



Caribbean Regional Air Transport Connectivity Project (CATCOP)

LABOUR MANAGEMENT PROCEDURES

December 2022

INTRODUCTION

The Saint Lucia Air and Sea Ports Authority (SLASPA) in compliance with WB project financing regulations, developed the Labour Management Procedures (LMP) to manage risks under the Caribbean Air Transport Regional Connectivity Project (CATCOP). The World Bank has agreed to provide financing for the Project.

The Labour Management Procedures (LMP) is listed as an Appendix to the Environmental and Social Assessment (ESA). This LMP was extracted from the ESA, and will be used as a standalone document during project implementation. This LMP has a Grievance Redress Mechanism (GRM) to accompany the implementation. The document is “live” and will be reviewed and updated throughout development and implementation of the project.

The LMP sets out the Project’s approach to meeting national requirements as well as the objectives of the Bank’s Environmental and Social Framework (ESF), specifically objectives of Environmental and Social Standard 2: Labour and Working Conditions (ESS2). The ESF instruments prepared for the project identified key risks and impact associated with project implementation, associated with workers health and safety, and the risk associated with labour impact.

The LMP is applicable to all project workers with the following objectives:

- to promote safety and health at work;
- to promote fair and equitable labour practices for the fair treatment, non-discrimination and equal opportunity of workers engaged under all components of the project;
- to protect all categories of project workers, including vulnerable workers such as women;
- to prevent the use of all forms of forced and child labour;
- to protect project workers’ rights and ensure the management and control of activities that may pose labour related risks; and
- to provide project workers with accessible means to raise workplace concerns.

The LMP assesses potential labour risks and impacts and describes how they will be mitigated. The LMP will help in addressing the following risks: i) Health screening and monitoring where appropriate, ii) Protective measures for hazardous conditions or substances, iii) Workers training, iv) Accident and incident monitoring procedures, v) Emergency response procedures vi) Remedies for adverse environmental or social impacts, vii) Terms and conditions of employment such as rights to regular payment hours of work, overtime, adequate rest, benefits such as annual, sick, maternity, and family leave and timely notice of termination, vii) Non Discrimination and equal opportunity; provisions for all aspects of employment and including measures to prevent and address harassment, intimidation and or exploitation, viii) Prohibitions against child labour and forced labour; and ix) Access to grievance mechanisms specifically for direct and contracted labour.

SOCIAL MANAGEMENT

The potential social risks for this project fall under two broad categories. The first type of risk is related to the inclusion and management of community expectations and relationships. The second type of risk is directly related to labor conditions and potential minor labor influx. Both categories of risk are expected

to be mitigated through consultative engagement with key airport stakeholders. The potential social risk associated with this project is expected to be moderate. This project is not expected to require any land acquisition. It is also not expected to a negative impact on livelihood activities in and around the main project site.

ENVIRONMENTAL MANAGEMENT

The potential environmental risks and impacts are expected to be moderate. Most of the interventions encompassed within this project involves rehabilitation of existing infrastructure. No new habitats or ecosystems are expected to be affected by infrastructure rehabilitation. Minor environmental impacts may be generated by the works that are intended to improve runway resilience and operational safety at UVF. The potential risk will be identified for each project activity and managed according to the Safeguards Manual. All project activities will require that the workforce engaged is trained and made aware of the importance of minimizing environmental harm.

A potential negative impact of the project would be the possibility for degradation of soil and deterioration of the water quality in the nearby river. The risks of these impacts are considered to be moderate. Notwithstanding, in order to mitigate against the possibility of these perils, there will be implementation and monitoring of procedures based on the World Bank Group Environmental, Health, and Safety General Guidelines. It is expected that training will ensure that the workforce engaged for the project are aware of environmental responsibilities and site-specific mitigation measures to minimize the risk of the discharges of wastes into the environment.

The LMP addresses the labour related risks and provides mitigation measures to minimize those risks. SLASPA is committed on a continuous basis throughout the project implementation and life to evaluate risks and impact, and to develop procedures to prevent further impacts. The focus of the LMP is on workers engaged under the project and contractors to conduct civil works within the CATCOP project. This LMP will be inserted in the contracts as part of contractors’ legal obligations. The approach will be assessed as part of the initial screening of environmental and social risks and impacts carried out by CATCOP PIU.

Supervision for compliance will be managed through the PIU under Bank supervision. In addition to the Bank’s requirements, the PIU will also be responsible for ensuring adherence to the applicable national and environmental requirements.

1. OVERVIEW OF LABOR USE ON THE PROJECT

Classification of Project Workers

Table 1 below defines the classification of workers as stated in ESS 2: Labour and Working Conditions. Further information on the classification, number and characteristics of workers can be found in subsequent sections of this LMP.

Table 1: Classification of Workers

Worker Classification	ESS 2 Definition
-----------------------	------------------

Direct Worker	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.
Contracted Worker	People employed or engaged through third parties to perform work related to core functions of the project, regardless of location.
Primary Supply Workers	People employed or engaged by the Borrower's primary suppliers.
Community Workers	People employed or engaged in providing community labour.

ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers

The table below (Table 2) describes the total number of workers to be employed on the project; and the different types of workers: direct workers, contracted workers and community workers. An estimate has been inserted into the table, as numbers of workers cannot be finalized at this time.

Table 2: Number and Characteristics of Project Workers

Type of Project Workers	No. of Workers	No. of Local Residents	No. of Foreign Workers	No. of Female Workers	Timing of Labour Requirements	Type of Job/Skill
PIU Staff	9	5	2	6	Q3 2021-Q4 2022	Project Manager; Technical Staff (Procurement Officer, E&S Specialist; Monitoring and Evaluation Specialist, International Procurement Specialist; Air Navigations Specialist; Finance Management Specialist; Airport Infrastructure Specialist), Support Staff; (Administrative, Procurement and Financial Assistants)
Consultant's Staff	4	1	3	NA	Q1 2022-Q4 2022	Technical Staff: Project Manager (Resident Engineer), Engineers
SLASPA's Staff	2	1	NA	1	Q1 2020-Q4 2022	Communications and Community Liaison Officer; Employer Relations Officer
Contractor's Staff	40-55 ⁱ	35-40	5-15	NA	Q1 2023-Q4 2025	Skilled/Unskilled Labour and Technicians/Engineers

The Project does not intend to make use of community workers and therefore this section is not relevant. All care will be taken, however, to safeguard against community or volunteer labour being used during stakeholder mobilisation activities, in preparation for stakeholder consultations.

Characteristics of Project Workers

This section, to the extent possible, provides a description and an indication of the likely characteristics of the project workers (e.g. local workers, foreign workers, female workers, workers between the minimum age of and 18. Some information is available in the Table in 1.1 above.

As of November 2021, there are four (4) female workers hired under this project.

Workers under the age of 18 will not be permitted in the implementation of this Project. Additionally, all measures will be put in place to monitor and safeguard against use of child labour by project contractors and suppliers.

Timing of Labour Requirements

The table below (Table 3) shows the timing and sequence of labour requirements in terms of numbers, locations, types of jobs and skills required.

Table 3 Timing and Sequence of Labour Requirements

Activities	Schedule	Workforce
Runway resurfacing at UVF, inclusive of shoulders	Q1 2021 – Q1 2025	Contractor
Construction of code 4E turning bay on south side runway 10	Q3 2021 – Q3 2024	Contractor
Construction of runway end safety areas (RESAs) at UVF	Q3 2021 – Q3 2024	Contractor
Installation of up-to-date airfield ground lighting system at UVF	Q3 2021 – Q3 2021	Contractor
Rehabilitation of storm water drainage system at UVF	Q2 2022 – Q1 2025	Contractor
Installation of instrument landing system (ILS) at the UVF	Q3 2024 – Q1 2025	Contractor
Erection of ground station (receiver antenna) for ADS-B system for UVF	Q1 2024 – Q2 2024	Contractor
Erection of ground station (receiver antenna) for ADS-B system for SLU	Q1 2024 – Q2 2024	Contractor
Installation of ADS-B monitor at UVF	Q1 2024 – Q2 2024	Contractor
Installation of ADS-B monitor at SLU	Q1 2024 – Q2 2024	Contractor
Remodeling and renovation of aerodrome rescue and firefighting (ARFF) facility at the UVF	Q3 2021 – Q2 2022	Contractor
Updating aeronautical charts and procedure design for all approaches and departures at UVF	Q4 2023 – Q4 2023	Contractor
Training all air traffic control (ATC) staff and other personnel relevant to new equipment installations and procedural designs and use in equipment	Q4 2021 – Q3 2023	Contractor

Contracted Workers

The Project will engage one main Contractor for carrying out the overall implementation of the works with subcontractors for the supply and installation of materials and various equipment. The estimated number of contracted workers to be employed by the Contractor will be in the order of 40 to 55. It is estimated that the Contractor will engage 35 to 40 local skilled and unskilled labour and subcontractors for carrying out the construction activities and additional 5 to 15 foreign staff as technicians and engineers.

Migrant Workers

It is not likely that any migrant workers will be engaged under this Project. This is to be distinguished from technical specialists with international backgrounds, referred to in this document as foreign workers. However, safeguards monitoring and reporting measures will be taken to ensure the project is not affected by any use of this type of labour.

2. ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

Project Activities

The Project Development Objective (PDO) of the CATCOP is to improve air transport safety through compliance with international and regional standards, and enhance resilience of airport infrastructure to natural disasters. The proposed project comprises four (4) components, which complement each other to achieve the PDO.

The first component is aimed at improving the resilience and operational safety of the runway at the UVF. This comprises:

- runway resurfacing;
- construction of a code 4E turning bay on south side runway 10 (RWY 10);
- installation of an up-to-date airfield ground lighting system;
- rehabilitation of the storm water drainage;
- addition of runway shoulders and runway end safety areas (RESAs);
- an aerodrome rescue and firefighting service (ARFFS) operational and organizational audit; and
- upgrading of the control room at the ARFFS located at the UVF, which will be completed in the context of the earlier audit.

The second component focuses on improving air traffic safety and efficiency. It includes the:

- installation of an instrument landing system (ILS) at the UVF;
- introduction of the automatic dependent surveillance-broadcast (ADS-B) which requires installation of ADS-B receiver antenna and monitors to support both airports;
- updating of the UVF's aeronautical charts, including procedure design for all approaches and departures; and
- Training of all air traffic control (ATC) staff and other personnel relevant to new equipment installations and procedural designs.

The third component deals with institutional strengthening and capacity building for the Saint Lucia Air and Sea Ports Authority (SLASPA). This is specific to identifying SLASPA capacity needs within the air transport sector. This will be accomplished through:

- a broad organizational and operational review to determine the areas with greatest opportunities for improvement, with focus on safety and security, as well as compliance with the International Civil Aviation Organization standards;
- the development of a Wildlife Hazard Management Plan and the procurement of equipment for the effective management of wildlife;

The fourth component is project management, with the establishment of a Project Implementation Unit (PIU) with skilled specialist to manage the implementation of the project.

The fifth component is a Contingency Emergency Response Component (CERC) in the event of natural disaster. To comply with World Bank Safeguards requirements, the activities identified for financing under the CERC will be subject to an expedited review by safeguards specialists to determine if they are eligible under the safeguard policies and compliance procedures. Further, the ESA and its ESMP contain procedures for debris removal and disposal, which should encompass the majority of CERC activities with potential for negative environmental impact.

The scope of this project is specific, and its activities are in no way related to the current US \$175 million HIARP (Hewanorra International Airport Redevelopment Project)¹.

Key Labour Risks

This section sets out the key aspects of national labour legislation concerning the term and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation, which relates to the items set out in ESS2, paragraph 11 (i.e. wages, deductions and benefits).

The key labour risks that may be associated with the project activities could include:

- Lack of awareness of occupational health and safety requirements such as the use of personal protective equipment (PPE) and safe workplace practices;
- The conduct of hazardous work, such as use of heavy machinery and hazardous materials, resulting in:
 - i. air emissions from vehicle exhaust and machinery operations
 - ii. dust from excavation and material hauling
 - iii. noise and vibration from construction activities and
 - iv. fumes from hazardous materials
- Possible accidents due to the use of rotating and moving equipment; and
- Electrical safety due to the use of faulty electrical devices such as cable plugs, cords, and hand tools.

In the eventuality of an accident or incident at the project site, established accident and incident procedures must be adhered to by the Contractor and PIU. The accident and incident procedures are annexed to this document. (See Appendix 2)

¹ <https://www.hiapproject.com/>

3. BRIEF OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

This section sets out the key aspects of national labour legislation with respect to the terms and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation, which relates to the items set out in ESS 2: Labour and Working Conditions, paragraph 11 (i.e. wages, deductions and benefits).

The Labour Act (No. 37 of 2006) of the Government of Saint Lucia (GoSL) will apply to all Project Workers. Under Part III (Terms and Conditions of Continued Employment), the following is addressed:

- Contracts of Employment
- Continuity of Employment
- Hours of Work
- Wages
- Minimum Wages
- Sick Leave and Benefits
- Vacation Leave
- Public Contracts
- Employment of Children and Young Persons
- Termination of Employment
- Termination of Benefits

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, color, 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.

Part III (Terms and Conditions of Continued Employment) of the Labour Act, under Wages, speaks to, among others:

- Wages to be paid in legal tender
- Payment of wages by cheque
- Wages to be paid directly to employees
- Employee’s right to recover
- Pay periods
- Employer to fix pay days
- Wages to be paid on completion of contract
- Wages to be paid on termination of contract
- Interest on advances prohibited
- Advances by way of loans
- Recovery of advances and excess in payment of wages
- Payment of outstanding balance advances and excess in payment of wages
- Deductions of payment in respect of fines restricted
- Deductions for obtaining employment prohibited
- Deductions authorized in certain cases

- Remuneration other than wages
- Employees in the employment of contractors
- Employers to issue details of wage payments
- Deduction for provident or pension funds

The same part of the Act, under Hours of Work, speaks to, among others:

- Duration of working week
- Weekly rest
- Maximum ordinary work day
- Split shifts and occasional shifts
- Meal intervals
- Overtime
- Prohibition of work on public holidays
- Pay for public holidays for daily paid workers
- Employees may opt to perform night work
- Reasonable alternative for discontinuing night work

Although provisions are made for the adoption of a minimum wage in the above-mentioned Act, there is currently no legislation on minimum wages for employment in Saint Lucia. However, pursuant to Statutory Instrument on the Minimum Wage Order (2006), No. 132, item: Fixing of Minimum Wage states, “the minimum wage applicable to construction workers is fifty-five dollars for each working day of eight hours.”

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

This section sets out the key aspects of the national labour legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1.

Under the provisions of the Labour Act (No. 37 of 2006) of the Government of Saint Lucia, the employer at a construction site must ensure, among others, that:

- measures and procedures prescribed by the Act and the Regulations are carried out on the construction site;
- he or she and every employee performing work on the construction site complies with the Act and the Regulations;
- the safety and health of employees on the construction site are protected;
- a safe, sound, healthy and secure working environment is provided and maintained as far as is reasonably practicable;
- keep and maintain accurate records of the handling, storage, use and disposal of chemicals, physical agents or biological agents as prescribed;
- every employee is provided training on the safe and healthy manner of carrying out his or her work;

- an inventory of all hazardous chemicals and all hazardous physical agents that are present in the workplace is kept and maintained;
- written notice is given to the Department of Labour and the committee, safety and health representative or trade union, if any, and the National Insurance Corporation, where any accident arising out of, and in the course of the employment of an employee occurs and causes loss of life or disablement.

Part IV (Occupational Health and Safety) of the Act has four (4) Divisions. They are as follows:

- Division 1. Registration and Requirements of Industrial Establishments
- Division 2. Hazardous Chemicals, Physical Agents and Biological Agents
- Division 3. Notification of Accidents and Occupational Diseases
- Division 4. Duties of Employers, Workers and Other Persons

Division 1 contains a number of sections relating to, among others; instructions on use of machines; protective clothing and devices; contravention of safety; drinking water; meals and lunchrooms; changing facilities; dangerous fumes and dust or other impurities; cleanliness; disposal of wastes, sufficient lighting; noise; sanitary and washing facilities; first aid; medical examinations; certification for fire safety; and safety provisions in case of fire.

Division 2 speaks to, among others, prohibition of certain chemicals and appeals against prohibition orders, notice of new chemicals or biological agents, inventory of chemicals and physical agents, labeling of chemicals, copy of inventory to be made available, assessment of chemicals, information from manufacturers, and participation in training.

Division 3 has sections relating to, among others, requirements to give notice of accidents, notification of occupational diseases and other diseases, and inquest in case of death.

Division 4 speaks to, among others, general duties of employers, duty to pregnant workers, reports and records, duties of employees, duties of owners at construction sites, duties of suppliers, and refusal to work on safety and health grounds.

5. RESPONSIBLE STAFF

The table below identifies the functions and/or individuals within the Project responsible for (as relevant):

- Engagement and management of project workers;
- Engagement and management of contractors/subcontractors;
- Occupational health and safety;
- Training of workers; and
- Addressing worker grievances.

In some cases, this section may identify functions and/or individuals from contractors or subcontractors, particularly in projects where project workers are employed by third parties.

Table 4: Roles and Functions of Individuals with Responsibility for the project

Role	Responsibility
Management, Saint Lucia Air and Sea Ports Authority (SLASPA)	<ul style="list-style-type: none"> Responsible for the engagement of the Project Implementing Unit (PIU) staffing, their Consultants' staff and Contractors.
The Project Manager, PIU	<ul style="list-style-type: none"> Responsible for the overall management of the PIU staff, their Consultants' staff, and the Contractors.
Senior Manager, Human Resources, SLASPA	<ul style="list-style-type: none"> Responsible for all labour relations of the PIU staff.
Environmental and Social (E&S) Specialist, PIU	<ul style="list-style-type: none"> Responsible for overseeing implementation of the occupational health and safety (OHS) aspects of the Project (awareness); and Responsible for addressing workers' grievances for the SLASPA.
Contractor's Environmental, Social, Health and Safety (ESHS) Specialist	<ul style="list-style-type: none"> Responsible for Occupational Health and Safety (OHS) of the Contractor's workers during implementation of the Project; Training of these workers; and Addressing workers' grievances for the Contractor.
Communications and Community Liaison Officer (CCLO); Employee Relations, SLASPA	<ul style="list-style-type: none"> Responsible for assisting with addressing workers' grievances for the SLASPA.

6. POLICIES AND PROCEDURES

This section sets out information on OHS, reporting and monitoring and other general project policies. Where relevant, it may also identify applicable national legislation.

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

- Compliance with all national and international OHS legislation that are applicable to Saint Lucia and the World Bank;
- Compliance with the Environmental and Social Safeguards of the World Bank;
- Prevention of discrimination and harassment on the work place, and of gender discrimination and gender pay gap;
- 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; and
- Prevention of use of faulty equipment or sub-standard equipment.

The project will commit to safety considerations in the conduct of all of 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 follow and implement 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 a danger to themselves or other workers, the public or the environment. Project workers commit the project to non-retaliation to stop-work actions.

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

Dissemination and Awareness

Disseminate the OHS policy described here to all project workers and stakeholders. Share the information in various formats including an adapted and summarized version.

Age of Employment

Labour Contracts Act Chapter 89:04:

With regards to the age of employment, several structures regulate the employment of minors. According to Section 7 of the Labour Contracts Act Chapter 89:04:

Section 7. (1) "Every person of the full age of eighteen years or more shall have the capacity to enter into a labour contract pursuant to this Act.

Section 7 (2)" Subject to the Employment of Children Prohibition Act and the Employment of Women, Young Persons and Children Act, a person under the age of eighteen years may enter into a labour contract only with the written consent of a parent or guardian of the person or, where that person has no parent or guardian, the written consent of the Labour Commissioner or the police officer in charge of the district in which the labour contract is to be made or performed."

Employment of Women, Young Persons, and Children Act, Chapter 90:06:

Additionally, the Employment of Women, Young Persons, And Children Act, Chapter 90:06 states:

Section 4. (1) "No child shall be employed or work in any public or private Prohibition of industrial undertaking, or in any branch thereof, other than an undertaking in which only members of the same family are employed, and any person who employs any child or permits him to work in contravention of this section is guilty of an offence.

Section 4 (2) "This section shall not apply to the exercise of manual labour by any child under order of

detention in a reformatory or industrial school, or by any child receiving instruction in manual labour in any school, provided that the work is approved and supervised by public authority.”

7. AGE OF EMPLOYMENT

- a. The minimum age for employment on this Project is eighteen (18) years.
- b. The Government issued Identification Cards or individuals’ passports will be used to verify the age of project workers. The complete age verification process can be found as Appendix 1 to this document.
- c. If underage workers are found working on the Project, the SLASPA will provide immediate notification to the Contractors and the Labor Department to ensure immediate termination of the employees by the Contractors.
- d. If the SLASPA is fined by local authorities because a Contractor employed a minor (under the age of 18), the SLASPA will transfer the cost of that fine to the Contractor, and the Contractor will be required to terminate the minor immediately.

8. TERMS AND CONDITIONS

Specific Wages, Hours and Other Provisions That Apply to the Project

To ensure continued service to valued customers and stakeholders, a significant amount of the project works will be undertaken during periods between 10:00 pm and 10:00 am daily for the runway, and 7:00 am to 3:00 pm daily.

Wages, hours of work, and other provisions relating to this Project will be in accordance with the provisions of the Labor Act (No. 37 of 2006) of the GoSL.

The main Contractor shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract.

Maximum Number of Hours That Can Be Worked on the Project

The main Contractor shall not require workers to work more than the regular and overtime hours allowed by the law of Saint Lucia. All overtime work shall be consensual. The contractor shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed the national labour allowable limits.

Collective Agreements That Apply to the Project

There is no collective agreement relating to the Project at this time. The main Contractor shall recognize and respect the right of employees to freedom of association and collective bargaining.

Other Specific Terms and Conditions

Construction Labour

Construction Labour monitoring will be required to play a key role in ensuring that the project follows national and international requirements that protect the workforce, promote respectful work relationships, and provide safe and healthy working and living conditions. The works contract will require the contractor to uphold Labour rights and tenets of fair treatment, non-discrimination and equal opportunity. Awareness of Labour rights and requirements will be built into the main contract. The works contract will therefore include the project emphasis on upholding Labour rights in tender documentation and emphasized during contract negotiation discussions. The main Contractor will be required to provide easy-to-read summaries of the national Labor law or project Labour statement to append to subcontractor agreements and to use in toolbox talks or on notice boards. All work is to be carried out in accordance with the Saint Lucia Standards for Health, Safety and the Environment and current Workplace, Health and Safety and Environmental Legislation, which will take precedence over the contractor's health and safety plan if a lower standard stated within the plan.

Employment Relationship

The main Contractor shall adopt and adhere to rules and conditions of employment consistent with the Labour Laws of Saint Lucia and ensure that the work conditions respect workers and, at a minimum, safeguard their rights under national and international Labour and social security laws and regulations.

Nondiscrimination

The main contractor will ensure that no person is subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

Harassment or Abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment.

Forced Labour

There shall be no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

Child Labour

No person shall be employed under the age of 18 or under the age for completion of compulsory education, whichever is higher.

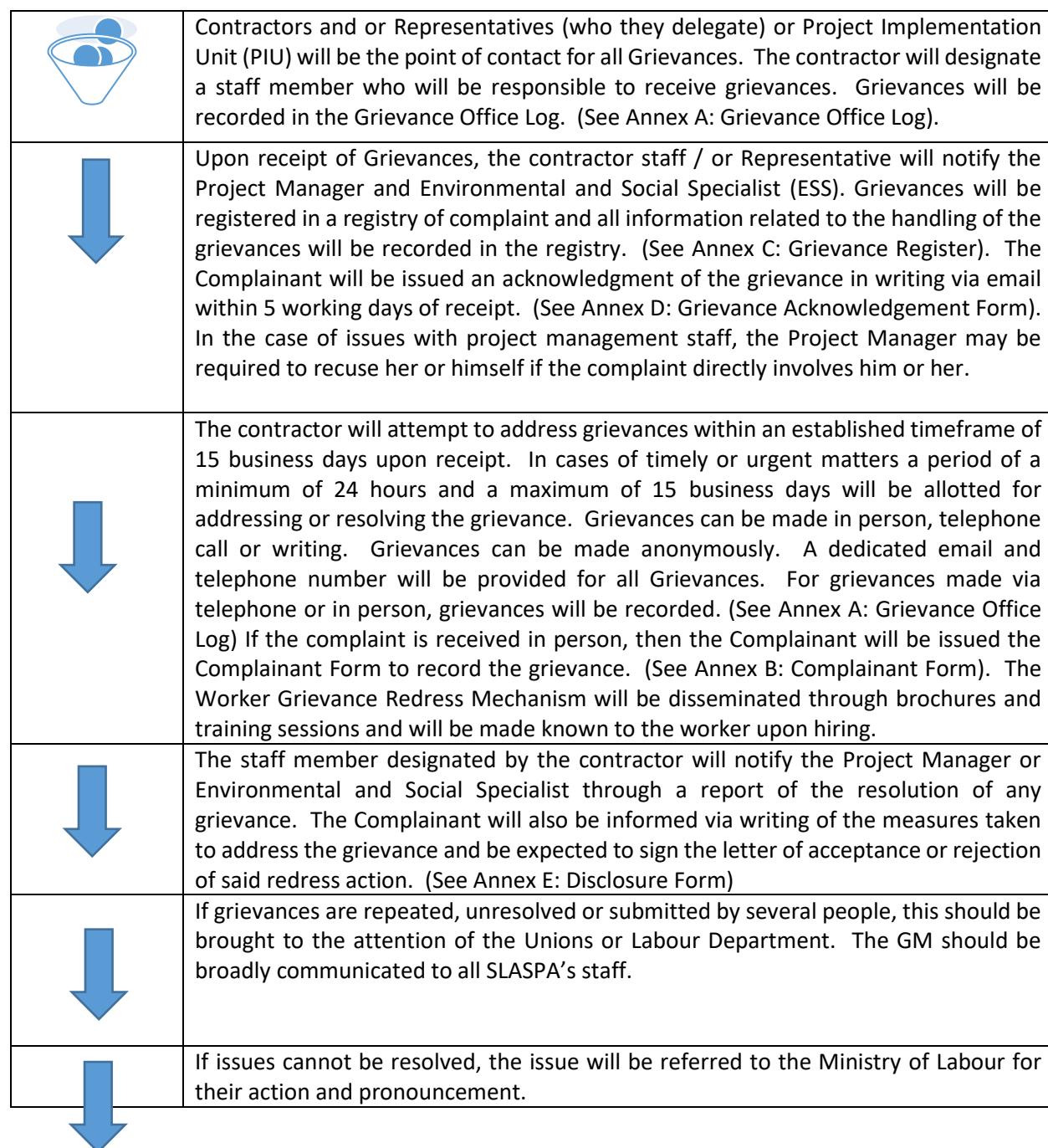
9. WORKERS GRIEVANCE MECHANISM (GM)


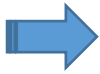
This section sets out details of the grievance mechanism that will be provided for direct and contracted workers, and describes the way in which these workers will be made aware of the mechanism.

The SLASPA has a separate, public Grievance Redress Mechanism (GRM) in place to receive concerns and grievances from key stakeholders and the public affected by the Project. That GRM is described briefly in Section 7.4.2 of the ESA, and more fully in the Stakeholder Engagement Plan (SEP) for the project. The public GRM is distinct and different from the Workers Grievance Redress Mechanism described in this Labour Management Plan.

The Grievance Redress Mechanism for all Project Workers is described in flow diagram below.

Diagram 1: The Grievance Redress Mechanism for all Project Workers is as follows



	The Ministry of Labour's ruling would be the final tier of the workers grievance mechanism.
	If unresolved, either party may seek redress in the courts of Saint Lucia.

Anyone with a grievance is asked to contact the points of receipts of complaints below:

Table 5: Points of Receipt of Complaints

Name	Designation	Contact Information
Shirlene Simmons-James	Environmental and Social Specialist (ESS) – CATCOP, SLASPA	T: 1 (758) 457-6168 M: 1 (758) 720-2673 E: shirlene.simmons-james@slaspa.com
Peter Lewis	Communications and Community Liaison Officer (CCLO) - SLASPA	T: 1 (758) 457-6108 M: 1 (758) 720-6933 E: peter.lewis@slaspa.com
Curline Ince	Administrative Assistant – CATCOP, SLASPA	T: 1 (758) 457-6168 M: 1 (758) 520-0523 E: curline.ince@slaspa.com

In addition, the Contractor shall have a separate Grievance Mechanism (GM) in place, with its contact number, and to deal exclusively with those that involve workers employed by the Contractor for the construction activities. Contractors will be responsible for managing their GMs. The SLASPA ensures and oversees that Contractors implement their GMs.

ADDRESSING GENDER-BASED VIOLENCE

The Grievance Mechanism (GM) 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 will be kept available by the GBV trained individual and by the Project Manager. The GM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. (See Appendix 3 for the GBV Referral Pathways)

If GBV-related incident occurs, it will be reported through the GM, as appropriate and keeping the survivor information confidential. Specifically, the GM 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;
- If possible, the age and sex of the survivor; and
- Whether the survivor was referred to a GBV service provider.

Any cases of GBV 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 GBV Services Provider; and
- Record the resolution of the complaint.

The GM will also immediately notify the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR.**

In addition to the project's main GM channel, the GBV survivor can also approach the Bank directly, especially if the alleged perpetrator ends up being someone directly implicated with managing the GRM. The affected person can approach the Task Team Leader (TTL), the World Bank Caribbean country director, or any other Bank staff within the task team with whom he/she feels comfortable sharing.

Appendix 1: AGE VERIFICATION

I. Introduction

Not all work done by children should be classified as child labour, and likewise, should be targeted for elimination. Children or adolescents' participation in work that does not affect their health and personal development or interfere with their schooling is generally regarded as being something positive. This includes activities such as helping their parents around the home, assisting in a family business, or earning pocket money outside school hours and during school holidays. These kinds of activities contribute to children's development and to the welfare of their families; they provide them with skills, experience and help to prepare them to be productive members of society during their adult life.

<https://www.ilo.org/ipec/facts/lang--en/index.htm>

ESS2 – Labour and Working Conditions refers to child labour as work done by a child over the minimum age and under the age of 18 that is likely to be hazardous² or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

A child under the minimum age (14 years) will not be employed or engaged in connection with the project. The labour management act specifies the minimum age for employment or engagement in connection with the project, which will be the age of 14 unless national law specifies a higher age.

II. Format

The project will be guided by ESS2 and/or the country's requirement on child labour, whichever is more stringent. The project will also be guided by the Labour Act (No. 37 of 2006) of Saint Lucia, which states that the minimum age of employment in Saint Lucia is 18 years old. In addition to the Labour Act (No. 37 of 2006), Saint Lucia is a signatory to the following international conventions related to the minimum age of employment.

- UN Convention on the Rights of the Child, Art. 32
- ILO Convention 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- SDG 8, Target # 7: By 2025, end child labour

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

- (a) the work is not likely to be hazardous and is not harmful to the child's health or physical, mental, spiritual, moral, or social development, and will not interfere with the child's education.

² Work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work: (a) with exposure to physical, psychological or sexual abuse; (b) underground, underwater, working at heights or in confined spaces; (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise or vibration damaging to health; or (e) under difficult conditions such as work for long hours, during the night or in confinement on the premises of the employer.

- (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 requirements of ESS2: Labour and Working Conditions.

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

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

Audits and controls of the process will be a requirement of the contractors³ and included in the contracts, in keeping with the Labour Act (No. 37 of 2006) and ESS2 requirements.

If underage workers are found working on the project, some of the measures that could be taken include the following:

- Depending on the context, consider proposing to move a child **to a lighter non-hazardous work if the workers is younger than 18. If the worker is younger the 14**, the child should be removed from the site, refer the child to support services, leverage support of Community Based Organization (CBOs) taken in conjunction to monitor the situation avoid that the child ends up working again or in a different site;
- If possible and if the context/law permits it, 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, Ministry of Equity and Ministry of Youth and Sports;
- Leverage the services of Non-government and Community Based Organizations such as New Beginnings Transit Home, Rainbow Home, and the Holy Children Family Home to assist the child; and
- Consider employing another adult member of the family if the child’s family is determined to be vulnerable or in dire circumstances.

If applicable, state the following: Part III, Division 9, Section 122 of The Labour Act (No. 37 of 2006) of the Government of Saint Lucia (GoSL) stipulates:

³ Example, prevention and detection programs by the company, independent inspections, or contractual provisions not to employ underage workers, mechanisms to verify that sub-contractors have rules in place for age verification, monitoring of subcontractors etc.

Prohibition of child labour

122.— (1) Notwithstanding section 18 (2)⁴ and subject to subsection (2), 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.

(2) A person may not employ or allow to be employed a child or young person in employment that is inappropriate for a person of that age, being work which places at risk the child or young person's wellbeing, education, safety, physical or mental health, or spiritual, moral or social development.

(3) The provisions of subsection (1) do not apply to —

(a) work done by children or young persons in technical schools as part of their technical program where such work is approved and supervised by the relevant public authority;

(b) work done under order of detention in a reformatory or industrial school where such work is approved and supervised by the relevant public authority; or

(c) Work done by children on job training or work experience activities where such work is approved and supervised by the relevant public authority;

(d) non-hazardous work done as a community service or for a charity outside of normal school hours where such work does not prejudice the child's capacity to benefit from the instruction received;

(e) work done by members of a recognized youth organization which is engaged collectively in such employment for the purposes of fund raising for such organization or charity outside of normal school hours where such work does not prejudice the child's capacity to benefit from the instruction received;

(f) work done by persons over the age of thirteen years which is characterised as light work which is not harmful, prejudicial or dangerous to the child or young person and does not place at risk the child's well-being, education, physical or mental health, or spiritual, moral or social development and such light work may include but is not limited to —

(i) newspaper rounds;

(ii) car-washing;

(iii) cake sales and other sales at school and charity fairs;

if such light work is approved by the Labour Commissioner by Order published in the Gazette after consultation with organizations of employers and employees concerned;

(g) work done by children or young persons participating in artistic performances based on a permit granted by the Minister in his or her discretion on a case-by-case basis limiting hours to be worked and indicating conditions of work.

⁴ 18.— (2) Subject to Division 9 of Part III, a minor may enter into a contract of employment only with the written consent of his or her parent or guardian.

The project may use one or more of the following methods for age verification. Check all that apply during the age verification process.

<input checked="" type="checkbox"/> Birth certificate	<input checked="" type="checkbox"/> National ID	<input type="checkbox"/> Medical certificate	<input checked="" type="checkbox"/> Interview	<input checked="" type="checkbox"/> School certificate	<input checked="" type="checkbox"/> Testimony
---	---	--	---	--	---

In case of child labour, develop a report based on the following:

1. Personal details (age, sex) without revealing confidential information like real names.
2. Type of involvement in child labour mentioning the sector (e.g. agriculture, fishing, construction) and specific activity.
3. To the extent possible family socio-economic situation.
4. Current opportunities and constraints.
5. Take recommendation measures.

If permitted, the following format will be used for age verification

<p>1. Subproject name _____ Registration # _____</p> <p>Observe height appearance, tone of voice, strength. If parents or guardians work in the project/sub project, we also ask them about the age of the child. Also, cross check educational information against other answers, given that girls and boys start school at 5. Ask the following questions, filling in the form.</p> <p>2. What is your name? _____</p> <p>3. How long have you been working here? _____</p> <p>4. What is your age? _____ 4.1 What is your educational level? _____</p> <p>5. How many years since you left school? Did you drop out? _____</p> <p>6. How many brothers and sisters do you have? _____ 6.1 Who is the oldest? _____</p> <p>7. How many years difference between you and your younger sister/brother? _____</p> <p>8. How many years difference between you and your older sister/brother? _____</p> <p>9. What are your younger brothers and sisters doing? _____</p> <p>10. What is your job at the project site? _____</p> <p>11. When did your voice get lower? _____ 11.1 When did you begin to develop a beard? _____</p>
--

Annex 1:

During an interview, the following assumptions about the age of girls and boys can be used to make the age estimate.

Check

Check	Indicator	Assumed age of boy	Assumed age of girl	Estimated age
<input type="checkbox"/>	Small soft wrist	10-11	could be 14	
<input type="checkbox"/>	Bones soft	11-12 (malnourished)	Under 14	

<input type="checkbox"/>	Eyes look innocent	10-12	10-12	
<input type="checkbox"/>	Soft hands and nails	10-12	10-12	
<input type="checkbox"/>	Beginning breasts	Not applicable	12-13	
<input type="checkbox"/>	Educational Level 5+	12-13	12-13	
<input type="checkbox"/>	Confused	12-13	12-13	
<input type="checkbox"/>	Immature high voice	-12	-12	
<input type="checkbox"/>	Showing guilt about being found	10-12	12+	
<input type="checkbox"/>	Reading Level 4 or 5	11-12	11-12	
<input type="checkbox"/>	Large wrist	12-13	Not applicable	
<input type="checkbox"/>	Has menstruated 3 or 4 times	Not for boys	13+-14	
<input type="checkbox"/>	Voice changing	13+	13+	
<input type="checkbox"/>	Has not menstruated	Not for boys	-13	
<input type="checkbox"/>	Shame response to personal questions		Adult and +14	
<input type="checkbox"/>	Answers questions spontaneously	14 or over	14 or over	
<input type="checkbox"/>	Muscular legs, looks tough	14 or over	14 or over	
<input type="checkbox"/>	Facial hair	14+	Not applicable	
<input type="checkbox"/>	Mature voice	14+	14+	

Sources:

1. Guidelines for Developing Child Labour Monitoring Processes (ILO 2005)
2. Age verification: Protection for unregistered children from child labour (ILO, 2016)
3. ESS 2: Labour and Working Conditions
4. World Bank CHILD LABOR Learning Session April 14, 2021
5. <https://www.ilo.org/ipec/facts/lang--en/index.htm>

Appendix 2: Reporting of Incidents / Accidents by Project Implementing Unit

In case of incidents and accidents, the Project Implementation Unit (PIU) will notify the Bank within 48 hours after learning of the incident or accident. The submission of the subsequent report would be provided to the Bank 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 a more detailed report(s) on the incident or accident, where it will propose measures to prevent it from happening again. (See Annex F, Reporting Incident and Accident Sheet)

These subsequent reports, among others, can be:

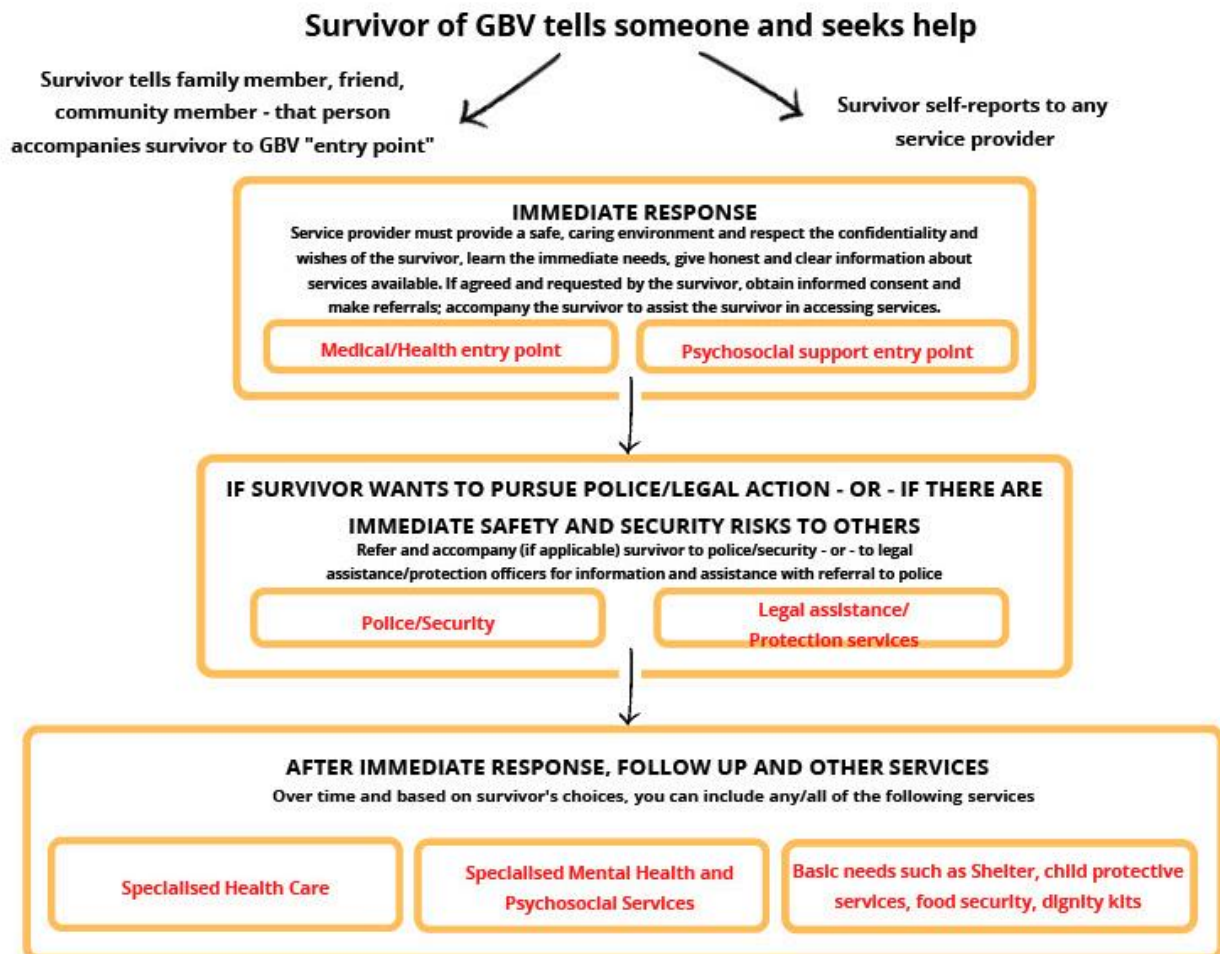
1. Root Cause Analysis (RCA). The main objective of the RCA is Prevention and it will be carried out by whoever is managing the site where the incident / accident occurred, for example grant, contractor, subcontractor, etc. The RCA⁵ will address the following:
 - a. Determine what happened by identifying 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 /lives or serious damage?
 - viii. How serious was the incident? (See Annex G for the Incident / Accident Classification Guide)
 - 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.

⁵ 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, in order to agree on measures to prevent recurrences

- iii. The Borrower is responsible for funding the preparation of the RCA from project funds or other resources.
 - iv. RCA should be completed as soon as possible, ideally within 10 days.
 - 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.
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 H.
 3. Any subsequent report would be provided within a time acceptable to the Bank.

Appendix 3: Gender-Based Violence with Referral Pathways

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:

PRIORITIZE URGENT HEALTH CARE!

PRIORITIZE 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.

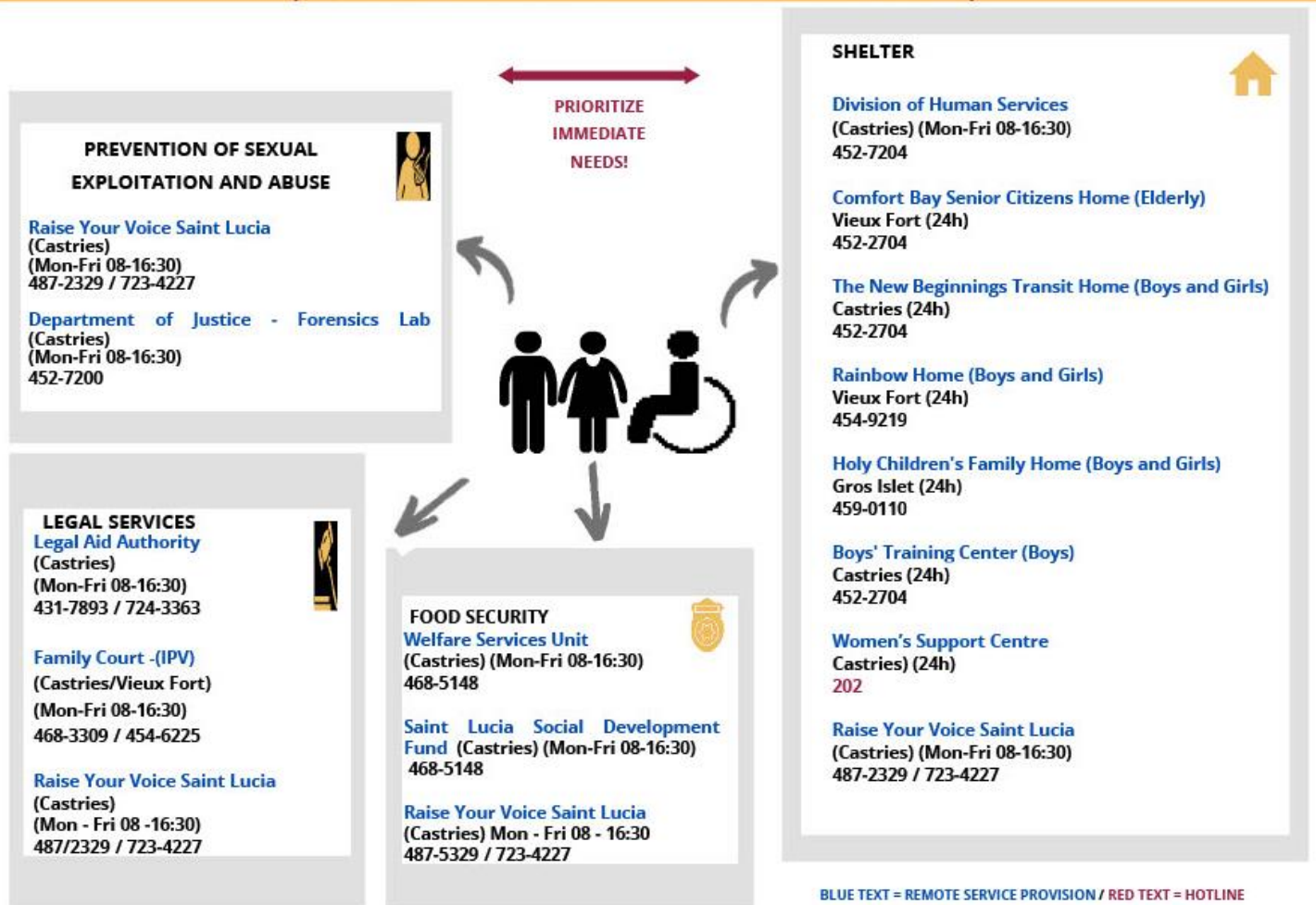
3

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)



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 Centre - 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 A: Grievance Office Log

Grievance Office Log

Office:	Name of Grievance log officer:
---------	--------------------------------

No.	Name	Alias	Date of Complaint	Staff Signature	Complainant’s Signature	Complainant’s contact information
1.						
2.						
3.						
4.						
5.						
6.						

Annex B: Complainant Form

COMPLAINT FORM

To be completed by Complainant

COMPLAINANT INFORMATION	
Name:	
Address:	
Phone:	
Email:	
COMPLAINT INFORMATION	
Complaint Date:	
Complaint Location:	
Complaint Details:	
Suspected cause of the problem:	
What should be considered to avoid a repeat of the problem?	
Name of person completing this form:	
Signature:	
Date:	

Annex C: Grievance Register

Grievance Register- Safeguards Report Log

Location:					Safeguards Officer:		
N o.	Type	Format	Date	Time	Complainant Details	Action Taken	Signatures
1.	Internal Stakeholder-Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- SLASPA Office [] In person- field [] Telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured- NGF [] Formal grievance filed [] Other (specify)	Officer: Complainant:
2.	Internal Stakeholder-Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- SLASPA Office [] In person- field [] Telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured [] Formal grievance filed [] Other (specify)	Officer: Complainant:
3.	Internal Stakeholder-Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- SLASPA Office [] In person- field [] Telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured [] Formal grievance filed [] Other (specify)	Officer: Complainant:
4.	Internal Stakeholder-Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- SLASPA Office [] In person- field [] Telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured [] Formal grievance filed [] Other (specify)	Officer: Complainant:

NGF- No grievance filed;

Annex D: Grievance Acknowledgement Form

Dear (NAME):

The Project Implementing Unit (PIU) of the Caribbean Regional Air Transport Connectivity Project (CATCOP) is responding with respect your complaint received on (dd/mm/yyyy). The PIU *will begin/not be* [delete as appropriate] investigating this grievance, as the PIU is of the view that *it may be/that it is not in this case* responsible for the grievance.

[If the PIU is going to investigate the case further, please give summary details of the next steps that will be taken to conduct the investigation]

Please do not hesitate to contact the Environmental and Social Specialist should you have any questions or need clarification.

Best regards,

NAME

DATE

Annex E: Results of Grievance Redress

1. Complaint No.:

2. Name of Complainant:

3. Date of Complaint:

4. Summary of the Complaint:

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

5. Summary of Resolution:

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

6. Level of Redress (please tick where applicable)

First ☐

Second ☐

Third ☐

7. Date of grievance redress (dd/mm/yyyy): _____

Name of Complainant: _____

Signature of the Complainant, indicating acceptance/rejection [of the solution] to his/her grievance:

Name of Grievance Handling Officer: _____

Signature of Grievance Handling Officer: _____

Date (dd/mm/yyyy): _____

Annex F: 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:			
PIU / Contractor:			
Town/District:			
Communities:			
Incident / Accident Information Source:			
INCIDENT / ACCIDENT DESCRIPTION			
Event Severity Level	Weather condition	Scope of the event	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 rating for 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 G: 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 escalate 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 or unwillingness 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 against a project, and trafficking in endangered species.

Annex H: Corrective Action Plan

General Information	
Corrective Action Plan ID:	
Action Plan Title:	
Corrective Action Plan Owner:	
Priority (Critical, High, Medium, Low):	
Project Change request Necessary (Yes / No):	
Expected Action Plan Implementation Date:	
Actual Date Implemented:	

Corrective Action Information
Issue or Problem Definition (be specific and quantify if possible):
Root Cause Evaluation:
Action Steps:
Alternatives Considered (if applicable):
Improvement Metric and Timeframe:
Implementation Verification (Monitoring and Evaluation):

ⁱ This is an estimated figure. Labour safeguards will also be extended to suppliers and the labour to be used for project delivery and installations. The labour safeguard will be incorporated into all project contracts.