

ESS2 - Labor and Working Conditions



CANARI serves as CEPF's regional implementation team for the Caribbean Islands Biodiversity Hotspot.

Labor Management Procedures Template

December 2023

Vermont Center for Ecostudies

CEPF-115350

Project Title: Conservation Standards Online Training Workshop Pilot Project

Grant Summary	
1. Grantee organization:	Vermont Center for Ecostudies
2. Sub project title:	Conservation Standards Online Training Workshop Pilot Project
3. Grant number:	CEPF-115350
4. Grant amount (USD\$):	\$US 48,861
5. Proposed dates of grant:	1 April 2024 to 31 March 2025
6. Countries where activities will be undertaken:	Antigua & Barbuda, The Bahamas, Jamaica, Saint Lucia and St Vincent & the Grenadines, Haiti, Dominican Republic.
7. Date of preparation of this document:	1 Dec 2023

8. Overview of the Caribbean Hotspot Project

The Critical Ecosystem Partnership Fund (CEPF) Caribbean Islands Biodiversity Hotspot Small Grants Mechanism is being implemented in the Caribbean Islands by the Caribbean Natural Resources Institute (CANARI) acting as the Regional Implementation Team (RIT). After a successful first investment in the Caribbean Islands Biodiversity Hotspot between 2011 and 2016, the CEPF has returned to the region for a second phase of investment from August 2021 – July 2026, which totals US\$11.8 million.

The goal of the CEPF is to conserve biodiversity. Its approach is to build local conservation leadership and nurture sustainable development by developing locally driven conservation strategies and providing grants to civil society to implement those strategies. In the Caribbean, the CEPF aims to strengthen the protection and management of globally important biodiversity within 32 priority Key Biodiversity Areas (KBAs) and seven conservation corridors in Antigua and Barbuda; The Bahamas; Dominican Republic; Haiti; Jamaica; Saint Lucia; Saint Vincent and the Grenadines.

9. Overview of labor use on the sub-project

To accomplish the objectives below, VCE’s Caribbean Conservation Coordinator will direct and collaborate with two contracted CS Instructors, who will also serve as coaches and mentors to trainees. The team of three will collaborate closely in all phases of course development, implementation, coaching and mentoring.

Component 1. VCE develops an online CS course

- VCE will develop a highly interactive online training workshop using the Conservation Standards framework, with case studies and other materials adapted to the Caribbean context.
- In this activity VCE develops presentations, instructional videos, reading materials, customized interactive whiteboard collaboration areas, and online quizzes to allow trainers to test their command of the material on their own, and tools to measure increases in practitioner capacity due to the training.

Component 2. VCE provides training 30 or more conservation practitioners in CSOs

- VCE provides online training workshops to at least 30 individuals from CSOs that are working in CEPFs target countries, protected areas and KBAs, and/or on CEPF target species in the Caribbean. The training will be free of cost to trainees. In this pilot project, the training will

be in English. As soon as this pilot project can demonstrate the value of training and mentoring in CS to donors and secure funding, VCE will develop the same course in Spanish and Kreyòl to expand access to CS training to the vast majority of conservationists in the Caribbean.

- The training will encompass the full project cycle using the Conservation Standards framework: *Assess, Plan, Implement, Analyze & Adapt, Share*.
- VCE will provide an optional training session on using Miradi and [MiradiShare](#) software that greatly facilitates use of CS.
- The training will emphasize using Conservation Standards to develop funding proposals and conservation plans.
- Activities will include VCE staff leading six or seven 3hr workshop sessions per workshop series for a total of 20-25 hours of instruction in highly interactive sessions. Using a flexible format with 1-3 trainers, Workshops can accommodate as few as 5 or as many as 24 trainees. This flexibility will enable VCE to provide multiple workshop series in order to accommodate individuals and teams with different availability.

Component 3. VCE provides follow-up CS mentoring to develop plans and proposals

- VCE will provide follow-up training and mentoring in a series of flexible practitioner-led sessions, in which VCE trainers work with practitioners so that they can further develop skills and experience using CS principles and practices to address their own conservation challenges.
- VCE will explicitly focus on teaching and encouraging trainees to use the CS framework to develop fully-elaborated feasible conservation plans, as well as fundable proposals that are tailored to the donor's framework and terminology.
- VCE will monitor the number of plans and proposals that trainees develop, up to what stage, and if they are implemented or funded. However, since this is a pilot project, we explicitly do not set goals for numbers of plans or proposals developed.

Component 4. VCE mentors trainees to develop personal and organizational conservation capacity building plans.

- VCE will provide follow-up training and mentoring to enable each trainee to develop both personal and organizational conservation capacity building plans.
- To aid in this, VCE will develop a conservation capacity self-assessment tool adapted from published competency frameworks, and share it with trainees to enable them self-assess their individual and organizational conservation capacity strengths and weaknesses.
- VCE will then mentor trainees to develop CS-style personal and organizational strategic plans to build their own conservation capacity.

Number of Project Workers

The project will employ 1 VCE staff member, and contract two CS Instructor-Coaches (See Table 9.1).

Table 9.1: Project worker positions and status

Staff Position	Type <i>(direct / contracted / community)</i>	Gender	Place of work <i>(remote / office / field)</i>	Status	
				<i>(full / part-time)</i>	<i>(current staff / to be hired)</i>
Caribbean Program Coordinator (Staff	Male	Remote	Full time	Current staff
CS Instructor-Coaches	Contracted	1 Male, 1 Female	Remote	Hourly	To be hired

Characteristics of Project Workers

- Caribbean Program Coordinator: Male, 50s.
- Conservation Standards Instructors, Coaches and Mentors: 1 female, 50s, and 1 male 50s.

Timing of Labor Requirements

Table 9.2 below outlines the anticipated timing of the labor requirements under this sub-project.

Table 9.2: Timing of labor requirements

Category of workers	2024				2025			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1. Direct workers								
1.1 Staff		X	X	X	X			
1.2 Consultants		X	X	X	X			
1.3 Volunteers and interns								
2. Contracted workers								
3 Community workers								

No community workers will be employed.

10. Risk mitigation measures

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

Table 10.1: Potential Labor Risks and Mitigation Measures

Key labor risks	Risk probability	Level of Risk	Description	Mitigation Measures
Discrimination and/or harassment in the workplace	low	low	Possibility of unfair treatment in the form of discrimination on the basis of personal characteristics such as race, gender, religion, sexual orientation, etc.	VCE will implement a grievance mechanism to address any unforeseen issues, and will inform all trainees be at the start of the training. VCE will take all issues raised seriously and resolve them quickly and transparently.
Transmission of COVID-19	low	low	COVID-19 transmission occurs through the air, and is more likely in confined spaces. Trainees may choose to convene to participate in the training.	VCE will advise trainees to follow official local guidelines of their respective health systems to avoid transmission.

11. Brief overview of legislation: terms and conditions

Table 11.1 sets out the key aspects of national legislation relevant to terms and conditions of employment (e.g., wages, deductions, benefits, etc.) in Jamaica and United States of America and their relevance to ESS2. A community health and safety plan has also been developed for the project and will be implemented.

Table 11.1: National labor legislation relevant to ESS2 in Jamaica and the United States

Law	Relevance to ESS2
United States of America	
The Fair Labor Standards Act (1938)	Establishes minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the private sector. Among other provisions, the act requires employers to pay non-exempt employees at least the federal minimum wage, restricts the hours that children under the age of 16 can work and forbids the employment of children under the age of 18 in certain dangerous jobs.
The Family and Medical Leave Act (1993)	Requires employers of 50 or more employees to give up to 12 weeks of unpaid, job-protected leave to eligible employees for the birth or adoption of a child or for the serious illness of the employee or a spouse, child or parent.
The Labor-Management Reporting and Disclosure Act (1959)	Deals with the relationship between a union and its members.
Title VII of the Civil Rights Act (1964)	Prohibits harassment and discrimination in the workplace based on race, color, religion, sex and national origin

12. Brief overview of legislation: occupational health and safety

Table 12.1 sets out the key aspects of national legislation relevant to occupational health and safety in the Jamaica and the United States of America and their relevance to ESS2. A community health and safety plan has also been developed for the project and will be implemented.

Table 12.1: National legislation relevant to occupational health and safety in the United States

Law	Relevance to ESS2
Disaster Preparedness and Emergency Management Act (1993)	Provides for disaster preparedness and emergency management measures.
United States of America	
The Occupational Safety and Health Act (1970)	Mandates that all non-government employers provide employees with an environment free from recognized hazards, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. Section 11(c) of the Act prohibits any employer from discharging, retaliating or discriminating against any employee because the worker has exercised rights under the act. These rights include complaining to the Occupational Safety and Health Administration (OSHA), seeking an OSHA inspection, participating in an OSHA

	inspection, and participating or testifying in any proceeding related to an OSHA inspection.
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13. Responsible staff

Responsible staff for management and supervision of activities related to the LMP are listed in Table 13.1.

Table 13.1: Responsible staff and workers for the implementation of the LMP

Position	Activities	Estimated time (%)
Caribbean Conservation Coordinator	Engagement and management of contracted instructors, addressing worker and trainee grievances. Ensure that the LMP document and Grievance Mechanism are shared with all direct workers	3%

14. Implementation cost estimates:

The below table outlines those items or activities associated with the LMP. For staff with the responsibility of implementing safeguard policies, a percentage of their budgeted costs has been used. The table represents the costs associated with implementing the LMP over the course of the entire sub-project. Travel insurance for workers is covered by another project.

Table 14.1: Implementation schedule and cost estimates for the lifetime of the sub-project.

Item	Cost Estimate (USD)
Averting, monitoring, and managing any grievances	\$400

15. Policies and procedures

We will follow the overarching policies and procedures of VCE, where the Coordinator is employed. The overarching policy outlines VCE policies on overall operations including but not limited to the following:

- Employee Code of Conduct
- Equal opportunity employment
- Employment at Will
- Diversity
- Conflict of Interest
- Workplace safety
- Computer, Internet and Social Media

16. Contracted workers

No (third party) contracted workers will be employed under this project. All project workers, including consultants, will be employed in following VCE policies and procedures as well as applicable local, State and Federal US laws.

17. Community workers

Not applicable.

18. Grievance mechanism

The following is the GM for the project to address concerns of The workers on VCE's project. The GM will be made available to workers at the start of the project. Grievances that relate to external stakeholders will be handled by a separate mechanism which is included as part of the project's Stakeholder Engagement Plan.

This GM is streamlined, considering the limited scope of project activities at the community level and the low risk of adverse social impacts. The key measures will be to explain the purpose of any visit to stakeholders, explain the existence of the GM and make available contact information of VCE and the CEPF RIT. This will be done through verbal means on calls and electronically via email.

Objectives of the GM

The objectives of the GM are as follows:

1. Ensure that the World Bank ESSs are adhered to in all project activities.
2. Address any negative environmental and social impacts of all project activities.
3. Resolve all grievances emanating from project activities in a timely manner.
4. Establish relationships of trust between project staff and stakeholders.
5. Create transparency among stakeholders, including affected persons, through an established communication system.
6. Foster trust among the project staff and the affected parties.

First Level of Redress

1. *Receive Grievance:* At the project level, all complaints should be received by **James Goetz**. Complaints can be made in person, in writing, verbally over the phone, by email or any other suitable medium. Complaints can be filed anonymously. The point of receipt of complaints is listed below:

Contact	James Goetz
Position	Caribbean Conservation Program Coordinator
Telephone	802-649-1431 ext. 220
Email address	jgoetz@vtecostudies.org
Physical address	20 Palmer Court, White River Junction, VT 05001

At the local and national level, all complaints should be addressed to:

Contact	James Goetz
Position	Director of Conservation Science
Telephone	802-649-1431 ext. 220
Email address	jgoetz@vtecostudies.org
Physical address	20 Palmer Court, White River Junction, VT 05001

All grievances received by VCE should be forwarded to the Chairman within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or electronically (email, WhatsApp, or relevant means) by the **Program Coordinator** within 48 hours of receipt and the complainant will be informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately, the **Program Coordinator** will seek to ensure the speedy resolution of the grievance. If the grievance cannot be resolved at this level, it is taken to the next level.
3. *Record:* The grievance will be registered in **VCE's** grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
 - a. If it is concerning the project, communication to **VCE's Program Coordinator**.
 - b. Notification will also be made to the CEPF Grant Director and Regional Implementation Team Manager within 15 days.
 - c. If it concerns general VCE operations/activity, communication to **VCE's Program Coordinator**.
5. *Assessment:* A decision is made on the nature of the investigation that will take place.
6. *Investigation:* Appropriate investigation of the grievance by an internal team assigned to this task (for example, this may include staff directly involved, as well as the **Associate Director of VCE**. The investigation may include meetings with the complainant and other stakeholders and a review of relevant documents. An impartial party shall be involved in meetings with the complainant. Community representatives or representatives of the complainant will be allowed to sit in on these meetings. Minutes of meetings and documents will be added to the grievance file.
7. *Resolution:* Depending on the findings of the investigation:
 - a. A resolution is decided immediately
 - i. The complaint is rejected
 - ii. A response is agreed upon
 - iii. The complaint is referred, as appropriate
 - b. A resolution cannot be achieved, and the case is presented to VCE's Grievance Committee, or the CEPF Grant Director or for further input
8. *Communication:* Once a resolution has been reached, the decision is communicated to the complainant in writing. Documents are added to the grievance file.
 - d. *Satisfaction:* If the complainant is not satisfied with VCE's response, the complainant may continue to the second level of redress. At all stages, relevant documents are added to the grievance file.

NB: The complainant may request that the issue be transferred to the second level of redress if he/she does not feel that the grievance is being adequately addressed by the Grant Director for the Caribbean Islands Biodiversity Hotspot.

Second Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level one, they will be given the opportunity to raise it directly with the CEPF Grant Director for the Caribbean Islands Biodiversity Hotspot, who can be contacted as follows:

Contact	
Title	Grant Director for the Caribbean Islands Biodiversity Hotspot
Telephone	+1-703-341-2400
Email address	cepf@cepf.net
Physical address	Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202

Third Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level two, they can contact the CEPF Grant Director via the telephone: +1-703-341-2400 or email: cepf@cepf.net

19. 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.

The Grantee 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. The Grantee should 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". This Grantee 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 favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour 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: <https://canari.org/wp-content/uploads/2022/06/CEPF-II-GBV-Service-Providers-Jamaica2.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 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

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.

according to preestablished 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 comprised 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 from 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.

² Project actors are: (a) people employed or engaged directly by the Grantee to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Grantee's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

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 from 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**.

20. Disclosure

CEPF also requires that all direct, contracted and community and community workers receive 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

The code of ethics will be consistent with the code of conduct of the WB:

[*enter name of Personnel*] has signed a contract with the sub-grantee for [*enter description of the Terms of Reference (ToR)*]. This assignment will be carried out at XXXXX. This contract requires you to implement measures to address environmental and social risks related to the sub-project, including the risks of sexual exploitation, sexual abuse, and sexual harassment.

Herewith, all persons are referred to as "**Sub-grantee's Personnel**" and are subject to this Code of Conduct.

This Code of Conduct identifies the behaviour that is required from all Sub-grantee Personnel.

The workplace is an environment where unsafe, offensive, abusive, or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

Sub-grantee's Personnel shall:

1. carry out his/her duties competently and diligently.
2. acknowledge that adherence to this Code of Conduct is a condition of employment.
3. comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Sub-grantee's Personnel and any other person.

4. maintain a safe working environment including by:
 - a. ensuring that workplace equipment and processes under each person's control are safe and without risk to health.
 - b. wearing required personal protective equipment when visiting construction sites and following sub-project COVID-19-related protection guidelines, as described in the Stakeholder Engagement Plan (SEP), Labour Management Procedure (LMP), Environmental and Social Management Framework (ESMF) and plans (ESMPs), or other relevant instruments.
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
5. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation that he/she reasonably believes presents an imminent and serious danger to his/her life or health.
6. avoid any conflicts of interest (such that benefits, contracts, employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection).
7. respect reasonable work instructions (including regarding environmental and social norms).
8. protect and properly use property (for example, to prohibit theft, carelessness, or waste).
9. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers, or children.
10. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with Sub-grantees or other Personnel.
11. not engage in Sexual Exploitation, which means 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.
12. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
13. protect children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behaviour towards children, limiting interactions with children, and ensuring their safety in project areas).
14. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage.
15. shall have access to a referral system for victims of Gender Based Violence/Sexual Exploitation and Abuse of employees and any individual that may be associated with the sub-project. Where such an incident would have occurred, it should immediately be reported to the Employer or his/her designate who would ensure that the victim is referred to a service provider trained to handle GBV cases.
16. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH).
17. shall have access to a Grievance Redress Mechanism, which will afford effective remedies.
18. report violations of this Code of Conduct to the Employer under this project.
19. not retaliate against any person who reports violations of this Code of Conduct, whether to the Employer or the Project's Grievance Redress Mechanism; and,
20. the Grantee staff will follow the relevant requirements set out in LMP.

RAISING CONCERNS

If you observe any behaviour that may represent a violation of this Code of Conduct, or that otherwise concerns you, you should raise the issue promptly. This can be done in either of the following ways:

1. Contact James Goetz in writing at this address [20 Palmer Court, White River Junction, VT 05001] or by telephone at [802-649-1431 ext. 220] or in person at []; or
2. Call [] to reach the Employer's hotline (*if any*) and leave a message

The person's identity will be kept confidential unless reporting of allegations is mandated by the laws of Jamaica Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Sub-grantee Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR GRANTEE PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of the Employer's contact person(s) with relevant experience*] requesting an explanation.

Name of Sub-grantee Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of an authorized representative of the Employer:

Signature: _____

Date: (day month year): _____

ATTACHMENT 1: Behaviours constituting Sexual Exploitation and Abuse (SEA) and behaviours constituting Sexual Harassment (SH)

ATTACHMENT 1 TO THE CODE OF CONDUCT FORM

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviours:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A Sub-grantee Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g., cooking and cleaning) in exchange for sex.
- A Sub-grantee Personnel that is connecting electricity input to households says that he can connect women-headed households to the grid in exchange for sex.
- A Sub-grantee Personnel rapes, or otherwise sexually assaults a member of the community.
- A Sub-grantee Personnel denies a person access to any project Site unless he/she performs a sexual favour.
- A Sub-grantee Personnel tells a person applying for employment under the Project that he/she will only hire him/her if he/she has sex with him/her.

(2) **Examples of sexual harassment in a work context**

- Sub-grantee Personnel comment on the appearance of another Sub-grantee Personnel (either positive or negative) and sexual desirability.
- When a Sub-grantee Personnel complains about comments made by another Sub-grantee Personnel on his/her appearance, the other Sub-grantee Personnel comment that he/she is “asking for it” because of how he/she dresses.
- Unwelcome touching of a Sub-grantee or Employer’s Personnel by another Grantee Personnel.
- A Grantee Personnel tells another Grantee Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

Annex 1:
VCE Policy Handbook