

# LABOR MANAGEMENT PROCEDURES

**Caribbean Digital Transformation Program (P171528)**

**Saint Lucia**



**April 07, 2025**

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## 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 government of Saint Lucia is 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.

## 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	No.
<b>1</b>	<b>Direct workers <sup>1</sup></b>	<b>7</b>
<b>2</b>	<b>Contracted workers</b>	<b>88</b>
<b>3</b>	<b>Primary Supply workers <sup>2</sup></b>	<b>0</b>
<b>Total</b>		<b>95</b>

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<sup>1</sup> 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.

<sup>2</sup> Those suppliers who, on an **ongoing basis**, provide directly to the project goods or materials essential for the **core functions** of the project.

<sup>3</sup> 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 Worker

<b>Jobs Classification</b>	<b>International</b>	<b>Female</b>	<b>Migrant/Domestic /International</b>	<b>Between the min age and 18</b>	<b>Total</b>
<b>Software and applications developers, analysts and other IT staff</b>	<b>10</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)</b>	<b>44</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>56</b>
<b>Database Network professionals</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>6</b>
<b>Data entry staff, or related to digitization of paper-based records</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>Business services and administration managers</b>	<b>9</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>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</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>3</b>
<b>TOTAL</b>					<b>93</b>

The project is being implemented under the fiduciary responsibilities of the Ministry of Public Service, with the Division of Public Sector Modernisation playing 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**

Jobs classification	Y1	Y2	Y3	Y4	Y5	Total
Software and applications developers, analysts and other IT staff	2	2	4	2	2	12
Technical Consultants (financial services, curriculum developers, face-to-face training providers, etc.)	10	10	15	10	4	49
Database and network professionals	1	1	2	1	1	6
Data entry staff, or related to digitization of paper-based records	0	0	1	0	1	2
Business services and administration managers	4	4	6	4	1	19
Workers related to in- building works required for rehabilitation and retro-fitting existing structure for	1	1	2	1	2	7

project activities, including in- building demolition, wiring and cabling, installation of IT and ICT equipment						
<b>Total</b>						<b>95</b>

## 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><b>Component 1: Digital Enabling Environment:</b> 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"> <li>• Possible accidents or emergencies, with reference to the sector or locality</li> <li>• General understanding and implementation of occupational health and safety requirements</li> <li>• Discrimination and harassment in the workplace</li> </ul>	<ul style="list-style-type: none"> <li>• Implement OHS measures described in the ESMF/ESMP</li> <li>• Training</li> <li>• Implement the code of conduct</li> </ul>
<p><b>Component 2: Digital Government Infrastructure, Platforms and Services:</b> This component will support public sector modernization, resilience and delivery of digital</p>	<ul style="list-style-type: none"> <li>• Conduct of in-building civil works and potential interaction with materials such as aerosols (such as</li> </ul>	<ul style="list-style-type: none"> <li>• Implement OHS measures described in the ESMF/ESMP</li> <li>• Training</li> </ul>

Project component	Key identified labor risks.	Proposed measures
<p>public services to individuals and businesses.</p>	<p>those used in fire-suppression systems in datacenters)</p> <ul style="list-style-type: none"> <li>• Possible accidents or emergencies, with reference to the sector or locality</li> <li>• General understanding and implementation of occupational health and safety requirements</li> <li>• Discrimination and harassment in the workplace</li> </ul>	<ul style="list-style-type: none"> <li>• Implement the code of conduct</li> </ul>
<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"> <li>• The conduct of hazardous work - the rehabilitation and retrofitting of existing training centers (where applicable per national work program).</li> <li>• Possible accidents or emergencies, with reference to the sector or locality</li> <li>• General understanding and implementation of occupational health and safety requirements</li> <li>• Discrimination and harassment in the workplace</li> </ul>	<ul style="list-style-type: none"> <li>• Implement OHS measures described in the ESMF/ESMP</li> <li>• Training</li> <li>• Implement the code of conduct</li> </ul>

<p><b>Component 4: Implementation Support</b></p>	<p><b>Project</b></p> <ul style="list-style-type: none"> <li>• General understanding and implementation of occupational health and safety requirements</li> <li>• Discrimination and harassment in the workplace</li> </ul>	<ul style="list-style-type: none"> <li>• Implement OHS measures described in the ESMF/ESMP</li> <li>• Training</li> <li>• Implement the code of conduct</li> </ul>
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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; 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 related to the influx of migrant and seasonal workers are not applicable. 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 Labour Code. 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 hazardous<sup>13</sup> 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

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.

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.

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.

## BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

Relevant aspects of national policies and labor legislation with regards to occupational health and safety. 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 grounds and the procedures for how such matters should be addressed.

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

## RESPONSIBLE STAFF

The Project Coordinator of the Project Implementation Unit (PIU) is responsible for the engagement and management of all project workers. The Project Coordinator and the PIU 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.

## 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, will ensure compliance of the following clauses, including compliance by contractors.

### 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.

## 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.

## 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 St. Lucia 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.

## 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.

## AGE OF EMPLOYMENT

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.

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.

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) 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.

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.

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 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.

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 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.

## TERMS AND CONDITIONS

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 contract 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.

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 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.

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.

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.

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.

## 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

Grievances can be reported through the following channels:

By email to the following address: [slu.cardpt@gmail.com](mailto:slu.cardpt@gmail.com)

By letter addressed to:

***Project Coordinator***

Project Implementation Unit (PIU) – Caribbean Digital Transformation Digital Project  
Division of Public Sector Modernization  
Department of Public Service  
Bourbon Street, Castries, St. Lucia

By phone at telephone number: (758) 468-4977 / 468-1407

Mobile phone: 758-285-4419

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 court. Parties involved will be advised that they can directly contact the project's line 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.**

## 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 assignment or fulltime or part time worker.

## COMMUNITY WORKERS

The project must not engage community workers.

## PRIMARY SUPPLY WORKERS

The project will not engage primary supplier workers. However, if such a situation arises, the 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- Grievance Information Form

<b>Date/Time received:</b>	<b>Date: (dd-mm-yyyy)</b>  <b>Time:</b> <input type="checkbox"/> am <input type="checkbox"/> pm	
<b>Name of Grievant:</b>		<input type="checkbox"/> You can use my name, but do not use it in public.  <input type="checkbox"/> You can use my name when talking about this concern in public.  <input type="checkbox"/> You cannot use my name at all.
<b>Company (if applicable)</b>		<input type="checkbox"/> You can use my company name, but do not use it in public.  <input type="checkbox"/> You can use my company name when talking about this concern in public.  <input type="checkbox"/> You cannot use my company name at all
<b>Contact Information:</b>	<b>Phone:</b>  <b>Email address:</b>  <b>Address:</b>  (Kindly indicate the preferred method of communication)	
<b>Details of grievance:</b> (Who, what, when, where)	<input type="checkbox"/> One-time incident/complaint <input type="checkbox"/> Happened more than once (indicate how many times): _____ <input type="checkbox"/> Ongoing (a currently existing problem)	

<b>How would you like to see issue resolved?</b>	
<b>Attachments to the grievance/complaint:</b> (e.g. pictures, reports etc.)	List here:

\_\_\_\_\_

**Grievant/Complainant Signature (if applicable)**

\_\_\_\_\_

**Date (dd-mm-yyyy)**

\_\_\_\_\_

**Signature- Project personnel (to confirm receipt only)**

\_\_\_\_\_

**Date (dd-mm-yyyy)**

<b><u>For PIU use only:</u></b>	
<b>Grievance No:</b> _____	
<b>Grievance Category:</b>	
<input type="checkbox"/> Problems during material transport	<input type="checkbox"/> Smell
<input type="checkbox"/> Blocked road access	<input type="checkbox"/> Problem with project staff
<input type="checkbox"/> Dust	<input type="checkbox"/> Other (specify): _____
<input type="checkbox"/> Noise	
<b>Grievance Owner/ Department:</b> _____	

## Annex 2- Grievance Acknowledgement Form (GAF)

The project acknowledges receipt of your complaint and will contact you within 10 working days.

<b>Date of grievance/complaint:</b> (dd/mm/yyyy)	
<b>Name of Grievant/Complainant:</b>	
<b>Complainant's Address and Contact Information:</b>	
<b>Summary of Grievance/Complaint:</b> (Who, what, when, where)	
<b>Name of Project Staff Acknowledging Grievance:</b>	
<b>Signature:</b>	
<b>Date:</b> (dd/mm/yyyy)	

Annex 3 - Grievance Redressal Registration Monitoring Sheet

No.	Name of Grievant/Complainant	Date Received	Grievance Description	Name of Grievant Owner	Requires Further Intervention	Action(s) to be taken by PIU	Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance
1.							
2.							
3.							
4.							

## Annex 4: Grievance Meeting Record Form

**Date of the Meeting:** ..... **Grievance No:** .....

**Venue of meeting:** .....

**Details of Participants:**

Complainant	Project/Government/OECS

**Summary of Grievance**.....

.....  
 .....  
 .....

**Meeting Notes:** .....

.....  
 .....  
 .....

**Decisions taken in the meeting / Recommendations of GRC**.....

.....  
 .....  
 .....

**Issue Resolved / Unresolved:** .....

**Signature of Chairperson of the meeting:** .....

**Name of Chairperson:** ..... **Date (DD/MM/YYYY):** .....

## Annex 5 - Grievance Closure/Release Form

### Result of Grievance Redressal

<b>Grievance No:</b>	
<b>Name of Grievant/Complainant:</b>	
<b>Date of Complaint:</b>	
<b>Summary of Complaint:</b>	
<b>Summary of Resolution:</b>	
<b>Resolved at:</b>	<input type="checkbox"/> First Level <input type="checkbox"/> Second Level <input type="checkbox"/> Third Level
<b>Date of grievance resolution (DD/MM/YYYY):</b>	

**Signature of Complainant in acceptance of the suggested grievance resolution:**

.....

**Name:** .....

**ID number:** ..... **Type of ID:** .....

**Date (DD/MM/YYYY):** .....



**Signature of Environmental and Social Specialist and Project Coordinator:**

1..... 2.....

**1.Name**.....

**Place**.....

**Date:(dd –mm – yyyy):** .....

**2.Name**.....

**Place**.....

**Date:(dd –mm – yyyy):** .....

## Annex 6: List of GBV Service Providers in Saint Lucia

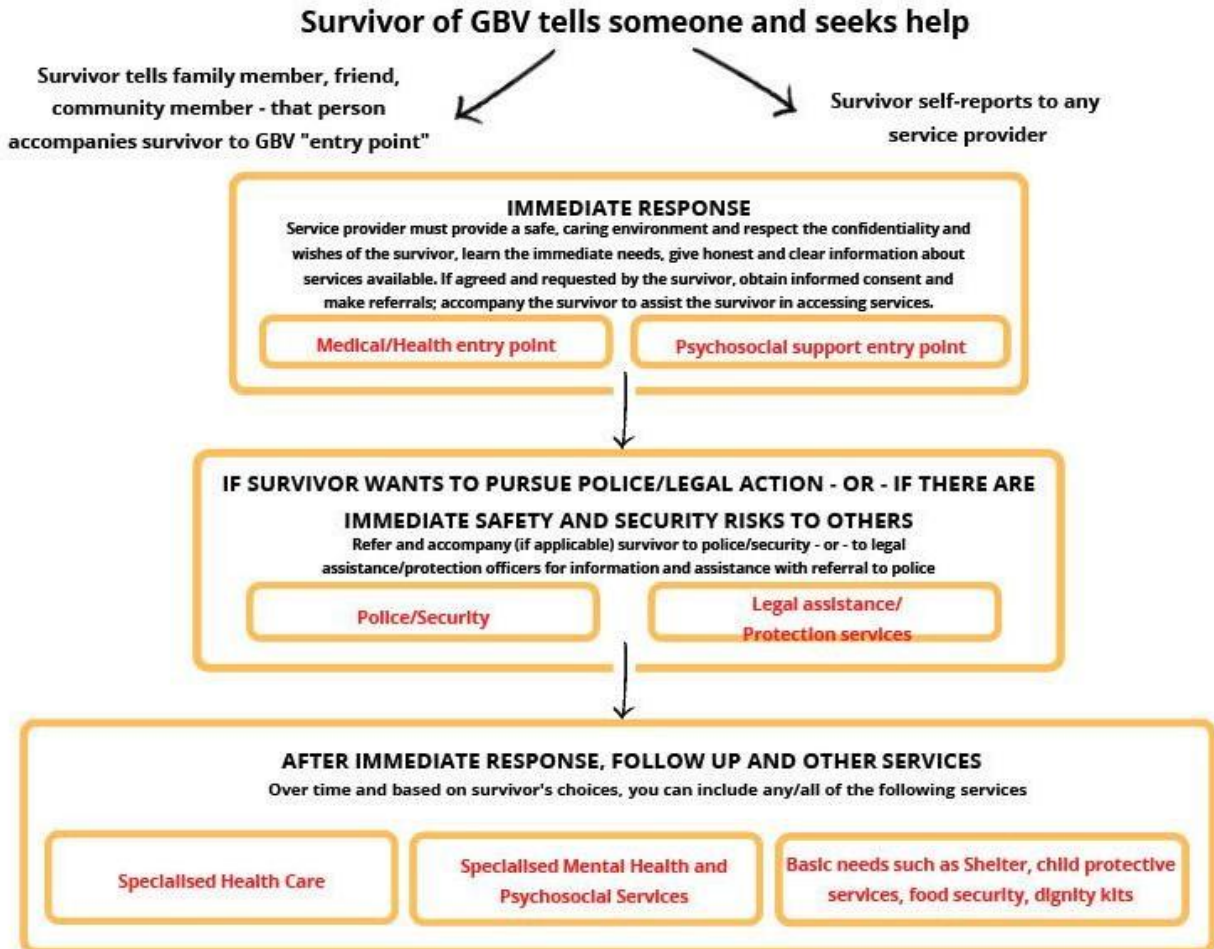
### GBV Service Providers in St. Lucia

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2 <sup>nd</sup> Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	<a href="mailto:slucps@gmail.com">slucps@gmail.com</a>
Family Court	Case Management	Peynier Street, Castries	468-3308	<a href="mailto:familycourt.slu@gmail.com">familycourt.slu@gmail.com</a>
Criminal Investigations Department	Case Management	Castries  Vieux Fort	456-3770 456-3817 456-3926	
Vulnerable Persons Unit	Case Management Investigates sexual offences against minors, women and men.	Vulnerable Persons Team South North	456-3908 456-4050 4051 4052	
St. Lucia Against Human Trafficking	Provides human trafficking victims and survivors with access to critical support and services to get help and stay safe.	Ministry of Home Affairs, Justice and National Security 1 <sup>st</sup> Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	<a href="mailto:police@antitraffickingslu.org">police@antitraffickingslu.org</a>

<b>Service Providers</b>	<b>Service Provided</b>	<b>Address</b>	<b>Telephone</b>	<b>Other</b>
Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	<a href="mailto:gender.relations@govt.lc">gender.relations@govt.lc</a>
Abuse Hotline	Psychosocial Support		202	
St. Lucia Crisis Centre	Psychological Support Livelihood Support Assistance with basic needs such as food and shelter	107 Chausse Road, Castries	453-1521 712-7574	<a href="mailto:stluciacrisis@gmail.com">stluciacrisis@gmail.com</a>
Women's Support Centre	Legal Aid Psychological Support Livelihood Support Assistance with basic needs such as food and shelter		458-4470	<a href="mailto:WSCCENTER2001@GMAIL.COM">WSCCENTER2001@GMAIL.COM</a>
Raise your Voice St. Lucia Inc	Psychological Support Livelihood Support	Manoel Street, Castries	726-0473 487-2329	<a href="mailto:raiseyourvoiceslu@gmail.com">raiseyourvoiceslu@gmail.com</a> <a href="https://ryvslu.org/">https://ryvslu.org/</a>
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	<a href="mailto:info@prosaf.org">info@prosaf.org</a> <a href="https://prosaf.org">https://prosaf.org</a>
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	<a href="mailto:unitedandstrongstlucia@yahoo.com">unitedandstrongstlucia@yahoo.com</a> <a href="https://www.facebook.com/Unitedandstrongstlucia/">www.facebook.com/Unitedandstrongstlucia/</a>

<b>Service Providers</b>	<b>Service Provided</b>	<b>Address</b>	<b>Telephone</b>	<b>Other</b>
St. Lucia Planned Parenthood Association	Sex education counselling, Sexual and reproductive health services	52 John Compton Highway	452-4335 Hotline: 459-7933 Whatsapp 722-1234	<a href="mailto:slppa758@gmail.com">slppa758@gmail.com</a>
OKEU Hospital	Medical Health Services	Castries	458-6500	
St. Jude Hospital	Medical Health Services	Vieux Fort	454- 6041	
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
Babonneau Wellness Centre	Medical Health Services	Babonneau		
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	

## Gender Based Violence (GBV) Referral Pathways



# 1

## A SURVIVOR DISCLOSES GENDER-BASED VIOLENCE TO SOMEONE TRUSTED

The survivor tells a trusted family, friend, or a community member OR The survivor self-reports to any service provider

### IMMEDIATE RESPONSE

- Respect the confidentiality and wishes of the survivor
- Provide reliable and comprehensive information on the available services and support to survivors of GBV
- Obtain and document informed consent.
- When family/guardians make decision on behalf of the child, ensure the best interest of the child is given priority. Preferably, the accompanying adult should be selected by the child
- Support survivors of rape to access medical care within 72 hours (but it is their choice).

#### DO

- DO believe the survivor. Reassure the survivor that this was not his /her fault.
- DO make sure that both the survivor and you are safe from immediate danger.
- DO provide practical care and support (e.g. offer water, somewhere to sit, etc.)
- DO listen to the person without asking questions.
- DO be aware of and set aside your own judgments.
- DO respect the right of the survivors to make their own decision.
- Inform, do not give advice.
- DO limit the number of people informed about the case (refer the case confidentially to appropriate GBV focal point, and only with the informed consent of the survivor).

#### DO NOT

- DO NOT force help on people, be intrusive or pushy.
- DO NOT pressure the survivor into providing information or further details.
- DO NOT doubt or contradict the survivor.
- DO NOT investigate the situation or provide advice
- DO NOT mediate between the survivor and the perpetrator or a third person (e.g. family).
- DO NOT write down or share details of the incident or personal details of the survivor
- DO NOT assume you know what a survivor wants or needs. Some actions may put the survivor at further risk of stigma, retaliation, or harm.
- Once a GBV referral has been made, DO NOT ask for extra information or contact the survivor directly.

#### ALWAYS PRACTICE THE SURVIVOR CENTERED APPROACH

- PRIORITY the needs, wishes, and decisions the survivor expresses
- ENSURE the survivor makes ALL decisions about accessing services and sharing information regarding her case
- DO NOT TELL THE SURVIVOR WHAT TO DO
- NEVER blame the survivor
- Be patient, be a GOOD LISTENER, and be NON-JUDGEMENTAL

# 2

IF THE SURVIVOR HAS GIVEN INFORMED CONSENT, THE IMMEDIATE RESPONSE SHOULD BE:  
PRIORITY URGENT HEALTH CARE! PRIORITY SAFETY AND SECURITY!

#### SEXUAL VIOLENCE

If the survivor needs it - ensure immediate access to available medical care (within 3 days /72 hours for emergency HIV treatment; within 5 days for emergency contraceptives and prevention of sexually transmitted infection).

#### PHYSICAL VIOLENCE

If the survivor needs it - seek medical care if he/she is experiencing severe pain, bleeding, or for the treatment of non-sexual violence related injuries

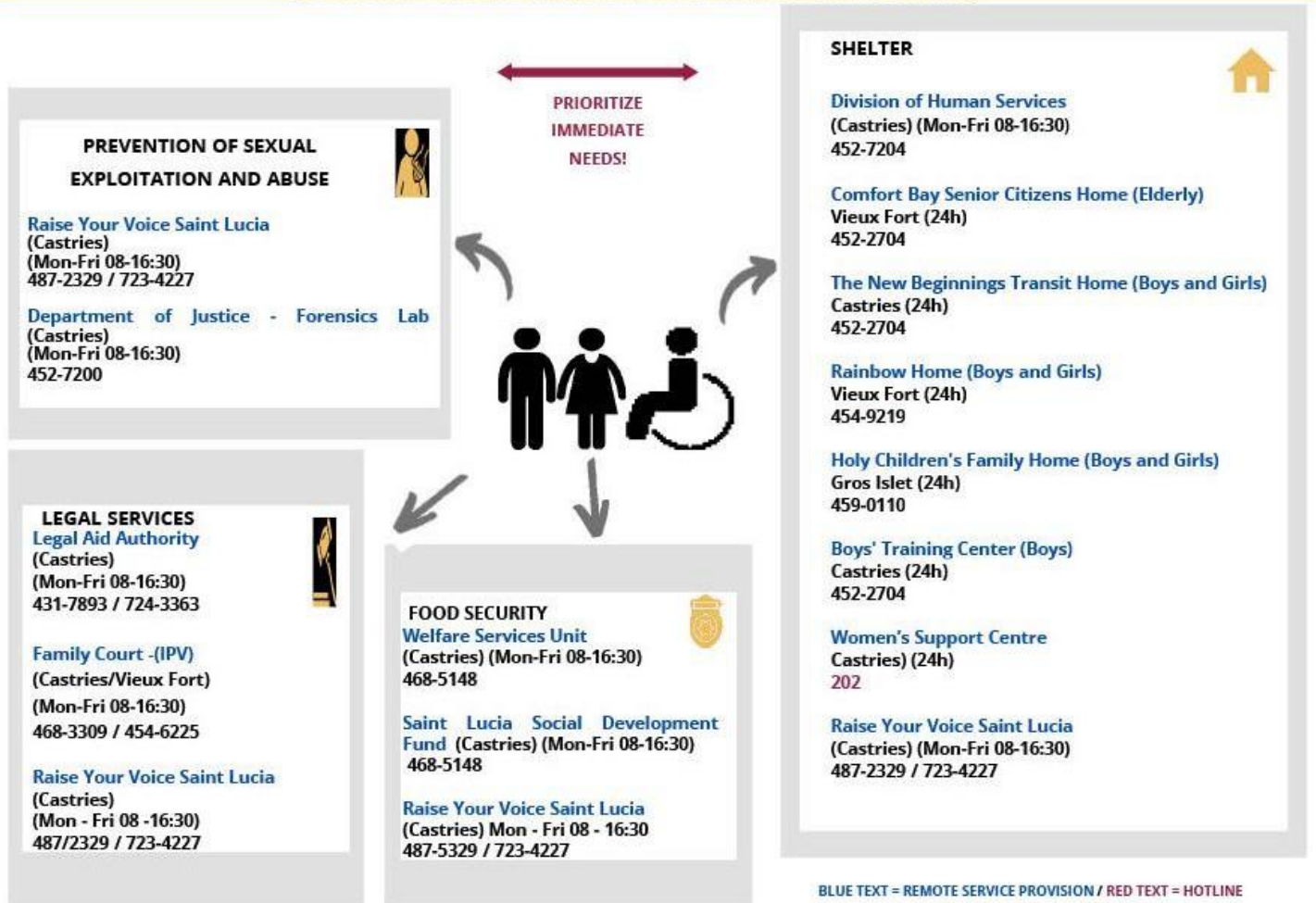
IF THERE IS AN IMMEDIATE RISK OF SAFETY FOR THE SURVIVOR/THERE IS A LIFE-THREATENING CONCERN  
Contact competent authorities (police,) or other appropriate emergency support.

# 3

IF THERE ARE NO URGENT HEALTH OR SAFETY & SECURITY NEEDS, RESPOND TO OTHER SERVICE NEEDS  
These can include Mental Health Services, Shelter, Non-food Items, Food, or Legal Information & Advice.

# GBV REFERRAL PATHWAYS - SAINT LUCIA

(TO BE USED ONLY BY TRAINED CASE WORKERS/SOCIAL WORKERS)



BLUE TEXT = REMOTE SERVICE PROVISION / RED TEXT = HOTLINE



## GBV REFERRAL PATHWAYS - ST LUCIA

(TO BE USED ONLY BY TRAINED CASE WORKERS/SOCIAL WORKERS)

### MEDICAL & SECURITY SERVICES - DIRECTORY OF OTHER CENTRES NOT LISTED ON PATHWAYS



#### FAMILY PLANNING SERVICES

**Ansa La Raye - (Mon- Fri- 08.00-16.30)**  
 Anse La Raye Health Centre - 451-4225  
 Jacmel Health Centre - 451-4004

**Babonneau - (Mon- Fri- 08.00-16.30)**  
 Fond Assau Health Centre - 450-5939  
 La Guerre Health Centre 458-9222

**Canaries - (Mon- Fri- 08.00-16.30)**  
 Canaries Health Centre - 459-4430

**Castries - (Mon- Fri- 08.00-16.30)**

Castries Health Centre - 452-4416  
 Babonneau Health Centre - 450-5858  
 Bexon Health Centre - 452-1261

Ciceron Health Centre - 453-7934

Antrepot Health Centre - 452-1873

La Clery Health Centre - 452-4303

La Crois Maingot Health Centre- 451-4248

Ti Rocher Health Centre - 452-3529

Vanard Health Center - 451-4247

**Choiseul - (Mon- Fri- 08.00-16.30)**

La Fargue Health Centre -459-3238

Mongouge Health Centre - 459-3123

Saltibus Health Centre - 455-1589

Delcer Health Centre - 459-3971

**Dennery - (Mon- Fri- 08.00-16.30)**

La Ressource Health Centre - 453-3312

Richford Health Centre - 453-3355

**Gros Islet - (Mon- Fri- 08.00-16.30)**

Grand Riviere Health Centre - 450-1651

Monchy Health Centre - 450-1319

**Micoud - (Mon- Fri- 08.00-16.30)**

Desruisseaux Health CentreD - 455-0449

Micoud Health Centre - 454-4230

Mon Repos Health Centre - 455-3229

Ti Rocher Health Centre - 455-4520

#### FAMILY PLANNING SERVICES

**Soufriere - (Mon- Fri- 08.00-16.30)**

Etangs Health Centre - 459-7582

Fond St Jacques Health Centre - 459-7595

**Vieux-Fort - (Mon- Fri- 08.00-16.30)**

Laborie Health Centre - 454-6930

Grace Health Centre - 454-8357

Vieux-Fort Health Centre - 454-6337

Belle Vue Health Centre - 454-8001

#### **SPECIALIZED SEXUAL AND REPRODUCTIVE HEALTH SERVICES**

**Castries - (Mon- Fri- 08.00-16.30)**

Adolescent Health Clinic

Castries Health Centre - 452-4417

**Vieux-Fort - (Mon- Fri- 08.00-16.30)**

Vieux-Fort Health Centre - 454-6338

**SEE AMPHSS DIRECTORY FOR LICENSED MENTAL HEALTH & PSYCHO-SOCIAL SUPPORT (private)**

#### COMMUNITY POLICE STATIONS

**Ansa La Raye - (24/7)**

Anse La Raye Police Station - 456-3600

**Canaries - (24/7)**

Canaries Police Station - 456-3610

**Castries - (24/7)**

Babonneau Police Station - 4506-4120

Marchand Police Station- 456-3885

**Choiseul - (24/7)**

Choiseul Police Station - 456-3635

**Dennery 24/7**

Dennery Police Station - 456-4090

Richford Police Station - 456-3690

**Gros Islet - (24/7)**

Gros Islet Police Station - 456-3839

Rodney bay Police Station - 456-4062

**Marigot - (24/7)**

Marigot Police Station - 456-3829

**Micoud - (24/7)**

Micoud Police Station - 456-3670

**Soufriere - (24/7)**

Soufriere Police Station - 456-3620

**Vieux-Fort - (24/7)**

Laborie Health Police Station - 456-3645

Vieux-Fort Police Station - 456-3905

BLUE TEXT = REMOTE SERVICE PROVISION / RED TEXT = HOTLINE



## Annex 8: 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/): \_\_\_\_\_