

ESS10: Stakeholder Engagement and Information Disclosure



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

Stakeholder Engagement Plan (SEP)

16 February 2023

CEPF Grant 112857

Durrell Wildlife Conservation Trust

Conserving the Saint Lucia racer and strengthening regional capacity for racer conservation

Saint Lucia

SEP Outline

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Grant Summary

1. **Grantee organization:** Durrell Wildlife Conservation Trust
2. **Grant title:** Saint Lucia Racer: catalyst for capacity development, stability, and engagement
3. **Grant number:** 112857
4. **Grant amount (US dollars):** \$251,187.80
5. **Proposed dates of grant:** 1 April 2023 – 31 March 2023
6. **Countries or territories where sub-project will be undertaken:** Saint Lucia
7. **Date of preparation of this document:** 16 February 2023

8. Summary of the sub-project:

Guidance:

This section should be approximately 4-5 sentences summarizing the overall sub-project.

This project aims to address two primary “conservation needs” paramount to the continued successful conservation and management of Saint Lucia’s endemic wildlife. Firstly, to secure the population of the most threatened species in country and the worlds most threatened snake, the Saint Lucia racer (*Erythrolamprus ornatus*, CEPF Priority species 23), which now survives only on Maria Major, an arid 9.4-hectare islet off the Southeast coast of Saint Lucia. It is believed the population is less than 50 adult individuals. Secondly, to enhance the regional cooperation between the Saint Lucia National Trust and Environmental Awareness Group, Antigua and Barbuda to help both organisations advance racer conservation goals.

Project Details

9. Overview of project components:

Guidance:

This section will briefly describe the sub-project, including design elements and potential social and environmental issues. Where possible, include maps of the sub-project site(s) and surrounding area.

Component 1: Implementation of key objectives within the current Saint Lucia Racer Conservation Action Plan (CAP) to prevent the extinction of the only wild population of Saint Lucia racer, and other threatened island endemic reptiles on Maria Major, by increasing protection from the impacts of invasive alien species and climate change.

Maintaining the integrity of Maria Major is critical to the survival of the Saint Lucia racer as well as the other endemic reptile fauna found there, including the Saint Lucia whiptail (*Cnemidorphus vanzoi*; CEPF Priority species 19), Saint Lucia anole (*Anolis luciae*; CEPF Priority species 37) and the Saint Lucian threadsnake (*Tetracheilostoma breuili*; CEPF Priority species 34). Ensuring the island remains free of invasive predators (Saint Lucia racer Conservation Action Plan Objective 1) and undertaking monitoring of native species and habitat (Saint Lucia racer Conservation Action Plan Objective 7) are important components of this. Additionally, actions to help mitigate the impact of climate change e.g., reduced water and humidity, on the islands fauna have become increasingly important in recent years.

Key activities under this component will be:

- Ensure ongoing effective monthly implementation of alien species detection, removal and monitoring on Maria Major.
- Undertake regular surveys and monitoring of Saint Lucia racer and other endemic reptiles on Maria Major.
- Trial experimental habitat manipulation and enhancement techniques to reduce the impacts of climate induced changes to the ecosystem on the Maria island.
- Review and update the Saint Lucia racer Conservation Action Plan

Component 2: Build on the previous CEPF investment “Islands without Aliens” by strengthening regional networks and facilitating capacity for collaboration, innovation and skill exchange between local and regional wildlife conservation organizations involved in Caribbean racer conservation.

The 2012 CEPF project “Islands without Aliens” strengthened the capacity of CSOs Environmental Awareness Group (EAG, Antigua) and Saint Lucia National Trust (SLNT, Saint Lucia) in biosecurity measures through training, the development of targeted Biosecurity Plans and the delivery of invasive mammal monitoring and baiting protocols, with Durrell providing the biosecurity training in Saint Lucia. This component aims to enable effective, and adaptive, long-term delivery of Caribbean racer snake conservations strategies along with the capture and dissemination of regional expertise through the establishment of inter-institutional and inter-island working groups/forums, and exchange opportunities, starting with Saint Lucia and Antigua and Barbuda to counter joint conservation concerns and challenges.

Key activities under this component will be:

- Establish a regional “Offshore Island, Biosecurity and Species Management” working group, initially between Saint Lucia and Antigua & Barbuda, engaging all CSO’s, NGO’s and government departments involved in the protection and maintenance of bio-secure offshore islands
- Biosecurity Review Workshop in Saint Lucia over 4 days to review and update biosecurity protocols, priorities, implementation for Saint Lucia and Antigua.
- Design and deliver a biosecurity training programme for all partners to deliver and manage across their various teams.
- Undertake inter-island skill and knowledge exchanges between Saint Lucia and Antigua working on racer conservation to develop the skill sets and reinforce regional network of racer conservation biologists.

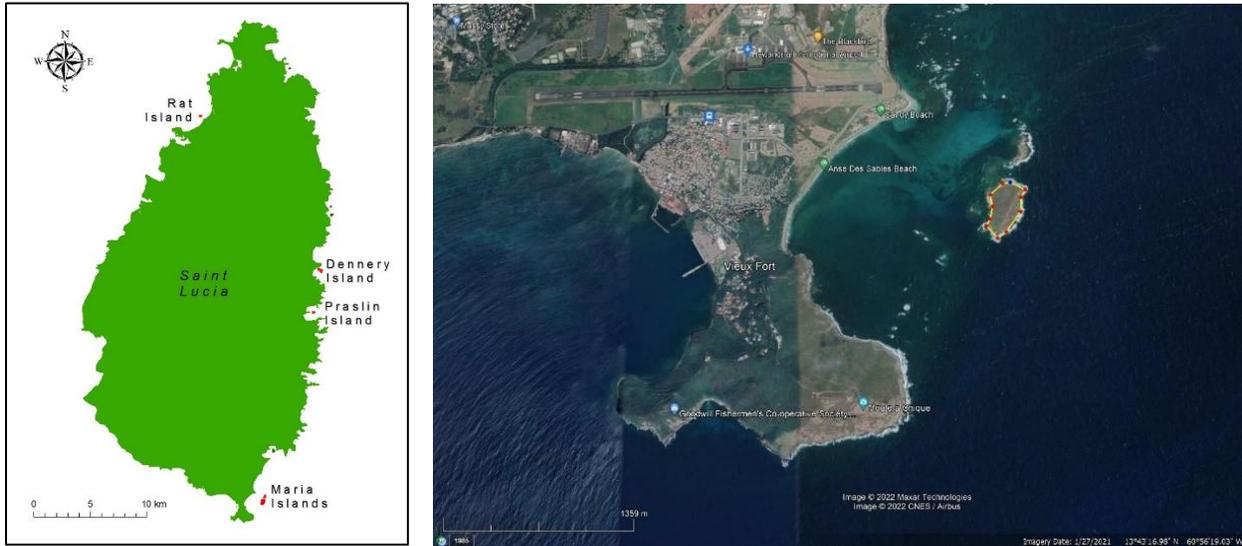
Component 3: Establish a captive breeding program for the Saint Lucia racer on Saint Lucia mainland to provide a safety net population and to produce offspring for future reintroductions.

Given the situation of the Saint Lucia racer the only way to reduce its extinction threat is through establishing a second population. To do so a captive population must first be established to provide individuals for any other populations. This will also act as a safety-net population should the population on Maria Major be negatively impacted in the meantime. A secure in-country captive breeding centre has been constructed in Saint Lucia on Department of Forestry grounds and a Lead Technician recruited through Durrell to oversee this work.

Key activities under this component will be:

- Establish and maintain live racer prey base consisting of three native reptile and amphibian species and associated invertebrate species.
- Ongoing maintenance and management of the racer breeding facility and live food facility.
- Bring Saint Lucia racers into captivity and develop specific husbandry guidelines.

Field activities will take place on Maria Major part of the Maria Islands Wildlife Reserve (WDPA ID 11845). Maria Major is a 9.4 Ha island approximately 1km of the Southeast coast of mainland Saint Lucia. It is uninhabited with restricted access to the public.



Map showing position of Maria islands in Saint Lucia (left) and Google Earth image of Maria Major in relation to mainland (right).

The captive breeding component of the project (Component 3) will take place at the captive breeding centre already constructed on Forestry Department grounds in Union.

10. Summary of previous stakeholder engagement activities:

Guidance:

If you have undertaken any activities to date, including information disclosure and/or consultation, provide the following details:

- *Type of information disclosed, in what form (e.g., oral, brochure, reports, posters, radio, etc.), and how it was disseminated.*
- *Locations and dates of any meetings undertaken to date.*
- *Individuals, groups, and/or organizations consulted.*
- *Key issues discussed and key concerns raised.*
- *Grantee's response to issues raised, including any commitments or follow-up actions.*
- *Process undertaken for documenting these activities and reporting back to stakeholders.*

Durrell has been working in collaboration with the Government of Saint Lucia since the 1970s and on conservation of the Saint Lucia racer since 1997. The wider Saint Lucia racer conservation partnership also includes the Saint Lucia National Trust and Fauna and Flora International.

Protection of all native wildlife in Saint Lucia is the responsibility of the Saint Lucia Forestry Department with whom Durrell work closely and have an existing MOU. Management of the Maria Islands Wildlife

Reserve, where the only population of Saint Lucia racer is found, is the responsibility of the Saint Lucia National Trust who are project partners.

All four partners were involved in developing the Saint Lucia Racer Conservation Action Plan 2015-2024, of which two objectives (Components 1 and 3) are being implemented through this project. The objectives and activities within this project have been developed in full consultation with Saint Lucia National Trust and Forestry Department. The proposal has been shared with FFI since LOI stage in February 2022. All partners are fully supportive of the activities within this project, many of which have been in development for the past several years. All project partners have held at least monthly partner meetings (mix of in-person and virtual) to discuss the Saint Lucia racer project and activities.

Biosecurity work on Maria Major and the offshore islands was initiated through the 2012-2014 CEPF Project “Islands without Invasives” of which Durrell, SLNT and FFI were partners. During this project stakeholder engagement was done with fisherman who utilise waters around Maria Major with regard what was happening. No concerns were raised and over the intervening years there has been negligible public opposition to the biosecurity work being carried out on the offshore islands.

Component 2 of the project will involve Environmental Awareness Group from Antigua, who were also partners within the 2012-2014 CEPF Project “Islands without Invasives”. Consultations have been had with SLNT, Forestry Department and EAG over undertaking regional skills exchanges

Given the types of activities (field work, captive breeding, biosecurity training and regional skills exchanges) and locations they will be taking place on (uninhabited, restricted access Maria Major and on Forestry Department grounds) there are no other direct stakeholders related to the project activities.

11. Project stakeholders:

Guidance:

This section will list the key stakeholder groups who will be informed and consulted about the sub-project. These should include persons or groups who:

- Are directly and/or indirectly affected by the sub-project (i.e., project-affected parties) or*
- have interests in the sub-project that determine them as stakeholders (i.e., other interested parties); and*
- have the potential to influence sub-project outcomes.*

Key stakeholder groups may include affected communities, non-governmental organizations, local and national authorities, and private landowners. They can also include politicians, companies, labour unions, academics, religious groups, national social and environmental public sector agencies, and media agencies.

The below tables provide an overview of the different stakeholders identified in the sub-project.

Table 11.1: Stakeholders: Project-affected parties

Stakeholder group	Involvement in project	Interest (high / med / low)	Influence (high / med / low)	Component under which will be engaged
Saint Lucia National Trust	Project partners	High	Medium	All components

Stakeholder group	Involvement in project	Interest (high / med / low)	Influence (high / med / low)	Component under which will be engaged
Saint Lucia Government – Forestry Department	Project partners	High	High	All components
Environmental Awareness Group (Antigua)	Project partners	High	Medium	Component 2

Table 11.2: Stakeholders: Other interested parties

Stakeholder group	Involvement in project	Interest (high / med / low)	Influence (high / med / low)	Component under which will be engaged
Fauna and Flora International	Whilst not partners in this specific project FFI are project partners in Saint Lucia racer conservation programme and are involved and support biosecurity on offshore islands	High	Medium	All components
Other regional CSO's involved in offshore island biosecurity	None to date	Medium	Low	Component 2

Vulnerable groups

A rapid stakeholder analysis has been conducted as part of the development of this SEP, and it is expected that this can be a dynamic and responsive process as the sub-project is implemented. This section summarizes the main types of vulnerable groups that *may* be present at the sub-project site. This is not intended as an exclusive list, as there may be additional groups that are not identified here.

Women

Poverty has a gendered dimension in the Caribbean islands: there is a greater prevalence of poverty among women than men. Women are heavily involved in productive sectors that depend on natural resources, such as agriculture and fisheries. However, there are structural inequalities in Caribbean societies that influence women’s access to resources, including natural and productive resources. Climate change is expected to worsen such environmental problems as deforestation, water scarcity and land degradation, and will have differentiated impacts on women and men in the Caribbean.

Although women’s educational performance tends to be higher than that of men, women are under-represented in large-scale enterprises, leadership and decision-making, and targeted growth areas; they tend to be concentrated in lower level and lower paying jobs. This is also true for the civil society sector

as a whole. In the context of the project, women are at risk of being left out of consultation processes, in which male presence is traditionally predominant. Hence, the sub-project will need to ensure that both men's and women's voices are heard in consultations. This may require separate consultations to be held for women. The sub-project will also need to approach its implementation with a gender lens.

Members of women-headed households

Women head nearly half of Caribbean households but are disadvantaged in the region's labour markets. Female participation in the labour force is 59 percent, compared to 79 percent for men. This has implications for women-headed households, which are more likely to be poor than men-headed households. There are some exceptions, however. For instance, the incidence of poverty among women-headed households in Saint Lucia (21%) is almost the same as among men-headed households (22%). In rural communities, women-headed households may be particularly vulnerable, due to the structural inequalities in women's access to resources discussed above. Again, the sub-project will need to ensure that women-headed households are represented and have their voice heard in consultations that influence the design of sub-project activities and the distribution of benefits, to ensure that they are not overlooked or excluded from project benefits.

COVID-19 has had a social and economic impact and adds a dimension to the social context that was not present when the Ecosystem Profile was developed. The full extent of the impact of COVID-19 is unknown but across the region there has been economic contraction. There are reports of worsening gender inequalities in the labour market, deterioration of diets and an increase in hunger, particularly in female-headed households, and a greater incidence of gender-based violence.

Unemployed young people

Unemployed young people are another vulnerable group within Caribbean society. The vulnerability of Caribbean youth is linked to educational underachievement, high unemployment rates, exposure to violence, and exposure to disease. Youth make up between 28 and 50 percent of all unemployed people; young women are more likely to be unemployed than young men. Youth unemployment rates range between 18 and 47 percent in the project countries; the unemployment rate for young people tends to be two to three times that of adults. Beyond limited employment opportunities, young men are disproportionately affected by crime in the Caribbean: they are the main victims and perpetrators. Caribbean youth are also disproportionately vulnerable to HIV infection. In the context of the sub-project, unemployed young people may have less opportunity to participate in project activities and/or access livelihood or employment opportunities owing to consultation processes being dominated by established elites, who tend to belong to older generations. The project will need to approach engagement in such a way that opportunities are created for unemployed young people to participate in conservation activities. This could include both young people in rural communities in and around the priority KBAs, as well as urban youth who could be employed by CSOs or engaged by them through training, internships or other means.

Elderly people

There is a long-term trend of population ageing in the Caribbean Islands. Thanks to improvements in socioeconomic conditions and global medical advances, Caribbean people are living longer than before. People aged 60 and over accounted for 10% of the Caribbean population in 2000; this proportion is anticipated to increase to 26% by 2050. In common with many parts of the world, elderly people are particularly vulnerable to social exclusion.

LGBTI persons

LGBTI persons are particularly vulnerable in the Caribbean. Because they are more likely to suffer discrimination, they are at enhanced risk of social exclusion with regard to project activities and benefits. None of the project countries have anti-discrimination laws concerning sexual orientation, and, in four countries, sexual activity between persons of the same sex is criminalized. There is also the possibility of high levels of homophobic and transphobic violence. These factors raise issues about how to identify LGBTI persons, without placing them at risk of discrimination, prosecution or violence. Stakeholder mapping will be done with sensitivity, and to implement measures to ensure the confidentiality of personally identifiable information.

Persons with disabilities

An estimated 15 percent of the population of the project countries is living with disabilities. Persons with disabilities are disproportionately vulnerable to the effects of environmental degradation and climate change. For instance, they are less able to seek shelter from extreme weather events, or to participate in certain livelihood activities. Persons with disabilities are also more likely to have lower educational attainment, health outcomes, income and levels of employment than persons without disabilities. Studies show that women with disabilities are four times more vulnerable to gender-based violence. Persons with disabilities are also at enhanced risk of discrimination and social exclusion. Engagement will take into account of persons with disabilities and ensure that they are not excluded from accessing training, alternative livelihoods, job creation and other sub-project benefits. This will require paying attention to such things as selecting training venues that are wheelchair accessible, and disseminating project information through media accessible to hearing impaired persons and visually impaired persons.

Members of poor households

Income inequality, or the gap between the rich and the poor, coexists with high levels of poverty, despite the high and middle-income status of most Caribbean countries. Members of poor households are particularly vulnerable to environmental degradation, due to greater dependence on natural resources, less diverse income sources and fewer economic assets. At the same time, poverty can be a driver of unsustainable use of resources, such as the use of forest or mangrove-derived charcoal for fuel, or encroachment on watersheds and forested areas for agricultural land. Conservation actions that fail to engage poor households risk exacerbating environmental degradation as well as entrenching inequality. Engagement will give particular attention to mitigating the risk of elite capture of project benefits, which can arise when poor households are viewed as less able to participate in sub-project activities.

Members of landless households

While there is significant overlap between landless households and poor households, they are considered as a separate group because there are particular considerations that apply to them. Members of landless households do not possess one of the main assets available to the rural poor: land. Rather, their main economic asset is their labour. Also, without land to use as collateral, members of landless households face an additional barrier to accessing credit, including micro-credit. In the context of the sub-project, members of landless households may be at enhanced risk of social exclusion if their rights to access or manage natural resources are seen as less legitimate because they do not own land.

12. Stakeholder engagement program:

Guidance:

This section will summarize the purpose and goals of the stakeholder engagement program. It will briefly describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the identified groups of stakeholders. Methods used may vary according to the target audience, for example:

- *Newspapers, posters, radio, television.*
- *Information centres and exhibitions or other visual displays.*
- *Brochures, leaflets, posters, non-technical summary documents and reports.*

All key Saint Lucia stakeholders (SLNT, Forestry, FFI) are project partners with Durrell within the wider Saint Lucia racer conservation programme. The partners tend to meet monthly to discuss both racer conservation work and other joint conservation activities in Saint Lucia. Engagement will therefore primarily continue to be via the regular partner meetings. These are held monthly face-to-face in Saint Lucia for all locally based members with quarterly meetings involving those based overseas. Minutes and updates are produced for each meeting.

EAG will be engaged through Component 2 of the project. Activity 2.1 is establishing a regional “Offshore Island, Biosecurity and Species Management” working group with stakeholders from Saint Lucia which will meet remotely quarterly. Meeting minutes for each will be produced. EAG will also be engaged directly in other aspects related to the biosecurity reviews, training development and implementation and inter-island exchanges between Saint Lucia and Antigua.

Whilst the regional “Offshore Island, Biosecurity and Species Management” working group will initially focus on stakeholders from Antigua and Saint Lucia there is the scope to open this to other regional CSO’s, governments and institutions engaged in offshore island biosecurity. Potential CSO’s would be identified by the project partners and contacted directly to discuss desires to participate.

Whilst not an explicit component of the project engagement with the wider Saint Lucia public will also be done. The captive breeding facility has the capacity to serve as an outreach hub and has already been used to bring school groups to learn about the project. The project partners will look to disseminate information on the project through various mediums including, social media, articles in local press.

At the end of the project an updated species conservation action plan will be done for the Saint Lucia racer. This will be comprised of all key stakeholders. The final list will be identified by the project partners as a group and individuals contacted. Once completed the conservation action plan will be made available through appropriate websites e.g., SLNT, IUCN.

13. Consultation methods:

Guidance:

This section will describe the methods that will be used to consult with each of the stakeholder groups identified in Section 10. Methods used may vary according to the target audience, e.g.:

- *Interviews with stakeholder representatives and key informants.*
- *Surveys, polls, and questionnaires.*
- *Public meetings, workshops, and/or focus groups with a specific group.*
- *Participatory methods.*
- *Other traditional mechanisms for consultation and decision-making.*

The below table provides an overview of the consultation to be implemented in the SEP.

Table 13.1: Stakeholder consultation methods

Stakeholder group	Methods
Saint Lucia project partners (SLNT, Forestry Department, FFI)	Face-to-face meetings; virtual meetings; direct emails and phone calls. Monthly partner meetings
EAG	Virtual meetings; direct emails and phone calls; quarterly working group meetings
Local and regional CSOs	Initial direct emails and phone calls followed by face-to-face and/or virtual meetings

14. Other engagement activities:

Guidance:

This section will describe any other engagement activities that will be undertaken, including participatory processes, joint decision-making, and/or partnerships undertaken with local communities, NGOs, or other stakeholders. Examples include benefit-sharing programs, community development initiatives, job creation initiatives, and/or training and microfinance programs.

As part of Component 2 the project will look to engage with other local and regional CSOs to build collaboration with SLNT.

Whilst not an explicit component of the project engagement with the wider Saint Lucia public will also be done. The captive breeding facility has the capacity to serve as an outreach hub and has already been used to bring school groups to learn about the project. The project partners will look to disseminate information on the project through various mediums including, social media, articles in local press.

Implementation of the Plan

15. Monitoring arrangements:

Guidance:

This section aims to outline what steps you will take to monitor and evaluate the effectiveness of the stakeholder engagement activities listed in Sections 11 to 14. Describe the feedback loop to inform stakeholders on how their recommendations were implemented and the outcomes and seek further input.

Engagement with the project partners will be assessed via number of project meetings held and attendees which is also where input will be sought and feedback on project activities provided. For any new CSO's engaged during the project the same approach will be followed.

16. Responsible workers:

Guidance:

This section identifies the functions and/or individuals within the sub-project responsible for the implementation of the Plan. This can include e.g., occupational health and safety, procurement of equipment to reduce spread of transmissible diseases etc. Workers identified here must be in alignment with those identified in the budget.

The below table identified those staff and project workers responsible for the implementation of the SEP.

Table 16.1: Responsible staff and workers for the implementation of the SEP

Position	Activities	Estimated time (%)
Caribbean Programme Manager	Partner and stakeholder engagement	20
Caribbean Programme Officer	Partner and stakeholder engagement	10

17. Implementation schedule and cost estimates:

Guidance:

This section will present and implementation timeline for each stakeholder engagement activity listed in Sections 11 to 13, together with an estimate of resource needs.

The below table outlines the anticipated schedule and budget for the implementation of the SEP.

Table 17.1: Implementation schedule and cost estimates

Activity	Estimated schedule	Estimated cost (USD\$)
Partner and stakeholder engagement	April 2023 – March 2026	33,508
Saint Lucia racer Conservation Action Plan	June 2025	3,000

Stakeholder engagement and feedback

18. Grievance mechanism (GM):

Guidance:

For all sub-projects where a World Bank environmental or social standard applies, the grantee must provide local communities and other relevant stakeholders with a means to raise a grievance, and whereby this grievance may be considered and satisfactorily resolved.

The RIT has provided a sample Grievance Mechanism below. If you do not have one in place for your organisation you may modify the sample below.

The following is the GM for the DWCT sub-project to address concerns of DWCT's external stakeholders. The GM will be made available to stakeholders, including via DWCT's website, once the sub-project starts. Grievances that relate to DWCT project workers will be handled by a separate mechanism which is included as part of the sub-project's Labour Management Procedures.

This GM is streamlined, considering the limited scope of 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 DWCT and the CEPF Secretariat.

This will be done through a printed handout or other locally appropriate means.

The GM is complemented by DWCT's Personnel Policies, Safeguarding People Section, which is intended to protect people, including partners and beneficiaries, from any harm that may be caused due to them coming into contact with DWCT. The policy is included as Annex 1.

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:* All complaints should be received by the International Grants Manager at DWCT. 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:

Contact	
Title	Field Programmes Manager
Telephone	+44 1534 860000
Email address	Safeguarding@durrell.org
Physical address	Durrell Wildlife Conservation Trust, Les Augrès Manor, La Profonde Rue, Trinity, Jersey JE3 5BP, British Channel Islands

All grievances received by DWCT staff should be forwarded to Field Programmes Manager within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Field Programmes Manager 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 Field Programmes Manager 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 DWCT's grievance file, including relevant documents.

4. *Notification:* Communication of the grievance as follows:

- a. If it is concerning the DWCT project, communication to the RIT Manager, copy to CANARI's Programmes Director.
- b. Notification will also be made to the CEPF Grant Director within 15 days.

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 as well as the <insert position>). 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 as appropriate
- b. A resolution cannot be achieved, and the case is presented to the RIT Manager or the CEPF Grant Director 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.

9. *Satisfaction*: If the complainant is not satisfied by DWCT'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 <insert position>.

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	Grant Director for the Caribbean Islands Biodiversity Hotspot
Telephone	+1-703-341-2400
Email address	cepf@cepf.net
Physical address	Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202

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 Executive Director via the CI Ethics Hotline (telephone: +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

If the complainant does not accept the solution offered by the CEPF Executive Director, then the complaint is passed on to the fourth level. Alternatively, the complainant can access the fourth level at any point. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress towards resolution is being made, the matter may be retained at this level for a maximum of 60 working days.

19. Addressing Gender-Based Violence:

Guidance:

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-centred 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. Please read through the required text from the World Bank. You may add any other context specific text for your project.

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-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.

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 for St. Lucia (<https://canari.org/wp-content/uploads/2021/11/CEPF-II-GBV-Service-Providers-Saint-Lucia.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.¹ 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 organization 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 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

¹ 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.

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 project², 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

² 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 labour 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.**

21. Disclosure:

Guidance:

CEPF requires that environmental and social instruments are disclosed to affected local communities and other stakeholders prior to sub-project implementation. Please describe the efforts you have taken to disclose this Stakeholder Engagement Plan.

All documents will be shared with project partners prior to start of the project and provided to members of public prior to any surveys or awareness events to be undertaken as part of the project.