

**ESS2 - Labour and Working Conditions**



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

## **Labour Management Procedures**

**November 2023**

**CEPF 115169**

JEMS Environment Management Services

***Project Name: Climate and Conservation risk mapping initiative in St Vincent and the Grenadines***

<b>Grant Summary</b>
<b>1. Grantee organization: JEMS Environment Management Services</b>
<b>2. Sub project title: <i>Climate and Conservation risk mapping initiative in St Vincent and the Grenadines</i></b>
<b>3. Grant number: CEPF 115169</b>
<b>4 Grant amount (USD\$): \$ 48,635.00</b>
<b>5. Proposed dates of grant: 1 February 2024 – 31 January 2025</b>
<b>6. Countries where activities will be undertaken: St Vincent and the Grenadines</b>
<b>7. Date of preparation of this document: 18 December 2023</b>

## **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 labour use on the sub-project**

The project consists of implementing a pre-survey to assess the knowledge, perspectives and attitudes of residents/householders and critical stakeholders of the communities on the climate and conservation risks impacting the central mountain ranges and biodiversity corridors in St Vincent and the Grenadines. It is also concerned with utilizing participatory qualitative mapping approaches to extract the data and using GIS technologies to develop climate risk and conservation maps on the specific areas of the central mountain systems and the biodiversity corridors.

Residents in communities will participate in a series of exchanges and cultural and sporting programmes to develop their knowledge and resilience on the strategies to adapt to climate change and enhance their capacity to establish conservation practices and actions to address such challenges. Based on the extent of the climate and conservation challenges affecting the biodiversity corridors, the project will engage residents of communities in developing conservation and livelihood plans for the communities/biodiversity corridors to resolve the development challenges impacting the areas.

### Number of Project Workers

The project will employ 8 direct workers, 2 who are volunteers of JEMS and 6 consultants. There will also be a team of community workers who will assist with the administration of surveys under the project. (See Table 9.1).

*Table 9.1: Project worker positions and status*

Staff Position	Type (direct / contracted / community)	Gender	Place of work (remote / office / field)	Status	
				(full-time / part-time)	(current staff / to be hired)
Project Manager	Direct Worker	Male	Office and field	Part-time	Current volunteer
Administrative/Field Officer	Direct Worker	Male	Office and field	Part-time	Current volunteer
Research Survey Specialist	Direct Worker (Consultant)	TBD	field	Part-time	To be hired
Participatory Mapping Specialist	Direct Worker (Consultant)	TBD	field	Part-time	To be hired
GISP Mapping Risk Mapping Consultant	Direct Worker (Consultant)	TBD	field	Part-time	To be hired
Capacity Building Specialist	Direct Worker (Consultant)	TBD	field	Part-time	To be hired
Conservation Planning Specialist	Direct Worker (Consultant)	TBD	Field	Part-time	To be hired
Livelihoods Planning Specialist	Direct Worker (Consultant)	TBD	field	Part-time	To be hired
Administering of survey	Community workers	TBD	field	Part-time	Eight (8) to be hired

### Characteristics of Project Workers

The Direct Workers for this project are all Vincentian. The project will not employ minors to work on the project. The Community Workers are all Vincentians, from the general geographic area in which the project activities are taking place. 80% of the Community Workers to be hired to administer the survey within the communities will be women and they will range in age from 18 to 45. The variation will not include opening participation up to minors.

### Timing of Labour Requirements

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

*Table 9.2: Timing of labour requirements*

Category of workers	2023 - 2024			
	Q1	Q2	Q3	Q4
1. Direct workers ( including consultants)	x	x	x	x
2. Community workers	x	x	x	x

### Direct Workers-Consultants

The JEMS will contact the services consultants who will work with the entity to prepare livelihoods and conservation plans as well as implement capacity development training initiatives and other activities. The JEMS will enter into a written agreement with the consultant, which will be a standard agreement including scope of work, deliverables and payment schedule.

For some project activities, the JEMS will enlist the support services of government agencies, e.g., National Parks, Rivers and Beaches Authority, Physical Planning Division and the Forestry Division. These services will be provided within the context of a letter of agreement for the provision of

services rather than under contract, as there will be no payment of CEPF funds to these agencies for salaries or wages of technical personnel.

### Community Workers

Community workers will be utilised to undertake the administer of surveys at community levels. There will be clear criteria to ensure transparency in the selection process. These persons are largely residents of the participating communities who have indicated a willingness to undertake the activities. These workers will be selected according to their knowledge of the task to be undertaken and their willingness to participate in training activities to ensure the end target is accomplished throughout the implementation process. Additionally, some of these persons are repeat volunteers who participated in various JEMS environmental activities at community levels and understand the community sustainable development process. The grievance mechanism will be available in all communities.

### **10. Risk mitigation measures**

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

*Table 10.1: Potential Labor Risks and Mitigation Measures*

<b>Key labour risks</b>	<b>Risk probability</b> <i>(low/medium/high)</i>	<b>Level of Risk</b> <i>(low/medium/high)</i>	<b>Description</b>	<b>Mitigation Measures</b>
Physical harm from field-related accidents (e.g. cuts from machetes, repetitive strain injury, back pain etc.), exposure to the elements (e.g. dehydration and heatstroke) and health emergencies (e.g., acute illness)	medium	medium	Activities involving in community development activities in carrying out surveys, visiting and observing forested areas, implementing training and other capacity development activities and others etc. Workers will be exposed to the elements.	Persons engaged in the various project activities will undergo practical training of working in communities and the necessary precautions they should take to protect themselves.
Accidents (e.g., road traffic accidents)	low	low	Movement by vehicle will be necessary to conduct several project activities.	All arrangements for transportation will be made with authorized/ licensed drivers with a known history of safe driving practices
Hydrometeorological events (hurricanes, tropical storms) and other natural disasters, including earthquakes and volcanic eruptions	medium	low	Over the life of the project, it is possible that the country could be severely impacted by a hydrometeorological event or other natural disaster. The Caribbean region is up to seven times more likely to	The Project Manager and Administrator/Field Officer will monitor the weather very carefully. If there is a threat of a hurricane and or volcanic eruption, field activities will not occur. Typically, sufficient advance notice for hurricanes is given, and thus, people have always been able to

			experience a natural disaster than larger states, and when one occurs, it incurs as much as six times more damage.	evacuate well in advance of a threatening situation.
Discrimination and/or harassment in the workplace	low	low	Men and women work together on this project. Possibility of unfair treatment in the form of discrimination on the basis of personal characteristics such as race, gender, religion, sexual orientation, etc.	Project workers and community workers, including consultants, will be notified that everyone has the right to a safe working environment, and discrimination and/or harassment (including sexual) will not be tolerated.  A grievance mechanism has been developed to address these issues and will be shared with all members of the project prior to the start of the project. All complaints will be taken seriously and resolved as quickly as possible.
Use of child labour	low	low	Use of persons under the age of 18 for labour under the project.	No children will ever be involved in the work on this project.
Contraction/transmission of COVID-19	low	low	COVID-19 occurs globally and is more likely to be transmitted through any work involving large meetings. Project staff may travel to participate in the fieldwork, as well as surveys.	The guidelines of the St Vincent and the Grenadines government on Covid-19 at the time of the fieldwork and community engagement will be followed.

### 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 St Vincent and the Grenadines 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 labour legislation relevant to ESS2 in St Vincent and the Grenadines*

Law	Relevance to ESS2
<b>St Vincent and Grenadines</b>	

The protection of Employment Act 2003	Provides for the maintenance and promotion of good employment relationship between employers and employees. It also address matters of severance and settlement of disputes.
St Vincent and the Grenadines Equal Pay Act 1994	Prohibits discriminations between male and female employees involving failure to pay equally pay for equal work. Set forth penalties for violating the Act, allowing courts to order payment of awards, and provides for inspectors to investigate complaints in in relationship to the Act.
Wages Councils Act, 1953	This Act provides for the establishment of wages councils and the making of wages council orders.
Trade Disputes (Arbitration and Inquiry) Act, 1940	This Acts provides for the establishment of an arbitration tribunal and a board of inquiry in connection with trade disputes and to make provision for the settlement of such disputes, and for the purpose of enquiring into economic and industrial conditions in St. Vincent and the Grenadines
Accidents and Occupational Diseases (Notification) Act, 1952	This Act places a legal obligation on the employer to inform the Labour Commissioner in writing on the prescribed form, any accident involving any worker that arises out of and in the course of employment and which causes loss of life or serious bodily injury or disables a worker. The employer is also obligated to inform the Labour Commissioner on any occupational disease which he reasonable believes or suspects to have occurred among workers employed by him
Employment of Women, Young Persons and Children Act, 1935	This Act regulates the employment of women, young persons and children in industrial undertakings and on ships in accordance with the following International Labour Organisation (ILO) Conventions: Minimum Age (Industry) Convention (Revised) 1937; Night Work of Young Persons (Industry) Convention 1919; and the Night Work (Women) Convention 1941

## 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 Jamaica 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*

<b>Law</b>	<b>Relevance to ESS2</b>
<b>St Vincent and the Grenadines</b>	
Public Health Act (2003)	Provides a list of communicable diseases that must be notified to the competent authorities.
Public Health Act (COVID-19) Amendment (No 2) 14 <sup>th</sup> March 2021	Provides a list of communicable diseases, including COVID 19, that must be notified to the competent authorities.
Disaster Preparedness and Emergency Management Act (2003)	Provides for disaster preparedness and emergency management measures.

### 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 (%)
Project Manager	Engagement and management of project workers, training of workers, and addressing worker grievances. Ensure that the LMP document and Grievance Mechanism are shared with all direct workers	10%
Administrator/Field Officer	Engagement and management of project workers, addressing worker grievances	5%

### 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.

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

Item	Cost Estimate (USD)
Salary of direct workers to implement the LMP (10% of Project Manager and 5% of Administrator/Field Officer)	\$900
Covid-19 preparedness, including cleaning venues, maintaining COVID-19 protocols etc.	\$105
Personal Protective Equipment	\$2400

### 15. Policies and procedures

JEMS currently does not have any written or established policies and procedures related to labour management, as membership is on a voluntary basis. The approach to policy and procedures will be guided by this Labour Management Plan, including for contracting and grievance redress. Other procedures set out in the Community Health and Safety Plan and Stakeholder Engagement Plan will also be observed.

### 16. Contracted workers

No (third party) contracted workers will be employed under this project. All project workers, including consultants, will be employed in St Vincent and the Grenadines in accordance with national labour and employment laws. All project workers and consultants will be formally contracted to the JEMS.

### 17. Community workers

Community workers will support the implementation of the survey. In the context of this subproject, community labour is provided by members of communities to work in their respective communities to implement the survey. Community workers will be given a stipend and will be asked to sign a basic service agreement.

## 18. Grievance mechanism

The following is the GM for the project to address the concerns of JEMS project workers. The GM will be made available to workers once the project starts. Grievances related 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 JEMS's project manager and the CEPF RIT Manager. This will be done through a printed handout or other locally appropriate means.

### 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. Bolster the relationship of 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 The Chairman. 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	
Position	Project Manager
Telephone	+17845320327
Email address	Kingshill.reserve@gmail.com
Physical address	JEMS Headquarter, Enhams, Calliaqua Post Office, St Vincent and the Grenadines

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

Contact	
Position	Project Manager
Telephone	+17845320327
Email address	Kingshill.reserve@gmail.com
Physical address	JEMS Headquarter, Enhams, Calliaqua Post Office, St Vincent and the Grenadines



All grievances received by JEMS's staff should be forwarded to the Chairman within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Chairman 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 Chairman 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 JEMS's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance is as follows:
  - a. If it concerns the project, communication to the Project Manager JEMS
  - b. Notification will also be made to the CEPF Grant Director and Regional Implementation Team Manager within 15 days.
  - c. If it concerns general JEMS operations/activity, communication to the Chairman.
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 Project Manager JEMS). 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
    - iii. The complaint is referred to as appropriate
  - d. A resolution cannot be achieved, and the case is presented to the CEPF RIT Manager or JEMS's Grievance Committee 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.
  - e. *Satisfaction:* If the complainant is not satisfied with SLFMCB.S response, it can be taken to the second level of redress. At all stages, 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	RIT Manager for the CEPF Caribbean Islands Hotspot
Telephone	+1-868-638-6062
Email address	<a href="mailto:caribbeanrit@canari.org">caribbeanrit@canari.org</a>
Physical address	Caribbean Natural Resources Institute, #105 Twelfth Street, Barataria, Trinidad & Tobago

### 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](mailto:cepf@cepf.net)

### Fourth Level of Redress

If the complainant is not satisfied with the way in which their grievance has been handled at level three, they should avail themselves of the services of the national labour disputes tribunal through the Pay and Conditions of Employment Branch (PCEB) of the Industrial Relations (IR) Department of the Minister of Labour and Social Security, telephone (876) 922-2468 or (876) 922 9500-14. Once complainants formally file a grievance, which includes filling out the appropriate forms, officers and inspectors from the PCEB will carry out an investigation. The name and identity of anyone who submits a complaint to the PCEB will be kept confidential.

## **19. Addressing Gender-Based Violence**

The specific nature of sexual exploitation and abuse, and sexual harassment (SEA/SH) requires tailored measures for reporting and safe and ethical handling of such allegations. A survivor-centred 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 prioritised 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 offence 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 organisation offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

The survivor-centred 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-centred approach aims to create a supportive environment in which the survivor's interests are respected and prioritised 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 "high-profile grievances, which, if not resolved promptly, may represent significant risks to the environment or community".

Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centred approach.<sup>1</sup> 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 organisation 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, the following steps will be taken once an incident occurs:

#### ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the designated person responsible within the Grantee organisation 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

---

<sup>1</sup> The survivor-centred 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-centred approach aims to create a supportive environment in which the survivor's interests are respected and prioritised 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.

to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and 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 within the Grantee organisation needs to report the anonymised SEA/SH incident as soon as it becomes known to the Executive Director, who will, in turn, inform the RIT for onward communication to 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 within the Grantee organisation 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 of her/him, one member of the Grantee organisation, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible within the Grantee organisation 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 project.<sup>2</sup>, 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 within the Grantee organisation or a contractor. The designated person responsible within the Grantee organisation will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in

---

<sup>2</sup> 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 labour such as voluntary services or participation in project activities and processes (community workers).

accordance with local labour 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 within the Grantee organisation 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 within the Grantee organisation 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 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](http://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 is believed 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 Chiefton Charles *of the Employer's Social Expert with relevant experience in handling gender-based violence*, in writing at this address JEMS Headquarter, Enhams, Calliaqua Post Office, St Vincent and the Grenadines or by telephone at +17844928836 or in person at JEMS Headquarter, Enhams, St Vincent and the Grenadines.

The person's identity will be kept confidential unless reporting of allegations is mandated by the laws of St. Vincent and the Grenadines 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: \_\_\_\_\_

Andrew Simmons

Date: (14<sup>th</sup> December 2023) \_\_\_\_\_

Countersignature of an authorised representative of the employer:

Signature: \_\_\_\_\_

Roger Young

Date: 14<sup>th</sup> December 2023 \_\_\_\_\_

**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.