



Labor Management Procedures

January 5, 2023

CEPF Grant 112943

Grantee Re:wild

Call to Action: Conservation Action Plans for Priority Caribbean Species

Antigua and Barbuda, The Bahamas, Jamaica, Saint Lucia and Saint Vincent and the Grenadines

Grant Summary

1. **Grantee organization:** Re:wild
2. **Sub-project title:** Call to Action: Conservation Action Plans for Priority Caribbean Species
3. **Grant number:** 112943
4. **Grant amount (US dollars):** xxxxxxxxxx
5. **Proposed dates of grant:** March 1 2023 – February 28, 2026.
6. **Countries where activities will be undertaken:** Antigua and Barbuda, The Bahamas, Jamaica, Saint Lucia and Saint Vincent and the Grenadines.
7. **Date of preparation of this document:** January 5, 2023.
8. **Overview of labor use on the sub-project:**

These Labor Management Procedures have been prepared by Re:wild, a biodiversity conservation NGO with its headquarters in Austin, Texas, for the CEPF project #112943 Call to Action: Conservation Action Plans for Priority Caribbean Species.

The proposal presented by Re:wild in partnership with sub-grantee Fauna & Flora International (FFI), is a joint endeavor to build the species conservation capacity of at least six local partner CSOs – including the Bahamas National Trust (Bahamas), Birdlife Jamaica (Jamaica), Caribbean Coastal Area Management Foundation (C-CAM, also Jamaica), Environmental Awareness Group (EAG, Antigua), Saint Lucia National Trust (Saint Lucia), and Science Initiative for Environmental Conservation and Education (SCIENCE, St Vincent & the Grenadines) – and support them to develop action plans for 10 target endangered species of trees, reptiles, amphibians and birds across multiple sites in five countries.

Re:wild, FFI and their staff and consultants will serve as mentors and trainers to provide technical guidance for the development, implementation and evaluation of species conservation action plans. This work will mainly take the form of workshops, meetings (in person and virtually), desk-based work, site visits and exchanges. Conservation action plans will be developed during the first 18 months of the project. Implementing the plans will be led by local partner CSO under their own funding agreements with CEPF and other sponsors.

The Labor Management Procedures seek to ensure that measures are in place to manage risks associated with employment by Re:wild and FFI under the sub-project and help to determine the resources necessary for effective planning and management. They set out the approach to complying with national labor legislation in all the countries where the sub-project will be implemented, 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 sub-project workers, whether full-time, part-time or temporary. This section describes the sub-project's 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 sub-project.

Project Workers

The sub-project will employ workers based in the USA and United Kingdom as well as locally-based workers from the Caribbean countries of implementation. The breakdown of project workers, to the extent known at present, is shown in Tables 1 and 2.

Direct Workers

Three direct workers employed by Re:wild will work on the sub-project. Their positions and places of work appear in Table 1a. Direct workers 1 and 2 are currently full-time employees of Re:wild and will be assigned to work part-time on the sub-project.

Direct worker 3 will be recruited and hired to work on the sub-project after inception. They will be a West Indian national who will work from home and/or the office of a Re:wild partner organization in the Caribbean. This position is 100% funded by Re:wild and therefore does not appear on the project budget (but is mentioned in the main text, including information on matched funding).

Table 1a Direct workers employed by Re:wild

	Position	Place of work	Jurisdiction	Sex	Status
1	Project Leader/ Caribbean Alliance Director	Working from home in the United Kingdom and Anguilla	United Kingdom	Female	National worker
2	Financial Administrator	Re:wild Headquarters: Austin TX	USA	Female	National worker
3	Caribbean Program Officer	TBD (probably one of the five sub-project countries)	TBD	TBD	National worker

A further four direct workers employed by Fauna & Flora International (FFI) will work on the sub-project under a subgrant (from April 2023 through December 2025). Their positions and places of work appear in Table 1b.

Direct workers 1 - 4 are currently full-time employees of FFI and will be assigned to work part-time on the sub-project. Direct workers #3 and #4 are 100% funded by FFI and therefore do not appear on the project budget.

Table 1b Direct workers employed by Fauna & Flora International (Sub-grantee)

	Position	Place of work	Jurisdiction	Sex	Status
1	Project Co-leader/ Caribbean Programme Manager	FFI headquarters: Cambridge, United Kingdom	United Kingdom	Female	National worker

	Position	Place of work	Jurisdiction	Sex	Status
2	Saint Lucia Coordinator	Working from home in Saint Lucia	Saint Lucia	Male	National worker
3	Antigua Coordinator	FFI office in Antigua	Antigua & Barbuda	Female	National worker
4	FFI Financial Administrator	FFI office in Antigua	Antigua & Barbuda	Female	National worker

Independent consultants engaged directly by Re:wild

It is anticipated that six independent consultants will be engaged during the course of the sub-project to undertake short term assignments, specifically including assisting with facilitating action planning workshops and writing up the plans, and providing specialist training on conservation skills requested by in-country partners. Two of these consultancies will be location-specific, as shown in Table 2. The places of work of the other consultants and are not known at this stage but will be guided by the findings of the capacity needs assessments and capacity building plans that will be produced under Component 3. Independent consultants will be engaged in their individual capacity. Where local CSOs are contracted to host action planning workshops and co-write action plans, such consulting service providers will fall within the category of small and medium-sized enterprises.

The CEPF procurement policy requires all consulting services with a value of \$5,000 or more to follow a competitive procurement process. None of the services are expected to reach this threshold and the specialized nature of the consultancies means that Re:wild is likely to use sole-source procurement in most cases.

Table 2 Projected location-specific independent consultants

Position	Place of work	Jurisdiction	Sex	Status
Action Planning Assistant, Saint Lucia	Saint Lucia	Saint Lucia	To be determined	National
Caribbean Trainer 1: Snake Telemetry Trainer	St. Vincent and the Grenadines	St. Vincent and the Grenadines	Male	International (from USA)

Community Workers

No community workers will be engaged directly by Re:wild. It is anticipated that some of Re:wild's partners will engage community workers in the context of implementing the action plans developed under the sub-project. If this is the case, Dedicated Labor Management Procedures will be developed by each CSO receiving CEPF funding.

Migrant Workers

No migrant workers are expected to work on the sub-project.

Characteristics of Project Workers

Re:wild is an equal opportunity employer that values diversity in all forms. Re:wild 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 six known direct workers currently comprise five women and one man. This ratio will change only slightly with the addition of one direct worker (Re:wild Caribbean Program Officer) who will be recruited after the start of the sub-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 sub-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 Re:wild will ensure that all additional direct workers and independent consultants hired for the sub-project have work eligibility in their country of residence.

Timing of Labor Requirements

Direct workers 1 – 3 in Table 1a (Re:wild staff) will work on the sub-project from inception in March 2023 through completion in February 2026. Direct workers 1 – 4 in Table 1b (FFI staff) will work on the sub-project from April 2023 through December 2025 (the expected duration of the sub-grant from Re:wild to FFI). Level of effort by direct workers will vary over the sub-project's lifetime and will correspond with the needs of sub-project and its deliverables.

Six independent consultants will be engaged to support deliverables over the project cycle: Three in Year 1, two in Year 2 and one in Year 3. Most contracts are anticipated to last 2-6 weeks.

9. Assessment of key potential labor risks

The sub-project aims to build the capacity of CSOs to reverse the decline of globally endangered species in Antigua & Barbuda, the Bahamas, Jamaica, Saint Lucia and St. Vincent & the Grenadines, and to foster a new network of CSOs and other conservation organizations in the Caribbean. Re:wild will work closely with at least six in-country partner CSOs and assist them to develop their own proposals to CEPF for funding to implement action plans developed under this sub-project. Each will be required to prepare sub-project-specific Labor Management Procedures prior to grant award.

Much of the project work can be classified as knowledge work, requiring professional and administrative labor. There will be no use of heavy machinery, working at heights or other hazardous work. Most of the occupational health and safety risks relate to in-country and international travel to run workshops, provide training and other forms of support in the field, and evaluate activities in the sub-project countries. At the time of writing, Covid-19 presents a threat to all personnel, whether working in-country or during international travel.

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 sub-project are summarized in Table 3.

10. 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.

Mitigation measures currently in place include the following:

- All persons employed by Re:wild and FFI benefit from comprehensive medical insurance, including travel insurance.
- Prior to travel, all FFI employees complete a risk assessment, and Re:wild staff consult country-specific risk assessments from Global Rescue and advisories from their respective Foreign Offices.
- Re:wild and FFI 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). Both Re:wild and FFI work closely international safety advisers to track global risks, and may reinstate further restrictions if the risk from Covid-19 is deemed to be rising). The safety of project workers, communities and partners will be the main consideration in deciding whether and when to suspend international travel and face-to-face interactions.
- Re:wild has zero-tolerance policies for discrimination of any kind, as set out in the Equal Employment Opportunity (EEO) Statement and Non-Harassment Policy, Statement of Ethics and Principles, and Whistleblower Policy. All employees must sign a statement of compliance with these policies as a condition of employment. FFI has a similar set of policies for its employees, including an Equal Opportunities Policy, Anti-bullying and Anti-harassment Policy, Code of Conduct, and Whistleblower Policy.
- All Re:wild and FFI staff undergo mandatory training to identify and prevent discrimination and harassment, including (for all Re:wild staff) certified training on Harassment Prevention for US Employees to comply with US federal anti-discrimination and anti-harassment laws.
- Re:wild's Safeguarding Policy ("To protect people, particularly children, women, and at-risk adults and beneficiaries of assistance, from any harm that may be attributed to Re:wild.... arising from the conduct of Re:wild representatives, and from the design and implementation of Re:wild's programs and activities."), Equal Employment Opportunity (EEO) Statement and Non-Harassment Policy, and Whistleblower Policy informs all project workers of their responsibility in relation to protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, exploitation, abuse, discrimination and neglect. FFI has similar policies for its employees, including a Safeguarding Children and Vulnerable Adults at Risk Policy, Equal Opportunities Policy and Whistleblower Policy. All employees in FFI have to take a compulsory training course on Safeguarding.
- Both Re:wild and FFI also perform due diligence of partners, especially those receiving sub-grants. Due diligence includes assessment of partners' safeguarding competencies and training/ support to meet needs identified.

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 sub-project, whether directly by Re:wild 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 sub-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. Vehicles may be rented only with prior approval from the Project Leader, and only suitably qualified, insured and experienced personnel are permitted to drive. Personnel must consult and strictly follow national rules, which may differ between islands.
Civil unrest/ security issues (kidnapping, car-jacking, abduction)	Low for all sub-project countries except parts of Jamaica (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 en route. The risk is highest in Jamaica, where violent crime, including armed robbery and murder, is a problem in large cities and tourist areas, including parts of Kingston and Montego Bay. At the time of writing, the Government of Jamaica has established a State of Emergency in nine parishes to address violent crime.	Staff will monitor and follow advisories from the relevant governments and travel insurance providers before and during travel, and consult local partners on specific areas or practices to avoid. Staff will avoid travel to remote locations at night, and avoid areas known or suspected to be high risk. Special caution will be taken in Jamaica, such as keeping vehicles locked while driving, avoiding unmarked taxis, keeping to main roads where possible, concealing valuables, travelling in groups, choosing hotels with

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				security, and avoiding areas where the government has declared a state of emergency.
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 sub-project, one or more target countries could be severely impacted by a hurricane or other natural disaster. However, it is highly unlikely that all five countries would be afflicted simultaneously.	<p>Project leaders and other personnel will consult the NOAA website for advanced warnings of hurricanes and tropical storms (NOAA typically provides at least three days warning of an impending storm, giving ample time to take measures to protect personnel and resources, 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 in countries afflicted by a natural disaster, depending on the location and nature of the impact. Work will continue in the other, unaffected countries in the meantime.</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> , Christmas bush <i>Comocladia dodonaea</i>) and potentially life-threatening venomous snakes (parts of Saint Lucia only).	Personnel will be trained to identify and avoid contact with potentially dangerous wildlife. In Saint Lucia, personnel will follow national guidelines to protect themselves against snakebite and learn what to do if bitten (including appropriate first aid and immediate travel to Victoria

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
				Hospital for professional observation and treatment, as recommended by the government).
Workplace injuries at offices or remote work locations	Low	Low	This encompasses a range of possible injuries, such as falls and burns.	<p>All direct workers are insured and entitled to compensation for occupational illness or injury.</p> <p>Personnel will also be required to comply with Health and Safety</p> <p>Risk assessments and Health and Safety Guidelines developed by Re:wild, 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 Re:wild's Code of Ethics and Principles and Equal Employment Opportunity (EEO) Statement and Non-Harassment Policy.</p> <p>All direct workers are required to read Re:wild's Code of Ethics and Principles and EEO Statement and Non-Harassment Policy (or FFI's equivalent documents in the case of its staff) and sign a statement of compliance as a condition of employment.</p> <p>All direct workers and independent consultants are required to adhere to Re:wild's Safeguarding Policy and/or FFI's Safeguarding Children and Adults at Risk Policy</p>

Key labor risks	Risk probability	Risk severity	Description	Mitigation Measures
Covid-19	High	Medium	All Caribbean countries have been affected by the Covid-19 pandemic since early 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.	All personnel are also expected to monitor and follow guidelines and protocols set out by the relevant governments, travel providers and their health and travel insurance providers, which may change at any time. 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. All staff are strongly encouraged to take a test prior to travel or attending meetings. Staff must furthermore respect the wishes of local partners and stakeholders (e.g. if partners request face masks to be worn in meetings).
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.

11. 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 all sub-project countries, as recently identified by the RIT. Direct workers will be employed in the UK, USA, Saint Lucia, Antigua and possibly other sub-project countries. 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 sub-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 Labour 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.
The Bahamas	Persons with Disabilities (Equal Opportunities) Act (2014)	Establishes rights of persons with disabilities.
The Bahamas	Health and Safety at Work Act (2002; amended)	Establishes general duties of employers to their employees regarding health and safety at work.
The Bahamas	Employment Act (2001; amended)	Establishes comprehensive legal framework for employment, including with regards to conditions of employment and employment of children. Specifically, the act prohibits the employment of children under the age of 14 years and places restrictions on employment of young persons under 18.
The Bahamas	Industrial Relations Act (1970; amended)	Provides for the registration and control of trade unions and for the recognition of trade unions by employers.
Jamaica	Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Jamaica	Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.
Jamaica	Labour Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Jamaica	Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Jamaica	Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant or their employment is terminated.
Jamaica	Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.
Jamaica	Jamaica (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.
Jamaica	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.

Country	Law	Relevance to ESS2
Jamaica	Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.
Jamaica	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.
Jamaica	Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.
Saint Lucia	Labour Code of Saint Lucia(2006; amended)	Establishes fundamental principles of employment, including with regards to terms and conditions, occupational health and safety, equal opportunities and industrial relations. The code prohibits employment of children and young persons below the minimum school leaving age.
Saint Lucia	Education Act (1999)	Sets the minimum school leaving age at 15.
Saint Lucia	Equality of Opportunity and Treatment in Employment and Occupation Act (2000)	Provides for protection against unlawful discrimination on grounds of race, sex, religion, color, ethnic origin, family responsibilities, pregnancy, marital status, or age, and places restrictions on work and employment of minors.
Saint Lucia	Minimum Wages Act (1999; amended)	Establishes process for setting minimum wages for workers in particular sectors or industries.
Saint Lucia	Employees (Occupational Health and Safety) Act (1985)	Covers all aspects of occupational health and safety, including providing for preventive health measures, protective devices and equipment.
St. Vincent and the Grenadines	Wages Councils Act (1953)	Provides for the establishment of wages councils and the making of wages regulations addressing <i>inter alia</i> minimum wage, hours of work, overtime, vacation and sick pay, maternity leave and health and safety.
St. Vincent and the Grenadines	Trade Unions Act (1950)	Provides for the establishment and regulation of trade unions.
St. Vincent and the Grenadines	Trade Disputes (Arbitration and Inquiry) Act (1940)	Provides for arbitration in industrial disputes.
St. Vincent and the Grenadines	Protection of Employment Act (2003)	Provides for maintenance of good relationships between employers and employees, and addresses matters of severance and settlement of disputes.
St. Vincent and the Grenadines	Equal Pay Act (1994)	Prohibits discrimination based on grounds of sex in respect of remuneration and other terms and conditions of employment.

Country	Law	Relevance to ESS2
St. Vincent and the Grenadines	Constitution of Saint Vincent and the Grenadines (1979)	Establishes right of protection from discrimination on grounds of sex, race, place or origin, political opinions, color or creed.
St. Vincent and the Grenadines	Employment of Women, Young Persons and Children Act (1935)	Establishes the legal age of a child as under 14 and prohibits employment of children in certain settings.
St. Vincent and the Grenadines	Environmental Health Services Act (1991)	Provides for the regulation of activities that may affect public health and the environment.
St. Vincent and the Grenadines	Factories Act (1955)	Provides for health, safety, welfare and special protective measures in certain workplace settings.

12. 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 the sub-project countries and their relevance to ESS2. A community health and safety plan has also been developed for the sub-project and will be implemented.

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

Country	Law	Relevance to ESS2
Antigua and Barbuda	Occupational Safety and Health Act (2013) The Antigua and Barbuda Labour Code (1975) (amendment 2019) Labour Commissioner Act (1967) (amendment 1989)	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.
The Bahamas	Health and Safety at Work Act (2002) (amendment 2015)	Sets forth general duties of employers to their employees and provides for general duties of employees at work.
Jamaica	Occupational Health and Safety Bill (2017)	Provides a framework to secure the safety and health of workers.
Saint Lucia	Saint Lucia Labour Code (amendment) 2011	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
Saint Lucia	Employees (Occupational Health and Safety) Act 1985.	Covers all aspects of occupational health and safety, including preventive health measures, protective devices

Country	Law	Relevance to ESS2
		and equipment, medical examinations and the notification of employment injuries.
St. Vincent and the Grenadines	Occupational Safety and Health Bill (2017)	Promotes and develops OSH standards in the workplace.

13. Responsible staff: This section identifies the functions and/or individuals within the sub-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 6a and 6b.

Table 6a Responsible Staff, Re:wild

Area	Function/individual
Engagement and management of project workers	<ul style="list-style-type: none"> • Re:wild's Chief Operating Officer • Re:wild's Caribbean Alliance Director (for Caribbean employees)
Engagement and management of independent consultants	<ul style="list-style-type: none"> • Re:wild's Chief Operating Officer • Re:wild's Caribbean Alliance Director (oversight of consultants employed in the Caribbean)
Occupational health and safety	<ul style="list-style-type: none"> • Re:wild's Chief Operating Officer
Training of workers	<ul style="list-style-type: none"> • Re:wild's Chief Operating Officer (including coordinating training on Re:wild's Safeguarding Policy and certified training on Harassment Prevention for US Employees) • Re:wild's Caribbean Alliance Director (coordinates technical training for and by workers in the Caribbean)
Addressing worker grievances	<ul style="list-style-type: none"> • Re:wild's Chief Operating Officer

Table 6b Responsible Staff, FFI (subgrantee)

Area	Function/individual
Engagement and management of project workers	<ul style="list-style-type: none"> • FFI's Director of Human Resources • FFI's Director of Americas and Caribbean (for Caribbean employees)

Engagement and management of independent consultants	<ul style="list-style-type: none"> • FFI's Director of Human Resources • FFI's Caribbean Subregional Manager (oversight of consultants employed in the Caribbean)
Occupational health and safety	<ul style="list-style-type: none"> • FFI's Director of Human Resources
Training of workers	<ul style="list-style-type: none"> • FFI's Director of Partnerships and Organizational Development • FFI's Caribbean Subregional Manager (oversight of consultants employed in the Caribbean)
Addressing worker grievances	<ul style="list-style-type: none"> • FFI's Director of Human Resources

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

Re:wild 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
- Whistleblower Policy

These documents are shared with all direct workers through Re:wild'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 Re:wild makes provisions for compensatory time off (time off in lieu).

Re:wild's standard work week is 40 hours, but this may vary depending on the jurisdiction where the staff is based. Time worked includes all time that an employee is required to be physically at work or performs work for Re:wild. Re:wild has a flexible work policy that allows most employees to work from home and manage their working hours with minimal supervision.

Re:wild's compensation program uses a merit-based approach that utilizes job descriptions, pay structures, and external salary data to help ensure that pay levels are competitive with external market practices, particularly among NGOs based in the USA.

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

Benefits

A full set of benefits is available to salaried employees including medical insurance and pension. Staff are also encouraged and assisted to undertake vocational training.

- 15. 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 Re:wild under a service agreement governed by and interpreted in accordance with US law. 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 Re:wild, its agents, employees or collaborating institutions, nor any of the funding agencies involved in supporting Re:wild, 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 the countries where the work is being carried out. 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 Re:wild's Code of Ethics and Principles and Conservation International's Code of Conduct and certify their agreement and compliance therewith. Independent consultants will be informed about Re:wild's Safeguarding Policy, EEO Statement and Non-harassment Policy, and Whistleblower Policy.

- 16. 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 sub-project.**

No community workers will be engaged directly by Re:wild.

- 17. 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 Project Leader will be the point of contact for all grievances concerning this sub-project. Contact information will be provided to workers upon signing of contract.
2. If the individual does not feel comfortable reporting to the Project Leader (for example, if that person is nonresponsive or implicated in the concern), they may report to Re:wild's Chief Operating Officer.
3. If that individual does not feel comfortable reporting to the Project Leader or Chief Operating Officer, they may report to any member of the Re:wild 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 Project Leader or Chief Operating Officer, 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, Re:wild may take disciplinary action or refer the matter to the relevant authorities for prosecution. All complaints will be recorded in the Re:wild 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 by Re:wild's Whistleblower Policy and FFI's Whistleblower Policy. 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 contacted details of the Re:wild Project Leader, Re:wild's Chief Operating Officer, 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 Re:wild and the project team.
8. All received grievances received by the project shall be logged and filed.

Re:wild 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, Re:wild will follow up as necessary to ensure that no individual is retaliated against for making a complaint or cooperating with an investigation.

- 18. 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 sub-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.

Re:wild'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. Re:wild'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.

Re:wild will seek CANARI's list of GBV service providers in each sub-project country and ensure workers and consultants have this information. Re:wild does not employ a specialist on GBV, and survivors of GBV will be encouraged to contact the GBV service provider directly, if they wish.

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 sub-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