



CRITICAL ECOSYSTEM
PARTNERSHIP FUND



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

Labor Management Procedures

18 November 2022

CEPF Grant 113658

BirdsCaribbean

***Developing a Conservation Action Plan for the Endangered Whistling Warbler in
Cumberland Forest Reserve and the Central Mountain Range, St. Vincent***

St. Vincent and the Grenadines

Grant Summary
<p>1. Grantee organization: BirdsCaribbean</p> <p>2. Sub project title: Developing a Conservation Action Plan for the Endangered Whistling Warbler in Cumberland Forest Reserve and the Central Mountain Range, St. Vincent</p> <p>3. Grant number: 113658</p> <p>4. Grant amount (USD\$): \$49,984</p> <p>5. Proposed dates of grant: 1 November 2022 - 31 October 2024</p> <p>6. Countries where activities will be undertaken: St Vincent and the Grenadines</p> <p>7. Date of preparation of this document: 18 November 2022</p>

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

Number of Project Workers

The project will employ 10-13 workers from BirdsCaribbean and partner organizations (See Table 8.1).

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 time / part-time)</i>	<i>(current staff / to be hired)</i>
Project Co-leader	Direct	F	Remote/field	part-time	current staff
Project Co-leader	Direct	M	Remote/field	part-time	current staff
Project Coordinator	Direct	F	Remote/field	part-time	current staff
Trainer	Direct	M	Remote/field	part-time	current staff
Trainer	Direct	F	Remote/field	part-time	current staff
Communications Manager	Direct	F	Remote/field	part-time	current staff
Project Assistant	Contracted	F	Office/field	part-time	current staff

Staff Position	Type (direct / contracted / community)	Gender	Place of work (remote / office / field)	Status	
				(full time / part-time)	(current staff / to be hired)
Partner Project Leaders and Fieldwork Coordinators (1-2)	Contracted	M	Office/field	part-time	current staff
Field technicians (2-4)	Contracted	M/F	Office/field	part-time	current staff/to be hired

Characteristics of Project Workers

International and local workers, male and female, >18 years of age

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 labour requirements

Category of workers	November 2022-October 2023				November 2023-October 2024			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1. Direct workers	X	X	X	X	X	X	X	X
1.1 Staff	X	X	X	X	X	X	X	X
1.2 Consultants	X	X						
1.3 Volunteers and interns								
2. Contracted workers	X	X	X	X	X	X	X	X
3 Community workers	X	X	X	X	X	X	X	X

Contracted Workers

1-2 contracted workers likely to engage 2-4 subcontractors in the project

Community Workers

The anticipated or known services expected from community workers including from local partner stakeholders. The salaries of community workers are paid with non-project funds.

10. Assessment of key potential labor risks and 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 (low / medium / high)	Level of Risk (low / medium / high)	Description	Mitigation Measures
Physical harm from accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Low	Medium	Field work hazards (vehicle crashes, slips, trips, falls during work in the	Workers are licensed to operate vehicles and any other motorized equipment; workers will be determined

			field, exposure to and potential of harm to project field workers from wildlife including bites, allergic reactions, etc.)	to be in good health prior to departure; workers will be trained in field risks by trained supervisor(s); workers will have first aid supplies; contracted organization will cover health treatment costs
Hydrometeorological events (hurricanes, tropical storms) and other natural disasters, including earthquakes and volcanic eruptions	Medium	High	Over the life of the project, it is possible that the country could be severely impacted by a hydrometeorological event or other natural disasters. The Caribbean region is up to seven times more likely to experience a natural disaster than larger states, and when one occurs, it incurs as much as six times more damage.	Acknowledging the natural disaster risk, workers will maintain vigilance to all weather advisories. Field work for this project requires clear weather; workers will not undertake travel into the field under adverse weather conditions
Discrimination and/or harassment in the workplace	Low	Medium	Unfair treatment in the form of discrimination on the basis of personal characteristics such as race, gender, religion, sexual orientation, etc.	Workers will be notified that everyone has the right to a safe working environment, and discrimination and/or harassment will not be tolerated. Any incidents will be addressed according to the grievance mechanism outlined in sections 18 and 19
Contraction/transmission of COVID-19	Low	Medium	Travel, project staff in-person interaction among the team as well as with stakeholders, increases risk of transmission of COVID-19 or other communicable diseases.	Direct workers are vaccinated; All workers will follow distancing and hygiene protocols, including no work with COVID-19 symptoms, and be provided with safety supplies (masks, sanitizer) as necessary

11. Brief overview of legislation: terms and conditions

Table 11.1: National labor legislation relevant to ESS2 in St. Vincent and the Grenadines and the United States of America

Act	Description
St. Vincent and the Grenadines	
Wages Councils Act (1953)	Provides for the establishment of wages councils and the making of wages regulations addressing inter alia minimum wage, hours of work, overtime, vacation and sick pay, maternity leave and health and safety.
Trade Unions Act (1950)	Provides for the establishment and regulation of trade unions.
Trade Disputes (Arbitration and Inquiry) Act (1940)	Provides for arbitration in industrial disputes.
Protection of Employment Act (2003)	Provides for maintenance of good relationships between employers and employees, and addresses matters of severance and settlement of disputes.
Equal Pay Act (1994)	Prohibits discrimination based on grounds of sex in respect of remuneration and other terms and conditions of employment.
Constitution of Saint Vincent and the Grenadines (1979)	Establishes right of protection from discrimination on grounds of sex, race, place or origin, political opinions, colour or creed.
Employment of Women, Young Persons and Children Act (1935)	Establishes the legal age of a child as under 14 and prohibits employment of children in certain settings.
Environmental Health Services Act (1991)	Provides for the regulation of activities that may affect public health and the environment.
Factories Act (1955)	Provides for health, safety, welfare and special protective measures in certain workplace settings.
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 St. Vincent and the Grenadines 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 St. Vincent and the Grenadines and the United States of America

Act	Description
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St. Vincent and the Grenadines	
Occupational Safety and Health Bill (2017)	Promotes and develops OSH standards in the workplace.
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.

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 Co-leader	Engagement and management of project workers, occupational health and safety, training of workers, addressing worker greivances	5%
Project Co-leader	Engagement and management of project workers, occupational health and safety, training of workers, addressing worker greivances	5%
Partner Project Leaders and Fieldwork Coordinators (1-2)	Within their organization - engagement and management of contractors, occupational health and safety, training of workers, addressing worker greivances	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. 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)
Engagement of direct workers	0 (costs covered by organizaitonal salaries)

Item	Cost Estimate (USD)
Engagement of contracted workers	0 (costs covered by organizational salaries)
Training and oversight of occupational health and safety of direct workers	0 (costs covered by organizational salaries)
Training and oversight of occupational health and safety of contracted workers	0 (costs covered by organizational salaries)
Grievances management	0 (costs covered by organizational salaries)

15. Policies and procedures

The following non-discrimination policy can be found on BirdsCaribbean's website: BirdsCaribbean does not discriminate in its programs, activities or hiring on the basis of race, skin color, national or ethnic origin, age, religion, disability or handicap, sex or gender, gender identity and/or expression, sexual orientation, military or veteran status, genetic information, or any other characteristic protected under applicable USA federal, state or local law (this organization is incorporated in Washington D.C. USA).

The other policies and procedures outlined in this document are not currently documented, but will be shared with all project workers prior to the start of project activities.

16. Contracted workers

The Labor Management Procedure will be shared with project partners who will employ and engage contracted workers. As part of the Memorandum of Understanding with partner organizations, they will be responsible for disseminating the grievance mechanisms and any other relevant information related to national labor and employment law.

17. Community workers

Not applicable

18. Grievance mechanism

The following is the GM for the project to address concerns of BirdsCaribbean's project workers. The GM will be made available to project workers once the project starts. 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 BirdsCaribbean and the CEPF RIT. 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 Executive Director. 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	Executive Director
Telephone	1 (508) 333-8587
Email address	info@BirdsCaribbean.org
Physical address	Natick, MA, USA

All grievances received by BirdsCaribbean staff should be forwarded to the Executive Director within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Executive Director 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 Executive Director 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 BirdsCaribbean's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
 - a. If it is concerning the project, communication to the Manager from BirdsCaribbean
 - b. Notification will also be made to the CEPF Grant Director and Regional Implementation Team Manager within 15 days.
 - c. If it is concerning general BirdsCaribbean operations/activity, communication to the Executive Director.
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 Manager at BirdsCaribbean. 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
 - b. A resolution cannot be achieved, and the case is presented to the CEPF Grant Director or BirdsCaribbean’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.

9. *Satisfaction:* If the complainant is not satisfied with BirdsCaribbean’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 the complainant is 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 RIT, which can be contacted as follows:

Contact	
Title	RIT Manager for the CEPF Caribbean Islands Biodiversity Hotspot
Telephone	+1-868-638-6062
Email address	caribbeanrit@canari.org
Physical address	Caribbean Natural Resources Institute, #105 Twelfth Street, Barataria, Trinidad & Tobago

Third Level of Redress

If the complainant is 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

Fourth Level of Redress

If the complainant is not satisfied with the way in which their grievance has been handled at level three, they have the opportunity to raise it with the CEPF Executive Director via the CI Ethics Hotline.

The CI Ethics Hotline consists of a toll-free telephone line (+1-866-294-8674) and a secure web portal (<https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>) that allows grievances to be made anonymously.

If the complainant is still not satisfied, following the response by the CEPF Executive Director, they will be given the option of submitting their grievance to the World Bank's Grievance Redress Service but this should only be accessed after other GRM options have been exhausted by the claimant. The RIT and CEPF Secretariat will aim to resolve all grievances within 60 days of receipt.

The World Bank Grievance Redress Service (GRS)

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. It must be noted that this GRS should ideally only be accessed once the project's grievance mechanism has first been utilized without an acceptable resolution. World Bank Procedures require the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank's GRS complaint form, which can be found at the following link: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5> . Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: The World Bank
Grievance Redress Service (GRS)

MSN MC 10-1018 NW,
Washington, DC 20433, USA

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 GBV service providers for the St. Vincent and the Grenadines can be accessed through the Regional Implementation Team's (RIT's) project page at this link <<https://canari.org/wp-content/uploads/2021/11/CEPF-II-GBV-Service-Providers-St-Vincent-the-Grenadines.pdf>> and will be defined prior to the contracting of workers, will be kept available by the GBV trained individual, the Project Managers, Project Coordinators, and Social Specialists.

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,

¹The 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.

- 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 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

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).

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.

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 requires that all direct and contracted workers be informed of the existence of the grievance mechanism and the measures put in place to protect them against any reprisal for its use, either at the time of recruitment or at the start of the sub-project, whichever is later.

Prior to the start of project activities, the Executive Director will send an email to direct workers and project partners informing them of the grievance mechanism. Project partners will disseminate this information to all contracted workers prior to the start of any engagement in project activities.

CEPF also requires that all direct, contracted and community workers be provided with Conservation International's (CI's) 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 in Cockpit Country Protected Area. 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 JET's Chief Executive Officer in writing at this address [123 Constant Spring Road, Unit 5 Kingston 8] or by telephone at [876-960- 3693] or in person at the same address; or

The person's identity will be kept confidential unless reporting of allegations is mandated by the laws 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)