

**ESS2: Labour and Working Conditions**



**LABOUR MANAGEMENT PROCEDURES**

**Date: May 24, 2022**

**CEPF Grant #112652**

**Grantee: Caribbean Coastal Area Management Foundation**

***Project Title: "Participatory preparation and implementation of the Portland Bight Protected Area Management Plan, Jamaica"***

## **Contents**

1. Grantee organization
  2. Grant title
  3. Grant number
  4. Grant amount (US dollars)
  5. Proposed dates of grant
  6. Countries or territories where project is located
  7. Overview of labour use in the project
  8. Assessment of key potential labour risks
  9. Risk mitigation measures
  10. Brief overview of legislation: terms and conditions
  11. Brief overview of legislation: occupational health and safety
  12. Responsible staff
  13. Policies and procedures
  14. Implementation cost estimates
  15. Grievance mechanism
  16. Addressing Gender Based Violence, Sexual Exploitation and Abuse and Sexual Harassment
- Annex 1 – Community members letter of engagement
- Annex 2 – GOJ COVID 19 Guidelines
- Annex 3 – Travel requirements for community members
- Annex 4 – C-CAM Code of conduct

## Grant Summary

- 1. Grantee organization:** Caribbean Coastal Area Management Foundation.
- 2. Grant title:** Participatory preparation and implementation of the Portland Bight Protected Area Management Plan, Jamaica
- 3. Grant number:** 112652
- 4. Grant amount (US dollars):** \$388,483.53
- 5. Proposed dates of grant:** 1 July 2022 to June, 2025
- 6. Countries or territories where project is located:** Jamaica

### **7. Overview of labour use in the project:**

These Labor Management Procedures (LMP) have been prepared by the Caribbean Coastal Area Management Foundation (C-CAM) for the CEPF grant #112652 to be implemented in the Portland Bight Protected Area (PBPA), Jamaica.

The LMP seek to ensure that measures are in place to manage any risks associated with Project Workers: employment of staff or hiring of consultants and contractors under the project and help to determine the resources necessary for efficient and effective planning, implementation and management. The LMP ensures that C-CAM is compliant with Jamaican labour laws, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), in particular Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions. The LMP will be updated during the project implementation period as necessary. The LMP applies to all project workers, whether staff full-time, part-time or temporary as well as consultants or contractors.

### Number of Project Workers:

All workers will be based in Jamaica. Table 7.1 outlines proposed staff positions and status.

*Table 7.1: Staff positions, and status*

<b>Staff Positions</b>	<b>Full time</b>	<b>Part time</b>	<b>Gender</b>	<b>Place of work</b>	<b>Status</b>
Executive Director		X	Female	Home/office/field station	Current staff
Science Officer		X	Male	Home/office	Current staff
Assistant Science Officer	X		Male	Field station	
Public Education Officer	X		TBD	Office/field	
Accountant		X	TBD	Main Office	
Assistant Administration & Finance Officer		X	Female	Main Office	Current staff
Office cleaner		X	Female	Main Office	Current staff
Gardener		X	TBD	PBDC	

Staff Positions	Full time	Part time	Gender	Place of work	Status
<b>Consultants</b>					
Project Coordinator			Female		
Lead Consultant			Female		
Management Consultant			TBD		
GIS Consultant			Male		
Communications Consultant			TBD		
Attorney at law			TBD		
Auditor			Male & female		
Gender strategy expert			TBD		
KAP consultant			TBD		

#### Community workers

In the context of this subproject, community labour is provided by the community as a contribution to the subproject. The subproject will ensure that such labour will be provided on a voluntary basis as an outcome of individual agreement as per Annex 1- Communitymember’s letter of engagement. C-CAM intends to expand its community monitoring program into a Citizen Science (CS) program. The community members who will be engaged for the CS program will be drawn from across the PBPA.

The members of the CS programme will support establishment of monitoring plots, installation of Cuban Tree Frog monitoring devices, collection of seeds and seedlings for propagation as well as monitoring and data collection. C-CAM is seeking in this project to implement a new methodology will include supporting at least 10 community members with a monthly stipend. The CEPF project will also provideongoingg training, and basic data collection equipment (e.g., tablets). Potential risks and mitigation measures for community workers are outlined in Section 9. In summary, they revolve around the transmission of communicable diseases, natural hazards and disasters, discrimination/sexual harassment or use of child labour, workplace injury, accidents or injury to their person, potential allergic reactions from nursery activities, and attack or harm by persons committing infractions or danger from wildlife.

#### Characteristics of Project Workers

C-CAM does not discriminate or allow for any discrimination in its operation. There is equal opportunity for persons of all races, color, nationality, religion, gender, age, ethnicity, sexual orientation, marital status or disability. This includes full time and part-time staff, volunteers and interns, consultants, contractors and community workers.

All workers will be over the age of 18. The gender ratio will adjust as additional team members are brought on board based on academic qualification, experience and expertise throughout the life of the project as is the practice in the overall C-CAM operations.

All existing workers are authorized to work in the jurisdiction where they are normally domiciled, and C-CAM will ensure that all additional part-time and full-time workers and independent consultants or contractors hired for the project will be eligible to work in Jamaica.

Timing of Labor Requirements

The below table outlines the timing of labor requirements by quarter (every 3 months) of the project from July 2022 – June 2025.

*Table 7.2: Timing of labour requirements*

Category of workers	Quarters (every 3 months) from the start of project implementation											
	1	2	3	4	5	6	7	8	9	10	11	12
1 Direct workers		X	X	X	X	X	X	X	X	X	X	X
1.1 Staff including management and other fulltime and part time staff to be hired under the project	X	X	X	X	X	X	X	X	X	X	X	X
1.2 Consultants* including Project Coordinator and Lead Consultant	X	X	X	X	X	X	X	X	X	X	X	X
1.3 Volunteers and interns to be hired in summer months					X				X			
2 Community workers^		X	X	X	X	X	X	X	X	X	X	X

\* Other consultants (e.g., planners, attorney at law, auditor) will be hired throughout the project as needed to undertake actions relevant to the project implementation activities.

^ Community members will be engaged throughout the life of the project to undertake various actions especially once their training has been successfully completed.

**8. Assessment of key potential labor risks:**

The focus of the project is to develop a management plan and supporting zoning and regulations through desk surveys and stakeholder engagement in meetings and workshops. The associated potential risks and mitigation measures are described in Table 9.1 below. It is expected that field staff will be engaging with the community throughout the project to encourage good conservation and

environmental practices. This can include observing and identifying where infractions of related Jamaican legislation (e.g., the Wildlife Protection Act) are occurring and ways to help curb this behavior. The field staff may, at their discretion, advise the relevant government agency of the infractions for investigation and follow-up actions.

The project activities do not include use of any hazardous materials, hazardous activities, working from heights or use of heavy equipment.

COVID 19 presents a threat to all workers at all levels. Team members may be exposed to the workplace injuries at any of C-CAM’s offices, at sea or in the field. There is the potential, albeit unlikely, possibility of gender-based violence, discrimination, sexual harassment and use of child labour.

There are also risks to occupational health and safety associated with natural hazards, particularly those hazards characteristic of countries in the Atlantic hurricane belt.

**9. Risk mitigation measures:**

The cost of the premium for health insurance for C-CAM team members is covered by donor funds where that is permitted. It is expected that the project will cover this for full time project workers. The Government of Jamaica (GOJ) through the Ministry of Health and Wellness has a national guideline for dealing with COVID19, which C-CAM team members are expected to follow. Those guidelines change with recommendations from the World Health Organization (WHO).

C-CAM’s Code of conduct is meant to guide team members on how they are expected to conduct themselves while employed to C-CAM.

All staff are allowed medical leave and vacation leave as the national labour laws allow.

*Table 9.1: Risks and mitigation measures*

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
Contraction/transmission of COVID19	High	High	COVID 19 has affected Jamaica like other countries in the world. The GOJ, through various measures, is seeking to keep this under control.	All team members will follow the guidelines provided by the Government of Jamaica. All offices have signs referencing wearing of masks, use of sanitizer and other recommendations as the GOJ prescribes.
Natural hazards such as hurricanes, earthquakes, flooding, strong winds at sea.	High	High	Jamaica is affected by hurricanes and other natural hazards. It is possible that during the	The GOJ keeps the nation abreast of impending events. C-CAM is a member of the parish disaster and preparedness committees which allows

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
			project implementation period Jamaica and particularly the PBPA could be impacted by one or more disaster of varying magnitude.	us to keep abreast of pending impacts. They also offer training in disaster management actions from time to time. The PBDC had a disaster plan and there is a general protocol for securing buildings and other property (e.g., boats, engines) especially for events that we can be forewarned.
Discrimination/Sexual harassment	Low	High		C-CAM's code of conduct which is shared with team members references appropriate conduct and potential consequences for not following the code. Project workers will also have access to a grievance mechanism.
Use of child labour	Low	High		C-CAM's code of conduct which is shared with team members references appropriate conduct and potential consequences for not following the code. Project workers will also have access to a grievance mechanism.
Workplace injury	Low	Low		C-CAM follows the GOJ rules regarding workplace injury while ensuring that repairs and maintenance is done to reduce potential injuries.
Accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Low	High		Proper maintenance, insurance and servicing of company vehicles, use of authorized public transportation. All full-time project staff will

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				benefit from health insurance for the duration of the project.
Potential allergic reaction to plants or additives or cuts and bruises from handling plants, seeds and seedlings	Low	High		The gardener and other staff involved in the operation of the nursery will receive training and will be required to wear safety gear. All full-time project staff will benefit from health insurance for the duration of the project. A first aid kit will also be kept nearby.
<b>Community workers</b>				
Contraction/transmission of COVID19	High	High	COVID 19 has affected Jamaica like other countries in the world. The GOJ through various measures is seeking to keep this under control.	All team members will follow the guidelines provided by the Government of Jamaica as per Annex 2. All offices have signs referencing wearing of masks, use of sanitizer and other recommendations as the GOJ prescribes.
Accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Low	High		All community workers will be required to utilize public transportation that meet the requirements of the Road Traffic Act e.g., proper licensing and insurance as per Annex 3.  In case of accidents and incidents, C-CAM will immediately report the accident/incident to CEPF. C-CAM will provide sufficient detail regarding the incident or accident, indicating immediate measures

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				taken or that are planned to be taken to address it. Subsequent reports may be provided to CEPF upon request.
Natural hazards such as hurricanes, earthquakes, flooding, strong winds at sea.	High	High	Jamaica is affected by hurricanes and other natural hazards. It is possible that during the project implementation period Jamaica and particularly the PBPA could be impacted by one or more disaster of varying magnitude.	The GOJ keeps the nation abreast of impending events. C-CAM is a member of the parish disaster and preparedness committees which allows us to keep abreast of pending impacts. They also offer training in disaster management actions from time to time. The PBDC had a disaster plan and there is a general protocol for securing buildings and other property (e.g., boats, engines) especially for events that we can be forewarned.
Discrimination/Sexual harassment, or use of child labour	Low	High		C-CAM's code of conduct as per Annex 4 which is shared with team members references appropriate conduct and potential consequences for not following the code. Project workers will also have access to a grievance mechanism.
The risk of community workers being attacked or harmed by persons committing infractions or in danger from wildlife.	Low	Medium	As part of the Citizen Science (CS) Programme, community workers will be involved in IAS reduction and monitoring in remote areas.	The training to be implemented under the CS programme will include how to safely collect data and interact with persons who might be committing infractions. Community workers will not be engaged in coercive activities to enforce laws.

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				The approach will be to create awareness among stakeholders about the law and work collaboratively on how to conserve. They will also be made aware of how to handle wildlife.

#### 10. Brief overview of legislation: terms and conditions:

All staff (full-time and part-time) 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 which will be further detailed in contracts and pay slips.

*Table 10.1: Jamaican labor legislation relevant to ESS2*

Legislation	Relevance
Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.
Labour Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant or their employment is terminated.
Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.
Jamaica (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.
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.
Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.
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.

Legislation	Relevance
Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.

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

Table 11.1 sets out the key aspects of national legislation relevant to occupational health and safety in Jamaica.

*Table 11.1. Jamaican legislation relevant to occupational health and safety*

Legislation	Overview
Occupational Health and Safety Bill (2017) -Draft	Provides a framework to secure the safety and health of workers.
Factories Act (1943 amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction

### 12. Responsible staff:

This section identifies the functions and/or individuals within the sub-project responsible for (as relevant):

*Table 12.1 – Role of staff*

Responsibilities	Staff
Engagement and management of project workers.	Executive Director and Science Officer
Engagement and management of contractors/subcontractors	Executive Director and Science Officer
Occupational health and safety	Finance Officer and Assistant Science Officer
Training of workers	Science Officer and Executive Director
Addressing worker grievances	Executive Director and Science Officer

### 13. Policies and procedures:

#### Salary and working hours

Each staff member will have a project contract to guide their engagement with C-CAM. This will include salary, working hours, detailed job description to include activities, supervisor, deliverables as well as, summary code of conduct, vacation and any benefits that person is entitled to.

Each staff member will be given monthly pay slips to show the calculations for employees' statutory contributions as well as employers contribution paid on their behalf to the relevant agencies of the GOJ.

During the implementation of the C-CAM will hold staff sessions to discuss the project activities, deliverables and timelines as well as the project related requirements and other matters the team wish to discuss. The staff orientation session will provide staff with the requisite documentation needed.

C-CAM's standard workweek is 40 hours. Time worked includes all time that an employee is required to be physically at work or performs work for C-CAM. Time worked does not include rest breaks or

meal breaks. Work performed at different locations counts as work time. However, employees are expected to take a maximum of 40 minutes for lunch in accordance with good industrial relations practice.

### Benefits

Staff benefits vary depending on the role and responsibility.

*Contracted workers:* All consultants will be engaged directly by C-CAM under a service agreement governed by and interpreted in accordance with Jamaican law. Independent consultants are paid based on a daily rate or a fixed or flat fee, depending on the scope of work. They are considered independent service providers who are responsible for all forms of health or accident insurance and payment of taxes (except for the 3% withholding tax as required by GOJ). Therefore, neither C-CAM, its agents, employees or partner institutions, nor any of the funding agencies involved in supporting C-CAM, is liable for any damages resulting from the service agreement. Independent consultants are responsible for taking out any appropriate insurance coverage.

All independent consultants must agree to comply with all applicable laws in Jamaica. The service agreements will flow down relevant requirements of ESS2 in relation to management of labor issues, including occupational health and safety. Independent consultants will be required to acknowledge receipt of C-CAM's Code of Conduct and Conservation International's Code of Conduct and certify their agreement and compliance therewith.

*Community workers:* C-CAM will establish a criterion for engagement of community workers, volunteers and Interns to ensure that equal opportunity in line with the LMP and Jamaican labour laws and CEPF's procedures are being met. This will include:

- a) clearly identifying the terms and conditions on which community labor will be engaged (e.g., the amount and method of payment),
- b) setting out the times of work, and
- c) specifying the way in which community workers can raise grievances in relation to the project;

It will be necessary to assess working conditions and Occupational Health and Safety in relation to community labour. This assessment will be applied, proportionate to:

- a) the nature and scope of the project;
- b) the specific project activities in which the community workers are engaged; and
- c) the nature of the potential risks and impacts.

The necessary training that is appropriate will be established. C-CAM will ensure that potential risks are assessed and mitigation actions put in place if necessary.

### **14. Implementation cost estimates:**

The below table outlines those items or activities associated with the LMP. For staff with responsibility of implementing safeguard policies, a percentage of their budgeted costs have been used.

Table 14.1: Implementation schedule and cost estimates for the project lifetime

Item	Cost Estimate (USD)
Direct workers' time in monitoring and implementing the LMP including training. Direct workers here include the: <ul style="list-style-type: none"> <li>Executive Director (general oversight) (1%)</li> <li>Project Coordinator (primary responsibility to ensure that the safeguard policies are implemented) (2%)</li> <li>Assistant Administration &amp; Finance Officer (procurement of necessary protective equipment) (5%)</li> </ul>	\$1,500
Health insurance for CEPF staff (prorated)	\$5,800
Field gear for staff	\$680

### 15. Grievance mechanism:

The following is the GRM for C-CAM to address concerns of those working on the project. The GRM will be made available to Project workers, including via C-CAM's website once the project starts. Grievances that relate to C-CAM project workers will be handled by a separate mechanism which is included as part of the project's Labor Management Procedures. Grievances from project workers related directly to their conditions of work will be recorded separately from those received from general stakeholders.

#### Objectives of the GRM

The objectives of the GRM 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 on workers.
3. Resolve all grievances emanating from project activities in a timely manner.
4. Establish relationships of trust between project staff.
5. Create transparency among Project Workers, through an established communication system.
6. Bolster the relationship of trust among the project staff.

#### First Level of Redress

1. *Receive Grievance:* All complaints should be received by the Executive Director at C-CAM. 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	
Telephone	+1-876-986-3327 (landline) or 1-876-289-8253 (mobile or WhatsApp)
Email address	<a href="mailto:ccamfngo@gmail.com">ccamfngo@gmail.com</a>
Physical address	Bustamante Drive, Lionel Town, Clarendon, Jamaica

All grievances received by C-CAM 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 C-CAM 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. C-CAM 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 C-CAM's grievance file, including relevant documents.

4. *Notification:* Communication of the grievance as follows:

- a. If it is concerning C-CAM's project, communication to the Executive Director and the RIT Manager.
- b. Notification will also be made to the CEPF Grant Director within 15 days.
- c. If it is concerning general C-CAM operations/activity, communication to C-CAM's 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 Executive Director). 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.. Minutes of meetings and documents will be added to the grievance file and will be handled confidentially.

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 as appropriate
- b. A resolution cannot be achieved, and the case is presented to the RIT Manager and the CEPF Grant Director 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 by C-CAM'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 C-CAM's Executive Director.

#### 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:

<b>Contact</b>	
Title	Grant Director for the Caribbean Islands Biodiversity Hotspot
Telephone	+1-703-341-2400
Email address	<a href="mailto:cepf@cepf.net">cepf@cepf.net</a>
Physical address	Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202

### Third Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level two, they can contact the CEPF Executive Director via the CI Ethics Hotline (telephone: +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

If the complainant does not accept the solution offered by the CEPF Executive Director, then the complaint is passed on to the fourth level. Alternatively, the complainant can access the fourth level at any point. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress towards resolution is being made, the matter may be retained at this level for a maximum of 60 working days.

### **16. Addressing Gender Based Violence, Sexual Exploitation and Abuse and Sexual Harassment:**

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

The Grantee will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The Grantee should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

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

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

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

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

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

The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

SEA/SH grievances can be received through any of the available channels and will be considered as "High-profile grievances - that if not resolved promptly may represent significant risks to the environment or community". A list of SEA/SH service providers is available at the RIT's page: <https://canari.org/wp-content/uploads/2022/06/CEPF-II-GBV-Service-Providers-Jamaica2.pdf>

Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach.<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 organization learn about the complaint.

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

#### ACTION 1: COMPLAINT INTAKE AND REFERRAL

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

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

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the designated person responsible for the Grantee refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to 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

---

<sup>1</sup> 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.

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 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 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.

---

<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 labor such as voluntary services or participation in project activities and processes (community workers).

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

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

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

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

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

#### **21. 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.

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](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 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 "Grantee's Personnel" and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that is required from all Grantee Personnel.

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

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 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 follow sub-project COVID-19 related protection guidelines, as described in the Stakeholder Engagement Plan (SEP), Labor 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 favors, 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 favors, and other verbal or physical conduct of a sexual nature with 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 behavior 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 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 on 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 behavior 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 [*enter name of the Employer’s Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Employer to handle these matters*] in writing at this address [ ] or by telephone at [ ] or in person at [ ]; or
2. Call [ ] to reach the Employer’s hotline (*if any*) and leave a message

The person’s identity will be kept confidential, unless reporting of allegations is mandated by the laws XXXX. 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 behavior 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 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 Grantee Personnel: [insert name]

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

Date: (day month year): \_\_\_\_\_

Countersignature of authorized representative of the Employer:

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

Date: (day month year): \_\_\_\_\_

ATTACHMENT 1: Behaviors constituting Sexual Exploitation and Abuse (SEA) and behaviors 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 behaviors:

- (1) Examples of sexual exploitation and abuse include, but are not limited to:
  - A 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 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 Grantee Personnel rapes, or otherwise sexually assaults a member of the community.
  - A Grantee Personnel denies a person access to any project Site unless he/she performs a sexual favor.
  - A 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
  - Grantee Personnel comment on the appearance of another Grantee Personnel (either positive or negative) and sexual desirability.
  - When a Grantee Personnel complains about comments made by another Grantee Personnel on his/her appearance, the other Grantee Personnel comment that he/she is “asking for it” because of how he/she dresses.
  - Unwelcome touching of a Grantee or Employer’s Personnel by another Grantee Personnel.
  - A Grantee Personnel tells another Grantee Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.



**Annex 1 – Community members letter of engagement**  
**CARIBBEAN COASTAL AREA MANAGEMENT (C-CAM) FOUNDATION**  
**P.O. Box 33, Lionel Town, Clarendon, JAMAICA**  
**Telephone: 876-986-3344, 876-986-3327, 876-289-8253**  
**E-mail: [ccamfngo@gmail.com](mailto:ccamfngo@gmail.com)**

Date

Name

Address

Dear XXXX

**Provision of services: XXXX with C-CAM supported by the Critical Ecosystem funded project entitled “Participatory preparation and implementation of the Portland Bight Protected Area Management Plan, Jamaica”**

Further to our exchanges, we are pleased to confirm that the Caribbean Coastal Area Management Foundation (C-CAM) is seeking your services as a XXXX to support implementation of the captioned project. Your period of engagement will be from XXXX to XXXX.

This project is being implemented by C-CAM over a 3-year period from July 2022 to June 2025.

This correspondence formally confirms the following:

**Project Objective**

The overall objective of this project is that XXXX. This will include enhanced community engagement to support XXXX. You will support this objective by doing XXXX for XX days and collecting data, photographs and samples (example).

**Compensation & payment schedule**

C-CAM is pleased to offer a stipend for your voluntary services as follows:

**Stipend**

XX Jamaican dollars per day payable weekly.

**Funds will be transferred to your account (or other appropriate arrangement for cash payments) on completion of the specified activities as listed below:**

- E.g. Participate in training sessions
- Participate in meetings
- Participate in key informant interviews
- Get familiar with SMART software and utilization on a device

You will undertake other activities as directed by your supervisor

**Information or Items to be provided by the XXX (e.g. Community monitor)**

Copy of an Identification card (optional)

Contact number  
Name and telephone number of an emergency contact

**Items provided by C-CAM for your use**

C-CAM will provide:  
A tablet (if you do not have smart phone). (example)

You will report to the Science Officer, 876-383-2184 who will supervise you during the period with C-CAM.

Other contacts:  
Assistant Science Officer – add contact information  
Public Education Officer – add contact information

Kindly confirm your agreement by countersigning below and dating and then returning a copy to C-CAM no later than **XXXX**

Sincerely,

Signature: \_\_\_\_\_  
Name:  
Position:  
Date:

Signature: \_\_\_\_\_  
Name:  
Position: Executive Director  
Date:

Please see Annexes – to be included as appropriate

### **Annex 2 – GOJ COVID 19 Guidelines**

- [https://www.moh.gov.jm/wp-content/uploads/2020/10/MOH\\_CORONAVIRUS\\_2020\\_b.pdf](https://www.moh.gov.jm/wp-content/uploads/2020/10/MOH_CORONAVIRUS_2020_b.pdf)
- <https://www.moh.gov.jm/wp-content/uploads/2020/04/Interim-Guidance-for-COVID-19-Recommendations-for-Employers.pdf>
- <https://www.moh.gov.jm/wp-content/uploads/2020/04/Disinfection-of-Public-Places-Guidelines-V1.pdf>
- [https://www.moh.gov.jm/wp-content/uploads/2020/05/Inspection-Checklist-for-Public-Facilities-and-Workplaces\\_COVID\\_19\\_edits.pdf](https://www.moh.gov.jm/wp-content/uploads/2020/05/Inspection-Checklist-for-Public-Facilities-and-Workplaces_COVID_19_edits.pdf)

### **Annex 3 – Travel requirements for community members**

All community workers will be required to utilize public transportation that meet the requirements of the Road Traffic Act to include proper licensing and insurance.

If you have to travel in the back of a pickup truck, you must be seated inside the bed of the vehicle. C-CAM will reimburse travel on approved activities at public transportation (bus or taxi) rates or provide an appropriate and agreed travel stipend to carry out project related activities.



**Annex 4 – Code of conduct**  
**CARIBBEAN COASTAL AREA MANAGEMENT (C-CAM) FOUNDATION**

P.O. Box 33, Lionel Town, Clarendon, JAMAICA  
Telephone: (876) 986-3344, 986-3327 Fax: (876) 986-3956

**Employee Expectations & Code of Conduct**

**1. Avoiding Appearance of Impropriety**

Employees are expected to safeguard their ability to make objective, fair and impartial decisions, and therefore may not accept benefits of any sort under circumstances in which it could be inferred by a reasonable observer that the benefit was intended to influence a pending or future decision of theirs, or to reward a past decision. Employees should avoid any conduct (whether in the context of business, financial or social relationships) that might undermine the public trust, whether that conduct is unethical or lends itself to the appearance of ethical impropriety.

1. An employee also is prohibited from holding any employment or having a contractual relationship which will pose a frequently recurring conflict between private interests and public duties or which will impede the full and faithful discharge of public duties.
2. While on suspension an employee will not receive any pay for the length of the suspension and will be required to vacate all C-CAM property and must deposit all C-CAM identification and equipment in their possession with their supervisor.

**2. Misuse of Position**

An employee is prohibited from corruptly using or attempting to use their official positions to obtain a special privilege for themselves or others.

**3. Improper Disclosure or Use of Certain Information**

Employees are prohibited from disclosing or using information not available to the public and obtained by reason of their public positions for the personal benefit of themselves or others.

**4. Expectations**

Employees are expected to perform their particular duties and conduct themselves in a manner that fosters the achievement of C-CAM's purpose and goals. The conduct of each employee is expected to reflect a commitment to put forth his or her best efforts, to manage work time for maximum effectiveness and efficiency and to perform to the best of his or her ability the duties and responsibilities assigned to the employee.

**Any violation of the above four (4) Codes of Conduct shall be dealt with in the following manner depending of the severity of the violation**

First occurrence – Written reprimand, suspension up to 30 days, or dismissal

Second occurrence – Suspension up to 30 days, dismissal

Third occurrence - Dismissal

**5. Conduct Unbecoming an Employee** - Any willful action or conduct by an employee, on or off duty, which impedes efforts, brings discredit on C-CAM, impairs the operation or efficiency of the PBPA or any employee, or impairs the employee's ability to perform his or her job, including an action that violates standards of decency and/or morality.

First occurrence - Written reprimand, suspension up to 30 work days, or dismissal  
Second occurrence - Suspension up to 30 work days or dismissal  
Third occurrence – Dismissal

**6. Insubordination** - The deliberate and inexcusable refusal to comply with a reasonable order or directive, either written or oral, which relates to the employee's job. This includes both an expressed refusal to obey a proper order as well as the deliberate failure to carry out an order or assignment.

First occurrence – suspension up to 30 days without pay, dismissal  
Second occurrence - Dismissal

**7. Abuse of Position** - The use of one's position, power or authority as an employee to avoid the consequences of unlawful acts or identification of oneself as an employee of C-CAM for personal gain or influence. This includes soliciting or accepting a promise of any gratuity, gift, loan, reward, promise of future employment or, secondary employment from any person or business regulated by C-CAM or subject to such regulation.

First occurrence - Suspension up to 30 work days or dismissal  
Second occurrence – Dismissal

**8. Sabotage** - Participating in an act of destruction or attempted destruction of C-CAM property or equipment.

First occurrence - Suspension up to 30 work days or dismissal  
Second occurrence - Dismissal

**9. Inefficiency, Inability to Perform Assigned Duties or Substandard Performance of Duties** - The failure to meet the minimum satisfactory performance standards that specifically relate to an employee's duties and responsibilities, whether or not such failure is willful or deliberate. Employees shall not be required to meet work expectations or performance standards which have not been defined on either their official position description, performance standards/expectations or otherwise identified to the employee in writing as being part of the requirements of their position.

First occurrence - Written reprimand  
Second occurrence - Written reprimand or suspension up to 5 work days  
Third occurrence – Suspension up to 30 days without pay, dismissal

**10. Loafing** - Continued and deliberate idleness during work periods that results in the employee's failure to perform assigned tasks. This includes, but is not limited to, deliberately wasting time, engaging in idle talk or gossip, reading non work-related materials or conducting personal business during work periods.

First occurrence - Written reprimand  
Second occurrence - Written reprimand or suspension up to 5 work days  
Third occurrence - Suspension up to 30 work days or dismissal  
Fourth occurrence – Dismissal

**11. Sleeping on Duty**

First occurrence - Written reprimand or suspension up to 5 work days

Second occurrence - Suspension up to 5 work days or dismissal

Third occurrence – Dismissal

**12. Improper or Careless Use C-CAM Foundation’s Property, Including Conveyances** - Failure to properly care for or properly use C-CAM property or equipment such as but not limited to the operation of vehicles or vessels. This includes but is not limited to the failure to observe any traffic laws while driving a vehicle, failure to observe maintenance schedules, or causing or failing to prevent damage.

First occurrence - Oral or written reprimand or suspension up to 30 work days.

Second occurrence - Written reprimand or suspension up to 30 work days

Third occurrence - Suspension up to 30 work days or dismissal

Fourth occurrence – Dismissal

**13. Threatening or Interfering With Other Employees in Work Related Activities** - Any action taken by an employee who threatens another employee or member of C-CAM which prevents or hampers other employees in performing their work properly.

First occurrence - Written reprimand or suspension up to 5 work days

Second occurrence - Suspension up to 30 work days or dismissal

Third occurrence – Dismissal

**14. Abusive, Threatening or Offensive Language** - The use of language which is abusive, threatening or offensive, whether directed towards a supervisor, a fellow employee, or a member of the public. Includes any offensive language, whether or not directed towards anyone in particular, and regardless of intent.

First occurrence - Written reprimand or suspension up to 5 work days

Second occurrence - Suspension up to 30 work days or dismissal

Third occurrence – Dismissal

**15. Leaving Work Station without Authorization** - Absence from the work station or duty assignment without notice to the appropriate supervisor or designee.

First occurrence - Oral or written reprimand

Second occurrence - Written reprimand or suspension up to 5 work days

Third occurrence - Suspension up to 30 work days or dismissal

Fourth occurrence – Dismissal

**16. Absence without Authorized Leave**

- a. Failure to obtain approval from the proper authority prior to any absence from work, except in the case of an emergency that requires the employee to be absent prior to receiving approval;
- b. Failure to notify the proper authority in a timely or appropriate manner that the employee will be absent from work;
- c. Obtaining leave approval based on misrepresentation.

First occurrence - Written reprimand or suspension up to 5 work days  
Second occurrence – Suspension up to 30 days, dismissal

**17. Excessive Absenteeism** - Absences which adversely affects the employee's ability to perform assigned tasks with a reasonable degree of regularity even though all or most of the absences were necessary and excusable.

First occurrence - Written reprimand  
Second occurrence - Written reprimand or suspension up to 5 work days  
Third occurrence - Suspension up to 30 work days or dismissal  
Fourth occurrence – Dismissal

**18. Excessive Tardiness or Failure to Observe Established Work Times** - The repeated failure to follow established work schedules. This includes arriving late at the beginning of the work schedule, leaving early or returning late from lunch or rest breaks or leaving work early at the end of the work schedule, without prior approval.

First occurrence - Written reprimand  
Second occurrence - Written reprimand or suspension up to 5 work days  
Third occurrence - Suspension up to 30 work days or dismissal  
Fourth occurrence – Dismissal

**19. Lying or Failure to Give Truthful or Requested Information or Instructing an Employee to Do So** - Oral or written statements that are deliberately inaccurate, incorrect or misleading but which do not constitute falsification of records. This includes lying or failing to provide information during an internal investigation.

First occurrence - Suspension up to 30 work days or dismissal  
Second occurrence – Dismissal

**20. Falsification of Records** - The intentional issuance of a false or incomplete report, either oral or written, regarding the performance of work duties, attendance, injury, illness, job qualifications or other work-related matters. Failure to claim all hours worked on the official timesheet is considered falsification of records.

First occurrence - Suspension up to 30 work days or dismissal  
Second occurrence - Dismissal

**21. Violation or Disregard of Safety Practices** - The failure to follow established safety practices. This includes the performance of an unsafe act or the failure to wear or use appropriate safety equipment, lifejackets while at sea and seat belts.

First occurrence - Written reprimand  
Second occurrence - Suspension up to 5 work days  
Third occurrence - Suspension up to 30 work days or dismissal

**22. Negligence in Not Reporting Unsafe Conditions** - Not reporting an unsafe condition which could or did result in injury to oneself or others.

First occurrence - Written reprimand or suspension up to 5 work days  
Second occurrence - Suspension up to 30 work days or dismissal  
Third occurrence – Dismissal

**23. Negligence** - The failure to use ordinary or reasonable care, caution, attention, diligence or discretion in the performance of assigned duties and responsibilities.

First occurrence - Written reprimand or suspension up to 5 work days  
Second occurrence - Suspension up to 30 work days or dismissal  
Third occurrence – Dismissal

**24. Possession or Consumption of Alcohol**

The consumption of any alcoholic beverage while on duty or reporting to work under the influence of alcohol is prohibited. Possession and or consumption of an alcoholic beverage in or upon C-CAM Foundation’s equipment, vehicles, vessels, or property shall be prohibited.

First occurrence - Suspension for 5 work days.  
Second occurrence - Suspension up to 30 work days or dismissal.  
Third occurrence - Dismissal.

**25. Possession of Drugs or Drug Abuse**

The unlawful possession, distribution, sale or use of controlled substances, reporting for duty or being on duty while under the influence of drugs, or the storage of or transport of a controlled substance, except for controlled substances seized or held as evidence or drugs prescribed by a licensed physician for the treatment of personal illness or injury.

First occurrence - Suspension up to 30 work days or dismissal  
Second occurrence – Dismissal

**26. Improperly Dressed or Groomed** - Failure to wear appropriate uniform or wearing uniform improperly, including required equipment; or disregard of personal appearance which adversely reflects on the PBPA. Uniformed and non-uniformed personnel will be required to adhere to proper dress and grooming.

First occurrence - Oral or written reprimand  
Second occurrence - Written reprimand or suspension up to 5 work days  
Third occurrence - Suspension up to 30 work days or dismissal

**27. Violation of Computer Policy** - The deliberate violation of C-CAM computer policies including the unauthorized release of a password, failure to secure data, unauthorized copying of licensed software or the use of the computer to access, view, copy, download, print, forward, or e-mail objectionable material. Objectionable material includes, but is not limited to, images, text, or documents that depict, describe or evidence nudity, obscenity, sexually-explicit activity, gambling, or prejudice based on race, religion, ethnicity, color, ancestry, sexual orientation or national origin.

First occurrence - Written reprimand, suspension up to 30 workdays or dismissal.  
Second occurrence - Suspension up to 30 work days or dismissal  
Third occurrence – Dismissal

**28. Failure to follow oral or written instructions -**

First occurrence - Written reprimand or suspension up to 5 work days  
Second occurrence - Suspension up to 30 work days or dismissal  
Third occurrence – Dismissal

Employee Signature\_\_\_\_\_

Date\_\_\_\_\_

Signed\_\_\_\_\_

Date\_\_\_\_\_