

ESS2 - Labor Management Procedures



Labor Management Procedures

11 May 2023

CEPF Grant 113840

The Peregrine Fund

A Conservation Action Plan and Implementation for the Critically Endangered Ridgway's Hawk in the Dominican Republic

Dominican Republic

Grant Summary

- 1. Grantee organization:** The Peregrine Fund
- 2. Grant title:** A Conservation Action Plan and Implementation for the Critically Endangered Ridgway's Hawk in the Dominican Republic
- 3. Grant number:** 113840
- 4. Grant amount (US dollars):** \$159,590.76
- 5. Proposed dates of grant:** 1 August 2023 – 31 January 2025
- 6. Countries or territories where sub-project will be undertaken:** Dominican Republic
- 7. Date of preparation of this document:** 11 May 2023

8. Overview of labor use on the sub-project:

All workers engaged during this project using funds from CEPF will be employed by The Peregrine Fund (TPF) or The Peregrine Fund's officially registered subsidiary in the Dominican Republic, Fondo Peregrino Republica Dominicana (FPRD).

Number of Project Workers:

In total, 25 people will be receiving funds from CEPF to be employed on the project. Seven of these will be from The Peregrine Fund, 5 of whom are based in the United States, one in Canada, and one in Panama. The remaining 18 people will be local to the Dominican Republic and employed through FPRD.

The table below provides information on the workers to be employed on the project and receiving funds from CEPF.

Table 8.1: Staff positions and status

Staff Positions	Type <i>(direct / contracted / community)</i>	Gender	Place of work <i>(remote / office / field)</i>	Status	
				<i>(full time / part-time)</i>	<i>(current staff / to be hired)</i>
Environmental Education and Field Program Director	Direct worker	Female	Dominican Republic/Panama (Field/Remote)	Full-time	Current staff
Quantitative Ecologist	Direct worker	Male	Canada (Remote)	Full-time	Current staff
Database Architect	Direct worker	Female	USA (Office)	Full-time	Current staff
Research and Adaptive Management Coordinator	Direct worker	Female	USA (Office)	Full-time	Current staff

Program Coordinator	Direct Worker	Female	USA (Office/Remote)	Full-time	Current staff
Director of Accounting	Direct Worker	Male	USA (Office)	Full-time	Current staff
Grants Administrator	Direct Worker	Female	USA (Office)	Full-time	Current staff
Field Coordinator and Environmental Education Assistant	Direct worker	Female	Dominican Republic (Field)	Full-time	Current staff (Fondo Peregrino)
Ambassador Hawk and Field Coordinator	Direct worker	Male	Dominican Republic (Field)	Full-time	Current staff (Fondo Peregrino)
Field Team Leads x 4	Contracted	Male X 4	Dominican Republic (Field)	Full-time	Current Staff (Fondo Peregrino)
Field Technicians x 11	Contracted	Male x 11	Dominican Republic (Field)	Full-time	Current Staff (Fondo Peregrino)
Bookkeeper	Contracted	Female	Dominican Republic	Part-time	To be hired (Fondo Peregrino)

Characteristics of Project Workers:

The Peregrine Fund is an equal opportunity employer. It is our intent to maintain a work environment that does not tolerate harassment, discrimination, or retaliation because of age, race, color, national origin, ancestry, religion, sex, pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other status protected by federal, state, or local laws. The Peregrine Fund is dedicated to the fulfillment of this policy regarding all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment.

The Peregrine Fund's direct workers consist of five women and two men (71% women, 29% men). Within the Dominican Republic, one direct worker is a woman and one is a man. All contracted staff are local Dominican men. A female bookkeeper will be hired part-time to complete the Dominican team. All direct and contracted workers are over the age of 18 and have authorization to work within the country in which they are normally based.

Timing of Labor Requirements:

The table below provides an estimated schedule of labor requirements needed for the implementation of the project.

Table 8.2: Timing of labor requirements

Category of workers	Type of work	Quarter from project start					
		Q1	Q2	Q3	Q4	Q5	Q6
1. Direct workers	Planning, strategy, oversight (USA)	x	x	x	x	x	x
	Administration & financial management (USA)	x	x	x	x	x	x
	Quantitative analysis (USA & Canada)	x	x	x			
	Species Action Plan (USA)				x	x	x
	Field Work (Dominican Republic)		x	x	x		
	Education & Outreach (Dominican Republic)	x	x	x	x	x	x
2. Contracted workers	Field Work (Dominican Republic)		x	x	x		

Contracted Workers:

Twelve Dominican technicians and four Dominican team leads will be hired as contracted workers for 6 months during the 2024 breeding season.

9. Assessment of key potential labor risks:

The below table identifies potential and anticipated impacts and risks from the proposed project based on the activities.

Table 9.1: Anticipated key potential labor risks from the proposed project

Key labor risk	Description	Risk probability (low / medium / high)	Level of Risk (low / medium / high)
Contraction/transmission of COVID19	Potential risk during field work, training sessions, workshops, and outreach events	Medium	Low
Natural hazards such as hurricanes, earthquakes, flooding, etc.	The Dominican Republic is susceptible to hurricanes and tropical storms from June to November.	Low	High
Discrimination/Sexual harassment	Discrimination and/or sexual harassment of staff by colleagues from within same or partner organizations	Low	Low
Use of child labor	None within this project	Low	Low
Workplace injury	Potential risk of injury during fieldwork or training (primarily from tree climbing)	Medium	High
Accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Road travel to and from project sites. Traffic accidents are common on Dominican highways.	Medium	High
Treating nests with insecticide	Potential risk of exposure to insecticide to project staff and/or local communities	Medium	Medium

10. Risk mitigation measures

The below table outlines the proposed mitigation measures for those risks identified in the section above.

Table 10.1: Mitigation measures for anticipated negative impacts.

Key labor risk	Mitigation Measures	Responsibility
Contraction/transmission of COVID19	Follow local COVID-19 guidance when planning training sessions and workshops or public education and outreach events. Provide staff with appropriate PPE as necessary. All employees advised to self-monitor for Covid-19 symptoms and alert TPF staff if they feel unwell.	Environmental Education and Field Program Director
Natural hazards such as hurricanes, earthquakes, flooding, strong winds at sea.	Most project activities within the Dominican Republic will be conducted outside of hurricane season, minimizing potential exposure to hurricanes and tropical storms. Local weather advice and warnings will be monitored. In the event of a hurricane or other severe weather warnings in the Dominican Republic, project staff will follow local guidance and procedures. At all times dynamic risk assessments will be undertaken in the event of adverse weather conditions.	Environmental Education and Field Program Director
Workplace injury	Working protocols will adhere to safe working practices and field teams will be provided with appropriate equipment to safely perform their job duties, in addition to first aid kits and Garmin InReach devices for contacting emergency services as required. TPF provides worker's compensation insurance for work related injuries. The workers' compensation system provides for coverage of medical treatment and expenses, occupational disability leave, rehabilitation services, as well as payment for lost wages due to work related injuries.	Environmental Education and Field Program Director
Accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Ensure all project vehicles are maintained and have up-to-date insurance policies. Use of vehicles by TPF staff will follow TPF's organizational policies and drivers of TPF vehicles will follow local traffic regulations.	Environmental Education and Field Program Director
Treating nests with insecticide	Employees using chemicals will wear the appropriate PPE, avoid spreading chemicals outside the direct areas to be treated, and diligently follow TPF's Pest Management Plan (ESS3).	Environmental Education and Field Program Director

11. **Brief overview of legislation: terms and conditions**

The table below outlines the relevant laws and acts that are applicable to this project’s labor management plan.

Table 11.1: Legal and institutional framework: Terms and conditions

Act	Description
Dominican Republic	
Occupational Health and Safety Regulation (Decree No. 522-06)	Establishes occupational health and safety norms and procedures.
Dominican Republic’s Labor Code (Law No. 16-92, 1992)	Establishes fundamental principles of employment, including with regards to terms and conditions. The code prohibits employment of children under the age of 14 and restricts employment of young persons under 18 years old.
Dominican Social Security System (Law 87-01) and Presidential Decree 548-03	Covers the rights of workers regarding compensation for occupational hazards.
Standards from the International Labor Organization.	The Dominican Congress is a signatory to several International Labor Organization’s conventions and treaties, including those related to occupational health and safety, discrimination, and harassment.
United States	
The Fair Labor Standards Act (FLSA)	Establishes minimum wage, overtime pay, hours worked, recordkeeping and child labor.
The Occupational Safety and Health Act (OSHA)	Ensures safe and healthful working conditions.
Title VII of the Civil Rights Act of 1964	Prohibits discrimination and harassment based on personal characteristics.
Idaho Code Title 44	Covers specific state labor laws including employee assistance programs, employment contracts, minimum wage, and child labor laws.

12. **Brief overview of legislation: occupational health and safety**

The table below outlines the relevant laws and acts that are applicable to this project’s labor management plan.

Table 12.1: Legal and institutional framework: Occupational Health and Safety

Act	Description
Dominican Republic	
General Health Law (Law No. 42-01, 2001)	Defines the role of the State in ensuring the citizen’s right to health.
Dominican Social Security System (Law 87-01) and Presidential Decree 548-03	Covers the rights of workers regarding compensation for occupational hazards. Law 87-01, on the Dominican Social Security System, provides three types of assistance: health insurance, disability and life insurance, and occupational hazard insurance.

Standards from the International Labor Organization.	The Dominican Congress is a signatory to several International Labor Organization's conventions and treaties, including those related to occupational health and safety, discrimination, and harassment.
United States	
The Occupational Safety and Health Act (OSHA)	The primary piece of legislation covering occupational health and safety. The act confers on all workers a right to work in places where risks to their health and safety are properly controlled. It sets out the general duties that: employers have towards employees and members of the public; employees have to themselves and to each other; and certain self-employed have towards themselves and others.

13. Responsible staff:

The Environmental Education and Field Program Director will be responsible for:

- Engagement and management of project workers.
- Engagement and management of contractors/subcontractors.
- Occupational health and safety.
- Training of workers.
- Addressing worker grievances

14. Policies and procedures:

All direct workers with TPF shall abide by the TPF Employee Handbook, including, but not limited to, the following policies:

TPF Ethics Code:

Employees, interns, and volunteers associated with The Peregrine Fund are expected to adhere to a standard of professional conduct and integrity. This ensures that the work environment is safe, comfortable and productive. Employees should be respectful and courteous, including discussions of current and former employees/interns/volunteers. General cooperation between coworkers and supervisors is expected. Individuals who act in an unprofessional manner may be subject to disciplinary action up to and including dismissal.

TPF Policy Against Workplace Harassment:

The Peregrine Fund has a strict policy against all types of workplace harassment, including sexual harassment and other forms of workplace harassment based upon an individual's age, race, color, national origin, ancestry, religion, sex, pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by federal, state, or local laws. All forms of harassment of, or by, employees, vendors, volunteers, and visitors are strictly prohibited and will not be tolerated.

TPF Whistleblower Policy:

The Peregrine Fund Code of Conduct (hereinafter referred to as the Code) requires employees, directors, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable

laws and regulations. The objectives of the Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of employees, directors, and volunteers reporting concerns from retaliatory actions.

15. Contracted workers:

All contracted workers for this project will be employed by The Peregrine Fund's officially registered subsidiary in the Dominican Republic, Fondo Peregrino Republica Dominicana (FPRD), and as such will abide by all relevant TPF policies and procedures.

16. Community workers:

Community workers are often hired through FPRD as support staff for the project. For example, we employ community workers on a temporary basis to cook meals, do laundry, help with maintenance on the field house, to provide transportation for local staff and/or hawks, and other activities. These jobs help support the local economy and are appreciated by community members. All community workers will abide by the relevant TPF policies and procedures.

17. Grievance mechanism:

The Peregrine Fund commits to providing a grievance mechanism for all direct and contracted workers. This will include making them aware that regarding the management of environmental and social risks, they may raise a grievance, at any time, to the grantee, the regional implementation team, or the CEPF Secretariat. The contact information of TPF (including street address, mailing address, email address, telephone/WhatsApp numbers, social media, and website), the regional implementation team, and the CEPF Secretariat will be made publicly available through our website, social media, and presentations at relevant stakeholder meetings. Information will be provided in Spanish, English, and Haitian Creole.

We will share all grievances — and a proposed response — with the Regional Implementation Team and the CEPF Grant Director within 15 days. If the claimant is not satisfied following the response, they may submit the grievance via the CI Ethics Hotline (toll-free telephone line: +1-866-294-8674 / secure web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

Grievance Policy & Procedure

We recognize that from time to time you may wish to seek redress relating to matters where you feel you have been unfairly/unreasonably treated during your employment.

In this respect, our policy is to encourage free communication to ensure that any questions and problems arising during such times can be aired and, where possible, resolved fairly, quickly and to the satisfaction of all concerned in an informal way.

Informal Procedure

A range of informal actions can often resolve grievances. Such actions will depend on the individual circumstances of the grievance. Possible actions include, but are not limited to:

- Discussing the issue with the person against whom the grievance is made. You may find that the other person was not aware of your grievance and together; you can resolve the issue directly.
- Discussing the matter with your supervisor, who may:
 - facilitate a meeting between the parties to resolve the issue and move forward,
 - recommend discussion, counseling or mediation with HR; or
- Any other agreed informal action.

If you feel unable to approach your supervisor or the grievance is related to your supervisor, you should speak to HR directly.

In circumstances where the informal procedure is not appropriate, and/or the grievance is sufficiently serious, the grievance may be escalated directly to the formal procedure.

It should be noted that where the matter constitutes an appeal against a disciplinary decision, this is not the appropriate process, it should be taken up in accordance with our separate Disciplinary Appeals Procedure.

Formal Procedure - Stage 1

To lodge a formal grievance, you must put your complaint in writing headed “formal grievance” together with your desired outcome and send it to your supervisor or the Project Director in confidence.

Your supervisor will arrange a formal grievance meeting with you within five (5) working days following the receipt of your letter to consider the matter. A work colleague or an employee association member may accompany and represent you at any formal part of this process.

At the meeting, you will be asked to explain the grievance and how you believe it can be resolved. After any appropriate investigation and due consideration by your supervisor, HR will inform you in writing of the decision. This will be provided within seven (7) working days following the meeting and will set out what action (if any) is intended to resolve the grievance.

You have the right to appeal this decision by escalating the matter to Stage 2 within five (5) working days of the receipt of the outcome letter.

Formal Procedure - Stage 2

If the matter is still not resolved, is sufficiently serious, or you are dissatisfied with the Stage 1 outcome, you may raise the grievance in writing with HR. HR will escalate the matter to the appropriate senior individual for consideration.

HR will arrange a formal grievance meeting with you in writing within ten (10) working days. A work colleague or employee association member may accompany and represent you at this meeting. If further investigation is required, it will be undertaken following the meeting.

At the meeting, you will be asked to explain the grievance, why attempts to resolve it have not (or will not) succeed and how you believe it can be resolved. After due consideration by the senior individual, HR

will inform you in writing of the decision. This will be provided within seven (7) working days following the meeting and will set out what action (if any) is intended to resolve the grievance.

You have the right to appeal this decision by escalating the matter to Stage 3 within ten (10) working days of the receipt of the outcome letter.

Formal Procedure – Stage 3 (Appeal)

If your grievance is not upheld, you have the right of appeal.

Appeals, outlining the grounds on which the appeal is being made, must be lodged in writing to the person specified in the outcome of the grievance letter. Appeals must be received within five (5) working days of the receipt of the letter. In exceptional circumstances this period may be extended.

The purpose of the appeal is not to repeat the investigation or the grievance hearing(s) but to focus on specific factors and mitigating circumstances that may have received insufficient consideration in previous meetings, such as new evidence becoming known. You must provide a full written statement of your case including the grounds upon which the appeal is presented or resisted, with copies of any documents you intend to use in evidence.

If an appeal is not granted, you will receive a letter detailing why the appeal has not been granted. This decision is final.

Appeals that are granted will be heard within four (4) weeks of receipt of the letter requesting the appeal; however, this period may be extended in exceptional circumstances.

A member of the senior management team will normally hear appeals and will include HR, wherever possible. A work colleague may accompany and represent you at this meeting. If further investigation is required, it will be undertaken prior to the meeting.

The decision from this meeting will be communicated in writing no later than five (5) working days after the appeal hearing.

This decision will be final.

Outcome of a Grievance - Whilst any employee who has raised a grievance will be told whether the allegations have been upheld or otherwise, they will not be advised of any disciplinary action taken against another employee. Any matters of discipline relating to the findings being upheld following a grievance investigation will be dealt with as a separate issue and again confidentiality will be maintained.

18. Addressing Gender-Based Violence:

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person's rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

TPF will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. TPF will assist SEA/SH

survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works". TPF will follow the official WB definitions described on the Technical Note as shown below:

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH) is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider is an organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

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.

SEA/SH grievances can be received through any of the available channels and will be considered as "High-profile grievances - that if not resolved promptly may represent significant risks to the environment or community". A list of SEA/SH service providers is available at the RIT's page for Dominican Republic (<https://canari.org/wp-content/uploads/2021/11/CEPF-II-GBV-Service-Providers-DR.pdf>).

Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach.¹ Any cases of SEA/SH brought through the Grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The CEPF will be notified as soon as the designated persons from the

¹ 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.

Grantee organization learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the Grantee, as appropriate and keeping the survivor information confidential. Specifically, following steps will be taken once an incident occurs:

ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the designated person responsible from the Grantee fills in a complaints form, excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the designated person responsible for the Grantee refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to pre established and confidential referral procedures. The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The designated person responsible for the Grantee will keep the survivor informed about any actions taken by the perpetrator's employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the designated person responsible from the Grantee can close the case.

ACTION 2: INCIDENT REPORTING

The designated person responsible for the Grantee needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Executive Director who will in turn inform the CEPF.

Complaint Forms and other detailed information should be filed in a safe location by the designated person responsible for the Grantee. Neither the designated person responsible for the Grantee nor the Executive Director should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the designated person responsible from the Grantee needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to designated person responsible from the Grantee and CEPF; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved or disciplinary action is taken.

As long as the SEA/SH remains open the designated person responsible from the Grantee and/or Executive Director should update the CEPF on the measures taken to close the incident.

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

Each SEA/SH incident should be verified to determine if it was related to the CEPF-funded project. The designated person responsible for the Grantee should form a SEA/SH verification committee composed by her/him, one member of the Grantee organization, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible from the Grantee should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project², the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the designated person responsible from the Grantee or a contractor. The designated person responsible for the Grantee will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labor legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in SVG legal system, the designated person responsible from the Grantee should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the designated person responsible for the Grantee does not conduct investigations, make any announcements, or judge the veracity of an allegation.

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

- Refer complainants to the SEA/SH Services Provider; and
- Record the resolution of the complaint.

The Grantee will also immediately notify both the CEPF and the World Bank of any SEA/SH complaints **WITH THE CONSENT OF THE SURVIVOR.**

19. Disclosure:

All direct, contracted, and community workers will be informed of the existence of a grievance mechanism prior to project implementation. Information will be provided in Spanish, English, and Haitian Creole.

All workers will also be provided with Conservation International's (CI) Code of Ethics and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at

www.ci.ethicspoint.com