



Labor Management Procedures

March 2023

CEPF Grant 112938

Grantee Environmental Awareness Group (EAG)

Accelerating Locally-Led Conservation Action in Antigua and Barbuda

Antigua and Barbuda

Grant Summary

- 1. Grantee organization:** Environmental Awareness Group (EAG)
- 2. Project title:** Accelerating Locally Led Conservation Action in Antigua and Barbuda
- 3. Grant number:** 112938
- 4. Grant amount (US dollars):** \$356,453.17
- 5. Proposed dates of grant:** May 1, 2023 – April 30, 2026.
- 6. Countries where activities will be undertaken:** Antigua and Barbuda (and Redonda)
- 7. Date of preparation of this document:** March 2023.
- 8. Overview of labor use on the project:**

These Labor Management Procedures have been prepared by the Environmental Awareness Group (EAG), a biodiversity conservation NGO with its headquarters in Antigua, for the CEPF project #112938 Accelerating Locally Led Conservation Action in Antigua and Barbuda.

The proposal presented by EAG will focus on the two sites of conservation concern under the CEPF call for proposals in Antigua and Barbuda. Both sites have undergone considerable conservation management and activities under the umbrella of the EAG's core programs: the Offshore Islands Conservation Program (OICP) and the Redonda Ecosystem Reserve (RER) (formerly the Redonda Restoration Program). This therefore places the EAG in an ideal position to identify where gaps exist and take strategic strides to implement change through innovative methods that include a range of agencies with relevant technical expertise and high-capacity volunteers.

This project, "Accelerating Locally-Led Conservation Action in Antigua and Barbuda", seeks to address CEPF Strategic Direction 1 - to "Improve the protection and management of 33 priority sites for long-term sustainability". For EAG, this requires four core objectives that will have a direct impact on critically endangered (CR) reptiles within the North East Marine Management Area (NEMMA) and Redonda KBAs. These include:

- Develop Sustainable Financing Mechanism for the EAG to facilitate effective co-management of the NEMMA KBA and the Redonda KBA (2023 - 2025)
- Further the establishment of the Offshore Islands Nature Reserve in the NEMMA KBA through the completion of a Financial Feasibility Study (2023-2024)
- Strengthen conservation management of the CR Antiguan Racer, CR Redonda Ground Lizard, and CR Redonda Anole in the NEMMA and Redonda KBAs through the development and implementation of species-specific Conservation Action Plans (2023-2024)

Develop a network of committed individuals for environmental conservation within Antigua and Barbuda's KBAs through a strategic conservation capacity-building programme (2023-2026) EAG staff and partners will be integrally involved in the design and implementation of all components of the project. Consultants will also be engaged, as necessary, and as identified in the budget. The work will take the form of training and

workshops, field work, surveys, meetings (in person and virtually), desk-based work, site visits, consultations, and consistent involvement with target communities and volunteers. Critical components of the work will include other CEPF funded projects that will engage colleagues from across the Caribbean and will be led by international partners Re:wild and Fauna & Flora International (FFI).

The Labor Management Procedures seek to ensure that measures are in place to manage risks associated with employment by EAG and help to determine the resources necessary for effective planning and management. They set out the approach to complying with national labor legislation in Antigua and Barbuda, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), in particular Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions. The Labor Management Procedures apply to all workers, whether full-time, part-time or temporary. This section describes the labor requirements based on available information at the time of writing.

This is a living document and will be updated to meet any changes in the demands or circumstances of the project.

Project Workers

The project will employ workers based in Antigua and Barbuda. The breakdown of project workers, to the extent known at present, is shown in Tables 1 and 2.

Direct Workers

Nine direct workers employed by EAG will work on the project with varying levels of involvement in the project as it is implemented. Their positions and places of work appear in Table 1a. All except two of the direct workers are currently full-time employees of EAG and will be assigned to work part-time on the project. None of the workers below are going to be assigned to work on the project 100% of the time, however the Sustainable Finance Coordinator is expected to spend the majority of their time on this project. Workers will be funded by a combination of projects to include the Wyss Foundation, Linbury Trust, Sandals Foundation, subgrants under projects being implemented by FFI, and funding sourced from other grants that may be necessary during the life of the project.

Table 1 Direct workers employed by EAG

	Position	Place of work	Jurisdiction	Sex	Status
1	Project Leader/ Executive Director	Antigua and Barbuda	Caribbean	Female	National worker
2	Technical/ OICP Coordinator	Antigua and Barbuda	Caribbean	Female	National worker
3	Technical/ RER Coordinator	Antigua and Barbuda	Caribbean	Female	National worker
4	Wildlife Officer	Antigua and Barbuda	Caribbean	Male	National worker
5	Invasive Species Officer	Antigua and Barbuda	Caribbean	Male	National worker
6	Science Communications Officer	Antigua and Barbuda	Caribbean	Female	National worker

7	Programme Assistant	Antigua and Barbuda	Caribbean	Female	National worker
8	Sustainable Finance Coordinator	Antigua and Barbuda	Caribbean	Tbd	National worker
9	AMCP Coordinator	Antigua and Barbuda	Caribbean	Female	National worker
10	RER Officer	Antigua and Barbuda	Caribbean	TBD	National worker

Independent consultants engaged directly by EAG

It is anticipated that eleven individuals or groups of people will be engaged as independent consultants during the project to undertake short term assignments. Services will range from consultants to provide administrative services such as accounting and auditing, and technical skills including, but not limited to, a field biologist, financial feasibility consultant, and curriculum developer. Volunteers offer an important service to the management of wildlife in the NEMMA and Redonda KBAs and it is anticipated that they will receive monetary stipends as a part of the reward and recognition system developed under the Offshore Islands Guardian Programme. Noting that there are invasive species monitors who currently receive stipends under the existing Offshore Islands Conservation Programme, the project will also provide some stipends to support their continued efforts. This is important as EAG recognizes the fact that their service requires a diversion from sourcing income otherwise, particularly in a country with a high cost of living.

The project is expected to train and deploy five (5) tour guides. The expectation is that they should be paid from revenue generated through tour guiding, and would therefore not be included in the overall budget for the project. However, since they fall under the scope of the project, their time is accounted for here. Also, it is not anticipated that the Graphic Designer's contract will exceed the value of USD5,000 and will therefore fall under a sole source procurement.

Independent consultants will be engaged in their individual capacity and contracts will be drafted that fall under the jurisdiction of Antigua and Barbuda.

The CEPF procurement policy requires all consulting services with a value of \$5,000 or more to follow a competitive procurement process. These processes will be followed during the procurement of these experts, except for the Field Biologist, which will be a sole source procurement. Appropriate documentation will be prepared to justify this procurement. The Accountant, while a consultant, has already been engaged by the EAG and will continue to function in that role.

Table 2 Projected independent consultants

	Position	Jurisdiction	Sex	Status
1	Accountant	Antigua and Barbuda	Female	National worker
2	Field biologist 1	Antigua and Barbuda	Female	National worker
3	Field biologist 2	Antigua and Barbuda	TBD	National worker
4	Curriculum Developer	Antigua and Barbuda	TBD	TBD

5	Tour guides	TBD	Multiple	Multiple
6	Graphic designer	Antigua and Barbuda	TBD	National worker
7	Videographer	Antigua and Barbuda	TBD	National worker
8	Offshore Islands Guardians	Antigua and Barbuda	Multiple	Multiple
9	Financial Feasibility Study Consultant	TBD	TBD	TBD
10	Audit		NA	National worker
11	Videographer	Antigua and Barbuda	TBD	National worker

Community Workers

The EAG works closely with communities abutting the NEMMA, specifically Parham Town, Glanvilles, Seatons, Pares, Wilikies, and Freetown. Community members are engaged in a range of activities and are invited to engage in wildlife and invasive species training and monitoring. In this sense, the community is engaged however there is limited labor relations relevant to their involvement. There are few instances, however, where community members are paid for services and this includes using local fishermen or boat captains for transportation to the offshore islands within the NEMMA KBA, or utilizing catering services within the community for stakeholder consultations, meetings, and workshops. In the context of this project, community labor is volunteer service and is provided by the community as a contribution to the project. The project will ensure that such labor will be provided on a voluntary basis as an outcome of individual agreement as per Annex 1- Community member’s letter of engagement. EAG intends to continue to engage with the community through a Citizen Science (CS) program which involves training interested volunteers in wildlife and invasive species monitoring, which will be dubbed “Offshore Islands Guardian Programme”. Community members (or volunteers) will then participate in the fieldwork components of the project and will be critical in the data-gathering necessary for the Conservation Action Plans. Volunteers, therefore, will be drawn from across Antigua and Barbuda and will be alerted of opportunities to participate through advertisements in traditional and social media. Support from neighboring communities will be garnered through access to existing CSOs in those communities and directly through the EAG. The CEPF project will therefore provide ongoing training, and basic data collection equipment. Potential risks and mitigation measures for community workers are outlined in Section 9. In summary, they revolve around the transmission of communicable diseases, natural hazards and disasters, discrimination/sexual harassment or use of child labor, workplace injury, accidents or injury to their person, and attack or harm by persons committing infractions or danger from wildlife.

Additional measures are taken by ensuring that volunteers are provided with suitable insurance cover during the implementation of the project and this is a standard operating procedure for the EAG.

Migrant Workers

No migrant workers are expected to work on the project.

Characteristics of Project Workers

EAG is an equal opportunity employer that values diversity in all forms. EAG does not practice discrimination in any form, nor does it tolerate the practice of discrimination based on race, color, nationality, religion, gender, age, ethnicity, sexual orientation, marital status or disability. This applies in all spheres of the employment life cycle as well as in engagement with interns and volunteers as well as other internal and external stakeholders.

The eight known direct workers currently comprise six women and two men. This ratio will change only slightly with the addition of two direct workers (Sustainable Finance Coordinator and RER Officer) who will be recruited after the start of the project. None of the direct workers is aged under 18 years, and, given the qualification requirements for the positions, no one under this age will be hired to work on the project, either as a direct worker or an independent consultant.

All existing workers are authorized to work in the jurisdiction where they are normally domiciled, and EAG will ensure that all additional direct workers and independent consultants hired for the project have work eligibility in their country of residence.

Timing of Labor Requirements

Direct workers will work on the project from inception in May 2023 through completion in April 2026. This is because EAG's work is programmatic in nature and the work being completed under this grant supports the strategic vision and direction of core programmes. Level of effort by direct workers will vary over the project's lifetime and will correspond with the needs of project and its deliverables.

Eleven independent consultants will be engaged to support deliverables over the project cycle: Six in Year 1, and five in Year 2; noting that some of the contracts span several months and some may be carried on throughout the life of the project.

Assessment of key potential labor risks

The project aims to develop systems to improve management of the habitats of critically endangered species in Antigua, Barbuda and Redonda, and will do so while conducting a considerable amount of field work. The work done in the field will then build upon existing knowledge of management of racers regionally, and create a specific action plan for the critically endangered endemic Antiguan Racer. Other components of the work will include stakeholder consultations and desk work, which will be conducted by indirect consultants.

Noting these parameters, EAG has a Health and Safety Protocol that was developed for Redonda which can be tailored for the NEMMA, specifically the Offshore Islands Conservation Program. Because the work involves risk associated with working at heights and other hazardous work, all workers and volunteers are provided with insurance cover. Additionally, training is provided by the project team to ensure that all persons who are in the field follow strict guidelines. These guidelines are inclusive of handling bait, and developing buddy-systems. Direct workers who will be in the field are also First Aid certified, and each field team is provided with first aid gear.

At the time of writing, Covid-19 presents a threat to all personnel, and measures will be followed according to national guidelines provided by the relevant agencies.

There are also risks to occupational health and safety associated with natural hazards, particularly hurricanes. Project workers may also be exposed to workplace injuries at their offices or remote work locations. Also, although unlikely, there may be some risk of discrimination and/or harassment, including sexual harassment, in the workplace, on the grounds of gender, age, race or other protected characteristic. The main labor risks that may be associated with the project are summarized in Table 3.

9. **Risk mitigation measures:** This section will describe the measures that will be taken to mitigate all risks rated as moderate or above. Mitigation measures will be presented following the mitigation hierarchy, which requires that risks are anticipated and avoided where possible. Where avoidance is not possible, risks should be minimized to acceptable levels. Any risks that remain following avoidance and minimization should be mitigated.

The cost of workmen’s compensation insurance for EAG team members and volunteers is covered by donor funds where that is permitted. It is expected that the project will cover this for full time project workers. The Government of Antigua and Barbuda (GOAB) through the Ministry of Health, Wellness and the Environment has a national guideline for dealing with COVID19, which EAG team members are expected to follow. Those guidelines change with recommendations from the World Health Organization (WHO).

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

All staff are allowed medical leave and vacation leave as the national labor laws allow. All staff are also allowed mental health days, which is not required by national law, but is a policy of the EAG.

Table 3: Risk and Mitigation Measures

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
Contraction/transmission of COVID19	High	High	COVID 19 has affected Antigua and Barbuda like other countries in the world. The GOAB, through various measures, is seeking to keep this under control.	All team members will follow the guidelines provided by the Government of Antigua and Barbuda.
Natural hazards such as hurricanes, earthquakes, flooding, strong winds at sea.	High	High	Antigua and Barbuda is affected by hurricanes and other natural hazards. It is	The GOAB keeps the nation abreast of impending events. Once field work is being implemented, particularly camping on the offshore islands, weather reports

			possible that during the project implementation period Antigua and Barbuda could be impacted by one or more disaster of varying magnitude.	are closely monitored, and immediate action is taken to safeguard life and property.
Discrimination/Sexual harassment	Low	High		EAG's code of conduct which is shared with team members references appropriate conduct and potential consequences for not following the code. Project workers will also have access to a grievance mechanism.
Use of child labor	Low	High		EAG's code of conduct which is shared with team members references appropriate conduct and potential consequences for not following the code. Project workers will also have access to a grievance mechanism.
Workplace injury	Low	Low		EAG follows the GOAB rules regarding workplace injury while ensuring that repairs and maintenance are done to reduce potential injuries.
Accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Low	High		Proper maintenance, insurance and servicing of the company vehicle is done in accordance with guidelines prescribed by the manufacturer.
Community workers				

Contraction/transmission of COVID19	High	High	COVID 19 has affected Antigua and Barbuda like other countries in the world. The GOAB through various measures is seeking to keep this under control.	All team members will follow the guidelines provided by the Government of Antigua and Barbuda as per Annex 2.
Accidents (e.g., road traffic accidents), health emergencies (e.g., acute illness)	Low	High		All community workers will be required to utilize boat transportation provided through the EAG that must meet the requirements of the Fisheries Act e.g., proper licensing and insurance as per Part III. In case of accidents and incidents, EAG will immediately report the accident/incident to CEPF. EAG will provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it. Subsequent reports may be provided to CEPF upon request.
Natural hazards such as hurricanes, earthquakes, flooding, strong winds at sea.	High	High	Antigua and Barbuda is affected by hurricanes and other natural hazards. It is possible that during the project implementation period Antigua and Barbuda could be impacted by one or more disaster	The GOAB keeps the nation abreast of impending events. Once field work is being implemented, particularly camping on the offshore islands, weather reports are closely monitored, and immediate action is taken to safeguard life and property.

			of varying magnitude.	
Discrimination/Sexual harassment, or use of child labor	Low	High		EAG's code of conduct as per Annex 4 which is shared with team members references appropriate conduct and potential consequences for not following the code. Project workers will also have access to a grievance mechanism.
The risk of community workers being attacked or harmed by persons committing infractions or in danger from wildlife.	Low	Medium	Community Workers (volunteers) will be involved in IAS reduction and monitoring in remote areas.	The training to be implemented under the CS programme will include how to safely collect data and interact with persons who might be committing infractions. Community workers will not be engaged in coercive activities to enforce laws. The approach will be to create awareness among stakeholders about the law and work collaboratively on how to conserve. They will also be made aware of how to handle wildlife.

Mitigation measures currently in place include the following:

- All persons employed by EAG benefit from Workmen's Compensation insurance
- EAG advise staff on how to safeguard themselves and others against transmission of Covid-19. Staff are strongly encouraged to be vaccinated, self-isolate if they are known or suspected to be infected, and take tests prior to travel and any in-person meetings and workshops. Staff will abide by any additional measures required by the relevant national governments and transport providers, and any reasonable

requests from local partners and stakeholders (e.g. wearing facemasks in their offices if asked to do so). The safety of project workers, communities and partners will be the main consideration in deciding whether and when to suspend face-to-face interactions.

- EAG has zero-tolerance policies for discrimination of any kind, and works closely with staff to ensure that this is followed.
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Additional mitigation measures to deal with civil unrest/security risks are presented in Table 3.

Table 3 Potential Labor Risks and Mitigation Measures

In this table, “Personnel” refer to all project workers employed on the project, whether directly by EAG or through the sub-grant to FFI.

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
Accidents (e.g., road traffic and boat accidents)	Low	High	Work on this project will entail travel to project sites by various means, including planes, taxi, bus, rental vehicle and boat. Standards of aviation, road and boat safety are reasonably good in the Caribbean, but not without risk.	Personnel must exert due care and attention when travelling and avoid vehicles and operators that appear unsafe and avoid travelling during severe weather/ sea conditions.
Civil unrest/ security issues (kidnapping, carjacking, abduction)	Low for all project countries except parts of Antigua and Barbuda (High)	High	While project sites in Key Biodiversity Areas (KBAs) are unlikely to be affected by unrest or crime, staff travelling to these locations could be at risk enroute.	Staff will monitor and follow advisories from relevant government agencies, and be on the alert for any potential danger, and act to reduce that potential harm.
Severe weather events (hurricanes, tropical storms) and other natural disasters, including earthquakes, tsunamis and volcanic eruptions	High	High	Over the life of the three-year project, it is likely that Antigua and Barbuda will go into disaster-preparedness mode in response to a hurricane or tropical storm.	Project leaders and other personnel will consult with the National Office of Disaster Services and follow all guidelines provided by the Government of Antigua and Barbuda. NODS typically provides at least three days warning of an impending storm, giving ample time to take measures to protect personnel and resources,

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				<p>including withdrawing them from the field.</p> <p>As a precaution, major project activities will not be scheduled during the peak hurricane season (September, October).</p> <p>Project activities may be temporarily suspended, depending on the location and nature of the impact.</p>
Injuries from wildlife	Low	Medium	Project sites contain a small number of hazardous wildlife, including toxic plants (e.g. manchineel <i>Hippomane mancinella</i> , and Christmas bush <i>Comocladia dodonaea</i>)	Personnel will be trained to identify and avoid contact with potentially dangerous wildlife.
Workplace injuries at offices or remote work locations	Low	Low	This encompasses a range of possible injuries, such as falls and burns.	<p>Personnel will also be required to comply with Health and Safety</p> <p>Risk assessments and Health and Safety Guidelines developed by EAG, FFI and/or partners for specific project sites, where available.</p>
Discrimination and/or harassment in the workplace	Low	High		<p>Discrimination and workplace harassment addressed by EAG's Code of Ethics .</p> <p>All direct workers and independent consultants are required to adhere to EAG's Safeguarding Policy which will be developed under this project</p>
Covid-19	High	Medium	All Caribbean countries have been affected by the Covid-19 pandemic since early	All personnel are also expected to monitor and follow guidelines and

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
			2020, but most restrictions have now been lifted by governments in response to widespread vaccination and the perceived fall in risk. As the virus evolves and new vaccines become developed, risk levels, and hence the appropriate mitigation measures, can fluctuate over time.	protocols set out by the Government of Antigua and Barbuda. Even if national restrictions have been lifted, personnel are encouraged to have up to date vaccinations, and required to self-isolate if known or suspected to be infected
Other infectious diseases	Low	Medium	Other infectious diseases in the Caribbean region include dengue, typhoid and zika.	Staff are advised to have up to date vaccinations, guard themselves against mosquito bites, and practice good hygiene.

10. Brief overview of legislation: terms and conditions: This section should present a brief overview of the *key aspects* of national labor and employment law relevant to terms and conditions of employment (e.g., wages, deductions, benefits, etc.).

Table 4 sets out the key aspects of national labor legislation in Antigua and Barbuda, as recently identified by the RIT. Direct workers will be employed in Antigua and Barbuda. Direct workers will be paid monthly in compliance with national laws and labor management procedures. Statutory deductions from wages will comply with national laws, and direct project workers will be informed of the conditions under which such deductions will be made.

Table 4 National labor legislation relevant to ESS2 in project countries

Country	Law	Relevance to ESS2
Antigua and Barbuda	Disabilities and Equal Opportunities Act (2017)	Expounds the principles of equality and non-discrimination in relation to persons with disabilities.
Antigua and Barbuda	The Antigua and Barbuda Labor Code (1975; amended)	Brings together all major legislation applicable to employment standards and industrial relations. Prohibits the employment of children and young persons under the age of 16 years and places restrictions on employment of young persons under 18.
Antigua and Barbuda	Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Antigua and Barbuda	Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.

Country	Law	Relevance to ESS2
Antigua and Barbuda	Labor Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Antigua and Barbuda	Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Antigua and Barbuda	Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant, or their employment is terminated.
Antigua and Barbuda	Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.
Antigua and Barbuda	Antigua and Barbuda (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.
Antigua and Barbuda	Employment (Equal Pay for Men and Women) Act (1975)	Prohibits discrimination on grounds of sex in respect of remuneration and other terms and conditions of employment.
Antigua and Barbuda	Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.
Antigua and Barbuda	Child Care and Protection Act, (2004)	Prohibits the employment of children under the age of 13, restricts employment of children under 15 to light work, and prohibits the employment of young people under 18 in hazardous work.
Antigua and Barbuda	Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.

11. Brief overview of legislation: occupational health and safety: This section should present a brief overview of the key aspects of national labor and employment law relevant to occupational health and safety.

Table 5 sets out the key aspects of national legislation relevant to occupational health and safety in Antigua and Barbuda and their relevance to ESS2. A community health and safety plan has also been developed for the project and will be implemented.

Table 5 National legislation relevant to occupational health and safety in project countries

Country	Law	Relevance to ESS2
Antigua and Barbuda	Occupational Safety and Health Act (2013)	Legislative framework 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.

Country	Law	Relevance to ESS2
	The Antigua and Barbuda Labor Code (1975) (amendment 2019) Labor Commissioner Act (1967) (amendment 1989)	
Antigua and Barbuda	Occupational Health and Safety Bill (2017)	Provides a framework to secure the safety and health of workers.

12. Responsible staff: This section 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.
- Addressing worker grievances.

Staff responsible for management and supervision of activities related to the Labor Management Procedures are listed in Table 6.

Table 6 Responsible Staff, EAG

Area	Function/individual
Engagement and management of project workers	<ul style="list-style-type: none"> • Executive Director
Engagement and management of independent consultants	<ul style="list-style-type: none"> • Programme Coordinators
Occupational health and safety	<ul style="list-style-type: none"> • Executive Director • Programme Assistant • Programme Coordinators
Training of workers	<ul style="list-style-type: none"> • Programme Coordinators (including coordinating training on EAG's Safeguarding Policy and Health and Safety Protocols) •
Addressing worker grievances	<ul style="list-style-type: none"> • Executive Director

13. Policies and procedures: This section should describe policies and procedures for managing each category of project staff, in accordance with national labor and employment law and ESS2.

EAG has the following relevant policies and procedures, which all employees are responsible for understanding and following. These are encoded in the following:

- Statement of Ethics and Principles
- Equal Employment Opportunity Statement and Non-harassment Policy
- Safeguarding Policy

These documents are shared with all direct workers through EAG's intranet. Relevant provisions will be incorporated in the service agreements that are signed with independent consultants.

Salary and working hours

Direct project workers will be employed on a salary basis. Positions will be classified as salaried and will be either full-time or part-time. Direct project workers will be hired on either permanent or fixed-term contracts. Salary positions are excluded from overtime provisions, but EAG makes provisions for compensatory time off (time off in lieu).

EAG's standard work week is 40 hours. Time worked includes all time that an employee is required to be physically at work or performs work for EAG. EAG has a flexible work policy that allows most employees to work from home and manage their working hours with minimal supervision.

EAG's compensation program is based on qualifications and is tiered accordingly.

Each employee is eligible to receive payments for sick leave, maternity leave, work-related disability and pension. EAG provides vacation leave, sick leave, maternity leave, casual leave, leave for public function (e.g., jury duty), special leave and extended sick leave.

Benefits

- 14. Staff receive benefits in accordance with national labor laws. EAG is unable to provide further monetary benefits beyond what is required by law. Contracted workers: This section will describe how the requirements of national labor and employment law and ESS2 will be incorporated into grant agreements and/or service contracts with third parties who will employ or engage contracted workers.**

All independent consultants will be engaged directly by EAG under a service agreement governed by and interpreted in accordance with the laws of Antigua and Barbuda. Independent consultants are paid based on a daily rate or, more often, or a fixed fee for specific deliverables, depending on the scope of work. They are considered independent service providers who are responsible for all forms of health or accident insurance and payment of taxes. As such, neither EAG, its agents, employees or collaborating institutions, nor any of the funding agencies involved in supporting EAG, is liable for any damages resulting from the service agreement, or for the payment of taxes or fees that may be due any government. Independent consultants are responsible for taking out any appropriate insurance coverage.

All independent consultants must agree to comply with all applicable laws in Antigua and Barbuda. The service agreements will flow down relevant requirements of ESS2 in relation to management of labor issues, including occupational health and safety. Independent consultants will be required to acknowledge receipt of EAG's Code of Ethics certify their agreement and compliance therewith. Independent consultants will be informed about EAG's Safeguarding Policy

15. Community workers: This section will describe how the requirements of ESS2 will be complied with in regard to community workers employed or engaged to work on the project.

Community workers will be made aware of all policies relevant to this project and will be encouraged to use the grievance mechanism as necessary.

16. Grievance mechanism: This section will describe how a mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. The mechanism must: be made easily accessible to such workers; address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution; and operate in an independent and objective manner. Please describe how you will put in place a grievance mechanism that meets these requirements.

The Grievance Mechanism for all staff or contractual employees is as follows:

1. The Programme Coordinators will be the point of contact for all grievances concerning this project. Contact information will be provided to workers upon signing of contract.
2. If the individual does not feel comfortable reporting to the Programme Coordinator (for example, if that person is nonresponsive or implicated in the concern), they may report to EAG's Executive Director.
3. If that individual does not feel comfortable reporting to the Programme Coordinator or the Executive Director, they may report to any member of the EAG Management Team or the Board of Directors. Grievances can be made in person, by telephone call, or in writing. Grievances can be made anonymously.
4. All received grievances will be registered within two working days of receipt by the Programme Coordinator or Executive Director, who will attempt to address and resolve the grievance within three weeks upon receipt. The complainant will be informed in writing of the measures taken to address the grievance.
5. If the grievance is very serious (e.g. breaching safeguards to protect the welfare and wellbeing of people or wildlife), project activities may be suspended until the matter is resolved and, if appropriate, EAG may take disciplinary action or refer the matter to the relevant authorities for prosecution. All complaints will be recorded in the EAG Risk Register, which is regularly reviewed by the Board of Directors.
6. All workers will be made aware of employment contracts of the grievance mechanisms that are in place and what those consist of. Any team member reporting safeguarding concerns or complaints through formal whistleblowing channels (or if they request it) will be protected. It is essential that confidentiality is maintained at all stages of the reporting and response process when dealing with complaints. Information relating to the concern or complaint and subsequent case management shall be shared on a need to know basis only and shall be kept secure at all times.
7. Workers will have access to the following grievance information:
 - The option of either verbal or written grievance complaint, and the opportunity to remain anonymous.
 - Contact information for grievance submission (the direct contact details of the EAG Programme Coordinator, EAG's Executive Director, and the Grievance Mechanisms of the Implementing Agency—Conservation International. The contact information for the CI Ethics Hotline is tel. +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

- Timelines for grievance response (normally 24 hours to three weeks).
- The possibility to hold an open and a constructive meeting about a grievance with their immediate manager/supervisor.
- The right to appeal to another manager/supervisor against a decision made by their manager. If the workers are not satisfied and do not have confidence in those managing the grievances, they can escalate the matter. Workers can appeal to the Grievance Mechanisms of the Implementing Agency—Conservation International.
- The workers' right to be accompanied by a fellow worker or support of her/his own choice when attending the meeting to discuss a grievance.
- The Ministry of Labor of the respective country or the National Courts are alternatives that the affected worker can use, and may be approached if the matter cannot be resolved by EAG and the project team.

8. All received grievances received by the project shall be logged and filed.

EAG prohibits retaliation against team members who, based on a reasonable belief, provide information about, complain, or assist in the investigation of any complaint related to a violation. In all cases, EAG will follow up as necessary to ensure that no individual is retaliated against for making a complaint or cooperating with an investigation.

17. Addressing Gender Based Violence: You will also need to make special provisions for grievances related to gender-based violence (GBV), due to the need for complaints to be handled by persons with specialist training and adopting a survivor-centered approach. You will be provided with the contact details of a GBV service provider in the project country, and will be required to include them in your grievance mechanisms. Survivors of GBV will have the option of contacting the GBV service provider directly, who will, in-turn, inform the CEPF Secretariat, with the express consent of the survivor.

EAG's Equal Employment Opportunity Statement and Non-harassment Policy includes sexual harassment, which is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment; (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. EAG's policy sets out a sexual harassment reporting mechanism similar to that of the grievance mechanism above, but places priority on the wellbeing and wishes of the Survivor. The Survivor will not be subjected to interrogation about the matter, but instead enabled to give as much or as little information as they wish, in confidence.

EAG does not employ a specialist on GBV, and survivors of GBV will be encouraged to contact the GBV service provider directly, if they wish. These providers will be made accessible to the complainant and EAG will ensure that their contact details are available.

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

Disclosure: CEPF requires that all direct and contracted workers be informed of the existence of the grievance mechanism and the measures put in place to protect them against any reprisal for its use, either at the time of recruitment or at the start of the project, whichever is later. CEPF also requires that all direct, contracted and community workers be provided with Conservation International's (CI's) Code of Ethics, and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at www.ci.ethicspoint.com