFI	Transmission line network from the geothermal power plant to Fond Cole substation
GRM	Grievance Redress Mechanism
GTI	Transmission line network from the geothermal power plant to New Trafalgar substation
HR	Human Resources
ID	Information Document
kV	kilovolt
LMP	Labor Management Procedures
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PFI	Transmission line network from Padu substation to Fond Cole substation
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
TA	Technical Assistance
TPI	Transmission line network from Trafalgar substation to Padu substation

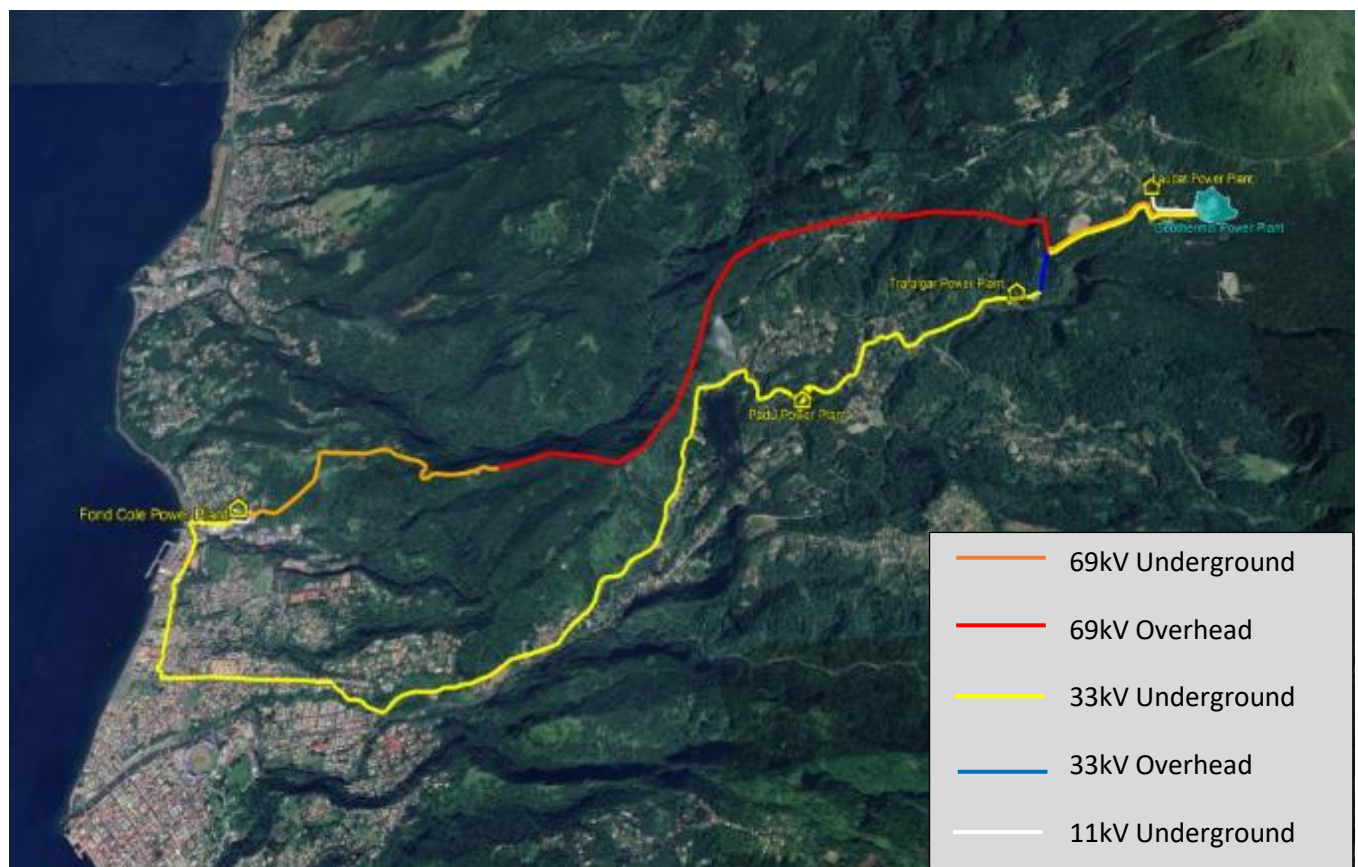
## 1. OVERVIEW OF LABOR USE ON THE PROJECT

The Dominica Geothermal Risk Mitigation II Project (DGRMP II) aims to enable the development and integration of renewable geothermal energy capacity in Dominica. DGRMP II will support the construction of transmission line networks from Dominica's first domestic geothermal power plant, which will be built by the ongoing DGRMP (first phase). The geothermal power plant is located in the Laudat community in Roseau Valley, south of the island. Both DGRMP and DGRMP II are implemented by the Dominica Geothermal Development Company Ltd. (DGDC), a private company in which the Government currently owns 100% of the shares. DGRMP was prepared under the Bank's safeguard policies, thus, the DGRMP II will be the first ESF project for DGDC.

### 1.1 Project Description

The proposed DGRMP II comprises two components: (1) Transmission Network Development for Integration of the Geothermal Power Plant and (2) Technical Assistance and Project Implementation Support. Figure 1 provides the project location map.

**Figure 1: Project Location Map.**



Component 1 will entail the construction of new transmission lines and three substations connecting the geothermal power plant with the national electric system load centers in Fond Cole (near Roseau City in

the southwest). Network expansion will take place in four segments:

- (i) A 69 kilovolt (kV) transmission line of 7.5 km from the geothermal power plant to the Fond Cole substation (GFI) consists of underground and overhead installation. To reduce land acquisition and easement in the Glasgow community, a part of GFI transmission line will be installed underground in a public road from the Fond Cole sub-station up to the Glasgow community. Thereafter, GFI will switch to an overhead installation with about 20 pole structure sites.
- (ii) A 33 kV underground transmission line totaling 10 km that connects the geothermal power plant and New Trafalgar substation (GTI), between Trafalgar and Padu substations (TPI), and between Padu and Fond Cole substations (PFI). TPI and PFI will be placed under the major road between Trafalgar and Roseau City.
- (iii) An 11 kV underground transmission line of 0.5 km connecting the geothermal power plant to the Laudat substation (GLI).
- (iv) Two new 69/33/11 kV substations at the Geothermal plant and Fond Cole; a new 33/2.2 kV substation at New Trafalgar; and a new 33/11 kV substation at Padu.

Component 2 will finance project management by DGDC and capacity building of Dominica Electricity Services Ltd. (DOMLEC) in operating new 33kV and 69kV networks.

### *1.2 Type of Project Workers.*

The Project will engage direct workers and contracted workers. Direct workers would be DGDC staff.

Following the implementation arrangement of the ongoing DGRMP I, DGDC is expected to engage four contractors under the proposed DGRMP II: (i) an owner's engineer (i.e., DGDC's design/construction supervision consultant) for the development of the transmission line network, (ii) a contractor for the construction of the transmission line network, (iii) a contractor to construct sub-stations, and (iv) an independent E&S monitoring consultant. In addition, DGDC would engage TA consultants for DOMLEC capacity building. The owner's engineer has already been engaged under the ongoing DGRMP. The civil work contractors may engage local subcontractors, e.g., for the construction of access roads and foundations for pole structures for overhead transmission lines. The Project will not engage community workers or primary supply workers.

It should be noted that DOMLEC will be responsible for O&M of the transmission line network. The TA component will review and strengthen DOMLEC's OHS guidelines and HR policies, including workers' GRM, during the DGRMP II implementation in line with ESS2. The DOMLEC employees are not considered as project workers, but this may be reviewed during the implementation, depending on the capacity building activities.

### 1.3 Number of Project Workers

DGDC has eight positions. It currently has seven permanent staff, including two female staff<sup>1</sup>. It may hire individual consultants as required. The Owner's Engineer's staff includes thirteen technical experts.

The Project would require a small labor force for civil work. For the construction of underground transmission lines, around 10-12 contracted workers would be required per 300m segment, including a few skilled workers (likely regional or international). The Contractor would work on 4-5 segments at a time. Similarly, around 10-12 workers would be anticipated per pole structure site for the construction of overhead transmission line network. The Contractor for substations will also engage a small workforce of 10 to 15 people to install the equipment in the existing substations. The estimated number of contracted workers will be around 100. Table 1 provides a summary of labor requirements during the construction phase.

**Table 1. Labor Requirement during Construction Phase**

Type of Worker	Employer	Estimated Number of Workers
Direct Workers	DGDC	8
Contracted Workers	Owner's Engineer	13
	Contractor (transmission line network)	Around 75
	Contractor (sub-stations)	Around 15
	Independent E&S Monitoring Consultant	Around 2-3

For civil work, it is expected about 40 workers will be foreign, and the remaining will be local. The regional/international workers would be accommodated in rented houses or hotels, as currently practiced for the well-drilling Contractor under DGRMP. The establishment of labor camp, therefore, is not anticipated. As noticed from the ongoing construction works in DGRMP, female workers would be involved in the project activities (both skilled and unskilled). Migrant workers are not engaged in DGRMP, thus, their involvement in DGRMP II is not expected.

## 2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

### 2.1 Project Activities

The Project's activities include: (a) the construction of an overhead transmission line network, including the establishment of pole structures, the installation of overhead transmission lines, and the construction of access roads; (b) the excavation of trenches and the installation of underground cables along the public roads; and (c) the construction of new sub-stations and upgrading of existing substations. The overhead transmission lines will pass through mountainous terrain with lush green vegetation. The underground cable lines will pass through communities along public roads.

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<sup>1</sup> Eight positions are Managing Director, DGRMP II Program Manager, E&S Lead, Social Specialist, Finance/HR Lead, Community Liaison Officer, Program Support Officer, and Site Officer (vacant). DGDC and DOMLEC have adequate inhouse resources to mobilise E&S Lead and a Social Specialist to oversee the implementation of the LMP.



**Pole Structures.** The overhead transmission lines will be constructed from the geothermal power plant to Glasgow community in Roseau Valley. There will be about 20 pole structure locations, adopting one of three types of steel pole structures: Type A and B with single pole steel structures and Type C with three pole steel structures. The footprint of each type of structure is estimated at around 160m<sup>2</sup>, 210m<sup>2</sup>, and 280 m<sup>2</sup>, respectively. Type A single pole structure is straight, while Type B will be angled. The pole height is 20m. Right of Way is 15.5m from centerline (i.e., 31m width in total). The pole structures will be built on forest or agricultural lands.

**Access roads.** Majority of pole structure sites will require new access roads to construct and maintain the pole structures. The access roads will be earthen roads built with locally available *tarish material* from volcanic gravel. The approximate road width is 3 to 5m.

**Underground cables.** Underground cables will be installed in the public roads between the geothermal power plant and Laudat sub-station (GLI), between the geothermal power plant to the Trafalgar sub-station (GTI), between Trafalgar and Padu substations (TPI), between Padu and Fond Cole substations (PFI), and between Glasgow and the Fond Cole substation (the tail end of GFI). The cables for GLI and initial section of GFI and GTI lines will be installed near the existing right of way of Laudat's hydropower pipeline. The tail end section of GFI will be installed along the public road connecting Glasgow community and Fond Cole. Cables will be laid by digging open trenches. The approximate width and depth of the trenches for 11 and 33 kV lines are 0.4 m and 0.9 m, respectively. The approximate width and depth of trenches for 69 kV line are 0.6 m and 1.5m, respectively. Underground cable tunnels will be built beneath the rivers through directional drilling for the river crossings.

## 2.2 Key Labor Risks.

**OHS Risks.** The potential Occupational health and safety (OHS) risks associated with the construction of overhead transmission lines include, among others, exposure to physical hazards from the use of heavy equipment and cranes; hot weather; working on steep slopes in mountainous terrain, trip and fall hazards; exposure to dust and noise; falling objects; exposure to hazardous materials; and exposure to electrical hazards from the use of tools and machinery. The potential OHS risks associated with the construction of underground transmission lines include working in trenches and confined spaces; risk of collapse of trenches; exposure to live traffic near the construction sites, exposure to physical hazards from the use of heavy equipment and cranes; hot weather; exposure to dust and noise; falling objects and exposure to electrical hazards from the use of tools and machinery. The potential OHS risks during the O&M stage include exposure to live power lines, electric and magnetic fields, and working at height.

**SEA/SH Risks.** According to the Bureau of Gender Affairs, Dominica had 1,035 reported cases of gender-based violence in 2015. 87% of survivors were women.<sup>2</sup> The Project's SEA/SH risk would be low, as the labor influx will be limited, and the overall labor requirements will be small. For the construction of

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<sup>2</sup> <https://genderaffairs.gov.dm/publications/booklets/file/43-data-on-gender-based-violence>

overhead transmission lines, 10-12 workers would be present at one pole structure location on agriculture or forest lands, mostly away from residences. For the installation of underground cables, around 50 workers would be present in a 1.2 to 1.5km road stretch. There are sensitive receptors, such as schools, hospitals, and bus stops along the major roads where the underground transmission lines will be placed. However, the duration of civil work would be as short as 3-4 days. The risks will be managed by mitigation measures, such as hiring local workers, workers to sign and be trained on the Code of Conduct, and civil work to avoid commuting hours.

**Child Labor Risks.** The risk of child labor would be low. According to the US Department of Labor, there is no evidence of child labor in Dominica in 2021.<sup>3</sup> As in the case of the ongoing DGRMP, the minimum age of employment is 18 for this Project, due to hazardous nature of civil work. Child labor risks will be mitigated by age verification prior to employment and maintenance of workers' registry.

**Migrant Workers.** According to the Global Migration Data Portal, there were 8,284 immigrants to Dominica in 2020<sup>4</sup>. There has been a flow of migrants from Haiti to Dominica. Some of the migrants are in agriculture sector. The Project will unlikely engage migrant workers, as the labor requirements are limited.

### 3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Key labor legislations of the Commonwealth of Dominica are the Labour Contracts Act, Chapter 89:04<sup>5</sup>, Labour Standards Act, Chapter 89:05<sup>6</sup>, the Protection of Employment Act, Chapter 89:02<sup>7</sup>, and the Employment of Women, Young persons, and Children Act, Chapter 90:06<sup>8</sup>. There also are labor related provisions in the Constitution of the Commonwealth of Dominica, Chapter 1:01<sup>9</sup>. Below provides a summary of key provisions vis a vis ESS2, i.e., terms and conditions of employment, nondiscrimination and equal opportunity, workers' organizations, child labor and minimum age, forced labor, and workers' grievance mechanism.

#### 3.1. Terms and Conditions of Employment

**Labour Contracts Act, Chapter 89:4, Section 3: Employer to prepare labour contract.** Any person who employs another shall, not later than fourteen days from the date on which the employment commences, prepare a labour contract in writing correctly describing the terms and conditions of employment that have been agreed upon by the employer and the employee.

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<sup>3</sup> [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2021/Dominica.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/Dominica.pdf)

<sup>4</sup> <https://www.migrationdataportal.org/fr/node/3154#recent-trends> The Global Migration Data Portal is managed by the Global Data Institute of the International Organization for Migration (IOM). The population of Dominica in 2020 was 71,995 (Source: World Bank).

<sup>5</sup> <https://dominica.gov.dm/laws/chapters/chap89-04.pdf>

<sup>6</sup> <https://dominica.gov.dm/laws/chapters/chap89-05.pdf>

<sup>7</sup> <https://dominica.gov.dm/laws/chapters/chap89-02.pdf>

<sup>8</sup> <https://dominica.gov.dm/laws/chapters/chap90-06.pdf>

<sup>9</sup> <https://dominica.gov.dm/laws/chapters/chap1-01-sch1.pdf> Also, see [https://www.ilo.org/wcmsp5/groups/public/---americas/---ro-lima/---sro-port\\_of\\_spain/documents/genericdocument/wcms\\_577372.pdf](https://www.ilo.org/wcmsp5/groups/public/---americas/---ro-lima/---sro-port_of_spain/documents/genericdocument/wcms_577372.pdf)



**Labour Contracts Act, Chapter 89:4, Section 5: Contents of labour contract.** A labour contract shall set out a description of the duties of the employee; the rate of pay that the employee is entitled to receive in respect of his employment; the normal hours of work of the employee; the rate of pay that the employee is entitled to receive for hours worked by him in excess of or outside of his normal working hours; the annual leave to which the employee is entitled and the pay that he is entitled to receive during the period of his annual leave; the sick leave to which the employee is entitled and the pay that he is entitled to receive during any period of sickness.

Additionally, **Labour Standards Act Chapter 89:05** has provisions for the fixing of wages of workers, the hours of work, their leave (vacation and maternity leaves) and generally for matters pertaining to the welfare of workers. Also, the **Protection of Employment Act Chapter 89:02** makes provisions for protecting the employment of workers, such as termination and redundancy benefits.

### *3.2 Nondiscrimination and Equal Opportunity*

**Labour Contracts Act, Chapter 89:04, Section 10-10: Equal wages.** The employer shall not establish or maintain differences in wages between the employee and any other employee employed in the same business who is performing under the same working conditions, the same or similar work or jobs requiring similar skills, efforts and responsibility, on the basis only of the sex of the employee or the other employee.

### *3.3 Workers' Organizations*

**Constitution of the Commonwealth of Dominica, Chapter 1:01, Section 11: Protection of freedom of assembly and association.** Except with his own consent, a person shall not be hindered in the enjoyment of his freedom of assembly and association, that is to say, his right to assemble freely and associate with other persons and, in particular, to form or belong to trade unions or other associations for the protection of his interests.

Further provisions on trade unions and labor disputes are in the Industrial Relations Act Chapter 89:01, which consolidates the law relating to Industrial Relations, including trade disputes and tribunal.<sup>10</sup> Additionally, the Trade Unions Act Chapter 89:03 amends and consolidates the law relating to trade unions and trade disputes.<sup>11</sup>

### *3.3 Child Labour and Minimum Age*

**Employment of Women, Young persons, and Children Act Chapter 90:06<sup>12</sup>** defines a child as a person under the age of fourteen years and prohibits child labor. According to Section 4: Prohibition of employment of children, no child shall be employed or work in any public or private industrial undertaking, or in any branch thereof, other than an undertaking in which only members of the same family are employed, and any person who employs any child or permits him to work in contravention of this section is guilty of offence.

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<sup>10</sup> <https://dominica.gov.dm/laws/chapters/chap89-01.pdf>

<sup>11</sup> <https://dominica.gov.dm/laws/chapters/chap89-03.pdf>

<sup>12</sup> <https://dominica.gov.dm/laws/chapters/chap90-06.pdf>

Furthermore, the Education Act 1997 or the Act 11 of 1997<sup>13</sup> stipulates compulsory school age is from five to sixteen years of age. Dominica is also a signatory to or is bound by the following international conventions and laws related to the minimum age of employment:

- Convention on the Rights of the Child (CRC): “Signed on the 19th of April 1990 and ratified on the 9th October 1990” (UNICEF, 2015)
- Minimum Age Convention, 1973 (No.138) (International Labour Organization, 2017)
- Forced Labour Convention, 1930 (No. 29) (International Labour Organization, 2017)
- Worst Forms of Child Labour Convention, 1999 (No. 182 (International Labour Organization, 2017))
- Labour Contracts Act Chapter 89:04

### *3.4 Forced Labor*

**Constitution of the Commonwealth of Dominica, Chapter 1:01, Section 4: Protection from slavery and forced labour.** (1) No person shall be held slavery or servitude; (2) No person shall be required to perform forced labour.

### *3.5 Workers’ Grievance Mechanism*

**Labour Contracts Act, Chapter 89:04, Section 10-21: Procedures to settling individual grievances.** The employee will make every effort to settle promptly, fairly and as near as possible to the point of origin, any personal grievances which may be in relation to his employment. In order to give effect to this undertaking, the following steps, should they be required, are notified as the procedure for achieving a settlement:

- Step 1. The employee wishing to take up an individual grievance should raise it verbally within two days of its happening with the person who is responsible for the job or his immediate supervisor, who will make every attempt to resolve it fairly and quickly.
- Step 2. If a solution is not reached at Step 1, the grievance should then be reported by the following morning to the employer who will endeavour to find a satisfactory settlement.
- Step 3. If a solution is not reached in Step 2, the grievance will be presented to the Labour Commissioner for conciliation.

In addition, the **Protection of Employment Act Chapter 89:02** has provisions for tribunal in case of termination.

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

The Employment Safety Act, Chapter 90:08<sup>14</sup> is the principal form of legislation pertaining to Occupational Health and Safety. It reorganizes the system under which safety and health at work are safeguarded and extends it in such a way that every employee is covered by this protection. The Act covers everyone at work and provides for the establishment of consultative and advisory committees and appointment of safety officers to inspect working conditions by the Minister. The Act includes the Factory and Machinery

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<sup>13</sup> <https://dominica.gov.dm/laws/1997/act11-1997.pdf>

<sup>14</sup> <https://dominica.gov.dm/laws/chapters/chap90-08.pdf>

Rules as a subsidiary legislation that provides workers' health and safety, including ventilation, lighting, sanitation, provision of drinking water, provision of restrooms, safety in operating heavy machineries, etc.

The Accidents and Occupational Diseases (Notification) Act, Chapter 89:51<sup>15</sup> provides for the notification of accidents and occupational diseases; establishes the processes of the notification of accidents; grants the administrator in Council with the power to extend dangerous occurrences provisions to notification of accidents; provides for inquests in cases of death by accident; grants the Administrator the power to direct formal investigation of accidents and cases of occupational diseases; and sets penalties for offences.

Additionally, there is Noxious and Dangerous Substance (Control) Act, Chapter 40:09<sup>16</sup>, for the control of noxious and dangerous substances. The Act governs the licensing requirements for storage of such substances and for the inspection of premises.

## 5. RESPONSIBLE STAFF

DGDC is responsible for the LMP implementation. DGDC currently has seven permanent staff members, including the Managing Director, Finance and HR Manager, and an acting E&S Lead. Under the ongoing project, the E&S Lead is responsible for overall OHS implementation. Both owner's engineer and contractors have E&S officers on site, who regularly train workers on OHS. OHS implementation is also monitored by the E&S Officers of the Owner's Engineer. The E&S implementation of the ongoing DGRMP project has been satisfactory.

Under DGRMP II, to address ESS2 requirements during construction and operation phases, DGDC will hire, in addition to the existing E&S Lead, a site officer to ensure Environment, Health, and Safety (EHS) and, as required, engage DOMLEC EHS specialists as secondees and environmental consultants. DGDC will appoint a social specialist from its existing staff. A community liaison officer is already on board. DGDC's Managing Director will be responsible for overall project implementation, including LMP implementation. The Finance and HR Manager, who is responsible for procurement, will ensure bidding documents include relevant E&S clauses, i.e., EHS staff, OHS risks, Code of Conduct among contracted workers, contract management, and workers' GRM. The E&S Lead, together with the social specialist and site officer, will support the Managing Director in LMP implementation, including monitoring/spot check of contractors on OHS implementation, contract management (including issuance of contracts to individual workers with clear terms of employment), Code of Conduct, setting up/management of workers' GRM, and contract management by sub-contractors.

The owner's engineer has an EHS specialist and a Social Risks Management Specialist in its team to ensure LMP implementation among civil work contractors. Contractors will be responsible for hiring EHS staff and site staff for managing OHS risks. They will be responsible for training workers on OHS and Code of Conduct, setting up/managing workers' GRM, and sub-contractors' LMP implementation.

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<sup>15</sup> <http://www.dominica.gov.dm/laws/chapters/chap89-51.pdf>

<sup>16</sup> <https://dominica.gov.dm/laws/chapters/chap40-09.pdf>

## 6. POLICIES AND PROCEDURES

DGDC has an Occupational Health & Safety Manual consisting of two volumes, i.e., Volume 1: Safety Management Systems and Volume 2: Safe Work Practices. The Manual will be supplied to the contractors. In addressing OHS risks, the bidding documents will stipulate the contractor's requirements to comply with the implementation of the Code of Conduct for Contractor's workers, grievance mechanism, and requirements set out in the ESIA, ESCP and EHSGs, as well as SEA/SH prevention and management obligations. The Contractor's EHS staff will be responsible for the implementation of these requirements. The compliance will be monitored by the EHS specialist of the owner's engineer and DGDC's E&S Lead and site officer.

Mitigation measures for all identified OHS risks are presented in Table 1, and they will be included in the contract documents so that the contractors are aware of the project's E&S obligations. The OHS standards will be maintained with regards to workers safety, health, and welfare of people at work. 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 OHS measures. These measures will be applied and enforced on all activities of the project, and the contractors and subcontractors through contractual agreements as appropriate.

Contractors will prepare the Contractor's Environmental and Social Management Plan (C-ESMP), which includes an OHS implementation plan, prior to the start of the construction works, which will be reviewed and approved by the DGDC and World Bank. The C-ESMP, including the OHS implementation plan, will be updated every six months. The Contractors will hire qualified OHS specialists to implement the OHS plans. The Contractors will submit monthly monitoring reports on the compliance status of the Project with the environmental and social mitigation and monitoring measures. In case of any incidents, the Contractors will submit Incident investigation reports covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event.

**Table 1. Potential OHS Risks and Mitigation Measures**

Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
Workers knowledge on OHS risks	Lack of awareness among workers on the OHS risks and requirements of the Project.	The Contractor shall provide training to all his workers, before they start working on site, on basic OHS risks associated with the proposed construction works and the workers' responsibility.  The training program shall be repeated on a monthly basis.  Contractor's site engineers will provide brief weekly toolbox talks to the construction workers on OHS risks associated with the construction activities that will be carried on that particular week.

Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
		The Contractor's monthly training program will also cover topics related to Code of Conduct such as sexual harassment, particularly towards women and children, violence, including sexual and/or gender-based violence and respectful attitude while interacting with the local community.
Live power lines	Workers may be exposed to occupational hazards from contact with live power lines during construction, maintenance, and operation activities	<p>Only allowing trained and certified workers to install, maintain, or repair electrical equipment;</p> <p>Workers not directly associated with power transmission and distribution activities who are operating around power lines or power substations should adhere to local legislation, standards, and guidelines relating to minimum approach distances for excavations, tools, vehicles, pruning, and other activities</p> <p>Minimum hot stick distances may only be reduced provided that the distance remaining is greater than the distance between the energized part and a grounded surface.</p>
Working at height on poles and structures	Workers may be exposed to occupational hazards when working at elevation during construction, maintenance, and operation activities	<p>Testing structures for integrity prior to undertaking work.</p> <p>Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers, among others;</p> <p>Establishment of criteria for use of 100 percent fall protection (typically when working over 2 meters above the working surface, but sometimes extended to 7 meters, depending on the activity). The fall protection system should be appropriate for the tower structure and necessary movements, including ascent, descent, and moving from point to point;</p> <p>Installation of fixtures on tower components to facilitate the use of fall protection systems;</p> <p>Provision of an adequate work-positioning device system for workers. Connectors on positioning systems should be compatible with the tower components to which they are attached;</p> <p>Hoisting equipment should be properly rated and maintained and hoist operators properly trained;</p> <p>Safety belts should be of not less than 16 millimeters (mm) (5/8 inch) two-in-one nylon or material of equivalent strength. Rope safety belts should be replaced before signs of aging or fraying of fibers become evident;</p>

Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
		<p>When operating power tools at height, workers should use a second (backup) safety strap;</p> <p>Signs and other obstructions should be removed from poles or structures prior to undertaking work;</p> <p>An approved tool bag should be used for raising or lowering tools or materials to workers on structures.</p>
Electric and magnetic fields	Electric utility workers typically have a higher exposure to EMF than the general public due to working in proximity to electric power lines	<p>Identification of potential exposure levels in the workplace, including surveys of exposure levels in new projects and the use of personal monitors during working activities;</p> <p>Training of workers in the identification of occupational EMF levels and hazards;</p> <p>Establishment and identification of safety zones to differentiate between work areas with expected elevated EMF levels compared to those acceptable for public exposure, limiting access to properly trained workers;</p> <p>Implementation of action plans to address potential or confirmed exposure levels that exceed reference occupational exposure levels developed by international organizations such as the International Commission on Non-Ionizing Radiation Protection (ICNIRP), and the Institute of Electrical and Electronics Engineers (IEEE). Personal exposure monitoring equipment should be set to warn of exposure levels that are below occupational exposure reference levels (e.g. 50 percent). Action plans to address occupational exposure may include limiting exposure time through work rotation, increasing the distance between the source and the worker, when feasible, or the use of shielding materials.</p>
Rotating and Moving Equipment	Injury or death can occur from being trapped, entangled, or struck by machinery parts due to unexpected starting of equipment or unobvious movement during operations	<p>Designing machines to eliminate trap hazards and ensuring that extremities are kept out of harm's way under normal operating conditions. Examples of proper design considerations include two-hand operated machines to prevent amputations or the availability of emergency stops dedicated to the machine and placed in strategic locations. Where a machine or equipment has an exposed moving part or exposed pinch point that may endanger the safety of any worker, the machine or equipment should be equipped with, and protected by, a guard or other device that prevents access to the moving part or pinch point. Guards should be designed and installed in conformance with appropriate machine safety standards.</p> <p>Turning off, disconnecting, isolating, and de-energizing (Locked Out and Tagged Out) machinery</p>



Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
		<p>with exposed or guarded moving parts, or in which energy can be stored (e.g. compressed air, electrical components) during servicing or maintenance, in conformance with a standard such as CSA Z460 Lockout or equivalent ISO or ANSI standard</p> <p>Designing and installing equipment, where feasible, to enable routine service, such as lubrication, without removal of the guarding devices or mechanisms</p>
Fire and explosions	Fires and or explosions resulting from ignition of flammable materials or gases can lead to loss of property as well as possible injury or fatalities to project workers	<p>Storing flammables away from ignition sources and oxidizing materials. Further, flammables storage area should be:</p> <ul style="list-style-type: none"> <li>• Remote from entry and exit points into buildings</li> <li>• Away from facility ventilation intakes or vents</li> <li>• Have natural or passive floor and ceiling level ventilation and explosion venting</li> <li>• Use spark-proof fixtures</li> <li>• Be equipped with fire extinguishing devices and self closing doors, and constructed of materials made to withstand flame impingement for a moderate period of time</li> </ul> <p>Providing bonding and grounding of, and between, containers and additional mechanical floor level ventilation if materials are being, or could be, dispensed in the storage area</p> <p>Where the flammable material is mainly comprised of dust, providing electrical grounding, spark detection, and, if needed, quenching systems</p> <p>Defining and labeling fire hazards areas to warn of special rules (e.g. prohibition in use of smoking materials, cellular phones, or other potential spark generating equipment)</p> <p>Providing specific worker training in handling of flammable materials, and in fire prevention or suppression</p>
Confined spaces (trenches for underground cable works)	Serious injury or fatality can result from inadequate preparation to enter a confined space or in attempting a rescue from a confined space	<p>Engineering measures should be implemented to eliminate, to the degree feasible, the existence and adverse character of confined spaces.</p> <p>Permit-required confined spaces should be provided with permanent safety measures for venting, monitoring, and rescue operations, to the extent possible. The area adjoining an access to a confined space should provide ample room for emergency and rescue operations.</p> <p>Prior to entry into a permit-required confined space:</p>

Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
		<ul style="list-style-type: none"> <li>Process or feed lines into the space should be disconnected or drained, and blanked and locked-out.</li> <li>Mechanical equipment in the space should be disconnected, de-energized, locked-out, and braced, as appropriate.</li> <li>The atmosphere within the confined space should be tested to assure the oxygen content is between 19.5 percent and 23 percent, and that the presence of any flammable gas or vapor does not exceed 25 percent of its respective Lower Explosive Limit (LEL).</li> <li>If the atmospheric conditions are not met, the confined space should be ventilated until the target safe atmosphere is achieved, or entry is only to be undertaken with appropriate and additional PPE.</li> </ul> <p>Before workers are required to enter a permit-required confined space, adequate and appropriate training in confined space hazard control, atmospheric testing, use of the necessary PPE, as well as the serviceability and integrity of the PPE should be verified. Further, adequate and appropriate rescue and / or recovery plans and equipment should be in place before the worker enters the confined space.</p>
All construction activities	<p>Lack of relevant PPE's will increase the risk of worker's exposure to construction hazards.</p> <p>Eye and face protection: Flying particles, molten metal, liquid chemicals, gases or vapors, light radiation.</p> <p>Head protection; Falling objects, inadequate height clearance, and overhead power cords.</p> <p>Hearing protection; Noise, ultra-sound.</p> <p>Foot protection: Falling or rolling objects, pointed</p>	<p>Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems. These include</p> <ul style="list-style-type: none"> <li>Safety Glasses with side-shields, protective shades, etc.</li> <li>Plastic Helmets with top and side impact protection.</li> <li>Hearing protectors (ear plugs or ear muffs).</li> <li>Safety shoes and boots for protection against moving &amp; falling objects, liquids and chemicals.</li> <li>Gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials, etc.</li> </ul> <p>Recommended measures for use of PPE in the workplace include:</p> <p>Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure</p>

Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
	<p>objects. Corrosive or hot liquids.</p> <p>Hand protection: Hazardous materials, cuts or lacerations, vibrations, extreme temperatures.</p>	<p>Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual</p> <p>Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for employees</p> <p>Selection of PPE should be based on the hazard. and selected according to criteria on performance and testing established by recognized organizations</p>
OHS Procedures to be followed by the Contractors	Overall risks associated with general construction activities.	<p>The contractor will be required to prepare, obtain approval of, and implement an occupational health and safety (OHS) plan. These plans will be prepared in compliance with the World Bank Group's EHSGs and national regulations. If these guidelines cannot address any specific aspect of OHS, international good practices such as OSHA and ILO will be applied. OHS Plan should contain general guidance for all identified hazards under each work activity, site-specific OHS hazards and risks during construction, and control and preventive Measures proposed by the Contractor. The Plan shall be reviewed and updated if there are any changes in the construction methodologies.</p> <p>OHS Plan should contain general guidance for all identified hazards under each work activities and they should be presented in three discrete headings, (a) Contractor's Standards on the identified hazard management, (b) Expected Site-specific OHS hazard and risks during construction, (c) Control and Preventive Measures proposed by the Contractor, and (D) A system for the management of potential violations and non-compliances.</p> <p>The OHS plan will be reviewed and approved by the Construction Owner's Engineer and the World Bank.</p> <p>Conduct a 'job hazard analysis' at the new construction site to identify potential hazards that may arise from the proposed works or working conditions for the project workers and implement necessary control measures. The job hazard analysis should be part of the contractor's method statements, which will be reviewed and approved by the Owner's Engineer. The specialists of the Owner's Engineer will also visit the construction sites, prior to the start of construction, to ensure the control measures are in place.</p>

Sources of Potential OHS Risks	Description of Risks	Measures by Contractors to address these risks
		<p>Regular site inspections and safety audits by the construction supervision team, both by the OHS specialist and the site engineers. Since the site engineers will be present at the worksites all the time, they will be trained by their OHS team on monitoring the safety aspects of the construction works.</p> <p>Regular training program for workers on occupational health safety (details are provided earlier)</p> <p>In order to protect all project personnel and visitors, the Contractor will provide personal protective equipment (PPE) for workers (details are provided earlier).</p>
	Tracking OHS issues and Incident Management	<p>The Contractors will provide medical and rescue facilities at the site for the implementation of an emergency response plan. First aid facilities will be made available at the worksites and in the workers residences. The contractors will engage qualified first aider(s) and make necessary agreements with health clinics or hospitals close to the site.</p> <p>Adequate water supply and mobile toilets, medical and first aid care facilities at the worksites</p> <p>Contractors will have dedicated and qualified staff to ensure compliance with the OHS Plan.</p> <p>Awareness-raising material will be used, including posters, signage, booklets, and others at the worksites.</p> <p>A complete record of accidents and near misses will be maintained.</p> <p>Incident investigation and reporting, including a complete record of accidents and near misses, will be maintained.</p> <p>The contractors will track OHS performance by tracking the incident logs and workers GRM for management of OHS-related enquiries and management.</p>

## 7. AGE OF EMPLOYMENT

While the national legislation sets the minimum age of employment at 14, the minimum age to work on the Project will be 18, due to the hazardous nature of civil work. This follows the age requirement of the ongoing DGRMP I. The contractors will be obliged to verify the age of workers. If the Contractor engages a sub-contractor, it is the Contractor's responsibility to ensure workers under 18 are not hired by the sub-contractor.

The following process will be followed to verify the age of project workers to ascertain that compliance with the Minimum Age under the Project per this LMP: All project employees will be asked to produce identification documents (ID) that are acceptable in local laws, employment and human resources practices as “proof of age”. These forms of ID will be birth certificates, national drivers’ licenses and national registration cards. In the absence of one of those forms of IDs, the Project will apply and document an age verification process. The age verification process will consist of alternative methods, including copies of academic certificates, testimony/affidavits from officials of the schools attended, a medical examination, and statements from family members and parish/village officials/local authorities. In addition, all documents will be cross-referenced and subjected to a verification process to ensure the validity of the documents. In instances where the documents are thought to be falsified, the project will conduct the same verification process with the relevant Government of Dominica Ministries, Agencies and Departments to ensure their authenticity. Throughout the verification processes, due care and precaution measures will be adopted to ensure that the applicant or employee’s data are protected and their right to privacy is guaranteed. All copies of the IDs and documents pertaining to the applicant’s age and other supporting materials will be kept in files with the human resources personnel. Audits and controls of the process will be a requirement of the contractors and included in the contracts, in keeping with the Labour Contracts Act Chapter 89:04.

Should a breach be detected by DGDC or others, the Contractor will be immediately issued a show cause notice for termination of contract and the matter will be duly reported to the labour authorities. In addition, the World Bank will be notified promptly and within a maximum of 48 hours.

## **8. TERMS AND CONDITIONS**

All workers employed on the Project will be provided with written contracts and non-discrimination must be exercised by the Contractor in the recruitment of workers and in relation to the conditions of work. The employment of project workers will 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. In addition, employees will be paid no less than the minimum wage as established by the Government of Dominica. The current minimum wage, effective as of September 1, 2021, stands at EC\$ 7.50 per hour for unskilled construction workers.

The Project will adhere to the legal provisions with respect to hours of work, overtime work and associated pay. The working day should not exceed 8 hours, including at least a half-hour break. Consequently, a working week will consist of 40 hours. A worker, who agrees to do overtime work, should be paid at the rate of one and a half times the regular wage.

Workers will be entitled to two weeks’ annual vacation leave with pay after a year of continuous employment. Part-time workers will be entitled to vacation leave pro-rated on two weeks based on the number of hours worked in relation to 1760 hours per year. Alternatively, the part-time worker may be awarded pay in lieu of leave.

## 9. GRIEVANCE MECHANISM

DGDC has its own HR manuals and has a workers' GRM or an internal grievance mechanism. The internal grievance mechanism guideline was developed under the ongoing DGRMP I in compliance with the IFC's PS2 (see Annex 1). DGDC's Finance and HR Manager is responsible for managing the internal grievance mechanism, together with the social specialist. The guideline describes grievance risk categorizations, handling procedures (including handling of high risk grievances, e.g., fatality and work place SEA/SH), acceptance of anonymous grievances, escalation mechanism, responsibilities, and monitoring.

The contractors are responsible for setting up and managing their own internal grievance mechanism, following the DGDC's guidelines. If sub-contractors are engaged, the contractors are also responsible for ensuring the sub-contractors to set-up and manage their own internal grievance redress mechanisms. DGDC's social specialist will monitor the setting up and functionality of their internal GRM.

## 10. CONTRACTOR MANAGEMENT

It is mandated that the Contractor execute the management of the contract in a manner that is acceptable to the client and is in accordance with ESS2, specifically relating to the selection process for contractors, management of labour issues, including terms and conditions of employment (wages, working hours, leave, social security, non-discrimination, etc.), occupational health and safety, management of project workers grievances, procedures for managing and monitoring of performance for contractors, as well as reporting on workers under the project.

As a part of progress reports, contractors should submit labor management records to DGDC, including (a) a representative sample of employment contracts; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of noncompliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS for the project. If the Contractor engages sub-contractors, the labor management records of sub-contractors should also be included. Spot checks of labor management records will be conducted by the DGDC's E&S Lead and Site Officer as well as a third-party monitoring agency.

### *10.1 Information on Public Records*

The Contractor must have in place information on corporate registers and documents relating to the violation of applicable law, including reports from labour inspectorates and other enforcement bodies.

### *10.2 Certification and Approval of Business and Workers*

Documentation of approved business licenses, registration, permits and other approvals and workers' certification/permits and training to perform the work.



### *10.3 Health and Safety*

Contractors should have in place labour management systems as they relate to occupational health and safety. Detailed Records of all accidents and incidents and corresponding root cause analysis with a corrective mitigation plan. First aid cases, high potential near misses, and remedial and preventive activities required. Identification and establishment of safety committee and records of meetings.

### *10.4. Workers Payroll Records*

Documentation of the number of hours worked and pay (wages, benefits and social security deductions, for example) received inclusive of all payments made on their behalf.

## **11.COMMUNITY WORKERS**

The Project will not engage community workers.

## **12.PRIMARY SUPPLY WORKERS**

The Project will not engage primary supply workers.

## Annex 1. DGDC's Internal Grievance Mechanism

### 1. Introduction

DGDC is committed to ensuring compliance in the implementation of the E&S risk management policies and procedures. The Project is committed to maintaining lasting, transparent, culturally appropriate and efficient relationships with its internal and external stakeholders, through communication and engagement measures that allow receiving, analyzing and solving any concern, doubt, or question regarding the environmental and social performance of the Project in all of its activities. Based on the foregoing, the Project has developed an Internal Grievance Mechanism with the objective of identifying and managing the potential internal nonconformities and/or complaints in a timely and effective manner.

#### 1.1 Objective

Establish an Internal Grievance Mechanism so that the Project can handle internal complaints, presented by its employees and internal stakeholders (e.g., direct workers and their organizations, workers hired by third parties, contractors, subcontractors, and supply chain workers), during the development of its projects by giving them an adequate response, generating satisfactory agreements and implementing compensatory and corrective actions, when necessary. By establishing an effective Internal Grievance Mechanism, DGDC will be able to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the concern, suggestion or grievance management process and avoiding placing individuals in a position where conflicts could be perceived to arise. The mechanism does not replace the public mechanisms of resolution of conflicts in Dominica's legal system but does aim to resolve issues where possible so they do not escalate, although at any time during a complaint handling process a complainant may also choose to use the local judicial system.

#### 1.2 Scope of Application

This mechanism will apply during the development of DGDC's activities and during the Project's life cycle. It is DGDC's responsibility to ensure that Employees, Contractors and Subcontractors are evaluated according to DGDC's E&S risk management policies and procedures, which are aligned with international best practices. Contractors will use this mechanism and develop it further to provide their workers with a mechanism to cover complaints related to working conditions and other work place concerns.. DGDC will review and approve this document before any implementation.

#### 1.3 Definitions

The main terms used in this document are defined below:

**Table 1: Terms and Definitions**

Term	Definition
Claim	Concern, suggestion, complaint, or grievance raised by an individual or group of individuals that need to be addressed.
Claimant	Person or group of people communicating a claim to DGDC.
Concern	Requests for information or general negative perceptions unrelated to a specific Project impact or incident. If not addressed to the satisfaction of the claimant, concerns may become claims.

Conflict of interest	A conflict of interest exists where there is a divergence between the interests of an employee or Contractor and his or her responsibilities or capabilities under this directive, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her own interests.
Contractor	An individual or a company that has entered into a contract to provide goods or services to DGDC. The term covers parties directly contracted by DGDC and those contracted by a Contractor company, also referred to as subcontractors.
Grievance	A problem raised by an individual or group of individuals that needs to be addressed. Claims can result from either real or perceived impacts of DGDC's operations. The terms "claim" and "grievance" can be used interchangeably.
Sexual Exploitation	Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual Abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual Harassment	Sexual harassment occurs when differences in power between staff members, are abused (verbally, through touch, use of inappropriate images, etc.). This includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: <ul style="list-style-type: none"> <li>• Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or</li> <li>• Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or</li> <li>• Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.</li> </ul>
Suggestion	Proposal, insinuation, or indication that is submitted with the aim of proposing an action to improve DGDC's internal processes.
Retaliation	Any adverse action taken against a Claimant, employee, or Contractor whose purpose is to frustrate the operation of this directive.
Worker representatives	People designated from DGDC or a contractor to represent Project workers. It can be a worker, supervisor, or union representative.
Workers Grievance Mechanism	A procedure through which a grievance can be raised by a worker, assessed, investigated and responded to. It is also a framework through which workers can gain access to remedy for any adverse impacts or damage they have suffered as a result of business activities.

## 2. Roles and Responsibilities

In order to properly implement the Internal Grievance Mechanism, DGDC requires the involvement of the people listed below.

**Table 2: Roles and Responsibilities**

<b>Role</b>	<b>Responsibilities</b>
Executive Chairman and Board of Directors	<ul style="list-style-type: none"> <li>• Review and approve the Internal Grievance Mechanism.</li> </ul>
Director of Accounts	<ul style="list-style-type: none"> <li>• Ensure the availability of resources necessary for the implementation of the Internal Grievance Mechanism.</li> </ul>
Finance and HR Manager	<ul style="list-style-type: none"> <li>• Ensure the correct implementation of the Internal Grievance Mechanism.</li> <li>• Communicate the Internal Grievance Mechanism among DGDC's internal stakeholders (i.e., employees, contractors and sub-contractors)</li> </ul>
Finance and HR manager and Social Specialist	<ul style="list-style-type: none"> <li>• Ensure the correct implementation of the Internal Grievance Mechanism.</li> </ul>
Representative of DGDC's Legal Area	<ul style="list-style-type: none"> <li>• Evaluate and determine the origin of the complaints received and define the measures to be taken in response, as suitable according to what is stated in this plan.</li> </ul>
Managing Director	<ul style="list-style-type: none"> <li>• Communicate the Internal Grievance Mechanism among DGDC's internal stakeholders (i.e., employees, contractors and sub-contractors) at a project level.</li> </ul>
Social Specialist	<ul style="list-style-type: none"> <li>• Help with the implementation of the Internal Grievance Mechanism.</li> <li>• Review and approve the Contractor project-specific Internal Grievance Mechanism Plan.</li> <li>• Update the Internal Grievance Mechanism.</li> </ul>
Grievance Mechanism Team (Finance/HR Manager and Social Specialist)	<ul style="list-style-type: none"> <li>• Manage the registration and follow up on to the feedback received.</li> <li>• Share the received feedback with the Managing Director, based on what is stated in this document.</li> <li>• Sign all responses before being communicated to the employee and/or interested parties.</li> <li>• Share the feedback of subcontractors, with the appropriate Contractor when applicable.</li> </ul>
DGDC Employees, Contractors and Subcontractors	<ul style="list-style-type: none"> <li>• Read and be familiarized with the Internal Grievance Mechanism.</li> <li>• In case of not having a proper mechanism of their own, inform their employees working in DGDC's operations about the existence of this mechanism and monitor its implementation</li> </ul>

### 3. Activities

The Internal Grievance Mechanism Plan establishes the guidelines for internal stakeholders to submit complaints, grievances and concerns arising from any project's activities and operations, ensuring the accessibility and effectiveness of the process.

### 3.1 Principles

DGDC recognizes that this plan has to guarantee the same level of integrity and respect for all the people involved, as well as for any type of claim. To this regard, the Project's Internal Grievance Mechanism will be:

- Understandable and reliable (e.g., the affected stakeholders must understand the management plan, the confidentiality of the person filing the complaint must be protected, the expected deadline for receiving a response must be shared);
- Culturally appropriated and accessible (e.g., complaints can be filed in the local language, the technology required to file a complaint must be of common use, illiterate people can file complaints verbally);
- Free of charge (e.g., raising a complaint will not have any cost);
- Anonymity (e.g., the claimant will have the option to remain anonymous);
- Proportional (e.g., to provide the appropriate level of management to address the grievance promptly);
- Rights-Compatible (e.g., outcomes and remedies will be in line with internationally-recognized human rights legislation and national law. No aspect of the mechanism will prevent workers from enforcing their legal rights. Workers will be protected against retaliation for having raised complaints);
- Inclusive and non-discriminatory (e.g., all grievances, from all workers regardless of age, ethnicity, mental or physical disability, race, religion, gender, sexual orientation or gender identity, will be accepted, reviewed and solved as needed);
- Transparent (e.g., every complaint will be treated seriously, and dealt with consistently and in an impartial, confidential and transparent manner. The process is transparent and provides timely feedback to the claimant).

The present plan establishes the guidelines of the Internal Grievance Mechanism and describes how each Project along with its Grievance Mechanism Team<sup>17</sup> will proceed in order to adequately and satisfactorily address the possible complaints expressed by its internal stakeholders. Complaints related to affected communities and external stakeholders are covered by the External Grievance Mechanism Plan.

The Internal Grievance Mechanism aims to prevent social contingencies and conflicts with the people directly involved in the development of the Project, since it will provide, at all times, effective attention, and it has the obligation to respond to the requests of all claimants.

DGDC has established a process for the reception, registration, review, analysis, resolution and evaluation of complaints, claims and concerns to be implemented in all of its projects. The process will be documented through a physical record file and will end with the closure and written agreement on the resolution of both parties (i.e., the claimant and the Project).

### 3.2 Publication of the Mechanism

Based on the Stakeholder Engagement Plan, the Project will inform internal stakeholders about the Grievance Mechanism and the communication channels to submit complaints, claims or suggestions

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<sup>17</sup> The Grievance Mechanism Team is led by the Finance/HR Manager and the Social Specialist.

regarding any activities related to the Project, as well as how and where to submit them. This information will be shared through:

- Direct dialogue;
- Printed material such as brochures and posters;
- Informative presentations of the Project;
- Trainings; and
- Didactic educational tools (e.g. games, videos, books, etc.).

### *3.3 Internal Grievance Mechanism*

Procedure In order to ensure the proper implementation of the Internal Grievance Mechanism, and the resolution of the feedback received, this mechanism is divided into four main steps: (1) Reception and Registration; (2) Review, Analysis and Investigation; (3) Resolution; and (4) Right to Appeal.

These steps are designed based on the recommendations of the International Finance Corporation (IFC), through which a communication channel and responsible for monitoring in each of them is designated.

#### *3.3.1 Reception and Registration*

Once the Grievance Mechanism has been presented to the internal stakeholders, any manager of the Project, Company and/or contractors will be able to personally receive any feedback, which must then be delivered to the Grievance Mechanism Team. In addition to the feedback collected by the managers, the feedback will be submitted through the following reception channels:

- Website – To be determined prior to the start of construction and operation activities;
- Telephone – To be determined prior to the start of construction and operation activities;
- A Grievances Mailbox placed within the Project's facilities. The mailbox's precise location will be shared with workers during their hiring process. Any complaint or suggestion that is entered by the aforementioned means must follow the Internal GM form (see Annex 1), which shall contain the following information:
  - Place and date of the complaint or suggestion;
  - Reason for the feedback, with details of the events;
  - Claimant's contact information (In case the grievance is not anonymous);
  - Claimant's proposed solution to the issue

The Internal GM accepts anonymous grievances. The process will begin with the receipt of a complaint or suggestion by the Grievance Mechanism Team and notify the claimant that the claim has been received, will be reviewed and taken for analysis. Once the suggestions and/or complaints have been received, the Grievance Mechanism Team will complete the Communication Report (see Annex 2) and the information collected regarding the complaint and/or suggestion will be captured in the Internal GM Database to register the complaints and/or suggestions.

If the claim is readily resolvable (e.g., a request that can be immediately granted or an easy solution can be applied without an investigation process), the person receiving the claim (i.e., immediate manager, human resources or worker representative) takes action to address the issue directly and records the details in the Internal GM Database. If the claim subject is considered sensitive by the claimant (e.g., in cases regarding abuse, sexual harassment, or other forms of gender-based violence), a special point of



contact with adequate training will be provided. DGDC's Community Liaison Officer is trained on SEA/SH by the World Bank. SEA/SH related grievances will be referred to the Bureau of Gender Affairs under the Ministry of Social Services, Community Development, and Gender Affairs. The claimant will have the option to talk to a point person of their same gender, if requested. The approach to these claims should be in line with the survivor-centered approach detailed by the WB and IDB: "The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions." (The World Bank, Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment in Investment Project Financing involving Major Civil Works).

Claims will not be applicable in cases when:

1. It is not directly related to DGDC, its contractors, or subcontractors;
2. It is out of DGDC's influence;
3. Its nature exceeds the scope of the present Internal Grievance Mechanism;
4. The claimant has no standing to file (e.g., is not an affected party); and/or

When the claim is classified as **non-applicable** following the above criteria, DGDC will clearly communicate the reasons why it cannot be considered to the claimant, and when possible, DGDC will provide information to help them redirect their claim to the right institution or party.

The Internal Grievance Database is updated weekly to reflect the current state of the claim until the claim has been resolved according to the claimant. Reception of the claim will be acknowledged within three (3) days after the claim is received. If an investigation is needed, this will take up to 15 days (low risk claims), up to 10 days (medium risk claims) and 5 days (high risk claims).

The Project will provide a means by which all workers will be able to raise **anonymous complaints**. This gives the most vulnerable workers confidence that they will not be retaliated against for raising concerns, and can be fundamental to shifting power dynamics in the workplace. During OHS training, workers will be informed of their right to file grievances anonymously on the phone or by any other uptake means. The uptake form for the grievance mailbox or website will have an option to file grievances anonymously. Therefore, in case of an anonymous case, the resolution will be published on a visible and accessible notice board on site and communicated in regular staff meetings.

### *3.3.2 Review, Analysis and Investigation*

Once the complaints have been filed, the review, analysis and investigation process will unfold as follows:

1. The Grievance Mechanism Team will collect on a weekly basis the complaints presented, whether submitted physically or via website, and will review the nature of the complaint, as well as the company's departments potentially involved;

2. The Grievance Mechanism Team will make an initial assessment of severity in coordination with the E&S Lead, if necessary. The grievances will be classified in four categories:
  - a. **Non-Admissible** (e.g., claims that are not directly related to the Project, its contractors or subcontractors, out of DGDC's influence);
  - b. **Low Risk** (e.g., claims that do not require resolution per se, but instead only require information or a certain clarification to be provided to the claimant. If there are recurring complaints that have been previously received and addressed by the Project, DGDC will reconsider elevating the importance of the complaint, as this might be a sign that the response to the grievance has been insufficient or inadequate);
  - c. **Medium Risk** (e.g., claims that require resolution and are related to minor risks associated with health, the environment, construction, transportation, and contractor and subcontractor personnel. Although important, they do not pose an immediate risk); and
  - d. **High Risk** (e.g., claims related to the security and safety of Project personnel and community stakeholders, as well as those that, according to criteria of the Human Resources team, require immediate response as the claim poses an immediate major health and safety risk or a risk to an individual, to a large or small group or several groups of stakeholders. This includes claims regarding illegal and abusive activities).
3. The Finance/HR Manager will prepare the Communication Report, that includes the information listed below:
  - a. Internal tracking folio number provided to the claimant;
  - b. Type of feedback,
  - c. Area potentially involved;
  - d. Claimant's information (In case the grievance is not anonymous);
  - e. Date the complaint or suggestion was originated;
  - f. Grievance Risk Category (Low, Medium or High);
  - g. Brief description of the complaint or suggestion;
  - h. Area responsible for monitoring and solution;
  - i. Recommended solution;
  - j. Term of resolution.
4. Once the complaint, claim or concern has been reviewed, the investigation must be carried out in the first instance by a member of the Grievance Mechanism Team. In case the feedback transcends and involves more areas of the Project, the suggestions and/or complaints will also be channeled to the Managing Director and the Finance/HR Manager, as appropriate, to coordinate resolution with the departments involved, depending on the scope of each, and to determine the actions to follow.

Regardless of the categorization of the claim, the claimant must always be informed that her or his grievance has been received and is being investigated. The answer must be given in written and/or verbal form, in a clear and precise language, preferably respecting the claimant's language. In cases where the complaint is anonymous, the response will be published in the same way in which the complaint was submitted (through the website or in the module). The deadline for the resolution of a complaint or claim is according to the categories shown in the following table.

5. The evaluation of each complaint claim or concern must be in accordance with the following categories.

**Table 3: Claim Category**

<b>Claim Category</b>	<b>Responsibilities</b>	<b>Response Time</b>
Non-Admissible	Grievance Mechanism Team notifies the claimant	These suggestions and/or complaints will be communicated within fifteen (15) business days once the categorization is done.
Low Risk	The Manager of the area responsible for the resolution receives and follow up the complaint.	<p>These suggestions and/or complaints will be addressed and answered in an average of ten (10) business days.</p> <p>If the complaint could not be resolved within this timeframe for reasons beyond the Project, the claimant will be notified and the time of response will be determined, considering a maximum period of three (3) months.</p>
Medium Risk	The Manager of the area responsible for the resolution receives and attends the complaint.	<p>The response will be carried out within an average of five (5) days after categorizing the complaint or concern, indicating that the resolution period will be of fifteen (15) business days from the complaint's registration.</p> <p>If the complaint could not be resolved within this timeframe for reasons beyond the Project, the applicant will be notified and the time of response will be determined, considering a maximum period of three (3) months.</p>
High Risk	<p>The Manager of the area responsible for the resolution receives and responds to the complaint immediately and communicates it to the Managing Director via email/phone call.</p> <p>Once registered and communicated internally, the Social Specialist will proceed to provide support for the follow-up and resolution of the complaint, collectively with the Manager of the responsible area and the Project Manager.</p>	<p>The response time must be immediate (within 24 hours of its submission)</p> <p>In the event that, for reasons beyond the Project, the complaint could not be resolute within this timeframe, the claimant will be notified, and the time of response will be determined on a case-by-case basis. However, the resolution period will not be longer than five (5) days.</p>

Source: ERM, 2020

In high-risk situations, where there is a possibility of serious danger (e.g., death, sexual harassment), DGDC will consider involving other member teams to weigh in on the resolution strategy. In these type of cases, an alternative timeline will be established for addressing and involving third parties as needed, such as the Gender Affairs<sup>18</sup>, police, and hospitals. The Project will always protect the confidentiality of the claimant, and in cases of sexual harassment or sexual abuse and exploitation, the Project will take the survivor-centered approach described earlier. The special procedure for High Risk Claims is described below.

1. The claim enters an expedited process for investigation and resolution by HR and if applicable other senior management, such as the Managing Director, when appropriate.
2. DGDC initiates the investigation immediately and coordinates with local authorities to appropriately address the matter for claims related to allegations of illegal or abusive acts.
3. HR meets the claimant to gather additional information as necessary. Subsequently, he or she investigates the claim (e.g., meets with members of the security team involved in the claim), develops, and implements corrective actions in collaboration with other project staff, as necessary.
4. If both the HR staff and other staff involved in the resolution of the claim are all the same gender, and the claimant prefers to speak to a person of his or her same gender, DGDC will facilitate this request. This option will be disseminated when disclosing the procedure. If additional investigations are needed, these are promptly undertaken.

If the person responsible of the claim is not able to obtain a resolution within 5 days of the reception of the claim, he or she submits the claim to Human Resources, who notifies and seeks advice from the Managing Director.

If the Managing Director and Human Resources do not reach an agreement on a resolution within the following 5 days, Human Resources arranges meetings and discussions with relevant higher hierarchy personnel and the claimant, as well as other relevant departments, to agree on a final solution.

Before the final resolution is issued, the agreed resolution will be reviewed by the claimant, or his or her worker representative, and will confirm his or her agreement with the solution proposed.

### *3.3.3 Resolution*

Once the complaints have been categorized and reviewed, the resolution and closure process will unfold as follows:

1. The first step for the resolution is the determination of the timeframe (considering the periods defined in the Table above) and its inclusion in the registration file previously elaborated.
2. The complaint or claim will be discussed by the managers of the areas involved. However, if a Manager is directly involved in the grievance, that person cannot play a role in the Internal Grievance Mechanism process in order to prevent conflicts of interest. In the case of complaints related to

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<sup>18</sup> SEA/SH-related grievances will be referred to the Ministry of Social Services, Community Development, and Gender Affairs. While the Ministry does not have a dedicated GBV program, a support mechanism is maintained by the Bureau of Gender Affairs.

allegations of illegal or abusive acts, the Project will immediately initiate the investigation to adequately address the matter. Based on the investigation, the complaint may or may not proceed.

3. Depending on the risk category, the approach will be defined. The management of the responsible areas, together with a representative of the Legal Area will evaluate and determine the origin of the complaint and define the measures to be taken in response. The Social Specialist must sign all responses before they are communicated to the employee and/or interested parties.
4. If the complaint is not admissible, the claimant will be notified.
5. The Grievance Mechanism Team and the Project Manager will have performed an analysis of all the viable resolutions, seeking to, at all times, provide solutions that respond to the claimant, from a position of dialogue and respect. A complaint will be dismissed only when all the instances of solution have been exhausted, explaining in writing to the claimant, in a clear and indubitable manner, the reasons for the refusal on the resolution of the complaint.
6. All documentation issued during the process by the company to interested parties must be sent by email or written notification. In any case, the answer must have the corresponding record (the folio of complaint or suggestion) and will be properly archived as part of the process.

### *3.3.4 Right to Appeal*

A worker who is not satisfied with the procedure or resolution can contest DGDC's decision. The claimant will have a maximum period of fifteen (15) business days to express any disagreement with the response and appeal it. Once the deadline has elapsed and there are no new grounds for complaint, the process will be considered closed.

In the event that a claimant wishes to challenge/appeal DGDC's decision or propose a counter offer, the Board of Directors will decide whether DGDC can resolve the dispute or it is necessary to involve a third party (e.g., a mediator, technical expert, local authority, or ombudsman) to reach an agreement between the parties and resolve the dispute. The claimant will always have the right to seek other legal or administrative resources. The last resort will be the national judicial process.

When a resolution agreement is established, both parties, the Finance/HR Manager, acting as the representative of DGDC and the claimant, will sign it in writing. Once the solution is implemented, both parties in recognition of compliance with the agreement will sign a compliance agreement again.

### *3.3.5 Evaluation and Follow Up*

It will be the responsibility of the Grievance Mechanism Team to follow up on all responses to suggestions and/or complaints in written and/or verbal form, especially those of medium and high priority, so as to confirm that the response given to the interest group was adequate, given the circumstances and criteria applicable at the time of filing the complaint. The Internal GM Database will be used to follow up each claim until it is resolved and closed.

## **4. Confidentiality and Protection from Retaliation**

The Project is committed to protecting the identity of claimants and anyone else involved in the claim, and to handling personal information in accordance with legal requirements. This duty extends to all employees and representatives of DGDC and its contractors who participate in the Internal Grievance Mechanism process.

Information about a claim is shared within the company on a need-to-know basis and only to the extent necessary to complete the steps in this directive. DGDC will not share personal information with third parties unless required by law or authorized by the claimant.

When a claim relates to a specific DGDC or contractor employee, that person cannot play a role in the Internal Grievance Mechanism process in order to prevent conflicts of interest.

DGDC does not tolerate retaliation against claimants, be they an employee or Contractor. When concerns about retaliation are raised, Human Resources is responsible for leading an investigation into the alleged retaliation under DGDC's Human Resources Policy and Code of Conduct.

## 5. Documentation and Monitoring

Once every two months, the Grievance Mechanism Team will send the Internal GM Database to the Managing Director with information on the feedback received through a consolidated report showing the status of each claim and its indicators. This plan will be monitored continuously and is designed to facilitate the integration of lessons learned during its execution. The Project will be able to respond adequately to situations as soon as they develop.

The Internal Grievance Mechanism Plan will be reviewed annually however, if required, the mechanism could be updated as necessary. It will also ensure that contractors update their procedures at least once a year.

## 6. Key Performance Indicators

The table below present the key performance indicators that will evaluate the implementation of this plan:

**Table 4: Key Performance Indicators**

Impact	Indicator	Performance Goals/ KPIs	Method/Tool / Frequency
<b>GM attainment</b>	Number of complaints closed and those unresolved.  Number of grievances received per month versus number of grievances resolved.	100% of grievances resolved within the established GM timeframes.	Internal Grievance Mechanism Database and Finance/HR Manager / Quarterly
<b>GM time efficiency</b>	Number of days between the grievance submission until its resolution and closure to calculate the average length of time needed to resolve grievances.	Low risk grievances: Max. 10 days Medium risk grievances: Max. 5 days High-risk grievances: Max. 24 hours	Internal Grievance Mechanism Database and Finance/HR Manager / Quarterly
<b>GM Focus/ Risk Areas</b>	Type/source of grievances (e.g., health, safety, etc.)	Resolve 100% of grievances from all	Finance/HR Manager in coordination with contractors /Quarterly



		sources and about all topics. Disseminate information regarding the different solutions when there are recurrent complaints in order to decrease recurrent grievances.	
<b>Method of grievance reporting</b>	Use and success of the different grievance reporting methods (e.g., number of grievances received by phone, at the office, website, and boxes).	100% of reporting methods will be functional and accessible at all times.	Finance/HR Manager through direct interviews with workers / Quarterly
<b>GM dissemination</b>	DGDC will monitor all GM informational documents, meetings, and events where the GM was disclosed and explained.	GM dissemination of information in at least 70% of events and regular meetings with staff, including contractors and subcontractors	Finance/HR Manager Records (trainings, meetings, orientation sessions, etc.) / Quarterly

## Annex 1. Internal Claim Form

<b>GRIEVANCE REGISTRATION #:</b> /		
<b>* Not mandatory fields. You can submit complaints anonymously.</b>		
Date:	Time:	Filed by:
Complaint received via:		
In person: <input type="checkbox"/>	By Phone: <input type="checkbox"/>	By email: <input type="checkbox"/> Other: <input type="checkbox"/>
Complainant Name:*	Complainant gender:*	Employee Company:
	(drop down) M / F	
Complainant contact (address, tel. number):*		
What is the best way to contact complainant? (drop down – phone/email/letter/in person)		
Preferred time of day to contact complainant:		
<input type="checkbox"/> The complainant is filing an individual complaint		
<input type="checkbox"/> The complainant is representing a group or a community		
- Name of the group or community:		
- Nature of the group or community:		
- Location/address:		
Description of the grievance:		
<b>GRIEVANCE TREATMENT</b>		
Date of the response:	Filed by:	
Proposed action(s) to remedy to the grievance:		
Complainants acceptance of the proposed action:		
<b>GRIEVANCE CLOSURE</b>		
Date of grievance closure:	Filed by:	
Ending of the grievance treatment:		
Reference in Commitment Register:		

## Annex 2. Communication Report

### Communication Record

Communication Record							
Dominica Geothermal Project							
Project Team Member							
Company							
Correspondence Type (Please Circle)	Email	Fax	House Call	Letter	Meeting	Phone	Other
Date of Communication							

Stakeholder Details			
Name			
Position			
Organisation			
Phone		Fax	
Mobile		Email	
	Property Address (If Required)		
Address			

Issue Raised in Communication (Please Circle)								
Property Value	Access	Water Pollution		Noise	Dust	Complaint		
Employment Issues	Economic Effects	Traffic		General Information	Hours of Operation	Regulatory Requirements		
	Other (Please List)							
What they said:								
Urgent Communication (Report within 24 hours)								
Actions Requested								

If yes, please state document title		
Document Reference Number (Office use only)	#	