

## ESS10: Stakeholder Engagement and Information Disclosure



CANARI serves as CEPF's regional implementation team for the Caribbean Islands Biodiversity Hotspot.

# Stakeholder Engagement Plan

**November 2023**

**CEPF 114941**

**South East Cockpit Country Local Forest Management Committee Benevolent Society**

**Project Name:**

***Promoting and Supporting Sustainable Livelihoods in South East Cockpit Country, Jamaica***

### Grant Summary

- 1. Grantee organization: South East Cockpit Country Local Forest Management Committee Benevolent Society**
- 2. Sub project title: Promoting and Supporting Sustainable Livelihood in South East Cockpit Country Jamaica.**
- 3. Grant number: 114941**
- 4. Grant amount (USD\$): \$ 49,836.00**
- 5. Proposed dates of grant: December 2023**
- 6. Countries where activities will be undertaken: Jamaica**
- 7. Date of preparation of this document: 29 November 2023**

### 8. Overview of the Caribbean Hotspot Project

The Critical Ecosystem Partnership Fund (CEPF) Caribbean Islands Biodiversity Hotspot Small Grants Mechanism is being implemented in the Caribbean Islands by the Caribbean Natural Resources Institute (CANARI) acting as the Regional Implementation Team (RIT). After a successful first investment in the Caribbean Islands Biodiversity Hotspot between 2011 and 2016, the CEPF has returned to the region for a second phase of investment from August 2021 – July 2026, which totals US\$11.8 million.

The goal of the CEPF is to conserve biodiversity. Its approach is to build local conservation leadership and nurture sustainable development by developing locally driven conservation strategies and providing grants to civil society to implement those strategies. In the Caribbean, the CEPF aims to strengthen the protection and management of globally important biodiversity within 32 priority Key Biodiversity Areas (KBAs) and seven conservation corridors in Antigua and Barbuda; The Bahamas; Dominican Republic; Haiti; Jamaica; Saint Lucia; Saint Vincent and the Grenadines.

### 9. Project Components

Deforestation stands as a longstanding environmental challenge confronting communities situated within Cockpit Country. The depletion of tree cover, spanning decades, primarily stems from the harvesting of sticks utilized to support yam vines. Notably, this practice lacks specificity in terms of targeted tree species or age; the sole criterion is suitability for propping purposes, necessitating tall and straight attributes. Consequently, diverse tree species are adversely affected by this widespread activity. Given the prevalence of yam production in the region, nearly every community member, encompassing women, youth, and farmers, maintains a socio-economic connection to yam farming.

The consequences of this practice have led to significant areas within Cockpit Country experiencing extreme barrenness caused by soil erosion. These detrimental effects have profoundly impacted the natural habitats of the ecosystem's fauna. The looming threat of deforestation, compounded by climate change impacts, exacerbates the situation. This includes adverse effects on crop production arising from both prolonged droughts and brief, intense periods of rainfall. Farmers resort to increasingly unsustainable farming practices and encroach further into the Cockpit Country Protected Area (PA) to optimise crop yields in response to these challenges.

The identified threats underscore the imperative for intervention that prioritizes sustainable yam stick production and utilization, diversification of income sources for tree-cutting farmers, and enhancement of agricultural practices, particularly in light of climate change impacts. The sub-

project's objectives thus centre on supporting more sustainable agricultural methods, promoting food security in South East Cockpit Country, and mitigating the necessity for encroachment within forest management areas.

The sub-project has five components that aim to reduce the cutting of trees in Cockpit Country forests for yam sticks, enhance land management techniques, diversify livelihoods, and strengthen the institutional capacity of the South East Cockpit Country Local Forest Management Committee Benevolent Society (SECCLFMCBS) and ensure effective project management.

#### **Component 1: Introducing the Use of Live Yam Sticks Among Farmers**

Under this component, the sub-project will introduce 30 farmers to the sustainable practice of using live yam sticks, an environmentally friendly alternative to traditional forest-based yam sticks. By facilitating the adoption of this method, the sub-project seeks to reduce the reliance on tree cutting for yam sticks. The activities include sensitisation tours to established live yam stick farms, distributing bitter damsel species to farmers, and workshops on growing live yam sticks. The production and dissemination of a video that showcases the benefits of using live yam sticks will further promote this sustainable practice.

#### **Component 2: Sustainable Land Management**

This component focuses on building the capacity of 30 farmers in sustainable agricultural practices through Farmer Field Schools (FFS) and targeted training sessions. Training includes aspects of general land husbandry, farming as a business, erosion control, water harvesting, and crop diversification. Collaborating with organizations like RADA, the Forestry Department, and Caribbean Chemicals Ltd., the SECCLFMCBS aims to enhance farmers' knowledge of climate-smart agriculture, soil erosion reduction, and climate change resilience.

#### **Component 3: Sustainable Alternate Livelihoods**

This sub-project component will focus on diversifying income streams for farmers and community members, reducing dependency on the Cockpit Country Protected Area for livelihoods. The sub-project will include training in beekeeping, craft production, entrepreneurship, and other livelihood opportunities.

#### **Component 4: Institutional Capacity Building of the SECCLFMCBS**

This component of the sub-project aims to bolster the operational capabilities of the SECCLFMCBS through the preparation of a three-year business plan for the SECCLFMCBS group and the procurement and installation of a 40 ft. container retrofitted for office space and storage

#### **Component 5: Project Management**

This sub-project component is intended to ensure proper project management in compliance with CEPF and World Bank requirements.

### **10. Summary of previous stakeholder engagement activities**

The SECCLFMCBS works with the Forestry Department (FD) to fulfil its mandate, which is to preserve and protect the natural resources within Cockpit Country and its environs. The SECCLFMCBS operates on a membership basis and often meets with different interest groups and communities in the general geographic area. In addition to this, there is also the development of strategies to facilitate sustainable income generation among, not just committee members, but members within

the wider Cockpit Country communities. During regular monthly meetings held for SECCLFMCBS project ideas are typically discussed.

This sub-project idea has been discussed in monthly meetings starting in June 2023 when the initial Call for Proposals was released. The views discussed were welcomed and there was a mutual decision among members to compile the document. Typical partnering agencies such as the Forestry Department, Rural Agriculture Development Authority (RADA), Social Development Commission (SDC), and members from surrounding communities such as Wilson’s Run and Troy participated in the initial planning and development of the sub-project approach and activities.

### 11. Project stakeholders

The below table outlines the key stakeholders for this sub-project.

Table 11.1: Project stakeholders.

Stakeholder Group	Type of Stakeholder <i>(partner / target stakeholder)-</i>	Involvement in project	Interest <i>(low / medium / high)</i>	Influence <i>(low / medium / high)</i>	Component under which will be engaged
<p><b>Government:</b> Forestry Department, Rural Agricultural Development Authority, Social Development Commission Caribbean Chemicals</p>	<p>partner</p>	<p>The FD will provide technical support, a ready supply of seedlings as well as training in reforestation activities. The FD will provide guidance during the reforestation activities, including reforestation surveys. Caribbean Chemicals will Provide training in agroforestry and different types of products. RADA will provide training and technical support on the importance of, benefits, care and protection of plants (navel string component), and the local monitoring and maintenance of</p>	<p>high</p>	<p>high</p>	<p>Component 1-3</p>

		apiaries.  The SDC will assist in community mobilization and governance.			
<b>Communities:</b>	Target stakeholder	For education and to identify farmers to participate in land management and apiculture	medium	high	Component 2, 3 and 4

## 12. Stakeholder engagement program

The stakeholder engagement program aims to ensure equal opportunities for stakeholder groups to participate in discussions, and access information and benefits arising from activities of the sub-project.

The sub-project will implement meaningful consultations. In the context of this sub-project, meaningful consultation is a two-way process, that:

- a) begins early in the planning process to gather initial views on proposals and inform the design of activities;
- b) encourages stakeholder feedback, particularly as a way of informing the definition of activities and their scope, and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- c) continues on an ongoing basis, as risks and impacts arise;
- d) is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
- e) considers and responds to feedback;
- f) supports active and inclusive engagement with project-affected parties;
- g) is free of external manipulation, interference, coercion, discrimination, and intimidation; and
- h) is documented and disclosed by the grantee.

When working with stakeholders on a project like this, there are several social risks to consider which can be mitigated through proper stakeholder engagement. In Component 1, 30 farmers will participate in a program geared towards facilitating the adoption and use of the more sustainable and environmentally friendly live yam sticks as an alternative to the traditional yam sticks from the forest. The concept of live yam sticks is relatively simple, as instead of cutting down trees and using them for yam sticks each yam season, specific tree/s are grown and used on an ongoing basis. The sub-grantee will conduct open discussions during meetings and will, as extensively as possible, invite participation in the activity from the wider community. This activity follows on the sensitization as the farmers will be provided with the raw material to implement the live yam stick system.

In Component 2, the Farmer Field School (FFS), a farmer-centred locally adapted programme through RADA often described as the 'school without walls', will be used to deliver a training programme to increase the awareness in farming communities and change behaviours to increase the adoption of sustainable environmental and farming practices. Utilizing this approach, this

component is aimed at building the capacity of farmers in agroforestry and climate smart agriculture to reduce soil erosion, improve crop yield, increase their knowledge on climate change and the selection of climate-smart crops.

New and existing bee farmers will be facilitated in the initial stage, with the required basic equipment, protective gear and first aid supplies made available for the duration of sub-project implementation. These bee farmers will be chosen in a transparent manner with clear selection criteria, including having a vested interest in the field and a basic understanding that unforeseen possibilities may arise, in order to manage expectations. In the past, persons who were fearful of bees, have now become mentors for newcomers in the bee-farming industry. These mentors will assist in stakeholder engagement through their success stories.

Stakeholder engagement mechanisms will vary depending on the group and their level of interest / influence. Table 12.1 below provides possible methods for engaging the stakeholder groups identified in Table 11.1. The specific method used for each stakeholder group will be determined by the circumstances and desired objective of the engagement

*Table 12.1: Methods that will be used to consult and engage each stakeholder group*

<b>Stakeholder group</b>	<b>Possible methods for consultation and engagement</b>
National government agencies	Scheduled meetings based on activity, including one-on-one and within a group setting with other stakeholders.
Local communities including, but not limited to women, unemployed young people, elderly, persons with disabilities, and immigrants	Information sharing through one-on-one meetings, LFMC group meetings, and targeted engagement at local gathering spots
Vocational Training	The Project Manager will communicate in writing and telephone contact with HEART to conduct entrepreneurship training session. Identify youths and community members to participate in vocational training courses.

### **13. Consultation methods**

Consultations will occur with the project-affected stakeholders listed above, using the methods listed in Table 12.1. These consultations are to ensure equal opportunities for groups to participate in discussions, provide valuable information and access information arising from activities of the sub-project.

### **14. Other engagement activities**

Not Applicable

### **15. Timeline and resources**

Stakeholder engagement is an important element of this project. Table 15.1 below outlines the indicative timeline for SEP implementation. The budget for SEP implementation has been built into the project budget.

*Table 15.1: Indicative timeline for implementation*

Action	Cost Estimate (USD)	Implementation Schedule				
		2024			2025	
Monthly LFMC meetings	\$1,680/In-kind	x	x	x	x	X
Community meetings for general awareness	\$400	x	x	x	x	X
Engagement with persons interested in participating in farm and yam stick activities	\$200	x	x	x		
Consultant meetings to develop business plan and model	\$60		x	x	x	
Awareness-raising activities for apiculture activities	\$150		x	x	x	
Awareness-raising activities for agroforestry activities	\$150		x	x	x	
Awareness-raising activities for entrepreneurship activities.	\$350		x	x	x	X

## 16. Monitoring and arrangements

The Project Manager will be responsible for overseeing monitoring and arrangements. All meetings will be recorded with the number of participants and gender. All feedback will be openly discussed and implemented if appropriate and feasible.

For monitoring the engagement, itself, the following will take place:

- Registration and sign-in sheets will be used
- The number of persons, including their gender and age range, involved in each engagement activity will be recorded
- Notes from consultations will be recorded to reflect concerns and issues raised/discussed and any feedback or suggestions will be incorporated into project activities, as appropriate.

## 17. Grievance mechanism (GM)

The following is the GM for the sub-project to address concerns of the SECCLFMCBS's external stakeholders. The GM will be made available to stakeholders once the sub-project starts. Grievances that relate to project workers will be handled by a separate mechanism which is included as part of the sub-project's Labor Management Procedure.

This GM is streamlined, considering the limited scope of sub-project activities at the community level and the low risk of adverse social impacts. The key measures will be to explain the purpose of any visit to stakeholders, explain the existence of the GM and make available contact information of The SECCLFMCBS's and the CEPF RIT. This will be done through a printed handout or other locally appropriate means.

### Objectives of the GM

The objectives of the GM are as follows:

1. Ensure that the World Bank ESSs are adhered to in all project activities.
2. Address any negative environmental and social impacts of all project activities.
3. Resolve all grievances emanating from project activities in a timely manner.
4. Establish relationships of trust between project staff and stakeholders.
5. Create transparency among stakeholders, including affected persons, through an established communication system.
6. Bolster the relationship of trust among the project staff and the affected parties.

### First Level of Redress

1. *Receive Grievance:* At the project level, all complaints should be received by Vice-Chair. Complaints can be made in person, in writing, verbally over the phone, by email or any other suitable medium. Complaints can be filed anonymously. The point of receipt of complaints is listed below:

<b>Contact</b>	<b>Arlette Dunkley-Fullerton</b>
Position	Vice-Chair
Telephone	876-830-0638
Email address	<a href="mailto:dunkleyfullerton@gmail.com">dunkleyfullerton@gmail.com</a>
Physical address	Job Lane, Christiana P.O Manchester.

At the local and national level, all complaints should be addressed to:

<b>Contact</b>	<b>Arlette Dunkley-Fullerton</b>
Position	Vice-Chair
Telephone	876-830-0638
Email address	<a href="mailto:dunkleyfullerton@gmail.com">dunkleyfullerton@gmail.com</a>
Physical address	Job Lane, Christiana P.O Manchester.

All grievances received by SECCLFMCBS's staff should be forwarded to the Vice Chairman within 24 hours of receipt.

*Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Vice Chairman within 48 hours of receipt and the complainant will be informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately. The Deforestation stands as a longstanding environmental challenge confronting communities situated within Cockpit Country. The depletion of tree cover, spanning decades, primarily stems from the harvesting of sticks utilized to support yam vines. Notably, this practice lacks specificity in terms of targeted tree species or age; the sole criterion is suitability for propping purposes, necessitating tall and straight attributes. Consequently, diverse tree species are adversely affected by this widespread activity. Given the prevalence of yam production in the region, nearly every community member, encompassing women, youth, and farmers, maintains a socio-economic connection to yam stick farming.

The ramifications of this practice have resulted in significant areas within Cockpit Country experiencing extreme barrenness due to soil erosion. These detrimental effects have profoundly impacted the natural habitats of the ecosystem's fauna. The looming threat of deforestation, compounded by climate change impacts, exacerbates the situation. This includes adverse effects on crop production arising from both prolonged droughts and brief, intense periods of rainfall. Consequently, farmers resort to increasingly unsustainable farming practices and encroach further into the Cockpit Country Protected Area (PA) to optimize crop yields in response to these challenges.

The identified threats underscore the imperative for intervention that prioritizes sustainable yam stick production and utilization, diversification of income sources for tree-cutting farmers, and enhancement of agricultural practices, particularly in light of climate change impacts. The project's objectives thus center on supporting more sustainable agricultural methods, promoting food security in South East Cockpit Country, and mitigating the necessity for encroachment within forest management areas.

2. Vice Chairman will seek to ensure the speedy resolution of the grievance. If the grievance cannot be resolved at this level, it is taken to the next level.
3. *Record:* The grievance will be registered in SECCLFMCBS's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
  - a. If it is concerning the project, communication to the Project Manager
  - b. Notification will also be made to the CEPF Grant Director and Regional Implementation Team Manager within 15 days.
  - c. If it is concerning general SECCLFMCBS operations/activity, communication to the Vice Chairman.
5. *Assessment:* A decision is made on the nature of the investigation that will take place.
6. *Investigation:* Appropriate investigation of the grievance by an internal team assigned to this task (for example, this may include staff directly involved). The investigation may include meetings with the complainant and other stakeholders and a review of relevant documents. An impartial party shall be involved in meetings with the complainant. Community representatives or representatives of the complainant will be allowed to sit in on these meetings. Minutes of meetings and documents will be added to the grievance file.
7. *Resolution:* Depending on the findings of the investigation:
  - a. A resolution is decided immediately
    - i. The complaint is rejected
    - ii. A response is agreed
    - iii. The complaint is referred to as appropriate
  - d. A resolution cannot be achieved, and the case is presented to the RIT Manager or SECCLFMCBS's Grievance Committee for further input
8. *Communication:* Once a resolution has been reached, the decision is communicated to the complainant in writing. Documents are added to the grievance file.
  - e. *Satisfaction:* If the complainant is not satisfied with SECCLFMCBS's response, it can be taken to the second level of redress. At all stages, documents are added to the grievance file.

NB: The complainant may request that the issue be transferred to the second level of redress if he/she does not feel that the grievance is being adequately addressed by the Grant Director for the Caribbean Islands Biodiversity Hotspot.

## Second Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level one, they will be given the opportunity to raise it directly with the CEPF Grant Director for the Caribbean Islands Biodiversity Hotspot, who can be contacted as follows:

Contact	
Title	RIT Manager for the CEPF Caribbean Islands Hotspot
Telephone	+1-868-638-6062
Email address	<a href="mailto:caribbeanrit@canari.org">caribbeanrit@canari.org</a>
Physical address	Caribbean Natural Resources Institute, #105 Twelfth Street, Barataria, Trinidad & Tobago

### Third Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level two, they can contact the CEPF Grant Director via the telephone: +1-703-341-2400 or email: [cepf@cepf.net](mailto:cepf@cepf.net). Physical address: Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202, USA

### Fourth Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level three, they can contact the CEPF Executive Director via the telephone +1-866-294-8673 or via the web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>

## **18. Addressing Gender Based Violence**

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person's rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

The Grantee will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The Grantee should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works". This Grantee will follow the official WB definitions described on the Technical Note as shown below:

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another,

when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider is an organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

The survivor-centred approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

SEA/SH grievances can be received through any of the available channels and will be considered as "High-profile grievances - that if not resolved promptly may represent significant risks to the environment or community". A list of SEA/SH service providers is available at the RIT's page: <https://canari.org/wp-content/uploads/2022/06/CEPF-II-GBV-Service-Providers-Jamaica2.pdf>.

Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach.<sup>1</sup> Any cases of SEA/SH brought through the Grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The CEPF will be notified as soon as the designated persons from the Grantee organisation learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the Grantee, as appropriate and keeping the survivor information confidential. Specifically, following steps will be taken once an incident occurs:

#### ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the designated person responsible from the Grantee fills in a complaints form, excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the designated person responsible for the Grantee refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures. The survivor's consent must be

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<sup>1</sup> The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The designated person responsible for the Grantee will keep the survivor informed about any actions taken by the perpetrator's employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the designated person responsible from the Grantee can close the case.

#### ACTION 2: INCIDENT REPORTING

The designated person responsible for the Grantee needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Executive Director who will in turn inform the CEPF.

Complaint Forms and other detailed information should be filed in a safe location by the designated person responsible for the Grantee. Neither the designated person responsible for the Grantee nor the Executive Director should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the designated person responsible from the Grantee needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to designated person responsible from the Grantee and CEPF; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved or disciplinary action is taken.

As long as the SEA/SH remains open the designated person responsible from the Grantee and/or Executive Director should update the CEPF on the measures taken to close the incident.

#### ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

Each SEA/SH incident should be verified to determine if it was related to the CEPF-funded project. The designated person responsible for the Grantee should form a SEA/SH verification committee comprised by her/him, one member of the Grantee organization, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible from the Grantee should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project<sup>2</sup>, the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the designated person responsible from the Grantee or a contractor. The designated person responsible from the Grantee will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the

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<sup>2</sup> Project actors are: (a) people employed or engaged directly by the Grantee to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Grantee's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in SVG legal system, the designated person responsible from the Grantee should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the designated person responsible from the Grantee does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Any cases of SEA/SH brought through the Grantee 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 SEA/SH Services Provider; and
- Record the resolution of the complaint

The Grantee will also immediately notify both the CEPF and the World Bank of any SEA/SH complaints **WITH THE CONSENT OF THE SURVIVOR**.

The Code of Conduct that forms part of the Labor Management Plan includes a list of behaviours constituting Sexual Exploitation and Abuse (SEA) and behaviours constituting Sexual Harassment (SH) that will be provided to all project workers and community workers.