



## **Labor Management Procedures**

July 10, 2021

**CEPF Grant 111512**

Instituto Tecnológico de Santo Domingo (INTEC) and Integrated Health Outreach Inc. (IHO)

Collaborative Social Accountability for Improved Governance in Protecting Biodiversity  
Hotspots Project

Dominican Republic, Antigua and Barbuda, Jamaica, and Saint Lucia

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## Grant Summary

1. **Grantee organization:** Instituto Tecnológico de Santo Domingo (INTEC)
2. **Project title:** Collaborative Social Accountability for Improved Governance in Protecting Biodiversity Hotspots Project
3. **Grant number:** 111512
4. **Grant amount (US dollars):** \$500,000
5. **Proposed dates of grant:** August 1, 2021 – July 31, 2025
6. **Countries where activities will be undertaken:** Antigua and Barbuda, Dominican Republic, Jamaica, and Saint Lucia.
7. **Date of preparation of this document:** July 2021

### 8. Overview of Labor Use on the Project

These Labor Management Procedures (LMP) have been prepared for the Critical Ecosystem Partnership Fund – Caribbean Islands Biodiversity Hotspot Project (CEPF Grant #111512), funded by the Policy and Human Resources Development Trust Fund at the World Bank and implemented by Conservation International (CI). The Collaborative Social Accountability (CSA for Improved Governance in Protecting Biodiversity Hotspots Project will be implemented by Instituto Tecnológico de Santo Domingo (INTEC) as the lead, headquartered in the Dominican Republic and its sub-grantee partner, Integrated Health Outreach Inc, headquartered in Antigua and Barbuda. The project is a joint effort by the World Bank GPSA and CEPF, to contribute to improving biodiversity conservation in KBAs located in four Caribbean countries (Dominican Republic and Antigua and Barbuda, during the first year, with adaptive replication in Jamaica and Saint Lucia during years 2 to 4) through collaborative social accountability mechanisms between governments, citizens and civil society organizations (CSOs).

The initiative forms part of the Critical Ecosystem Partnership Fund – Caribbean Hotspot Project (P173464) funded by the Policy and Human Resources Development Trust Fund at the World Bank and implemented by Conservation International (CI), headquartered in Washington, D.C., USA, which aims to improve the capacity of CSOs to reduce threats to globally important biodiversity in the Caribbean Islands Biodiversity Hotspot. INTEC will lead the Collaborative Social Accountability Team (CSAT), with project staff based in Santo Domingo, Dominican Republic. IHO staff, based in St. John, Antigua and Barbuda, and two coordinators who will be contracted in Jamaica and Saint Lucia, complete the CSAT core team. An independent evaluator (M&E specialist) will also be contracted. The CSAT will work closely with CANARI and the CEPF secretariat to implement the project activities

The LMP seeks to ensure that measures are in place to manage risks associated with employment under the project and help to determine the resources necessary for effective planning and management. They set out the approach to complying with national labor legislation, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), in particular Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions. It is important to note the LMP is a living document and can be updated to meet the demands of the project.

The LMP is applicable to all project workers, whether full-time, part-time or temporary. This section describes the project's labor requirements, based on available information.

### 8.1 Direct Project Workers

The project will employ locally based workers from each of the implementing countries. It is expected that these workers will mainly be females over the age of eighteen. It is not anticipated that the project will employ any migrant workers. There will be seven direct project workers. The breakdown of direct project workers is as follows in **Table 8.1**:

**Table 8.1: Project staff**

Position	Jurisdiction	Number of workers	Timing of worker engagement	Status	Sex
Project Manager	Dominican Republic (DR)	1	August 2021 to July 2025	National worker	Female
Project Manager	Antigua and Barbuda (A/B)	1	August 2021 to July 2025	National worker	Female
Environment and Climate Change Specialist	Dominican Republic	1	August 2021 to July 2025	National worker	Female
Gender, Youth and Minority Specialist	Dominican Republic	1	August 2021 to July 2025	National worker	Female
Climate Change and Social Specialist/M&E	Antigua and Barbuda	1	August 2021 to July 2025	National worker	Male
Local M&E/Administration	Dominican Republic	1	August 2021 to July 2025	National worker	TBD
Administration	Antigua and Barbuda	1	August 2021 to July 2025	National worker	Female
<b>Total</b>		<b>7</b>			

Three consultants will be hired over the course of the project: One will be international and the other two will provide in-country support in Jamaica and Saint Lucia (therefore they will also be international hires from INTEC’s perspective). It is anticipated that the contracted workers will be engaged in their individual capacity. The consulting services will follow a competitive procurement process. A written justification will outline the unique features that favor the identified service provider when sole-source procurement is used. The breakdown of consultants is as follows in **Table 8.2**:

**Table 8.2: Consultants**

Position	Jurisdiction	Number of workers	Timing of worker engagement	Status	Sex
Monitoring and Evaluation Specialist (independent evaluator)	All countries	1	September 2021 to July 2025	International	To be determined

Consultant	Jamaica	1	August 2022 to July 2025	National worker	To be determined
Consultant	Saint Lucia	1	August 2022 to July 2025	National worker	To be determined
<b>Total</b>		<b>3</b>			

**8.2. Contracted Project Workers**

INTEC does not anticipate having any workers for this project hired thru a third party or contractor.

**8.3. Community Workers**

No community workers are expected to be employed/engaged directly by INTEC/IHO, and there are no sub-grants or sub-projects expected under INTEC/IHO.

In the eventuality that the need for engaging community workers is identified, this document will be amended in consonance with the Bank guidelines prior to any such engagement.

**8.4. Migrant Workers**

No migrant workers are expected to work on the project in any of the project islands.

**8.5 Characteristics of Project Workers**

INTEC and IHO are equal opportunity employers that value diversity and inclusivity. INTEC and IHO do not practice discrimination in any form, nor does it tolerate the practice of discrimination based on race, color, nationality, religion, gender, age, ethnicity, sexual orientation, marital status or disability. This applies in all spheres of the employment life cycle. INTEC has institutional policy—Sexual Harassment Prevention and Attention Policy (Política de Prevención Y Atención Al Acoso Sexual)—that protects civil and gender rights.

The five known direct workers currently comprise four women and one man; the sex ratio may change with the addition of the three direct workers who will be recruited after the start of the sub-project.

None of the direct workers is aged under 18 years, and given the qualification requirements for the positions, no one under this age will be hired to work on the project, either as a direct worker or a contracted worker.

All existing workers are authorized to work in the jurisdiction where they are normally domiciled, and INTEC/IHO will ensure that all additional direct and contract workers hired for the project have work eligibility in their country of residence.

**8.6. Timing of Labor Requirements**

The Project Managers, Climate Change and Social Specialist, Gender, Youth and Minority Specialist, Monitoring and Evaluation Specialists, and Administration in Dominican Republic and Antigua and Barbuda will be engaged in the project from inception to completion (August 2021 to July 2025). The Consultants in Jamaica and Saint Lucia will commence engagement in the project from August 2022 to

July 2025. The Monitoring and Evaluation Specialist International Consultant will be involved from September 2021 to July 2025.

## **9. Assessment of Key Potential Labor Risks**

The project is conceived of as part of a broader set of inter-connected interventions—alongside the Global Partnership for Social Accountability (GPSA)—aimed at improving the conservation of biodiversity in the Caribbean. The World Bank Critical Ecosystem Partnership Fund—Caribbean Hotspot Project seeks to improve the capacity of civil society organizations in the conservation and management of globally important biodiversity in selected Key Biodiversity Areas in the Caribbean Biodiversity Hotspots. Specifically, the GPSA project will complement these interventions by utilizing social accountability mechanisms and tools to address challenges across the biodiversity conservation delivery chain. The project is set to start in August 2021 until July 2025. Public input will be sought through collaborative social accountability mechanisms between governments, citizens, and civil society organizations (CSOs).

Most of the project work can be classified as knowledge work, requiring professional and administrative labor. There will be no use of heavy machinery, working at heights, or other hazardous work. Most of the occupational health and safety risks relate to in-country and regional travel to support and evaluate activities in project countries. COVID-19 currently presents a threat to all workers, whether working in-country or during regional travel.

There are also risks to occupational health and safety associated with natural hazards, particularly those hazards characteristic of countries in the Atlantic hurricane belt. Project workers may also be exposed to workplace injuries at INTEC/IHO's offices or remote work locations.

Although unlikely, there may be some risk of discrimination and/or harassment, including sexual harassment, in the workplace, on the grounds of gender or other protected characteristic.

The key labor risks that may be associated with the project are summarized in Table 10.0.

## **10. Risk mitigation measures**

Mitigation measures currently in place include the following:

- All INTEC employees benefit from medical insurance; they are also entitled to compensation for work related injuries in accordance with Dominican law.
- At INTEC and IHO occupational health and risk management trainings are mandatory and occur at least once a year.
- It is INTEC and IHO's policy to purchase travel insurance for regional and international travel.
- INTEC complies with all Dominican Republic Labor and Social Security Laws and Regulations, which include provisions for paid annual personal leave and paid sick leave up to 6 months.
- IHO complies with all Antigua and Barbuda and Social Security Act.
- INTEC has in place guidelines for staff on how to safeguard themselves against transmission of COVID-19 in the Santo Domingo Campus. Staff working from home or based outside of Santo Domingo follow national government guidelines and protocols. All non-essential travel has been discontinued and local events and face-to-face meetings are discouraged. When the risk presented by COVID-19 eventually diminishes, the safety of project workers, communities and

partners will be the main consideration in deciding when international travel and face-to-face interactions can resume.

- IHO will include training for project workers on hygiene and other Covid-19 preventative measures. Virtual sessions, including with project communities, will be conducted where viable. Where virtual sessions are not viable and sessions must be held in person, the project will ensure that proper Covid-19 protocols will be adhered. Project workers will be provided with the adequate PPE required to safely carry out their duties. A protocol will be developed in the event any project worker contracts Covid-19.
- INTEC and IHO have a non-discrimination policy for hiring and promotion, as well as ethics requirements for all employees.
- INTEC and IHO have zero tolerance for harassment or discrimination of any form in the workplace.

The Project will also adhere to international guidelines related to Covid-19. These include:

- [ILO Occupational Safety and Health Convention, 1981 \(No. 155\)](#)
- [ILO Occupational Health Services Convention, 1985 \(No. 161\)](#)
- [WHO International Health Regulations, 2005](#)
- [WHO Emergency Response Framework, 2017](#)

The project will also ensure that adherence is made to the WHO’s specific guidelines on Covid-19, along with the Guidelines of the World Bank: [Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, issued on March 20, 2020.](#)

**Table 10.0** outlines potential labour risks and mitigation measures

**Table 10.0: Potential Labor Risks and Mitigation Measures**

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
Accidents (e.g., road traffic accidents)	Medium	High	Project personnel will travel by road from Santo Domingo to communities around priority KBAs. Traffic accidents are common on Dominican roads.  Project personnel will travel by road to communities around priority KBAs in Antigua and	INTEC’s vehicles are maintained in good condition and covered by liability insurance that includes passengers and third parties (required by local law). Drivers are well trained. Protocols are in place to reinforce safety procedures.  Compensation for work related injuries

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
			Barbuda. Traffic accidents are common on Antiguan roads.	includes those incurred during travel.
Health emergencies	Low	High	Covid-19 related health emergencies & standard health risks such as the flu, etc.	INTEC & IHO staff are covered by national health insurance. Protocols will be enforced to prevent staff from getting ill.
Hydrometeorological events (hurricanes, tropical storms) and other natural disasters, including earthquakes and volcanic eruptions	High	Medium	Over the life of the four-year project, one or more of the target countries 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.	<p>INTEC has procedures in place for business continuity in the event of hydrometeorological events. Work on Campus in Santo Domingo is not likely to be affected by any but the most severe storms. IHO staff can work remotely and not be affected by anything but severe storms.</p> <p>INTEC has in place a meteorological alert system coordinated with national emergency management agencies, which will be used to ensure activities in KBAs will be conducted only when safe to do so.</p> <p>Policies and procedures are in place for working from home is needed.</p>

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				<p>Regional travel to be scheduled, insofar as possible, outside the Caribbean's hurricane season (June to November).</p> <p>Use of adaptive management and flexibility in activities in response to changing situations.</p>
Workplace injuries at INTEC or IHO's offices or remote work locations	Low	Low		<p>All INTEC and IHO staff are entitled to compensation for occupational illness or injury under Dominican law and Antiguan law respectively.</p> <p>INTEC Health and Safety Plan was originally approved in 2017 and it's revised regularly.</p> <p>Protocols will be reinforced and implemented to ensure safety and prevent injury.</p>
Discrimination and/or harassment in the workplace	Low	High		<p>Discrimination and workplace harassment are addressed by INTEC's and IHO's policies.</p> <p>All staff receives induction on relevant policies. These will be reinforced and implemented through ongoing staff training.</p>

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
Contraction/transmission of COVID-19	High	Substantial	All Caribbean countries have been affected by the COVID-19 pandemic, though to differing degrees. Countries are similarly moving towards recovery at differing paces. All countries remain vulnerable to a change in their national situation.	<p>Non-essential travel deferred, and face-to-face interactions discouraged, in alignment with national guidelines and protocols.</p> <p>INTEC has developed COVID-19 guidelines for working in the office, events, public gatherings, and travel. These guidelines are reviewed and updated regularly. IHO has similar guidelines. All current INTEC and IHO staff are fully vaccinated.</p> <p>Work outside the DR and A&amp;B will follow national/local government guidelines, as appropriate; as well as WHO recommendations and Guidelines of the World Bank.</p>

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

Table 11.0 sets out the key aspects of national labor legislation in all project countries. Direct workers will be employed in the Dominican Republic and Antigua and Barbuda. Direct workers will be paid on a monthly basis in compliance with national laws and labor management procedures. Statutory deductions from wages will comply with national laws; direct project workers will be informed of the conditions under which such deductions will be made.

**Table 11.0: National labor legislation relevant to ESS2 in project countries**

<b>Country</b>	<b>Law</b>	<b>Relevance to ESS2</b>
Antigua and Barbuda	Disabilities and Equal Opportunities Act (2017)	Expounds the principles of equality and non-discrimination in relation to persons with disabilities.
Antigua and Barbuda	The Antigua and Barbuda Labour Code (1975; amended)	Brings together all major legislation applicable to employment standards and industrial relations. Prohibits the employment of children and young persons under the age of 16 years and places restrictions on employment of young persons under the age of 18.
Dominican Republic	Presidential Decree 522-06 on Occupational Health and Safety	Establishes standards for occupational health and safety.
Dominican Republic	Labor Code of the Dominican Republic (Law 16 from 1992)	Provides for regulation of industrial relations and establishes employment standards, including with regard to employment of children. Specifically, the code prohibits the employment of children under the age of 14 years and places restrictions on employment of young persons under the age of 18.
Dominican Republic	Law 87-01 on Social Security and Presidential Decree 548-03 which regulates national insurance for labor related injuries	All workers in the DR are legally entitled to compensation from the national insurance on labor related injuries.
Dominican Republic	Agreements of the International Labour Organization	The Dominican Republic Congress have ratified (and thus turned into national law) agreements of the International Labour Organization, including those related to occupational health and safety, discrimination and harassment.
Jamaica	Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Jamaica	Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.
Jamaica	Labour Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Jamaica	Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Jamaica	Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant or their employment is terminated.
Jamaica	Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.
Jamaica	Jamaica (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.

Country	Law	Relevance to ESS2
Jamaica	Employment (Equal Pay for Men and Women) Act (1975)	Prohibits discrimination on grounds of sex in respect of remuneration and other terms and conditions of employment.
Jamaica	Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.
Jamaica	Child Care and Protection Act, (2004)	Prohibits the employment of children under the age of 13, restricts employment of children under the age of 15 to light work, and prohibits the employment of young people under the age of 18 in hazardous work.
Jamaica	Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.
Saint Lucia	Labour Code of Saint Lucia (2006; amended)	Establishes fundamental principles of employment, including with regards to terms and conditions, occupational health and safety, equal opportunities and industrial relations. The code prohibits employment of children and young persons below the minimum school leaving age.
Saint Lucia	Education Act (1999)	Sets the minimum school leaving age at 15.
Saint Lucia	Equality of Opportunity and Treatment in Employment and Occupation Act (2000)	Provides for protection against unlawful discrimination on grounds of race, sex, religion, color, ethnic origin, family responsibilities, pregnancy, marital status, or age, and places restrictions on work and employment of minors.
Saint Lucia	Minimum Wages Act (1999; amended)	Establishes process for setting minimum wages for workers in particular sectors or industries.
Saint Lucia	Employees (Occupational Health and Safety) Act (1985)	Covers all aspects of occupational health and safety, including providing for preventive health measures, protective devices and equipment.

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

Table 12.0 sets out the key aspects of national legislation relevant to occupational health and safety in the project countries and their relevance to ESS2.

**Table 12.0: National legislation relevant to occupational health and safety in project countries**

Country	Law	Relevance to ESS2
Antigua and Barbuda	Environmental Protection and Management Act (2015)	Provides for measures for the control and mitigation of all forms of environmental degradation or pollution including the management of pesticides and other hazardous substances to protect human health and maintain the quality of the environment.

<b>Country</b>	<b>Law</b>	<b>Relevance to ESS2</b>
Antigua and Barbuda	Labour Code for Occupational Health and Safety (D10-17) (2013)	Provides for preventative health measures, protective devices and equipment, medical examinations, notification of employment injuries and diseases, training, etc. This Act obligates the employer to ensure the safety and health of all employees and to mitigate risk of exposure to any hazards in the work environment. The Labour Code for Safety stipulates that for the purpose of ensuring the safety of persons employed in or performing any duty in workplaces, safety provisions shall apply to every workplace.
Antigua and Barbuda	Public Health Act (1957; amended)	Makes provisions for various matters relating to public health, including with regards to notification and control of infectious diseases.
Dominican Republic	General Health Law (2001)	Defines the role of the state in relation to fulfilling citizen's rights to health.
Dominican Republic	Agreements of the International Labour Organization	The Dominican Republic Congress have ratified (and thus turned into national law) agreements of the International Labour Organization, including those related to occupational health and safety, discrimination, and harassment.
Dominican Republic	Law 87-01 on Social Security and Presidential Decree 548-03 which regulates national insurance for labor related injuries	All workers in the DR are legally entitled to compensation from a national insurance on labor related injuries. Social Security. Law 87-01 on the Social Security System requires employers and their employees to contribute to the system, which provides for three types of assistance: (a) health insurance, (b) old-age, disability and survival insurance (pension fund), and (c) insurance against occupational hazards.
Jamaica	Public Health Act (2003)	Provides a list of communicable diseases that must be notified to the competent authorities.
Jamaica	Occupational Safety and Health Legislation—the Occupational Safety and Health (OSH) Bill (2017) is still in draft form.	The legislation requires employers operating workplaces to observe certain regulations regarding the safety and health of their workers. Its objectives are: (a) the prevention of injury and illness caused by conditions at the workplace, (b) the protection of workers from risks to their safety, health and welfare arising out of or in connection with activities in their workplaces and (c) the promotion of safe and healthy workplaces. Until it is approved, other legislation that applies to Occupational Health and Safety in Jamaica include the Factories Act (1943), the Labour Officers (Power) Act (1943), the Building Operations and

Country	Law	Relevance to ESS2
		Works of Engineering Construction (Safety, Health and Welfare) Regulations, the Docks (Safety, Health and Welfare) Regulations and the Women (Employment of) Act (1942).
Jamaica	Disaster Preparedness and Emergency Management Act (1993)	Provides for disaster preparedness and emergency management measures.
Saint Lucia	Public Health (Communicable and Notifiable Diseases) Regulations (1978; amended)	Provides a list of communicable diseases that must be notified to the competent authorities under the Public Health Act.
Saint Lucia	Saint Lucia Labour Code (2006)	Under Part four, Divisions 1-4 provides for preventative health measures, protective devices and equipment, medical examinations, notification of employment injuries and diseases, training, etc. This Act obligates the employer to ensure the safety and health of all employees and to mitigate risk of exposure to any hazards in the work environment. Division three of the Code clearly outlines the procedures to be followed in relation to notification of accidents, occupational diseases and other diseases. Division four specifically speaks to the responsibilities of employers, employees and other persons in adhering to health and safety regulations. The Code also clearly outlines the circumstances where employees may refuse to work on health and safety grounds and the procedures for how such matters should be addressed.
Saint Lucia	Public Health Act (1975)	Consolidates regulations for public health, including on the prevention, treatment, limitation and suppression of disease.

### 13. Responsible staff

Responsible staff for management and supervision of activities related to the LMP are listed in Table 13.0.

**Table 13.0: Responsible Staff**

Area	Function/individual
Engagement and management of project workers	INTEC'S Project Manager, Indhira de Jesus IHO's Executive Director, Nicola Bird
Engagement and management of contractors	INTEC'S Project Manager, Indhira de Jesus IHO's Executive Director, Nicola Bird
Occupational health and safety	INTEC'S Human Resources Manager, Yolanda Salazar

	IHO's Executive Director, Nicola Bird
Training of workers	INTEC'S Human Resources Manager, Yolanda Salazar and Environment and Climate Change Specialist, Rosaura Pimentel IHO's Social and Climate Change Specialist, Dwayne Simon
Addressing worker grievances	INTEC'S Human Resources Manager, Yolanda Salazar IHO's Executive Director, Nicola Bird

**14. Policies and Procedures**

Given the nature of the project, no major labor-related risks are expected. However, the World Bank's provisions on Labor and Working Conditions apply given that the project will engage with direct workers and may also hire specialized consultants. Therefore, any contracts must also be consistent with the labor provisions outlined in the World Bank's Environmental and Social Framework. Mitigation measures will be established by incorporating standardized clauses in the contract documents so that all workers are aware of the project's Environment and Social obligations. The grantees, INTEC and its partner IHO will ensure compliance with the clauses. These clauses will include non-tolerance of gender-based violence (GBV), sexual harassment and sexual exploitation and abuse (SEA), discrimination. Project workers will be employed on the basis of equal opportunity and there will be no discrimination as it relates to compensation, working conditions and terms of employment. All project workers will be given and receive training on the Code of Conduct as well as any OHS measures required under ESS2.

***Age of Employment***

- The minimum age for employment on the project is 18-years of age.
- The process that will be followed to verify the age of project workers is two pieces of ID, such as national id, driver's license and/or passport. All potential hires will be required to present these to the Project Manager prior to being employed.
- The procedure that will be followed if underage workers are found working on the project: If any consultant is found hiring persons under the age of eighteen, he/she will be immediately relieved of their duties.
- The procedure for conducting risk assessments for workers aged between the minimum age and 18: The implementing agency and its partner will conduct regular monitoring to ensure that no one is employed under the age of eighteen and that all the requirements of ESS2 are being adhered.

Under this Project all consultants will be provided with a written contract, in accordance with the Labour Code of each country, outlining terms and conditions for executing the work they have been contracted for. The terms and conditions of employment will make adequate provisions for periods of rest per week, annual holiday, sick, maternity and vacation and bereavement leave as stipulated in the Labour Code as per the terms and conditions consistent with labor code in each of the countries:

- All wages are contract-based with a set amount for each year of work delivered.
- Staff will be both full-time and part-time.
- The maximum hours are 40-hours per week.

- Contracts will be signed with each staff member with an outline of responsibilities and a code of conduct.

Project consultants will also be provided with a Code of Conduct. Project consultants will be managed according to the terms and conditions outlined in their signed contract. The Project Managers at INTEC and IHO respectively will be responsible for providing oversight over the execution of contracts. The Project Managers will also be responsible for ensuring that all consultants or individuals hired for the project are implementing project activities according to their agreed upon Terms of Reference which will form part of the contract document. Additionally, a copy of the workers' Grievance Redress Mechanism and Code of Conduct will be made available to all workers hired as part of the project.

### **15. Contracted workers**

INTEC does not anticipate having any workers for this project hired thru a third party or contractor. If it were to happen, contractors will be required to follow national labor laws and ensure compliance with the requirements of the ESF.

### **16. Community Workers**

No community workers are expected to be employed/engaged directly by INTEC/IHO, and there are no sub-grants or sub-projects expected under INTEC/IHO.

In the eventuality that the need for engaging community workers is identified, this document will be amended in consonance with the Bank guidelines prior to any such engagement.

### **17. Grievance Mechanism**

The Grievance Mechanism for all Project staff or contractual employees (ie. Consultants) is as follows:

The Project Managers will be the point of contact for all Grievances. Contact information (Table 17.0) will be provided to workers upon signing of contract.

Upon receipt of Grievances (not channeled through the project manager,) the staff will notify the Project Manager and/or Social Specialist within 24 hours of receiving complaint. In the case of issues with project management staff, the Project Manager may be required to exclude herself if the complaint directly involves her.

All received grievances will be recorded in a grievance register within 24 hours of receipt by the Project Managers. The Project Managers will attempt to address and resolve the grievance within the established time frame of three-weeks upon receipt. In cases of matters which require more urgent attention, a period of a minimum of twenty-four hours and a maximum of fifteen days will be allotted for addressing and resolving the grievance. Grievances can be made in person, by telephone call, or in writing. Grievances can be made anonymously. A dedicated email and telephone number will be provided for all Grievances. For grievances made via telephone or in person, grievances will be recorded a grievance register within 24 hours of receipt by the Project Managers and the complainant asked to sign same.

All workers will be made aware on employment contracts of the grievance mechanisms that are in place and what those consist of. Workers will have access to the following grievance information:

- The option of either verbal or written grievance complaint.
- Contact information for grievance submission
- Timelines for grievance response: minimum 24-hours, maximum 3-weeks.
- Grievance forms will be simple and easily available: the workers describe the actual grievance, allow the organization to track the investigation, conciliation, and remediation steps, and be available to all workers.
- The possibility to hold an open and a constructive meeting about a grievance with their immediate manager/supervisor.
- The right to appeal to another manager/supervisor against a decision made by their manager. If the workers are not satisfied and do not have confidence in those managing the grievances, they can escalate the matter. IHO staff can appeal to INTEC or directly to the Grievance Mechanisms of the Implementing Agency—Conservation International. INTEC staff/consultants can appeal directly to the Grievance Mechanisms of the Implementing Agency—Conservation International.
- The workers’ right to be accompanied by a fellow worker or support of her/his own choice when attending the meeting to discuss a grievance.
- The Ministry of Labour of the respective country or the National Courts are alternatives that the affected person (worker) can use.

The complainant will be informed in writing of the measures taken to address the grievance by the Project Manager if the complaint is against the project manager.

If issues cannot be resolved, the issue will be referred to the Ministry of Labour of the respective country for their action and pronouncement. The Ministry of Labour’s ruling would be the final tier of the grievance mechanism.

If unresolved, either party may seek redress in the courts of the Country. Parties involved will be advised that they can directly contact the Project Office Ministry.

**All received grievances received by the project shall be logged and filed.**

**Table 17.0: Contact names for grievance complaints**

Name	Title	Phone	Email	Physical Address
Indhira De Jesús	INTEC Project Manager	+1-809-567-9271x445	<a href="mailto:csat.gpsa@intec.edu.do">csat.gpsa@intec.edu.do</a>	Avenida de Los Próceres #49, Los Jardines del Norte 10602, Santo Domingo, Dominican Republic
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## 18. Addressing gender-based violence

The Grievance Redressal Mechanism (GRM) will specify and train an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers in each country, which 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. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV-related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

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

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint.

The GRM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR**.

## 19. Disclosure

INTEC/IHO will inform all direct and contracted workers of the existence of relevant policies, grievance mechanisms and 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 project, whichever is later.

INTEC/IHO will also provide all direct and contracted workers with Conservation International's (CI's) Code of Conduct, and be informed that any violations of the Code of Conduct should be reported to CI via its Ethics Hotline at [www.ci.ethicspoint.com](http://www.ci.ethicspoint.com)