

Canadian Coast Guard Comments on draft IGO Staff Rules document

The Canadian Coast Guard sees these Staff Rules as fundamental to ensuring a smooth transition of staff into the IGO as well as ensuring the Organization is well set for the future. With that in mind, we feel that that Council should take the required time to thoroughly review the proposed Staff Rules to ensure future costs as an IGO remain aligned and manageable.

As it is our view that many of the items in the Staff Rules will translate to costs to the Organization, therefore there needs to be transparency and explanations on how those decisions are made, for example, Merit bonuses.

5. Workplace and working hours: there are several differences in 2023 and 2024 documents, including:

- i. In 2023, the **relocation of the headquarters** and the IALA's duty to keep staff informed, give notice and for staff to allow remote work in the case of relocation. There is a 'mobility obligation' (for metropolitan Paris only). Such wording is not present in the 2024 document.
- ii. The provision for a **minimum 50% in presence work balance** is not present in the 2024 document.
- iii. No clause related to **Remote work limited to Paris area** in the 2024 document.
- iv. Working hours: no mention of **the legal hours being 35/week in France** and that IALA staff will have 2 hours of overpay per week with this clause.

6. Public holidays: "Public and Civic holidays": should the word *civic* be added for accuracy? There is one public holiday which is statutory (May 1st) and the other 10 are paid time off granted by the employers as far as our research shows. This applies for Leave policy, 2.1.6. where the text is unclear and not very specific. Perhaps an annex listing the specific holidays would be beneficial for members to understand the policy and foreign staff to be able to comply without asking questions.

8. Leave: in this section, there is no details for what happens for sick leave without doctors note over and above 2 days. In the 2023 text not included – "For long period of absence, the employee shall receive payment under French Social Security arrangements under specific conditions." Should this be rectified?

In the section 8.8, "The Secretary-General may grant special leave to staff members in the case of special circumstances such as marriage, death of a family member etc." We believe a list of potential situations would avoid contest and disagreements. Perhaps a short list can be provided.

Section 10. Government Clearance: we suggest changing this title for "Work Permits and residence visa".

Section 12.5 Rights: "All rights related to work carried out by the Staff members in the performance of their official duties, whether intellectual property rights, copyright or patents, are reserved to the Organization." We suggest changing the text for "...will be proprietary to the organization".

Section 13, appointment: "13.1 Recruitment processes shall follow the principles of transparency and fairness and be documented." Please consider adding "... as applicable under French Labour Law".



Section 14.3 vaccination: Is this travel vaccinations that is referred to here? If Covid-19 vaccination: In France, employers cannot mandate vaccination against COVID-19 or require proof of vaccination from their employees as a general rule. This text may have to clarify what kind of vaccination is referred to here. "... staff members may also be required to receive the relevant **travel** vaccination."

Section 17.1 Merit Bonus: There should be criteria and process to outline how bonuses are allocated including percentage limits etc.

Section 18, on internal tax: we understand the exemption of personal income tax is replaced by an internal tax of 5%. In paragraph 18.3, on the refund of personal income tax, we would like to understand why when "Reimbursement is not granted if the salary paid by the Organization is not taxed directly by national income tax", further details are to be decided by the Secretary-General? Why would this not be clarified in the staff rules and left opened to discussion by the Secretary-General? We would like to understand how the 5% decision was made.

Section 19, Calculation and payment of the salary: we would like clarification as to why the negotiation clause of the 2023 document has been left out in the 2024 document.

Section 22.4, on social protection: the 2023 document has a section on supplementary health insurance:

Social protection at IALA. "IALA's employees shall benefit from the social benefits and the retirement regimes in force within IALA and applicable to the employees of the same category. They shall be affiliated to: etc" why is this left out in the 2024 IGO document?

Section 23, retirement: in the 2023 document, there were specific provisions for executive's pensions and also a detailed section on the 'Company savings plan (PEE) and retirement savings plan (PERCO)'. These are omitted in the 2024 IGO document. Is there a reason?

Section 26.3, travel claims: in the 2023 document, the WWA's Dean was approving for the academy. In the 2024 document there is no distinctions.

Section 27, allowances: should we see here a specific section on reimbursement of travel expenses, or would that be in an employee handbook?

Section 28.21 to 28.23, business expenses: should this title be "Office equipment and communication allowances"?

Section 29.8, termination indemnity: "Staff members of all categories fulfilling one of the conditions as defined in Rule 29.7, shall be entitled to a termination indemnity equal to 50% of their last basic monthly salary per full year of service." French Labour Law states "Minimum is 25% (10 years) and 33% (12 years+)". Why are we looking at 50% which is far from the minimum?