



DRAFT

**LABOR MANAGEMENT
PROCEDURES**

**Caribbean Digital Transformation
Program (P171528)**

**Dominica, Grenada, Saint Lucia, Saint
Vincent and the Grenadines**

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1. INTRODUCTION

This Labour Management Procedures (LMP) is developed as a requirement of the World Bank in support of the Caribbean Digital Transformation Program (P171528). The procedures seek 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. It sets out the approach to meeting national requirements as well as the objectives of the World Bank’s Environmental and Social Framework, specifically the objectives of Environmental and Social Standards 2 (ESS2): Labour and Working Conditions and Occupational Health and Safety.

Based on the Project’s Environmental and Social Assessment, risks as it relates to labour and working conditions and occupational health and safety are temporary. These risks are understood and are expected to have a limited impact on the project if managed by the procedures set out in this Plan. The governments (Governments of the Commonwealth of Dominica, Grenada, Saint Lucia and Saint Vincent and the Grenadines) are committed, on a continuous basis throughout the life of the project, to evaluate risks and impacts and to have in place adequate measures and procedures to manage adverse impacts.

It is important to note the LMP is a live document and can be updated to meet the demands of the project.

2. OVERVIEW OF LABOR USE ON THE PROJECT

Project workers as it relates to the applicability of EES2 refers to workers that will be employed or engaged under the project, whether full-time, part-time, temporary, seasonal and migrant workers. The main type of workers anticipated to work under this project is contracted workers, as reflected in the **Table 1** below:

Table 1: Main Types of Workers

#	Project workers	National level					Total
		Dominica	Grenada	Saint Lucia	SV G ¹	Regional/O ECS ²	
1	Direct workers ³	7	4	7	7	6	31
2	Contracted workers	189	47	88	214	67	605

1 Saint Vincent and the Grenadines
 2 Organisation of Eastern Caribbean States
 3 People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project.

3	Primary supply workers ⁴	0	0	0	0	0	0
4	Community workers ⁵	0	0	0	0	0	0
	Total	196	51	95	221	73	636

4 Those suppliers who, on an **ongoing basis**, provide directly to the project goods or materials essential for the **core functions** of the project.

5 For the purpose of this project, labor provided by the community as a contribution to the project

Most of the Jobs can be classified as follows **(Table 2)**:

Table 2: Base Total Number of Workers

Country/ Entity	Jobs classification	International	Female	Migrant/ Domestic or International	Between the min age and 18	Total
DOM	Software and applications developers, analysts and other IT staff	28	8	0	0	32
DOM	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	56	15	0	0	63
DOM	Database and network professionals	17	4	0	0	19
DOM	Librarians, archivists and curators	4	3	0	0	4
DOM	Data entry staff, or related to digitization of paper-based records	2	25	0	25	50
DOM	Business services and administration managers	14	7	0	0	28
GRE	Software and applications developers, analysts and other IT staff	5	1	0	0	6
GRE	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	27	7	0	0	30
GRE	Database and network professionals	3	1	0	0	4

Country/ Entity	Jobs classification	International	Female	Migrant/ Domestic or International	Between the min age and 18	Total
GRE	Business services and administration managers	5	2	0	0	11
SLU	Software and applications developers, analysts and other IT staff	10	3	0	0	12
SLU	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	44	12	0	0	49
SLU	Database and network professionals	5	1	0	0	6
SLU	Data entry staff, or related to digitization of paper-based records	2	0	0	0	2
SLU	Business services and administration managers	9	4	0	0	19
SLU	Workers related to in-building works required for rehabilitation and retrofitting existing structure for project activities, including in-building demolition, wiring and cabling, installation of IT and ICT equipment	2	1	0	0	7
SVG	Software and applications developers, analysts and other IT staff	45	12	0	0	50

Country/ Entity	Jobs classification	Internatio nal	Female	Migrant/ Domestic or Internatio nal	Between the min age and 18	Total
SVG	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	63	17	0	0	71
SVG	Database and network professionals	21	6	0	0	24
SVG	Legal professionals	1	0	0	0	2
SVG	Data entry staff, or related to digitization of paper- based records	36	10	0	20	40
SVG	Business services and administration managers	17	8	0	0	34
Regional	Software and applications developers, analysts and other IT staff	2	0	0	0	5
Regional	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	33	9	0	0	45
Regional	Legal professionals	7	2	0	0	12
Regional	Business services and administration managers	4	2	0	0	11

The project will be implemented under the fiduciary responsibilities of the delegated project implementation department/ agency in participant countries. At a national level, the line ministry responsible for ICT and the digital economy⁶ will play a key role in technical oversight of the project. At a regional level, responsibilities for coordination and technical oversight of cross-cutting legal, policy and regulatory areas such as regional ICT markets regulation, cybersecurity, data use, and privacy, will be assigned to a regional institution most suited to the topic area, while implementation will be carried out by the regional PIU housed at the Organisation of Eastern Caribbean States (OECS). These agencies include Eastern Caribbean Telecommunications Authority (ECTEL), OECS, Eastern Caribbean Central Bank (ECCB), Caribbean Telecommunications Union (CTU), and Caribbean Community Implementation Agency for Crime and Security (CARICOM IMPACS) - others will be included if needed. The team will leverage the regional institutions to coordinate cross-cutting policy areas and use their existing convening schedule to make progress on regional project activities.

It is important to note that the timing of labour requirements will be based on the project implementation schedule that will be developed for the project. The **Table 3** below shows the anticipated sequencing of workers as it relates to achieving the projects' results:

Table 3: Yearly Job Classification and Number of workers per Country

Country / Entity	Jobs classification	Y1	Y2	Y3	Y4	Y5	Total
DOM	Software and applications developers, analysts and other IT staff	6	6	10	6	4	32
DOM	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	13	13	19	13	5	63
DOM	Database and network professionals	4	4	6	4	1	19
DOM	Librarians, archivists and curators	1	1	1	1	0	4
DOM	Data entry staff, or	10	10	15	10	5	50

⁶ Lead line ministry in each participant countries is: Dominica - Ministry of Public Works and Digital Economy; Grenada - Ministry of National Security, Public Administration, Home Affairs, and ICT; St. Lucia - Ministry of Public Service, Information, and Broadcasting; and SVG - Ministry of Finance, Economic Planning, Sustainable Development, and Information Technology.

Country / Entity	Jobs classification	Y1	Y2	Y3	Y4	Y5	Total
	related to digitization of paper-based records						
DOM	Business services and administration managers	6	6	8	6	2	28
GRE	Software and applications developers, analysts and other IT staff	1	1	2	1	1	6
GRE	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	6	6	9	6	3	30
GRE	Database and network professionals	1	1	1	1	0	4
GRE	Business services and administration managers	2	2	3	2	2	11
SLU	Software and applications developers, analysts and other IT staff	2	2	4	2	2	12
SLU	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	10	10	15	10	4	49
SLU	Database and network professionals	1	1	2	1	1	6
SLU	Data entry staff, or related to digitization of paper-based records	0	0	1	0	1	2
SLU	Business services and administration managers	4	4	6	4	1	19

Country / Entity	Jobs classification	Y1	Y2	Y3	Y4	Y5	Total
SLU	Workers related to in-building works required for rehabilitation and retro-fitting existing structure for project activities, including in-building demolition, wiring and cabling, installation of IT and ICT equipment	1	1	2	1	2	7
SVG	Software and applications developers, analysts and other IT staff	10	10	15	10	5	50
SVG	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	14	14	21	14	8	71
SVG	Database and network professionals	5	5	7	5	2	24
SVG	Legal professionals	2	0	1	0	1	4
SVG	Data entry staff, or related to digitization of paper-based records	8	8	12	8	4	40
SVG	Business services and administration managers	7	7	10	7	3	34
Regional	Software and applications developers, analysts and other IT staff	1	1	2	1	0	5
Regional	Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	9	9	14	9	4	45
Regional	Legal professionals	2	2	4	2	2	12
Regional	Business services	2	2	3	2	2	11

Country / Entity	Jobs classification	Y1	Y2	Y3	Y4	Y5	Total
	and administration managers						

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The key labour risks which may be associated with the project are outlined below:

Project component	Key identified labor risks.	Proposed measures
<p>Component 1: Digital Enabling Environment: This component will support the development of a positive enabling environment for the region's digital economy that drives competition, investment and innovation while promoting trust and security of online transactions.</p>	<ul style="list-style-type: none"> • Possible accidents or emergencies, with reference to the sector or locality • General understanding and implementation of occupational health and safety requirements • Discrimination and harassment in the workplace 	<ul style="list-style-type: none"> • Implement OHS measures described in the ESMF/ESMP • Training • Implement the code of conduct
<p>Component 2: Digital Government Infrastructure, Platforms and Services: This component will support public sector modernization, resilience and delivery of digital public services to individuals and businesses.</p>	<ul style="list-style-type: none"> • Conduct of in-building civil works and potential interaction with materials such as aerosols (such as those used in fire-suppression systems in datacenters) • Possible accidents or emergencies, with reference to the sector or locality • General understanding and implementation of occupational health and safety requirements • Discrimination and harassment in the workplace 	<ul style="list-style-type: none"> • Implement OHS measures described in the ESMF/ESMP • Training • Implement the code of conduct
<p>Component 3: Digital Skills and Technology Adoption: This component aims to better equip individuals and businesses across the region for the jobs and economy of the future and to spur innovation and job creation.</p>	<ul style="list-style-type: none"> • The conduct of hazardous work - the rehabilitation and retrofitting of existing training centers (where applicable per national work program). • Possible accidents or emergencies, with 	<ul style="list-style-type: none"> • Implement OHS measures described in the ESMF/ESMP • Training • Implement the code of conduct

Project component	Key identified labor risks.	Proposed measures
	<ul style="list-style-type: none"> • reference to the sector or locality • General understanding and implementation of occupational health and safety requirements • Discrimination and harassment in the workplace 	
Component 4: Project Implementation Support	<ul style="list-style-type: none"> • General understanding and implementation of occupational health and safety requirements • Discrimination and harassment in the workplace 	<ul style="list-style-type: none"> • Implement OHS measures described in the ESMF/ESMP • Training • Implement the code of conduct

The table above provides a brief description of the activities that will be undertaken under the project and their associated labour-related risks. Most of the labour risks will be related to the conduct of hazardous work - civil works (in-building works to refurbish sites for use as data centers or training/co-worker) related to the rehabilitation of training centers, and potential development of nodal digital infrastructure such as a datacenter in St. Vincent and the Grenadines; possible accidents or emergencies, with reference to civil works, and occupational health and safety risks. For technical assistance and management types work, risks are associated with extended hours. There is also the possibility of the staff not working in properly ventilated buildings or buildings not equipped with proper cooling facilities. The probability of the incidence of child labour or forced labour is also minimal. The project requires technical staff with skills that require experience and education, which will not be possible for children or those below the age of 18 to possess. The issues of migrant and seasonal workers, labour influx do not apply. A register of all persons under the age of eighteen years employed by the project and the dates of their births will be kept in keeping with the Employment Act of the participant countries. No person under the age of eighteen years shall be employed or allowed to work between the hours of 9.00 p.m. to 6.00 a.m.

There may be some risk for gender-based violence especially since there is the potential for harassment, including sexual harassment, intimidation and exploitation of young female workers. To mitigate these risks, the project will adopt a zero-harassment policy for all its workers and sub-contractors. The zero-harassment policy will be part of the workers' Code of Conduct (Annex 1) developed by the project. This policy will be broadcast to all workers through various mediums and several formats. If the project were to contract younger workers (Those over the minimum age and under the age of 18), the project will provide an extra layer of

supervision for them () to ensure they are educated of their rights, the project’s policies on harassment, intimidation and exploitation. The extra layer will include separate /training sessions and they will be informed of the Workers GRM and project point person to which complaints can be made; this as part of the functioning of the workers GRM and as part of the responsibility of the Environmental and Social Specialist of the project . The contracting of a young worker, will be consistent with ESS2: A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions: (a) the work does not fall within paragraph 19 below; (b) an appropriate risk assessment is conducted prior to the work commencing; and (c) the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of this ESS. A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous¹³ or interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.

BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Country	Description of the legislation
Dominica	<p>The Labour Standards Act Chapter 89:05 seeks to provide for the fixing of wages of workers, the hours of 2 of 1977. work, their leave and generally for matters pertaining to the welfare of workers. Specifically, the Act addresses: minimum wages, hours of work, vacation leave, maternity leave, and equal wages.</p> <p>The act provides for the fixing of wages of workers, the hours of work, and other matters pertaining to the welfare of workers. Establishes that minimum wages for specific sectors of economic activity are to be fixed by ministerial proclamation. Provides for the establishment of advisory boards to advise on such matters. Establishes normal working hours at eight per day and forty per week. Obliges employers to pay employees overtime for all work above this at the rate of one and a half times the normal wage. Provides for one day of rest per week. Regulates vacation leave. Provides for at least two weeks to three weeks of leave per year depending on the amount of years worked. Regulates the granting of such leave. Governs maternity leave. Provides for six weeks of maternity leave prior to confinement and six weeks after confinement. Regulates application for and entitlement to maternity leave. Establishes equality of wages between male and female employees. Provides for transfers of businesses. Provides for the administration and enforcement of regulations. Regulates inspections and inspectors. Provides for complaints to labour tribunals. Provides for the keeping of records. Addition, the Sections 24 to 26 of the Labour Standards Act Chapter 89:05, addresses discrimination and stipulate.</p>
Grenada	<p>The overarching major national labour legislation in Grenada is the Employment Act of 1999 which regulates the terms and</p>

Country	Description of the legislation
	<p>conditions of employment. The guiding principles reside on the prohibition of forced labour, discrimination, equal pay for equal works, as well as, remedies for infringements of rights. The Act makes it mandatory for employers to furnish employees with written particulars of employment, stating hours of work, wages, leave entitlements, job description, grievance procedures, benefits if any among others.</p> <p>Specifically, Part VI deals with the matter of hours of work and continuity of employment and will apply to the risk of extended hours of work as perceived as a minor risk to the project. Part VII speaks to Protection and Regulation of wages, Part VIII - Leave entitlements and other benefits and Part IX expounds on discipline and termination of employment.</p> <p>The Employment Act of Grenada strictly prohibits discrimination of employees based on race colour, national extraction, social origin, religion, political opinion, sex, marital status, family responsibilities or disability. An employee also has the right, by law, to remove himself or herself from a work situation which he or she reasonably believes presents an imminent or serious danger to life or health.</p>
Saint Lucia	<p>Saint Lucia Labour Code, no. 37 of 2006 outlines the conditions of employment with a view to improving the terms and conditions upon which workers are employed. The Labour Code makes it mandatory for employers to provide employees with written details of employment stating, hours of work, leave entitlement, job description, grievance procedures, benefits, health and safety etc. Within this legislation there are provisions relating to: Fundamental principles of employment-Part II; Contracts of employment-Division 1; Hours of Work-Division 3; Wages and minimum wages-Division 4&5; Leave entitlements (annual leave, sick leave, maternity leave, bereavement leave etc.)-Divisions 6, 7 and 2; Employment of Children and Young persons-Division 9; Termination of Employment-Division 10; Duties of Employers, workers and other persons-Part IV Division; Occupational Health and Safety-Part IV; Equality of opportunity and treatment in employment-Part V Division 1, Trade Unions and employers organizations-Part VII.</p> <p>Part II of the Code under Fundamental Principles of Employment number 7 states that “an employer shall not discriminate against any employee on the grounds of race, colour, sex, religion, national extraction, social origin, ethnic origin, political opinion or affiliation, age, disability, serious family responsibility, pregnancy, marital status or HIV/AIDS, in respect of recruitment, training, work facilities or service, promotion, terms and conditions of employment or benefit arising out of the employment relationship”. The Code also makes provision on how the matter of discrimination can be addressed.</p>

Country	Description of the legislation
	<p>Project workers will be paid on a regular basis as required by national law and labor management procedures. Deductions from payment of wages will only be made as allowed by national law or the labor management procedures, and project workers will be informed of the conditions under which such deductions will be made. Project workers will be provided with adequate periods of rest per week, annual holiday and sick, maternity and family leave, as required by national law and labor management procedures.</p>
<p>Saint Vincent and the Grenadines</p>	<p>The Labor legislation in St. Vincent and the Grenadines, is composed, among others by the:</p> <p>Wages Councils Act, 1953: This Act provides for the establishment of wages councils and the making of wages council orders. Wages regulations address: Minimum wage, Hours of work, Overtime wages, Vacation, Sick leave, Maternity leave, Health and Safety.</p> <p>Trade Unions Act, 1950: This Act provides for the establishment and regulation of trade unions and addresses other matters such registration, rules, use of funds, and accounts.</p> <p>Trade Disputes (Arbitration and Inquiry) Act, 1940: This Acts provides for the establishment of an arbitration tribunal and a board of inquiry in connection with trade disputes and to make provision for the settlement of such disputes, and for the purpose of enquiring into economic and industrial conditions in St. Vincent and the Grenadines.</p> <p>Protection of Employment Act, 2003: This Act provides for the maintenance and promotion of good employment relationships between employers and employees. It also addresses matters of severance and settlement of disputes.</p> <p>Equal Pay Act, 1994: This Act provides for the removal and prevention of discrimination, based on the sex of the employee, in the rates of remuneration for males and females in paid employment, and for all incidental matters.</p> <p>Employment of Women, Young Persons and Children Act, 1935: This Act regulates the employment of women, young persons and children in industrial undertakings and on ships in accordance with the following International Labour Organization (ILO) Conventions: Minimum Age (Industry) Convention (Revised) 1937; Night Work of Young Persons (Industry) Convention 1919; and the Night Work (Women) Convention 194</p> <p>The Employers and Servants Act, 1937: Requires wages to be paid by the employer to the worker only in money and the payment of wages is to be made at intervals not exceeding fourteen days</p> <p>Additionally, the Employment of Foreign Nationals and Commonwealth Citizens Act, 1973 will also apply as necessary</p>

4. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

In the below table, are the **key aspects** of national policies and labor legislation with regards to occupational health and safety.

Country	Description of the legislation
Dominica	<p>Labour occupational health and safety in Dominica is enforced by the Employment Safety Act (No. 3 of 1982) and the Factory and Machinery Rules (S.R.O. 16/1944). These are the main two Acts containing provisions in relation to occupation safety and health, and more details can be found in other regulations such as the Environmental Health Services Act (No. 8 of 1997), Accidents and Occupational Diseases (Notification) Act, Chap. 89:51 (Act No. 29 of 1952) (Cap. 108 of 1961)., and the Noxious and Dangerous Substances (Control) Act, 1981 (no. 4 of 1982).</p> <ul style="list-style-type: none"> • Employment Safety Act (No. 3 of 1982) The Employment Safety Act (No. 3 of 1982), provides for reorganising the system under which safety and health at work is safeguarded and to extend it to cover everyone at work; to provide for the establishment of consultative and advisory committees; to provide for the appointment of safety officers and for purposes connected with those matters. • Environmental Health Services Act (No. 8 of 1997) Provides for the regulation of the discharge of waste and pollutants in public areas. Allows the Health Minister to make regulations concerning, inter alia, the hygiene of workplaces and exposure to substances in workplaces. • Accidents and Occupational Diseases (Notification) Act, Chap. 89:51 (Act No. 29 of 1952) (Cap. 108 of 1961). Provides for the notification of accidents and occupational diseases. Establishes the processes of the notification of accidents. Grants the administrator in Council with the power to extend dangerous occurrences provisions to notification of accidents. Provides for inquests in cases of death by accident. Grants the Administrator the power to direct formal investigation of accidents and cases of occupational diseases. Sets penalties for offences. Applies the act to public servants. Grants the Administrator with the power to make regulations for the purposes of carrying out the act. The Schedule provides Forms for use with the act. • Noxious and Dangerous Substances (Control) Act, 1981 (no. 4 of 1982) Provides for the control of noxious and dangerous substances. Governs the licensing requirements for storage of such substances and for the inspection of premises. Grants the minister responsible for trade with the power to make regulations for the purposes of carrying out the act.
Grenada	Grenada has an Occupational Health and Safety Policy. The

Country	Description of the legislation
	<p>Factories Act is the main law governing occupation safety and health, and there are a number of detailed regulations developing the main Act such as the Factories (Sanitary Accommodation) Regulations, Factories (Welfare) Regulations, Factories (Electricity) Regulations, Factories (Lifting Tackle) Regulations, the Employment Act containing provisions on the establishment and functions of the Department of Labour, the Accidents and Occupational Diseases (Notification) Act. Grenada has active/in force the following conventions: C011 - Right of Association (Agriculture) Convention, 1921 (No. 11); C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19); C016 - Medical Examination of Young Persons (Sea) Convention, 1921 (No. 16); C155 - Occupational Safety and Health Convention, 1981 (No. 155). Under this convention (No. 155), the GoG takes account of the following main spheres of action in so far as they affect occupational safety and health and the working environment:(a) design, testing, choice, substitution, installation, arrangement, use and maintenance of the material elements of work (workplaces, working environment, tools, machinery and equipment, chemical, physical and biological substances and agents, work processes); (b) relationships between the material elements of work and the persons who carry out or supervise the work, and adaptation of machinery, equipment, working time, organisation of work and work processes to the physical and mental capacities of the workers; (c) training, including necessary further training, qualifications and motivations of persons involved, in one capacity or another, in the achievement of adequate levels of safety and health; (d) communication and co-operation at the levels of the working group and the undertaking and at all other appropriate levels up to and including the national level; (e) the protection of workers and their representatives from disciplinary measures as a result of actions properly taken by them in conformity with the policy referred to in Article 4 of this Convention.</p>
St. Lucia	<p>Part four of the Saint Lucia Labour Code also speaks to occupational health and safety in the workplace. 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</p>

Country	Description of the legislation
	grounds and the procedures for how such matters should be addressed.
Saint Vincent and the Grenadines	<p>Labour occupational health and safety in Saint Vincent and the Grenadines, in part is enforced by the:</p> <p>Environmental Health Services Act, 1991 (No. 14 of 1991): The Act provides for the regulation of activities that may affect public health and the environment.</p> <p>Factories Act, 1955 (Cap. 335), that part II, addresses health, safety, welfare and special protective measures.</p> <p>Accidents and Occupational Diseases (Notification) Act, 1952, that places a legal obligation on the employer to inform the Labour Commissioner in writing on the prescribed form, any accident involving any worker that arises out of and in the course of employment and which causes loss of life or serious bodily injury or disables a worker. The employer is also obligated to inform the Labour Commissioner on any occupational disease which he reasonable believes or suspects to have occurred among workers employed by him.</p> <p>The national legislation states that an employer shall not terminate the services of an employee on any of the following grounds: i) Trade union membership or participation in trade union activities outside working hours or, with the consent of the employer, within working hours; ii) Seeking office as, or acting as the capacity of, an employee representative, iii) Making a complaint or participating in proceedings against an employer involving an alleged violation of laws and regulation; iv) . Race, colour, sex, marital status, pregnancy, religion, political opinion, nationality or social origin; v) Reasonable absence from work due to family emergencies or responsibilities; vi) Absence from work during maternity leave as certified by a medical practitioner vii) Absence from work due to injury or illness provided that the employee submits a medical certificate to his employer by the third day of absence, and viii) Absence from work in the performance of jury service as required by law.</p>

The occupational health and safety (OHS) measures of the project will be designed based on the guideline provided in the Environmental and Social Framework of the project, and will be implemented to address:

- (a) identification of potential hazards to project workers, particularly those that may be life threatening.
- (b) Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;
- (c) Training of project workers and maintenance of training records.
- (d) Documentation and reporting of occupational accidents, diseases and incidents

- (e) emergency prevention and preparedness and response arrangements to emergency situations
- (f) Remedies for adverse impacts such as occupational injuries, deaths, disability and disease

5. RESPONSIBLE STAFF

The Project implementation Unit through the project manager, and through the national level Project Implementation Units (PIUs) will be responsible for the engagement and management of all project workers. The project manager and the national level Project Implementation Units (PIUs) (depending on who is the contracting party) will be the direct staff responsible for the engagement of project workers, contractors and subcontractors, occupational health and safety (OHS), training of workers, and addressing worker grievances. The project manager and the national level PIUs will be responsible for the overall management of all project workers and contractors and subcontractors.

6. POLICIES AND PROCEDURES

In an effort to mitigate the environmental and social impact relating to the project, it is the intention that mitigation measures will be put in place by incorporating standardized clauses in the contract documents so that the contractors will be aware of environmental and social obligations under the project. The PIU, (including national level PIU) will ensure compliance of the following clauses, including compliance by contractors.

7.1 Purpose

The primary purpose of this OHS measures is the safety and health of all the project employees at work and the protection of the environment and conservation of resources associated with the project. The measures also establish and defines the authority for the OHS and associated safety systems. These measures will be enforced on all activities of the project and contractors and sub-contractors of the project through contractual arrangements as is appropriate.

7.2 Scope

Occupational safety and health (OSH), also commonly referred to as occupational health and safety (OHS), occupational health, or workplace health and safety (WHS), is concerned with the safety, health, and welfare of people at work. Safety is defined as “the well-being of project employees whilst at work or carrying out work duties”. Project Employee for the Project is defined as “anyone employed by

activities of the project including employees of contractors and sub-contractors on a full-time or a part-time basis.

OSH Management System is the standards, policies, guidelines, that address project worker's safety, monitoring and evaluation of safety, worker's health, work and general environment.

3.0 Measures /procedures

The obligations of the project under the OSH policy includes the following:

- Compliance with all national and international OSH legislation that are applicable to the participating country governments and the World Bank;
- Compliance with the Environmental and Social Safeguards of the World Bank;
- Prevention of injury and ill health of all project workers;
- Establishment of safety systems, processes and performance;
- Continuous improvement of Safety Systems;
- Management and mitigation of adverse environmental and social impacts;
- Prevention of use of faulty equipment or sub-standard equipment.

The project will commit to safety considerations in the conduct of all its activities and that of contractors and sub-contractors.

The project will provide systems, processes, procedures, the necessary safety equipment and gears, and training for all project employees so that all activities are conducted in a safe environment.

Employees will be responsible, subject to their roles, for the maintenance of a safe environment including the assessment of risks and actions to mitigate minimize and manage risks to the safety of the work environment.

The project will develop and implement systems, processes, policies, and services that are national and international in compliance with national and international legal requirements including industry standards and best practices in relation to safety.

Employees at all levels have the authority to stop any activity they consider to be a danger to themselves or other workers, the public or the environment. **There will be no retaliation to project workers for stop-work whistle blowing.**

The Environmental and Social Specialist of the project is responsible for the implementation and monitoring of the safety management systems of the project. The Environmental and Social Specialist will develop sub-policies, guidelines, procedures, instructions and training and awareness materials to support this policy.

The project will also ensure that all employees hired as part of the project:

- Ascribe to the principle of not harming people;
- That sexual harassment, gender-based violence (GBV), sexual exploitation and abuse (SEA) will not be tolerated;
- That discrimination will not be tolerated in the workplace;
- The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment;
- Given that there are direct workers under PIU, the PIU will adapt and receive training on Code of Conducts as well as on OHS measures required under ESS2;
- That there is compliance with the laws of the Countries at all times;
- Compliance with the Environmental and Social Framework (ESF) of the Bank, including the Environment and Social Standard (ESS2) on Labor and Working Conditions;
- That all health and safety measures are adhered to as laid out under World Bank's Environmental and Social Standards (ESS2) on Labor and Working Conditions and for on Community Health and Safety.

7.3 Dissemination and Awareness

The OSH policy will be disseminated to all project workers and stakeholders. The information will be dissemination in various formats including an adapted and summarized version.

7. AGE OF EMPLOYMENT

The age of employment in the respective countries are:

Dominica	<p>The project will be guided by the Employment of Women, Young persons, and Children Act Chapter 90:06 of Dominica which states that the minimum age of employment in Dominica is fourteen (14) years old. In addition to the Employment of Women, Young persons, and Children Act Chapter 90:06, Dominica is a signatory to the following international conventions related to the minimum age of employment:</p> <ul style="list-style-type: none"> • Convention on the Rights of the Child (CRC): "Signed on the 19th April 1990 and ratified on the 9th October 1990" [CITATION UNI15 \ 1033] • Minimum Age Convention, 1973 (No.138) ([CITATION Int17 \ 1033]
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- Forced Labour Convention, 1930 (No. 29) [CITATION Int17 \l 1033]
- Worst Forms of Child Labour Convention, 1999 (No. 182 [CITATION Int17 \l 1033])
- Employment of Women, Young persons, and Children Act Chapter 90:06
- Labour Contracts Act Chpt 89:04

Employees over the minimum age of 14 and under the age of 18, may be employed or engaged in connection with the project only under the following specific conditions:

- (a) the work is not likely to be hazardous and is not harmful to the child's health or physical, mental, spiritual, moral or social development, and will not interfere with the child's education.
- (b) an appropriate risk assessment is conducted prior to the work commencing; and
- (c) the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS2: Labor and working conditions.

The following process will be followed to verify the age of project workers:

All project employees will be asked to produce identification documents (ID) that are acceptable in local laws, employment and human resources practices as "proof of age". These forms of ID will be birth certificates, national drivers' licenses and national registration cards. In the absence of one of those forms of IDs the project will apply and document an age verification process. The age verification process will consist of alternative methods including copies of academic certificates, testimony/affidavits from officials of the schools attended, a medical examination, statements from family members and parish/village officials/local authorities. In addition, all documents will be cross-referenced and subjected to a verification process to ensure the validity of the documents. In instances where the documents are thought to be falsified the project will conduct the same process to ensure their authenticity. In all the processes the attendant care will be provided to ensure that the applicant or employee's data are protected and their right to privacy is guaranteed. All copies of the IDs and documents pertaining to the applicant's age and other supporting materials will be kept in files with the human resources personnel. Audits and controls of the process will be a requirement of the contractors and included in the contracts, in keeping with the Labour Contracts Act Chpt 89:04

If underage workers are found working on the project the following actions will be undertaken:

	<ul style="list-style-type: none"> • Termination of the contract and services agreement immediately as per the Labour Contracts Act Chpt 89:04 and the Employment of Women, Young persons, and Children Act Chapter 90:06 of Dominica. • Schedule a meeting with the child and seek to determine the reasons for seeking employment • Refer the child to other support services including social services and the Ministry of Education • Leverage the services of Non-government and Community Based Organizations to assist the child • Consider employing another adult member of the family if the child’s family is determined to be vulnerable or in dire circumstances <p>Section 16 of the Employment of Women, Young persons, and Children Act Chapter 90:06 stipulates: “Any person guilty of an offence against this Act or any Rules made thereunder for which no penalty is expressly provided is liable on summary conviction to a fine of two hundred and fifty dollars and in the case of a second or subsequent offence to a fine of five hundred dollars.”</p>
Grenada	<p>The project will be guided by the (Grenada Employment Act, 1999) which states that the minimum age of employment in Grenada is sixteen (16) years old. In addition to the Employment Act, Grenada is a signatory to the following international conventions related to the minimum age of employment:</p> <ul style="list-style-type: none"> • Convention on the Rights of the Child (CRC): “Signed on the 19th April 1990 and ratified on the 9th October 1990” (UNICEF, 2015) • Minimum Age Convention, 1973 (No.138) (International Labor Organization, 2017) • Forced Labour Convention, 1930 (No. 29) (International Labor Organization, 2017) • Worst Forms of Child Labour Convention, 1999 (No. 182) (International Labor Organization, 2017) • Medical Examination of Young Persons Convention, 1921 (No. 16) (International Labor Organization, 2017) • UN CRC Optional Protocol on Armed Conflict (U.S. Department of Labor, 2017) • UN CRC Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography (U.S. Department of Labor, 2017) • Palermo Protocol on Trafficking in Persons (U.S. Department of Labor, 2017) <p>Employees over the minimum age of 16 and under the age of 18, may be employed or engaged in connection with the project only under the following specific conditions:</p> <p>(a) the work is not likely to be hazardous and is not harmful to the child’s health or physical, mental, spiritual, moral or social</p>

	<p>development, and will not interfere with the child’s education.</p> <p>(b) an appropriate risk assessment is conducted prior to the work commencing; and</p> <p>(c) the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS2: Labor and working conditions.</p> <ul style="list-style-type: none"> • Consider employing another adult member of the family if the child’s family is determined to be vulnerable or in dire circumstances <p>The Grenada employment Act of 1999 will be used as a guide in the conduct of the assessment of risks associated with persons below the age of 18. The procedure for assessing the risks will be as follows:</p> <ul style="list-style-type: none"> • All persons will be asked to provide a medical certificate with the results of a medical examination. • An assessment will be done of the tasks assigned, to ensure that persons below the age of 18 are not subjected to hazards and risks • There will be clear policy guidelines regarding supervision of young persons to prevent exploitation and sexual harassment • Young persons will be provided with educational and awareness information on the policies of the workplace including sexual harassment policies and labour related grievances and the grievance redress mechanism of the project.
<p>St. Lucia</p>	<p>Division 9 “Employment of children and young persons” of the Labour Code states “.....a person shall not employ or allow to be employed any child who is under the minimum school leaving age as declared by any law in force in Saint Lucia except for employment during school holidays in light work.</p> <p>The minimum age of employment for the Project will be 18 years. To ensure compliance all employees will be required to produce their National Identification Card (NIC) as proof of their identity and age. This NIC serves as the national document required for employment.</p> <p>A child over the minimum age, and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions:</p> <ul style="list-style-type: none"> (a) an appropriate risk assessment is conducted prior to the work commencing; and (b) the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS2 of the World bank: Labor and Working condition. <p>A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.</p> <p>Any consultant found hiring persons under the age of 18 will have their contract immediately terminated and will be reported to the authorities. Under Division 9 127- “Any employer who contravenes</p>

	sections 122, 123 or 124 commits an offence and is liable on summary conviction to a fine not exceeding ten thousand dollars or to imprisonment for a term of two years or both.
SVG	<p>Part II, Article 8 of the Employment of Women, Young Persons, and Children Act, 1938:</p> <p>Prohibition of employment of a child — (1) Subject to subsection (2), a child shall not be employed. (2) Nothing in subsection (1) applies— (a) to work done by any child in accordance with the provisions of Part I; (b) to the service rendered by any child to his parent or guardian in light agricultural or horticultural work on the family land or garden outside of school hours; (c) to the participation of a child, without fee or reward, in an entertainment the net proceeds of which are devoted to any charitable or educational purpose or to any purpose other than the private profit of the promoters.</p> <p>SCHEDULE II, ARTICLE 2 Children under the age of fourteen (14) years shall not be employed or work in any public or private industrial undertaking, or in any branch thereof, other than an undertaking in which only members of the same family are employed: Provided that, except in the case of employment which, by their nature or the circumstances in which they are carried on, are dangerous to the life, health or morals of the persons employed therein, national laws or regulations may permit such children to be employed in undertakings in which only members of the employer's family are employed.</p>

The following process will be followed to verify the age of project workers. This process will be completed by project contractors and verified by the PIU:

All project employees will be asked to produce identification documents (ID) that are acceptable in local laws, employment and human resources practices as “proof of age”. These forms of ID will be birth certificates, national driver’s licenses and national registration cards. In the absence of one of those forms of IDs the project will apply and document an age verification process. The age verification process will consist of alternative methods including copies of academic certificates, testimony/affidavits from officials of the schools attended, a medical examination, statements from family members and parish/village officials/local authorities. In addition, all documents will be cross-referenced and subjected to a verification process to ensure the validity of the documents. In instances where the documents are thought to be falsified the project will conduct the same process to ensure their authenticity. In all the processes the attendant care will be provided to ensure that the applicant or employee’s data are protected and their right to privacy is guaranteed. All copies of the IDs and documents pertaining to the applicant's age and other supporting materials will be kept in files with the human resources personnel. Audits and controls of the process will be a requirement of the

contractors and included in the contracts, in keeping with the country's Labor/ Employment Acts.

If underage workers are found working on the project the following actions will be undertaken:

- Termination of the contract and services agreement immediately as per the Labor Act;
- Schedule a meeting with the child and seek to determine the reasons for seeking employment;
- Refer the child to other support services including social services and the Ministry of Education;
- Leverage the services of Non-government and Community Based Organizations to assist the child.

8. TERMS AND CONDITIONS

Dominic a	<p>. The following terms and conditions apply to project workers in accordance with the law of Dominica, The Labour Contracts Act Chpt 89:04.</p> <p>Any person who employs another shall, not later than fourteen days from the date on which the employment commences, prepare a labour contract in writing correctly describing the terms and conditions of employment that have been agreed upon by the employer and the employee.</p> <p>Where, pursuant to section 3, a labour contract has been prepared by an employer respecting the employment of an employee:</p> <ul style="list-style-type: none">(a) a copy of the labour contract shall be delivered forthwith by the employer to the employee for his inspection;(b) the employer and employee shall sign the labour contract including any amendments agreed upon within three days of the date on which it was delivered to the employee; and(c) the employer shall give the employee a signed copy of the labour contract. <p>A labour contract between an employer and an employee shall set out:</p> <ul style="list-style-type: none">(a) the names of the employee and the employer;(b) the date on which the employment of the employee began or will begin;(c) a description of the duties of the employee;(d) the rate of pay that the employee is entitled to receive in
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	<p>respect of his employment, or the method to be used for calculating the pay of the employee;</p> <ul style="list-style-type: none"> (e) the intervals at which the employee will receive his pay, being intervals not exceeding one months in duration; (f) the period of time during which the employee will be on probation; (g) the normal hours of work of the employee; (h) the rate of pay that the employee is entitled to receive for hours worked by him in excess of or outside his normal working hours; (i) the annual leave to which the employee is entitled and the pay that he is entitled to receive during the period of his annual leave; (j) the sick leave to which the employee is entitled and the pay that he is entitled to receive during any period of sickness; (k) the length of notice that the employer and employee must give in order to terminate the labour contract; and (l) any other term or condition of employment that has been agreed upon.
Grenada	<p>The following terms and conditions apply to project workers in accordance with the Grenada Employment Act of 1999.</p> <p>Contracts</p> <p>The project, and sub-contractor, subcontractor, and assignees of contracts shall pay rates of wages and observe hours and conditions of employment which are not less favourable than those established in the country.</p> <p>Contractors and sub-contractors shall be certified according to the Government Requirements for governmental contractors including that contractors are certify that the wages and conditions of employment of all those employed by the contractor in the trade or industry in which the contractor is seeking to contract with the Government are fair and reasonable.</p> <p>The contracts will be guided by the principle of collective bargaining is applicable and where there is no minimum wage or rates established in the country, the guiding principle will be of fair wages and reasonable rates commensurate with governmental minimum wage and similar established rates and conditions.</p> <p>In keeping with the Employment Act, the contractor shall keep proper wage records and time sheets for all those employed in relation to the execution of the contract, and the contractor shall produce the wage records and timesheets for the inspection of any person authorised by the project or the Labour authorities of Grenada.</p> <p>Contractors are required by law, to post conditions of work in conspicuous places informing workers of their rights and conditions of</p>

	<p>work. The contractor shall ensure sufficient insurance so as to pay compensation to workers under the Workmen’s Compensation Act, Chapter 343. 9. A subcontractor shall be bound to conform to the conditions of the main contract and the main contractor shall be responsible for the observance of all contract conditions. Contractors and subcontractors shall recognise the right of their workers to be members of the trade unions.</p> <p>Minimum Wage</p> <p>All project workers shall be paid a wage that is above or equal to the minimum wage as established by the Government of Grenada. Wages will be paid on a weekly, bi-weekly or monthly basis. Each employee is entitled to a statement accompanying pay that itemised the following: “(a) the employee’s gross wages due at the end of that pay period; (b) the amount of every deduction from his or her wages during that pay period and the purpose for which each deduction was made; and (c) the employee’s net wages payable at the end of that pay period.”</p> <p>Hours of Work</p> <p>The maximum number of ordinary hours of work for employees shall be 40 hours per week with the ordinary working days being Mondays to Saturdays. Project employees are prohibited from working more than 10 hours per day inclusive of two hours for lunch and rest periods. No person under the age of eighteen years shall be employed or allowed to work between the hours of 9.00 p.m. to 6.00 a.m. Other provisions related to hours of work will be guided by the Employment Act on this matter.</p>
<p>St. Lucia</p>	<p>The Saint Lucia Labour Code guides and regulates the terms and conditions of employment. Division 1 “Contracts of Employment” applies to all persons engaged under contracts of employment. The Act mandates that “Within fourteen days from the date on which employment commences, an employer may prepare a written contract correctly describing the terms and conditions of employment that have been agreed upon by the employer and employee”. The Code also states that “where a contract of employment is not written the employer shall explain to the employee the contents of the contact of employment....”. The Code further states that “upon written request to the employer, an employee who is not employed under a written contract shall be given, within one month of the request, a written contract.</p> <p>The Labor code, para. 27.— (1) states that subject to subsections (2) and (3), an employer shall not require any employee to work for more than forty hours during any week, excluding overtime. In para. 265. — (1) It also states, that an employer shall not — (a) dismiss or threaten to dismiss an employee; (b) discipline or suspend or threaten to</p>

	<p>discipline or suspend an employee, (c) impose any penalty upon an employee; (d) intimidate or coerce an employee; or (e) discriminate against an employee in any way.</p> <p>The code states, that a person discriminates against another person if the first-mentioned person makes, on any of the grounds specified in subsection (2), any distinction, exclusion or preference, the intent or effect of which is to nullify or impair equality of opportunity or treatment in occupation or employment. (2) The grounds referred to in subsection (1) are — (a) race, sex, religion, colour, ethnic origin, social origin, political opinion or affiliation, disability, serious family responsibility, pregnancy, marital status, HIV/AIDS, trade union affiliation or activity, or age except for purposes of retirement and restrictions on work and employment of minors or for the protection of children and young persons.</p> <p>Para 285.—(1) states that, without prejudice to the provisions under this Division, an employer shall not refuse to employ a person, demote or dismiss a female employee, alter the terms and conditions of her contract of employment, refuse her promotion or training or in other way discriminate against her because she is or was pregnant or for any reason connected with pregnancy.</p> <p>Under this Project all consultants will be provided with a written contract, in accordance with the Labour Code, outlining terms and conditions for executing the particular work that 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.</p>
SVG	<p>The project will be guided by the Protection of Employment Act, 2003. This Act provides for the maintenance and promotion of good employment relationships between employers and employees. Among other elements, it addresses: promotion of employment rights, severance pay and disputes.</p> <p>Protection against dismissal without good cause:</p> <p>5. (1) Subject to the following provisions, every person shall be protected against the unfair termination of his employment without good cause.</p> <p>5. (2) The employment of a worker shall not be terminated for reasons related to his conduct or performance before he is provided an opportunity to defend himself against the allegations made except in cases where the employer cannot reasonably be expected to provide such opportunity.</p> <p>Termination after fixed term of employment.</p> <p>6. (1) The services of an employee who has been specifically employed for a fixed period may, notwithstanding anything contained in this Act, be terminated on the expiration of the term so stipulated.</p>

6. (2) For the purposes of this section, the effective date of termination of the services of an employee in relation to an employee who has been specifically employed for a fixed period and where that period expires without being renewed under the same contract, shall be the date on which the term expired.

Terms of employment in writing.

8. (1) Save in the case of daily paid and weekly paid workers, an employer shall inform an employee in writing of the terms and conditions in writing of employment and such terms and conditions shall include:

- a) the date of commencement of employment;
- b) the name and address of the employer and the employee;
- c) the rate of pay, the overtime rate if any and the pay period;
- d) the probationary period if any;
- e) the hours of work including time off and rest period, if any;
- f) the rate of vacation, sick and maternity leave if applicable; and
- g) the duties to be performed.

8. (2) An employer shall provide to the employee the conditions of service referred to in subsection (1) within seven working days from the date of employment or four calendar weeks where the employee is in employment at the commencement of this Act,

8. (3) Any person who fails to comply with the provisions of this section commits an offence and is liable on conviction to a fine not exceeding one thousand dollars.

9. GRIEVANCE MECHANISM

The Grievance Mechanism for all Project Workers is as follows:

Contractors will appoint a representative/employee who will be the point of contact for all Grievances. In the case of project management staff, the point of contact will be the project manager, and similar in the respective countries or the Permanent Secretary of the respective sector. Contact information will become available once the manager of the PIU is on board, and the contractors are known. Contact information will be available prior to the hiring of workers and it will be provided to workers upon signing of contract.

Upon receipt of Grievances (not channeled through the project manager,) the contractor staff / Permanent Secretary or Representative will notify the project manager and Social Specialist. In the case of issues with project management staff the Project Manager may be required to exclude her or himself if the complaint directly involves him or her.

The contractor will attempt to address grievance within established time frame of 3 weeks upon receipt. In cases of timely or urgent matters a period of a minimum of 24 hours and a maximum of 15 days will be allotted for addressing a resolving the grievance. Grievances can be made in person, telephone call or 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 at a later date and the complainant asked to sign same.

Contact information

Contact information of the social specialist in each PIU will be updated upon establishment and staffing of the PIUs. Given below are contact details of the line ministries where each PIU will be housed.

Contact	Dominica	Grenada	St. Lucia	SVG	OECS
Name	Ministry of Public Works and Digital Economy	Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation	Ministry of Public Service, Information, and Broadcasting	Ministry of Finance, Economic Planning, Sustainable Development, and Information Technology	TBD
Title	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first
Telephone	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever

Contact	Dominica	Grenada	St. Lucia	SVG	OECS
	comes first		comes first	comes first	comes first
Email address	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first	TBD and no later than 30 days after the Project Effective Date or prior to the hiring of workers, whichever comes first
Physical Address	1st Floor, Government Headquarters, Kennedy Avenue, Roseau, Dominica	Ministerial Complex, Botanical Gardens, St. George's, Grenada	2nd Floor, Greaaham Louisy Building, Waterfront, Castries, St. Lucia	1 st Floor, Financial Complex, Kingstown, St. Vincent and the Grenadines	Morne Fortune P.O. Box 179, Castries Saint Lucia

The contractor will notify the Project Manager through a report of the successful resolution of any grievance. The complainant will also be informed via writing of the measures taken to address the grievance.

If the grievance cannot be resolved by the contractor, the contractor will inform the Project Manager and the Social Specialists.

The Social Specialist and Project Manager will meet with the project contractor and workers and attempt resolution. In the case of project management staff, the Permanent Secretary will meet directly with the staff.

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 Labor'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.

ADDRESSING GENDER-BASED VIOLENCE

The 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 which will be defined prior to the contracting of workers, will be kept available by the GBV trained individual, the Project Manager at the PIU and by either the Project Manager or the Permanent Secretary of the respective ministries in each of the participating countries. 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 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**.

10. CONTRACTOR MANAGEMENT

It is mandated that the contractor execute the management of the contract in a manner that is acceptable to the client and is in accordance to the World Bank rules and regulations as it relates to ESS2, specifically relating to the selection process for contractors, management of labour issues, including health and safety, procedures for managing and monitoring of performance for contractors, as well as reporting on workers under the project.

Information on Public Records: The Contractor must have in place information on corporate registers and documents relating to the violation of applicable law, including reports from labour inspectorates and other enforcement bodies.

Certification and Approval of Business and Workers: Documentation of approved business licenses, registration, permits and other approvals and workers' certification/permits and training to perform the work.

Health and Safety: Document and have in place labour management systems as it relates to organizational health and safety. Records of incidents and

corresponding root cause analysis with a corrective mitigation plan. First aid cases, high potential near misses, and remedial and preventive activities required. Identification and establishment of safety committee and records of meetings

Workers Payroll Records: Documentation of the number of hours work and pay received inclusive of all payments made on their behalf, for example payment made to the National Insurance Scheme and other entitlements regardless of the workers being engaged on a short- or long-term assign mentor fulltime or part time worker.

11. COMMUNITY WORKERS

The project doesn't intend to be engaged with community workers.

12. PRIMARY SUPPLY WORKERS

The project does not intend to be engaged with primary supplier workers. However, if such situation appears, contractor who subcontract the supply of materials and equipment will be responsible to include conditions and specifications on ESHS aspects to its subcontracting agreements, including and to prevent the use of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers, and consistent with ESS2.

ANNEX 1- SAMPLE CODE OF CONDUCT

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [*enter name of Contractor*]. We have signed a contract with [*enter name of Employer*], for [*enter description of the Works*]. These Works will be carried out at [*enter the Site and other locations where the Works will be carried out*]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, labourers and other employees at the Works Sites or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as **“Contractor’s Personnel”** and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor’s Personnel.

Our 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.

REQUIRED CONDUCT

Contractor’s Personnel shall:

1. carry out his/her duties competently and diligently;
2. 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 Contractor’s Personnel and any other person;
3. maintain a safe working environment including by:
 - a) ensuring that workplaces, machinery, equipment and processes under each person’s control are safe and without risk to health;
 - b) wearing required personal protective equipment (PPE);
 - c) using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d) following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;

5. treat other people with respect and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of 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. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct;
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Contractor's Social Expert with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [] or by telephone [] or in person at []; or
2. Call [] to reach the Contractor's hotline (*if any*) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. 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 persons who experience 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 Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR CONTRACTOR'S 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 Contractor's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases*] requesting an explanation.

Name of Contractor's Personnel: [*insert name*]

Signature: _____

Date (day/month/year/): _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date (day/month/year/): _____