



DRAFT LABOUR
MANAGEMENT PROCEDURE
GRENADA RESILIENCE
IMPROVEMENT PROJECT
(GRIP) **P175720**

APRIL 1, 2022

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1.0 Introduction

This Labour Management Procedures (LMP or Procedures) is developed to comply with the Environmental and Social Standard 2 (Labor and Working Conditions) (ESS2) of the World Bank, which applied to the Grenada Resilience Improvement Project (GRIP or Project)- P175720. The Procedures seek to ensure that measures are in place to manage risks associated with the labour and working conditions of Project Workers, as defined in ESS2, under the project and help determine the resources necessary for effective planning and management. It sets out the approach to meeting national requirements and the objectives and requirements of the World Bank's Environmental and Social Framework, specifically the objectives and requirements of Environmental and Social Standards 2 (ESS2): Labour and Working Conditions and Occupational Health and Safety. Where national requirements and ESS2 differ, the latter prevails.

The analyses done for the project design identified risks as it relates to labour and working conditions and occupational health and safety as temporary and well managed through this LMP and diligent monitoring. The Government of Grenada is committed, on a continuous basis throughout the project's life, to evaluate risks and impacts and to having in place adequate measures and procedures to manage adverse impacts, in line with the ESF.

It is important to note that the LMP is a living document and can be updated, following approval of the World Bank, to meet the demands and evolving risks of the project.

2.0 Overview of Labour Use on the Project

Project workers, as it relates to the applicability of ESS2, 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 direct¹ and contracted workers², as reflected in **Table 1** below: The Project may engage primary supply workers³. The employment of Primary Supply Workers will be screened on an ongoing basis throughout Project implementation and, where needed, risks will be managed in line with ESS2 and this LMP. The Project doesn't intend to engage with community workers⁴.

¹ People employed or engaged directly by the Project (including the project proponent and the project implementing agencies) to work specifically in relation to the project

² People employed or engaged through third parties to perform work related to core functions⁴ of the project, regardless of location. Third parties may include contractors, subcontractors, brokers, agents or intermediaries

³ Primary suppliers are those suppliers who, on an ongoing basis, **provide directly to the project goods or materials essential for the core functions of the project.**

⁴ Where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net²³ or providing targeted assistance in fragile and conflict-affected situations

Table 1: Main Types of Workers Component 1

Contract Code	Contracts	Contract Description	Direct Workers	Contracted Workers	Primary Supply Workers
D-Bridge	Consultancy for the design and supervision of the Balthazar bridge	Preparation of Detailed Design of Balthazar bridge and support the MOIID with works supervision	-	15	NA
RC-bridge	Reconstruction of Balthazar Bridge.	Reconstruct Balthazar Bridge of 55-m length	-	50	At this stage this is not anticipated, but it will be further screened during implementation.
	Consultancy for the design and supervision of the Soubise/Marquis main road coastal works	Preparation of detailed design of the Soubise/Marquis coastal work and support the MOIID with works supervision.	-	15	NA
	Construction works at the Marquis and Soubise Coastal area	Construction of sea defense at Marquis and Soubise Coastal area.	-	100	At this stage this is not anticipated, but it will be further screened during implementation.
	Consultancy for the ESIA for coastal works at the Soubise/ Marquis main road	Consultancy to conduct an ESIA for the coastal works at the Soubise/Marquis main road	-	15	NA
	Total:			195	

Table 2: Main Types of Workers Component 2

Contract Code	Contract	Contract Description	Direct Workers	Contracted Workers	Primary Supply Workers
	Consultancy; assessment of the risks of flooding in the coastal city of Grenville	Consultancy to determine the level of risks to the coastal city of Grenville due to flooding and identification of management options to mitigate against the risks.	-	20	NA

Contract Code	Contract	Contract Description	Direct Workers	Contracted Workers	Primary Supply Workers
	Consultancy assessments and designs for the climate and disaster resilient rehabilitation of the Police Barracks cultural heritage building.	Consultancy assessments and designs for the climate and disaster resilient rehabilitation of the Police Barracks cultural heritage building.	-	10	NA
	Consultancy assessments and designs for the climate and disaster resilient rehabilitation of the York House cultural heritage building	Consultancy assessments and designs for the climate and disaster resilient rehabilitation of the York House cultural heritage building	-	20	NA
	Consultancy assessments and designs for the climate and disaster resilient rehabilitation of the Public Library cultural heritage building.	Consultancy assessments and designs for the climate and disaster resilient rehabilitation of the Public Library cultural heritage building.	-	15	NA
	Consultancy: assessment of the River Road and Balthazar rock faces and designs to manage rock fall.	Consultancy: assessment of the River Road and Balthazar rock faces and designs to manage rock fall and landslide risks incorporating consideration to expected climate risk.	-	20	NA
	Consultancy: Identification and implementation of capacity strengthening of road assets management	Consultancy: Identification and implementation of capacity strengthening of road assets management.	--	15	NA
	Total:		0	100	

Table 3: Main Types of Workers Component 4

Contract Code	Contract	Contract Description	Direct Workers	Contracted Workers	Primary Supply Workers
	Project Manager (Lead)	Manage and have overall oversight of the project.	1	NA	NA
	Assistant to the PM (Engineer)		1	NA	NA
	Accountant		1	NA	NA
	Procurement Specialist		1	NA	NA
SSC	Consultancy: Social safeguard consultant	provide support to the Implementing Agency with social safeguards	1	NA	NA
EC	Consultancy: Social and Environment Consultant	provide support to the Implementing Agency with environment safeguards	1	NA	NA
MEC	Consultancy: Monitoring & Evaluation consultant	provide support to the Implementing Agency with monitoring and evaluation	1	NA	NA
CSC	Consultancy: Communication Specialist consultant	provide support to the Implementing Agency with communication	1	NA	NA
		Total:	8		

Any part-time or full-time government civil servants working with the project will remain subject to the terms and conditions of their existing employment agreement or arrangement unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to such workers except for the provisions for Protecting the Workforce (ESS2 paragraphs 17-20-Child labour and minimum age) and Occupational Health and Safety (ESS2 paragraphs 24-30) if these persons are involved in project implementation and oversight.

It is important to note that the timing of labour requirements will be based on the project implementation schedule developed for the project.

3.0 Assessment of Key Potential Labour Risks

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

Table 4: Risks and Measures

Key identified Labour risk	Description	Proposed mitigation measures
1. Occupational Health & Safety	Includes risk of exposure to a number of hazards that could result in illness, injury or death such as due to workplace injuries, improper use of PPE or COVID-19 related illness. Project workers are exposed to an elevated risk of natural disasters especially during hurricane season.	<p>Conduct regular awareness raising sessions reaching project workers and affected communities as well as adequate OHS training.</p> <p>Use of adequate protective gear. Development of emergency preparedness and response plans, including at subprojects sites.</p> <p>Implementing OHS measures described in the ESMPs</p> <p>PIU to prepare Covid-19 transmission prevention plan which includes procedures to be followed if a project worker contracts the disease.</p>
2. Unfair treatment or discrimination of project workers	Project workers could be subjected to unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender, religion and sexual orientation. These risks apply to all project workers, including those employed by the PIUs (Direct workers).	<p>Requirement for fair recruitment policies and enforcement of zero tolerance to discrimination.</p> <p>Awareness, monitoring and enforcement of compliance with the CoC.</p>
3. Physical, psychological or sexual harassment of project workers	Project workers could be exposed to physical, psychological or sexual harassment and abuse. Risks include both physical forms of harassment and abuse (such as violence and sexual assault) and non-physical forms (such as verbal abuse, bullying and unwanted sexual attention). These risks apply to all Project workers	<p>The project will adopt a zero-harassment policy for all workers, reflected in the CoC and to be broadcast to all workers through various media and formats.</p> <p>The CoC will be integrated into contracts of all Project workers (under ESS2), and the project</p>

Key identified Labour risk	Description	Proposed mitigation measures
		<p>GRM will be available to all Project workers.</p> <p>Awareness raising and training will be conducted for all Project Workers reviewing the terms and conditions of these procedures and tools.</p>
<p>4. Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)</p>	<p>SEA/SH refers to inappropriate or criminal behaviour, such as sexual harassment of a person, exploitative sexual relations, and illicit sexual relations with minors from the local community. SEA/SH also includes any exploitative sexual relationships and human trafficking whereby women and girls are forced into sex work.</p>	<p>All project workers' contracts will include a CoC with SEA/SH provisions and the PIU will monitor compliance.</p> <p>Project workers will be provided GBV orientation. SEA/SH considerations are included in the GRM for project workers, in the form of maintaining a list of SEA/SH service providers.</p>
<p>4. Child and Forced Labour</p>	<p>While the risk exists, the risks of child labour or forced labour is minimal as the project will require technical staff with experience and education above a certain minimum age, in line with ESS2. Also, there will be no forced labour in the Project.</p> <p>Hiring youth and children under the age of 18 risks exposure to hazards and may interfere with the child's education or be harmful to the child's health.</p> <p>Children above the age of 16 years of age can only be hired by the Project to provide light work that exposes said child to hazards and harms their health and interfere with their education, in line with ESS2. As such, for example, persons under 18 years of age cannot work in any construction activities supported under the Project.</p>	<p>Certification of labourer's age using legally recognized documents.</p> <p>Awareness raising of the CoC, careful monitoring, and strict enforcement of compliance.</p> <p>Where persons under the age of 18 but above the 16 years of age are hired, the project will maintain a register containing the dates of their births and the type of work they provide in line with ESS2, and with the Employment Act of participating countries. Persons under 18 years of age cannot perform work that exposes them to hazards and harms their health and interferes with their education, in line with ESS2. As such, for example, persons under 18 years of age</p>

Key identified Labour risk	Description	Proposed mitigation measures
		cannot work in any construction activities supported under the Project.

Table 4 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 civil works and possible accidents or emergencies, with reference to civil works, and occupational health and safety risks.

For technical assistance and management types of work, risks are associated with terms and conditions of employment, including, without limitation, working extended hours and getting compensated for that. There is also the possibility of the staff not working in properly ventilated buildings or buildings not equipped with proper cooling facilities. The risks of child labour or forced labour is also minimal. The issues of migrant and seasonal workers, labour influx does not apply. If needed, 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 Grenada. 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 sexual harassment/sexual exploitation and abuse in both the assessments and technical works and the civil works. Young female workers are at the highest risk for harassment, including sexual harassment, intimidation, and exploitation. 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 workers over the minimum age of 16 and under the age of 18 to perform Project-related light work that is not harmful to their health or development, as set out in ESS2, the project will provide an extra layer of supervision for them to ensure they are educated of their rights and the project’s policies on harassment, intimidation, and exploitation. The extra layer will include separate training sessions and information and awareness of the Workers’ grievance mechanism (GM) and project point person to which complaints can be made; this is part of the functioning of the workers GM and as part of the responsibility of the Social Specialist of the project.

The contracting of a young worker will be consistent with ESS2: A child 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: (a) the work does not fall within paragraph 19 of ESS2; (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 of 16 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.

As a result of the ongoing COVID-19 pandemic, there is the risk of project workers contracting the virus following an outbreak in a Project site. Consequently, proper safety measures in accordance with national laws and regulations, and international good practices will be applied to manage the risks of such COVID19 outbreaks. Consequently, the project will be guided by good international industry practice including:

- ILO Occupational Safety and Health Convention, 1981 (No. 155)
- ILO Occupational Health Services Convention, 1985 (No. 161)
- WHO International Health Regulations, 2005
- WHO Emergency Response Framework, 2017
- WHO Guidance on COVID-19, 2020

The project will also ensure that adherence is made to the World Bank's guidance note "ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/ Civil Works Projects (April 1, 2020)"⁵.

The project will ensure the following:

- A detailed COVID-19 transmission prevention plan is developed, and implemented
- OHS training will include training for project workers on hygiene and other preventative measures, such as use of masks and social distancing or alternative working hours.
- A communication strategy for regular updates on COVID-19 related issues and status of any workers that may be affected by the illness.
- Project workers will be provided with the adequate Personal Protective Equipment (PPE) to safely carry out their duties.

⁵<https://worldbankgroup.sharepoint.com/sites/wbunits/opcs/Knowledge%20Base/ESF%20Safeguards%20Interim%20Note%20Construction%20Civil%20Works%20COVID.pdf>

4.0 Brief Overview of Grenada’s Labour Legislation: Terms and Conditions

4.1 Employment Act of 1999

The key overarching national labour legislation in Grenada is the Employment Act of 1999 which regulates the terms and 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.

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.

Some of the Key entitlements of the employment act are:

Every employer shall give to each employee a written statement of particulars of employment.
No person under the age of sixteen years shall be employed or allowed to work in any public or private agricultural, industrial, or non-industrial undertaking or any branch thereof, save and except for holiday job employment. Every employer shall keep a register of all persons under the age of eighteen years employed by him and of the dates of their births.
No employer shall require any employee with the exception of shift workers to work for more than the hours prescribed.
For an agricultural worker, a construction worker or an industrial worker, no more than forty hours with the ordinary working days being Mondays to Fridays.
No employer shall require an employee to work for more than six consecutive days without a period of rest comprising at least twenty-four consecutive hours which shall be taken on a customary day of rest or on a day agreed upon between the parties.
As ordinary working hours, no employer shall require any employee save and except a security guard, a domestic worker, or a shift worker, to work for more than eight hours on any day, inclusive of lunch period without paying adequate compensation for overtime work.
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.
An employee's continuous employment shall not be treated as interrupted if the employee is absent from work: a) (a) due to taking annual leave, maternity leave or sick leave or any other leave in accordance with the employment Act, any other enactment or contract or agreement.

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 danger to life or health.

Grenada has an Occupational Health and Safety Policy⁶. Grenada has ratified the 8 ILO Core Conventions.⁷ Other conventions that are also active/in force are the: C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19); 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 because of actions properly taken by them in conformity with the policy referred to in Article 4 of this Convention.

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

5.0 Responsible Staff

The Project implementation Unit through the project manager, will be responsible for the engagement and management of all project workers. The project manager will be the direct staff responsible for the engagement of project workers, contractors and subcontractors, occupational health and safety

⁶ <https://gov.gd/sites/mol/files/docs/LABOUR%20OSH%20Policy%20Grenada%2019.pdf>

⁷ **C029** - Forced Labour Convention, 1930 (No. 29), in force since July 09, 1979; **C087** – **C087**- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) in force since October 25, 1994; **C098** - Right to Organize and Collective Bargaining Convention, 1949 (No. 98) in force since July 9, 1979; **C100** - Equal Remuneration Convention, 1951 (No. 100), in force since October 25, 1994; **C105** - Abolition of Forced Labour Convention, 1957 (No. 105) in force since July 9, 1979; **C111** - Discrimination (Employment and Occupation) Convention, 1958 (No. 111), in force since May 14, 2003; **C138** - Minimum Age Convention, 1973 (No. 138) Minimum age specified: 16 years, in force since May 14, 2003; and **C182** - Worst Forms of Child Labour Convention, 1999 (No. 182), in force since May 14, 2003.

(OHS), training of workers, and addressing worker grievances. The project manager with the support of the Environmental and Social Specialists will be responsible for the overall management of all project workers. They will give follow-up with contractors to ensure that both contractors and subcontractors develop and implement procedures to establish and maintain a safe working environment, including that workplaces, machinery, equipment, and processes under their control are safe and without risk to health, including by use of appropriate measures relating to chemical, physical and biological substances and agents. Contractors and subcontractors will actively collaborate and consult with project workers in promoting understanding, and methods for, implementation of OHS requirements, as well as in providing information to project workers, training on occupational safety and health, and provision of personal protective equipment without expense to the project workers.

6.0 Occupational Health and Safety (OHS) Policies and Procedures

The LMP including Occupational Health and Safety (OHS) will be the responsibility of the Project Manager with the support of the Environmental and Social specialists. Contractors will assign a member of staff with responsibility for matters related to health and safety. In large firms, this member of staff may be a specialist in OHS, for smaller firms and sub-contractors a member of staff with training and experience in OHS can suffice. A Code of Conduct for workers is required and will be developed and implemented. The safety representative will ensure that any complaints on health and safety are recorded and reported to the project E&S specialists.

Training of Workers: The Environmental and Social Specialists will liaise with the contractor's OHS representative for the necessary capacity building activities of the contractor's management staff and workers. Training of workers in environmental and social standards and OHS will be the responsibility of the project E&S specialists. Training on the Code of Conduct will be conducted by the Project Manager with assistance from the project E&S specialists.

Worker Grievances: The process for addressing workers' grievances are described in the Worker Grievance Mechanism described in this LMP.

6.1 Purpose of OHS Procedures

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

6.2 Scope of OHS Procedures

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 workers whilst at work or carrying out work duties". OSH Management System is the standards, policies, guidelines that address project workers' safety, monitoring and evaluation of safety, worker's health, work and general environment.

6.3 OHS Procedures

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

- Compliance with pertinent national and international OSH standards, such as the WBG EHS Guidelines, that are applicable to Grenada;
- Compliance with the Environmental and Social Standards of the World Bank, including ESS2 objectives and requirements on Labor and Working Conditions;

- World Bank Environmental Health and Safety (EHS) Guidelines;
- Prevention of injury and ill health of all project workers;
- Identification and assessment of hazards; Measures to manage the hazards, including the establishment of safety systems, processes and performance;
- Continuous improvement of Safety Systems;
- Management and mitigation of adverse environmental and social impacts;
- Compliance with COVID-19 protocols
- Training and awareness
- Prevention of use of faulty equipment or sub-standard equipment.

The project will commit to safety considerations in 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 workers to conduct all activities in a safe environment. Project workers will be responsible, subject to their roles, for maintaining 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 national and international services in compliance with national laws, the ESF requirements and Good International Industry Practice (GIIP) in relation to safety. Project workers at all levels have the authority to stop any activity they consider a danger to themselves or other workers, the public or the environment. Project Workers will be responsible, subject to their roles, for maintaining a safe environment, including the assessment of risks and actions to minimise, mitigate, and manage labour risks, in line with ESS2. Workplace processes will be put in place for project workers to report work situations that they believe are not safe or healthy and remove themselves from a work situation that they have reasonable justification for believing presents an imminent and danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal. Project Workers in this situation must rely on the project's Worker GM, which lays out procedures and timeframes for resolution. The LMP also requires incidents and accidents to be logged and reported by the PIU Project Manager and the World bank in line with the World Bank Environment and Social Incident Response Tool (ESIRT), i.e., they need to be reported to the World Bank promptly and no later than 48h upon finding out of an incident or accident. Further investigation and remedial measures may be required, in line with the ESIRT and as detailed in the ESCP.

There will be no retaliation to project workers for stop-work whistleblowing.

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

The project will also ensure that all Project workers hired:

- Ascribe to the principle of not harming people;
- That sexual harassment and 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 the Code of Conduct as well as on OHS measures required under ESS2;
- That there is always compliance with the laws of Grenada, unless ESS2 or the other ESSs requirements differ and, therefore, the latter prevail for purposes of the Project;
- Compliance with the Environmental and Social Framework (ESF) of the Bank, including the Environment and Social Standard (ESS2) on Labour and Working Conditions;
- All health and safety measures are adhered to as laid out under World Bank's Environmental and Social Standards (ESS2) on Labour and Working Conditions.

6.4 Awareness of Policy

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

7.0 Age of Employment

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, provided that, in line with ESS2, Project Workers between 16 and 18 only engage in light work that is not harmful to their health, develop and allows them to attend school. Under no circumstances should persons below 18 years of age be employed in the project for construction activities. In addition to the Employment Act, Grenada is a signatory to the following international conventions related to the minimum age of employment:

- Convention on the Rights of the Child (CRC): "Signed on the 19th of April 1990 and ratified on the 9th of October 1990" (UNICEF, 2015)
- Minimum Age Convention, 1973 (No.138) (International Labour Organization, 2017)
- Forced Labour Convention, 1930 (No. 29) (International Labour Organization, 2017)
- Worst Forms of Child Labour Convention, 1999 (No. 182) (International Labour Organization, 2017)
- Medical Examination of Young Persons Convention, 1921 (No. 16) (International Labour 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)

Project workers 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:

- (a) the work is not likely to be hazardous and 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 before the work commences; and

- (c) the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS2: Labour and working conditions.

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 workers will be asked to produce identification documents (ID) 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, passports 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 schools’ officials, 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, 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 Employment Act.

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.

8.0 Terms and Conditions of Employment

The following terms and conditions apply to project workers in accordance with the Grenada Employment Act of 1999.

8.1 Contracts

The project -contractor, subcontractor, and any other assignees of contracts shall pay wages and observe hours and conditions of employment that are no less favourable than those established in the country as part of the Grenada Employment Act (1999).

Contractors and sub-contractors shall be certified according to the Government Requirements for governmental contractors. This includes that contractors are to 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.

The principle of collective bargaining will guide the contracts. Where there is no minimum wage or rates established in the country, the guiding principle will be fair wages and reasonable rates commensurate with governmental minimum wage and similar established rates and conditions.

In keeping with the Employment Act, the contractor shall keep proper wage records and timesheets 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, the Labour authorities of Grenada or the World Bank.

Contractors are required by law to post conditions of work in conspicuous places, informing workers of their rights and conditions of work.

The contractor shall ensure sufficient insurance to pay compensation to workers under the Workmen's Compensation Act, Chapter 343:09.

A subcontractor shall be bound to conform to the main contract conditions 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 trade unions.

8.2 Minimum Wage

All project workers shall be paid a wage 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."

8.3 Hours of Work

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, including 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. The Employment Act will guide other provisions related to hours of work on this matter.

9.0 Grievance Mechanism

This GM will be operational prior to the engagement of project workers.

The Grievance Mechanism for all Project Workers is as follows:

The Project Implementation Unit and 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, Contact information of the contractor will become available once 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 the contract.

Upon receipt of Grievances (not channelled 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 them.

The contractor will attempt to address the grievance within the 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, by telephone call or in writing. Grievances can be made anonymously. A dedicated email and telephone number will be provided for all Grievances. For grievances made via telephone or in-person, grievances will be recorded later, and the complainant will be asked to sign the same.

Contact Information

The Project Implementation Unit
Ministry of Infrastructure Development, Transport and Implementation (MOI)
Botanical Gardens
Tanteen, St. George's
Attn: Project Manager
Telephone: 1 473 416 4785
Email: digitalgrm@gov.gd

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 Specialist.

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 for their action and pronouncement. The Ministry of Labour's ruling would be the final tier of the grievance mechanism.

Grievances may be submitted anonymously without providing the complainant's name or contact details. There is a zero policy on retaliation against any Project Worker or Individual that submits a complaint through the Project GM.

If unresolved, either party may seek redress in the courts of Grenada. 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.

9.1 Addressing Sexual Exploitation and Abuse and Sexual Harassment complaints in the workplace

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

The GM will specify and train an individual responsible for dealing with any SH/SEA allegations issues, should they arise. A list of SH/SEA service providers included in Annex IV will be updated annually to ensure correct information will be kept available by the SH/SEA trained individual, the Project Manager at the PIU and by either the Project Manager or the Permanent Secretary. The GM should assist SH/SEA 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 World Bank Technical Note “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works”. This GRM 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)

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

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider

An organisation offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Survivor-centred Approach

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

SEA/SH grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant, and applying the survivor-centred approach⁸. Any cases of SEA/SH brought through the GRM will be documented but remain closed/sealed to maintain the survivor's confidentiality. The WB will be notified as soon as the Project Manager and the E&S specialists learn about the complaint.

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

⁸ The survivor-centred approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor’s interests are respected and prioritised, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.

ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the PIU safeguards specialist 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 PIU Social Specialist refers her/him to relevant SEA/SH service providers identified in the mapping of SEA/SH service providers carried out by UNFPA 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 PIU Social specialist will keep the survivor informed about any actions taken by the perpetrator 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 PIU Social Specialist can close the case.

ACTION 2: INCIDENT REPORTING

The PIU Safeguards Specialist needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Project Manager who will, in turn, inform the World Bank Task Team Leader (TTL) or directly to the TTL.

Complaint Forms and other detailed information should be filed in a safe location by the Social Specialist. Neither the Social specialist nor the Project Manager should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent, but the Social Specialist 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 PIU and WB; (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 taken.

As long as the SEA/SH remains open the Social Specialist and/or Project Manager should update the World Bank TTL 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 WB financed project. The Social specialist should form a SEA/SH verification committee comprised by her/him, one member of

the PIU, one member of a local service provider and a representative of the contractor (if relevant). The Social Specialist 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 project⁹, the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the PIU or a contractor. The Project Manager 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 labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

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

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in legal system, the Social Specialist 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 Social Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Any cases of SH/SEA brought through the GM 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 SH/SEA 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.**

Building Grievance Redress Mechanism Awareness

The Project Manager or Social Specialists will initially brief all project staff, including consultants the Grievance Mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

10.0 Contractor and Sub-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 with 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.

⁹ Project actors are: (a) 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 (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 Borrower'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).

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 assignment fulltime or part time worker.

10.1 Primary Supply Workers

The project may engage with primary supply workers. If this is this case,. each contractor who subcontracts the supply of materials (e.g sands, rocks. from quarries) will be responsible to include conditions and specifications of ESHS aspects in its subcontracting agreements.

As part of the Environmental and Social Impact Assessment for subproject sites, the Project will identify potential risks of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers. Where there is a significant risk of child labor or forced labor related to primary supply workers, the Project (in this case the contractor) will require the primary supplier to identify these risks, and the Environmental and Social Management Plans in its relevant sections/annex consistent with this Labor management procedures will set out roles and responsibilities for monitoring primary suppliers.

If child labor or forced labor cases are identified, the Project will require the primary supplier to take appropriate steps to remedy them. Additionally, where there is a significant risk of serious safety issues related to primary supply workers. The Project will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.

Annex I 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 behaviour that we require from all Contractor’s Personnel. Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

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 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's 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 behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by 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/): _____

Annex II Guidance for Reporting Incidents and Accidents

Guidance on Reporting of Incidents/accidents by the PIU of the project.

In case of incidents and accidents, the Project Implementation Unit (PIU) will notify the Bank within 24 hours after learning of the incident or accident. The submission of the subsequent report would be provided in a timeframe acceptable to the Bank and or as requested. The PIU will provide sufficient details about the incident or accident, indicating the immediate measures taken to address it, including information provided by any contractor and supervisory entity, as appropriate. Subsequently, at the Bank's request, the PIU will prepare more detailed report (s) on the incident or accident, where it will propose measures to prevent it from happening again. See annex A, format for reporting incident and accident.

These subsequent reports, among others, can be:

1. Root Cause Analysis (RCA). The main objective of the RCA is Prevention and it will be carried out by whoever is managing the site where the incident / accident occurred, for example grant, contractor, subcontractor, etc. The RCA¹⁰ will address the following:
 - a. Determine what happened by identifying and describing the incident / accident. Include photos.
 - i. What happened? Who was affected?
 - ii. Where and when it happened.
 - iii. What is the source of the information? How did you find out about the incident / accident?
 - iv. Are the basic facts of the incident / accident clear and indisputable, or are there contradictory versions?
 - v. What were the conditions or circumstances under which the incident / accident occurred?
 - vi. Is the incident ongoing or contained?
 - vii. Is it a loss of life / s or serious damage?
 - viii. How serious was the incident?
 - b. Determine the root cause (RCA) of the incident / accident
 - i. Understand and document the root cause (s) of the incident, which may be due to the following factors:
 1. Labour Procedures
 2. Equipment and technology
 3. Organizational / systemic
 4. Human factors.
 - ii. The RCA should be based on existing country processes, where available. It is only in the absence of systems or weak experience that consultants (national or international) need to be recruited to undertake the RCA.
 - iii. The Borrower is responsible for funding the preparation of the RCA from project funds or other own resources.
 - iv. RCA should be completed as soon as possible, ideally within 10 days.

¹⁰ While an RCA per se is not mandatory, especially in cases where information is clear and readily available., it is nonetheless essential that the Borrower and Bank understand very well the underlying cause(s) of the incident, to agree on measures to prevent recurrences

- v. Findings of RCA will inform measures to be included in Corrective Action Plan (CAP)
 - vi. Provide complete information about the incident to the Bank and facilitate site visit(s)
- c. Identify immediate corrective measures, as well as additional follow-up actions if any are required, with their associated deadlines. These additional follow-up actions may enter the
2. The CAP and with the aim of preventing similar incidents / accidents in the future. The CAP will have, among other elements, those indicated in Annex C.
 3. Any subsequent report would be provided within a time acceptable to the Bank.

Annex A: INCIDENT / ACCIDENT REPORTING SHEET

INCIDENT / ACCIDENT REPORT FORM			
EVENT IDENTIFICATION -INCIDENTS / ACCIDENTS			
Project name and Id:			
Name and Id of subproject:			
Event -Incident / Accident #:			
Date:		Hour:	
Place of occurrence:			
UPI / Contractor:			
Municipalities/ parishes:			
Communities:			
Incident / accident Information Source:			
INCIDENT / ACCIDENT DESCRIPTION			
Event Severity Level	Weather condition	Scope of the even to	How the event relates to the Project
<input type="checkbox"/> Indicative	<input type="checkbox"/> Sunny	<input type="checkbox"/> Local	<input type="checkbox"/> Linked with the project
<input type="checkbox"/> Serious	<input type="checkbox"/> Cloudy	<input type="checkbox"/> Regional	<input type="checkbox"/> Not linked with the project
<input type="checkbox"/> Severe	<input type="checkbox"/> Rainy	<input type="checkbox"/> National	
	<input type="checkbox"/> Night	<input type="checkbox"/> International	
	<input type="checkbox"/> Other (explain)		
Scope of the Incident / Accident			
<input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Occupational Health and Safety			
Detailed Description of the Incident / Accident Event			
RESPONSE ACTIONS FOR THE INCIDENT / Accident			
Status of resolution		Urgency of Response	

<input type="checkbox"/> Resolved	<input type="checkbox"/> Need for immediate response
<input type="checkbox"/> In progress	<input type="checkbox"/> No immediate response
<input type="checkbox"/> Other (explain)	
Description of Response to Event - Incident / Accident	
Recurrence of Similar Events / Incidents / Accidents	
<input type="checkbox"/> No	<input type="checkbox"/> yes
Number of times ____	
In case of recurrence, indicate the period in which the events were repeated:	
IMPACT ON THE PROJECT	
Does the event affect the execution of the work?	Is there a need for additional specialized resources to investigate, evaluate, or resolve the event?
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes
<input type="checkbox"/> NO	<input type="checkbox"/> No
	<input type="checkbox"/> Other (Explain)
Other Observations	

Annex B: Incident classification guide

Indicative
A relatively minor and small-scale incident or non-compliance that is limited in its immediate effects but may be indicative of wider-scale issues within a project that could lead to serious or severe incidents. It may be escalated to serious or severe under certain circumstances, including recurrence of the incident within a six-month period, severity of impact of the incident, or inability to rectify the condition within the agreed timeframe.
Serious
An incident that is causing or will cause significant harm to the environment, workers, communities, or natural or cultural resources, is complex and/or costly to reverse and may result in some level of lasting damage or injury. This may include repeated non-compliance. Serious incidents for example could involve injuries to workers that require off-site medical attention and result in lost time, improper treatment of vulnerable groups, inadequate consultation, consistent lack of OHS plans in a civil works environment, and medium-scale deforestation. These types of incidents require an urgent response.
Severe
An incident or repeated pattern of non-compliance of sufficient seriousness that it may, in addition to the actual or potential harm caused, pose a corporate risk. A severe incident is complex and expensive to remedy, and likely irreversible. A fatality is automatically classified as severe, as are large-scale deforestation, major contamination, forced or child labor, human rights abuses of

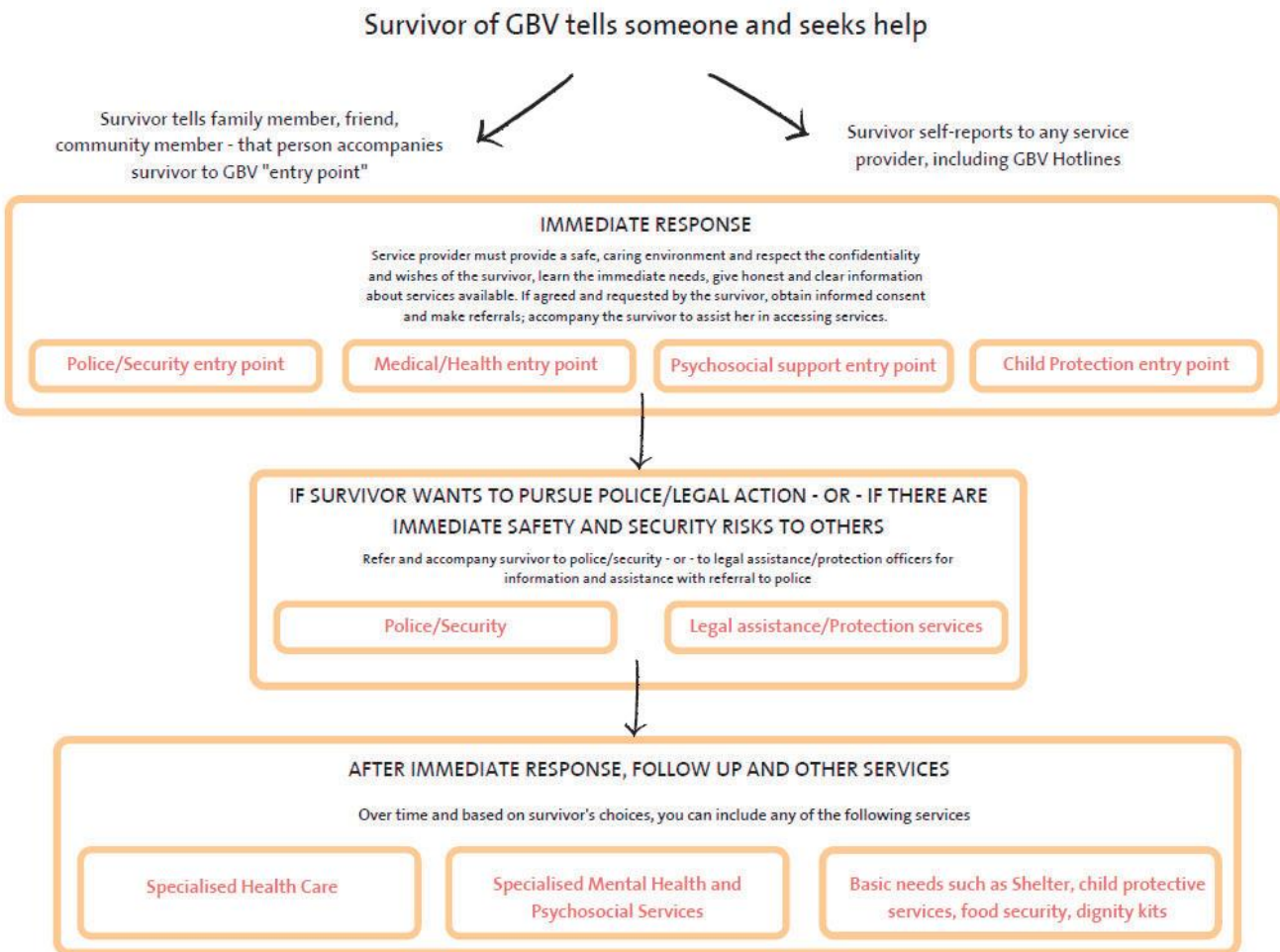
community members by security forces or other project workers, including GBV, violent community protests a project, and trafficking in endangered species.

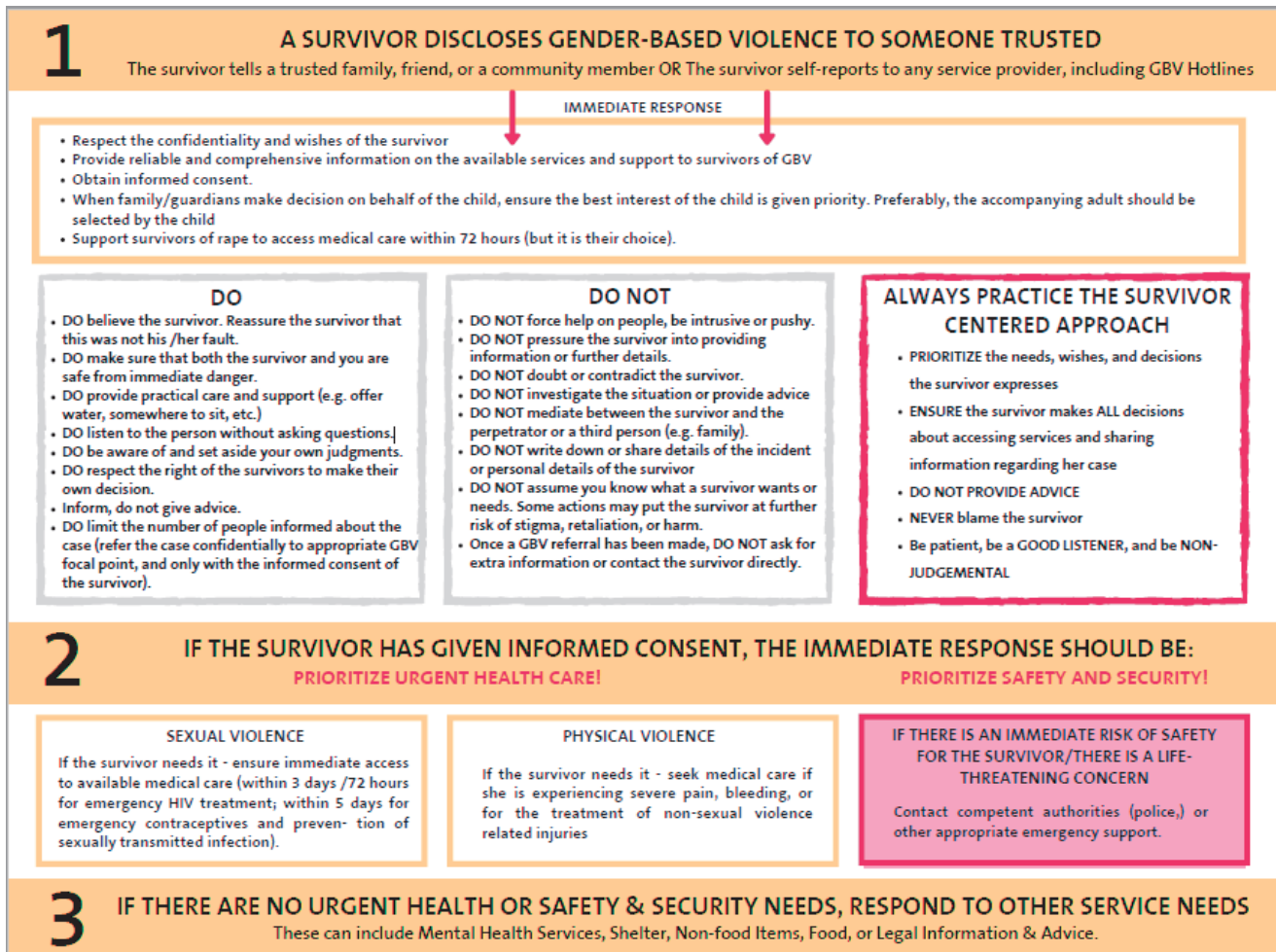
Annex C: Elements of a corrective action plan:

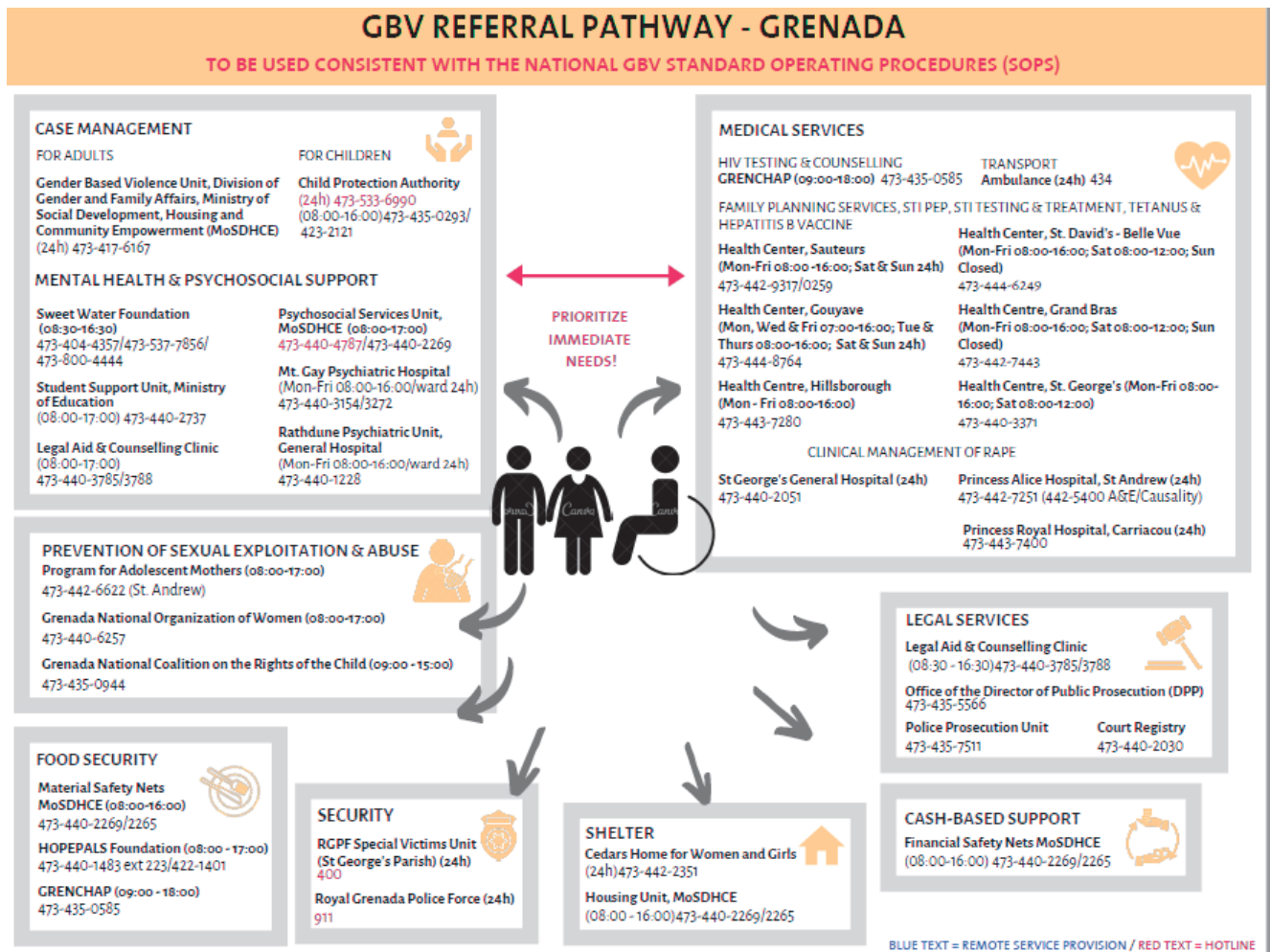
Timeframe: - Immediate to near term actions - Medium term/ongoing actions	Topics for example: Documentation, monitoring and reporting; Contractual agreements /enforcement; Risk assessment, processes, procedures and training plans for managing risks	Actions/Measures	Responsible Parties	Compliance Date	Compliance Status

Annex III Gender-based Violence Referral Pathway

Gender Based Violence (GBV) Referral Pathways







Annex IV List of available SEA/SH services

Name of Organisation	SEA/SH Service provided	Contact
Division of Family and Gender Affairs	Provides direct social and psychological services to victims of IPV and adult victims of sexual abuse. This includes counselling, a psychoeducational programme developed specifically for survivors, child protection, and social safety nets such as the Support for Education, Empowerment and Development (SEED) Programme which provides financial payments to the poorest and most vulnerable, and housing and relocation to Cedars Home for Abused Women and Their Children, if needed.	Sir Eric Matthew Gairy Botanical Gardens, St. George's Grenada, W.I. Tel: +1 (473) 440-2255 Fax: +1 (473) 440-4116 +1 (473) 435-7285 Email: pmpress@gov.gd Web: www.gov.gd
Cedars Home for Abused Women	Shelter facility	Undisclosed. But information on services available from the Division of Family and Gender affairs (above).

<p>Legal Aid Clinic</p>	<p>General legal advice and representation, counselling, psychological services, psycho-social, and mediation.</p>	<p>St. John’s St., St. Georges. Tel: 1 473-440-3785 Covid-19 emergency contact: 440 3788, 440 3785, 419 4112 and 456 7571 WhatsApp : 405 8643. Email:lacc@spiceisle.com.</p>
<p>Royal Grenada Police Force (RGPF)</p>	<p>Emergency response, investigations, arrests, and providing evidence for prosecution. SVU Hotline</p>	<p>Headquarters Fort George, St. George's Grenada, W.I. Tel: (473) 440-3999 (473) 440-1043 (473) 440-1047 Call 400 for SVU Hotline</p>
<p>Civil Society Organisations</p>		
<p>Sweet Water Foundation</p>	<p>Sexual Violence Help line. Branch of an organisation located in Canada.</p>	<p>WhatsApp: Message 473-534-5787 Telephone: 473-800-4444 Email:helpline@sweetwaterfoundation.ca</p>
<p>Grenada Planned Parenthood Association (GPPA)</p>	<p>Sexual and reproductive health services and education to women and girls, including through their youth arm (i.e., Youth Advocacy Movement). They run two full time clinics in St. George’s and St. Andrew’s.</p>	<p>Grenville, Grenada Tel: 473-442-5442</p>