

ESS10: Stakeholder Engagement and Information Disclosure



Stakeholder Engagement Plan

March 2023

CEPF Grant #112938

Environmental Awareness Group, Antigua

“Accelerating Locally-Led Conservation Action in Antigua and Barbuda”

Grant Summary

- 1. Grantee organization:** Environmental Awareness Group
- 2. Grant title:** Accelerating Locally Led Conservation Action in Antigua and Barbuda
- 3. Grant number:** 112938
- 4. Grant amount (US dollars):** \$356,453.17
- 5. Proposed dates of grant:** 1 May 2023 to 30 April, 2026
- 6. Countries or territories where project is located:** Antigua and Barbuda
- 7. Date of preparation of this document:** March 2023

8. Introduction:

This project will greatly increase the capacity of the Environmental Awareness Group (EAG) and its partners to implement effective management of the North East Marine Management Area (NEMMA) KBA which supports one CEPF trigger species that is both CR and EN, and the Redonda KBA, which supports 2 CEPF trigger species all of which are CR and EN. The EAG has been employing co-management of the KBAs in partnership with the Government of Antigua and Barbuda, the private sector, and international NGOs such as FFI (Fauna & Flora International and Re:wild). This co-management has been solidified through the development of the Offshore Islands Conservation Programme (OICP) Partnership and the Redonda Ecosystem Reserve (RER) management bodies, inclusive of the Technical Advisory Committee (TAC). This project was therefore developed as a result of the outcomes of the meetings of the OICP Partnership and the RER TAC. Letters of endorsement have been received from the Department of Environment, Re:wild, and regional partner, Durrel; which have been uploaded in ConservationGrants.

The project will be implemented through four components that will address major threats to the EN and CR species in both KBAs including habitat loss and degradation, invasive alien species, and climate change and will directly or indirectly support the conservation of all the trigger species and provide EAG with the institutional capacity to implement the project according to CEPF's requirements.

1. Develop Sustainable Financing Mechanism for the EAG to facilitate effective co-management of the NEMMA KBA and the Redonda KBA (2023 - 2025)
2. Through the completion of a Financial Feasibility Study, determine the fiscal viability of the Offshore Islands Nature Reserve for co-management of priority areas within the NEMMA KBA (2024)
3. Strengthen conservation management of the CR Antiguan Racer, CR Redonda Ground Lizard, and CR Redonda Anole in the NEMMA and Redonda KBAs through the development and implementation of species-specific Conservation Action Plans (2023-2024)
4. Develop a network of committed individuals for environmental conservation within Antigua and Barbuda's KBAs through a strategic conservation capacity-building programme (2023-2026)

Support from CEPF for this project will build on approximately \$500,000 being provided by Wyss Foundation and Linbury Trust for two projects currently being implemented by EAG.

All these actions are dependent on an aware and supportive cadre of staff among EAG, management agencies, partners, decision-makers, and the general public and a supportive network of citizen scientists. Therefore, development of a strong and comprehensive plan to engage stakeholders ensuring their participation and building their capacity to assist in co-management of the KBAs, is fundamental to the success of the project.

9. Summary of Previous Stakeholder Engagement Activities:

EAG uses the following mechanisms for ongoing stakeholder engagement as a means of co-management within the NEMMA and Redonda KBAs:

General stakeholder engagement activities of EAG

- The OICP Partnership meets annually to discuss the progress of activities being implemented within the NEMMA and seeks to identify where gaps exist in the implementation of the programme, and how partners can provide further assistance. This assistance is often through technical coordination and inputs. The OICP Partnership includes seven agencies: the Department of Environment (DoE), the Fisheries Division, the Forestry Unit, the Ministry of Tourism (Sustainable Tourism Unit), FFI, National Parks Authority (NPA), and EAG.
- The RER Technical Advisory Committee (RER TAC) meets twice annually and has been instituted by the governance system established under the RER Management Plan. This body meets to provide technical oversight of the work implemented by the RER and drive the focus of wildlife and ecosystem monitoring and management. The RER TAC includes the following agencies and individuals: the DoE, Fisheries Division, NPA, FFI, Re:wild, 3 private individuals, and EAG.
- The EAG is managed by a 9-member Board of Directors who are duly elected by the EAG membership. The Board comprises 9 individuals including an executive arm which has the President, Vice President, Treasurer, Secretary and the Executive Director. The Board meets monthly to provide strategic direction to the EAG. All major projects and key programme issues are discussed through the Board of Directors. It is also important to note that some members of the Board are also active volunteers within the EAG's programmes.
- EAG currently manages 130 registered volunteers who participate across the EAG's three programmes (OICP, RER, and the Antigua Marine Conservation Programme – AMCP). Volunteers are provided with comprehensive training before they are deployed and sign up to be scheduled for specific activities and monitoring timelines. The current size of the volunteer programme has necessitated inputs into this project, noting that there must be transparent engagement with volunteers, and transparent means for upward mobility within the volunteer core.
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Area-specific engagement

- EAG currently conducts wildlife monitoring in the NEMMA KBA and the Redonda KBA, and trains volunteers to assist in this process. The work is endorsed by the Department of Environment who rely upon the data collected through this monitoring to report under the Government of Antigua and Barbuda's requirements under ratified Multilateral Environmental Agreements. Data submitted to the DoE, therefore, feeds into all biodiversity related reports including the NBSAP and the State of the Environment Report. The EAG also works in tandem with the DoE to submit this data on the DoE's National Environmental Information System and National Environmental Registry.
- EAG works closely with communities within the NEMMA and has engaged with the villages that about the islands where the CR EN Antigua Racer lives (Parham, Seatons, Glanvilles, and Wilikies). These villages/communities have been engaged through a range of activities including assistance in identifying environmental issues within their communities and identifying the relevant agencies to provide technical or other resources to manage those issues. Communities have been trained

in grant proposal writing and one of the groups has successfully submitted and received funding from the GEF Small Grants Programme as a result. Communities are also invited to participate in EAG activities and events, including the annual EAG Environmental Conference (EECO), the EAG stakeholder appreciation event “Gratitude”, and all training in wildlife and invasive species monitoring. In turn, EAG is often invited to attend or participate in their community events and activities.

- EAG conducted, through support from CANARI’s IAF project, a Vulnerability Capacity Assessment in the Parham community, to determine the areas and individuals who were most susceptible to disaster risk in the community. The outcome of that project fed into the design of the GEF SGP project that was successfully submitted by the Parham community group, PABRO.
- EAG works along with landowners in the NEMMA and engages with them regularly through a series of activities. For example, EAG trains and works closely with the Mill Reef Club and their staff in invasive species management for Green Island. EAG has also trained staff who work on Great Bird Island through the landowners’ company “The Bird’s Nest”. Both the Mill Reef Club and The Birds’ Nest support EAG through transportation to their islands free of charge.
- Users of the NEMMA have been engaged in stakeholder consultations through the delivery of the Technical Feasibility Study for the establishment of the Offshore Islands Nature Reserve (OSI Nature Reserve) that was conducted in August 2022. A complete list of stakeholders engaged is available in that report, but it includes landowners, tour operators, community members, government agencies, Members of Parliament, and the wider Antiguan society.
- EAG has a very active social media presence, posting on Instagram, Facebook, and Twitter at least twice per week, and on YouTube as necessary. In 2022 social media analytics for Instagram and Facebook indicated that EAG reached 357,740 accounts. In the same period, EAG published 50 newspaper articles, through an arrangement with one of the main news agencies who publishes a weekly article submitted by the EAG. An overview of EAG’s impact and engagement in 2022 can be found in the Impact Summary [found here](#).
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Stakeholder engagement for the development of the CEPF Proposal

- EAG hosted a stakeholder consultation on the areas that would be covered under the CEPF grant prior to development in January 2022. Stakeholders included the NPA, DoE, Elkhorn Marine Conservancy (an NGO conducting marine work in the NEMMA), IHO, and PABRO.
- It must be noted that the Redonda KBA does not abut any communities and, due to its remoteness, is not immediately a concern by most Antiguan and Barbudans. Through the work done by the EAG and its partners, the Redonda Ecosystem Reserve has become a higher conversation point. Stakeholder engagement surrounding Redonda normally encompasses wildlife and invasive species monitoring, which can only be offered to a few people because of the high cost associate with traveling to Redonda (via helicopter only, with 6 seats available), and the fact that Redonda’s ecosystem is extremely fragile and limiting the activity there is a necessary management measure.

10. Project Stakeholders:

Key stakeholder groups that will be informed and consulted about the project are shown in the table below. These groups, agencies, and individuals all have a stake in the management of the NEMMA and Redonda KBAs and are already engaged in some form. For this project to be successful, these groups will continue to be engaged and their concerns have been reflected in its design.

Stakeholder	Stake/Mandate	Involvement in the Project
Fisheries Division	Government Dept/ OICP Partnership/ RER TAC	Technical and regulatory oversight
Environmental Awareness Group (includes staff, Board of Directors, wildlife monitors, invasive species monitors, volunteers, members)	OICP Partnership/ RER TAC	NGO working in conservation in NEMMA and Redonda KBAs and on mainland Antigua beaches. Project lead
Department of Environment	Government Dept/ OICP Partnership/ RER TAC	Technical and regulatory oversight
Forestry Unit	Government Dept/ OICP Partnership	Technical and regulatory oversight
National Parks Authority	Statutory body/ OICP Partnership/ RER TAC	Technical support and development
Fauna & Flora International	International NGO/ OICP Partnership/ RER TAC	Technical support and development; funding support
Ministry of Tourism & Investment	Government Dept/ OICP Partnership	Technical and regulatory oversight
Re:wild	International NGO	Technical support and development; funding support
Ministry of Blue Economy	Government Dept	Technical and regulatory oversight
Ministry of Finance	Government Dept	Technical and regulatory oversight
Tourism Authority	Government Dept	Technical and regulatory oversight
Community Development Division	Government Dept	Technical and regulatory oversight
A&B Defence Force Coast Guard	Government Dept	Technical and regulatory oversight
Development Control Authority	Government Dept	Technical and regulatory oversight
Antigua & Barbuda Airport Authority	Government Dept	Technical and regulatory oversight, tourism promotion, outreach and education
Elkhorn Marine Conservancy	Resource User/Research/ NEMMA NGO	Technical support; community engagement
NEMMA Community Groups (Parham, Seatons, Glanvilles, Wilikies, Pares, Fitches Creek)	Community Groups	Oversight, community engagement, participatory management
Fuller Family	Island Owner	Engagement, participatory management
Mill Reef Club	Island Owner/ Hotel	Engagement, participatory management
Jumby Bay Resort	Island Owner/ Hotel	Engagement, participatory management

Hotels within the NEMMA	Resource User	Engagement, participatory management
Tour operators	Resource User	Engagement, participatory management
Fisherfolk in NEMMA	Resource User	Engagement, participatory management
A&B Fisherman Cooperative Society	Resource User	Engagement, participatory management
Recreational Boat Owners	Resource User	Engagement, participatory management
Sportfishing Association	Resource User	Engagement, participatory management
Antigua & Barbuda Hotels & Tourism Association	Statutory Body	Engagement, tourism promotion, outreach and education
Antigua National Taxi Association	Tour Operator	Engagement, tourism promotion, outreach and education
Marinas, wharfs, quays	Departure Point	Engagement, biosecurity management, outreach and education
Calvin Air Helicopters	Departure Point/ Partner	Engagement, biosecurity management, outreach and education
Durrell Wildlife Conservation Trust	Research	International NGO with interest in CR Racers across Caribbean region
Linbury Trust	Donor with interest in the NEMMA	Support for establishment of Offshore Islands Nature Reserve and interest in long term sustainability of EAG
Wyss Foundation	Donor with interest in the Redonda Ecosystem Reserve	Support for establishment of Redonda Ecosystem Reserve and interest in long term sustainability of EAG

Table 10.2: Other interested parties

Vulnerable groups

Women head nearly half of Caribbean households but are disadvantaged in the region’s labor markets. This has implications for women-headed households, which are more likely to be poor than men-headed households. Interestingly, EAG has noted that the current mix of volunteers is 6:4 with women outpacing men in this area. This is likely because the EAG staff complement is 75% female, with 50% of the complement being in leadership. This therefore means that the EAG attracts far more women because of this demonstration of leadership.

EAG currently manages on a non-discriminatory policy that ensures that environmental conservation is accessible to all. This has been exemplified by volunteers who are from the disabled and LGBTQ communities. Noting that ageism can be a factor within the environmental community, with the expectation that certain activities should be exclusively for certain groups, the EAG currently engages with volunteers as young as 13 years old and as old as 70 years old. This is done, not just to ensure inclusion, but to ensure that the work done by the EAG is representative of varying groups and ages, and is therefore sustainable beyond the life of project activities.

Efforts to safeguard volunteers younger than 18 will be carefully managed throughout the implementation of this project. While most volunteers are not this age, the ones who are will only be involved if they are accompanied by a parent or guardian. Parents/guardians will be required to sign a safety and health waiver indicating that they understand the risks associated with working on the offshore islands and that they accompany their child to reduce any perceived risk.

EAG will also be developing Volunteer Clinics as a part of its overall work. These clinics are designed to serve as focus group sessions, allowing volunteers to raise any concerns that they may have in the execution of EAG programmatic activities. The clinics will be facilitated by a designated member of the EAG Board of Directors, to allow for free conversation and remove the likelihood of discrimination from EAG staff members. These concerns will therefore be added to the SEP and allow for continued development and management of the volunteers under this project and in future.

EAG will continue to take measures to ensure that women's and men's voices, and the voices of the vulnerable, are heard in all project consultations and will target having a 50:50 distribution in all training and engagement. There are instances where this may not be as practicable (especially in camping on offshore islands), however these opportunities will be given to participants in a fair, equitable, and transparent manner. As part of its own institutional strengthening, EAG will be developing a gender strategy, with the participation of community and agency representatives. Once the strategy has been prepared, EAG will integrate recommended strategies into the SEP, as well as proposal writing and management planning processes as may be needed.

EAG will provide equal opportunities for all stakeholders to participate regardless of education, religious affiliation, or gender identity and will ensure that underserved communities are not disenfranchised by the activities under this project.

11. Stakeholder Engagement Program:

Throughout the project we will continue to use different methodologies (online, face to face¹ or hybrid meetings, handouts, or workshops) to engage stakeholders focusing on different information and groups of stakeholders. EAG therefore notes the critical role of the Science Communications Officer, who will support the development of Communications Plans around the CR Antiguan Racer and the CR Redonda Lizards. Her role is imperative as the EAG is desirous of ensuring that science is communicated in a manner that engages target audiences and always has a call to action.

Within the scope of engagement, therefore, the EAG will also employ a range of activities including workshops and trainings, which will seek to provide key stakeholders with the tools necessary to

¹ As a result of the ongoing COVID-19 pandemic, any face-to-face meetings will be guided by the provisions established in the World Bank's Technical Note, "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings", issued on March 20, 2020 and relevant national guidelines

develop Conservation Action Plans, provide inputs to the Financial Feasibility Study, assist the EAG with the co-management of the NEMMA and Redonda KBAs, and finally provide the EAG with the necessary tool-box for sustainably managing its operations beyond the life of this project.

EAG has been partnering with a local newspaper, the Daily Observer, for many years and has a weekly spot for articles on Thursdays. This spot has traditionally been used as a means to share EAG's programme activities and work to the wider Antiguan and Barbudan society. This method is effective and will continue to be a necessary feature of this project. Other traditional media engagements on radio and television will be continued, and enhanced during this project.

12. Consultation methods:

Details of the consultation and engagement methods that will be used for each stakeholder group identified in the project will be outlined in the EAG's participation and communication strategy. In developing this strategy, the EAG will conduct a stakeholder identification and analysis exercise which will look at the following areas:

- Rights, responsibilities and interests
- How stakeholders can contribute, how will they be affected and how they could negatively impact the project
- Potential conflicts to be managed among stakeholders
- Capacities and capacity needs

Methods that will be used to consult with each of the stakeholder groups identified above will be tailored based on the findings of the analysis and will include (but are not limited to) those outlined in Table 12.1.

Table 12.1: Methods of engagement and consultation for Stakeholder groups

Stakeholder Group	Methods for consultation and engagement
National Government Agencies	Face to face, virtual and hybrid meetings Emails Letters Posting on EAG's social media pages Engagement in project activities Traditional media
Community Based Organizations	Face to face, virtual and hybrid meetings Emails Telephone calls WhatsApp messages Posting on EAG's webpage and social media sites Engagement in project activities Tours Traditional media Training for participants in the Offshore Islands Guardian Programme
Private sector organizations	Face to face, virtual and hybrid meetings Emails Telephone calls WhatsApp messages Posting on EAG's social media sites Engagement in project activities Media
Media	Face to face, virtual and hybrid meetings Emails Telephone calls WhatsApp messages Posting on EAG's social media sites Tours (as necessary)

13. Other Engagement Activities:

The project is seeking to establish an Offshore Islands Guardian Programme, which builds on work that the EAG has been doing in developing a core of citizen scientists for a number of years. This was also evident in the work done under the EAG’s previous CEPF grant #60933. The expectation is that the engagement with these stakeholders will lead to improved co-management of the NEMMA and Redonda KBAs with more Antiguan citizenry being at the forefront of ecosystem management. Training will be inclusive and democratic and will be managed to ensure that all are heard and feel safe.

The Conservation Action Planning sessions, which will be co-facilitated under the Re:wild and FFI CEPF grant #112943, will be highly collaborative and democratic, and will allow participants to contribute their ideas anonymously if they wish. We will also arrange in-person or virtual meetings with key persons who are unable to participate in workshops or require further, more in-depth discussions.

The species conservation action plans are likely to identify needs and methods for further stakeholder consultations to achieve their goals. For instance, if the new plans call for an action to expand the range of the species to other islands, the EAG, in collaboration with government partners and/or other parties responsible for its implementation would need to consult local stakeholders in those areas before the action is taken.

The species action plans will identify stakeholders and methods for further engagement to achieve their goals. It is too soon to prescribe what these may be: They may include training, job creation and other initiatives, but more details will be provided in the funding requests to CEPF from the implementing partners in due course.

14. Indicative timeline for SEP implementation:

Stakeholder engagement is an integral element of this project. Table 14.1 below outlines the indicative timeline for SEP implementation. The timetable for implementation is the overall project implementation schedule as detailed in the log frame, however they indicative table below outlines some of the key activities.

The below Table provides an indicative timeline of activities related to stakeholder engagement. The log frame (work plan) submitted with the proposal provides more details on the activities and timeline for the entire sub-project (and not just stakeholder engagement).

Table 14.1: Estimated timeline for implementation

Action	2023		2024				2025				2026	
	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
Engagement for developing the suite of ecotourism packages including conceptualization, training workshops, and evaluations of the programme	X	X	X	X								
Engagement for the development of EAG's Sustainable Financial Plan					X	X	X	X				
Engagement for development of the Offshore Islands Nature Reserve Financial Feasibility Study			X	X	X							
Engagement for the development and implementation of the CR Antiguan Racer Conservation Action Plan	X	X	X	X								
Engagement for the development and implementation of the CR Redonda Ameiva and CR Redonda Anole Conservation Action Plans			X	X								
Engagement in development and implementation of the Offshore Islands Guardian Programme				X	X	X	X	X	X	X	X	X

15. Resources and Responsibilities:

The activities to support stakeholder engagement will vary across different team members:

- The Sustainable Finance Officer will lead the development of the ecotourism products and engagement with the tour guides. However, since some of the tour guides should be garnered from the Offshore Islands Guardians, this will also be supported by the Offshore Islands Conservation Programme Coordinator, the Redonda Ecosystem Reserve Coordinator, and the Antigua Marine Conservation Programme Coordinator.
- The Sustainable Finance Officer will also lead the engagement on the Financial Feasibility Study for the OSI Nature Reserve, and will be supported by the Executive Director and the OICP Coordinator.
- The OICP Coordinator will lead the Antiguan Racer Conservation Action Planning workshops and the engagement on those issues. She will also be responsible for the engagement on the rapid surveys of the Antiguan Racer. However, she will be supported by the Wildlife, Invasive Species, and Science Communications officers in ensuring that all relevant agencies and stakeholder groups are engaged throughout the process.
- The RER Coordinator will lead the CR Redonda Ameiva and Redonda Anole Conservation Action Planning and the engagement on those issues. She will also be responsible for the engagement on the rapid surveys of the Antiguan Racer. However, she will be supported by the Wildlife, Invasive Species, and Science Communications officers in ensuring that all relevant agencies and stakeholder groups are engaged throughout the process.
- The Science Communications Officer will be involved in implementing the stakeholder plan by engaging– youth (including in schools sessions), women, community members, fisherfolks, government agency partners in public awareness generally while giving input to social media posts, supporting tours, exhibitions, workshops, meetings and Offshore Islands Guardian programme.
- The OICP Coordinator will be involved in implementing the stakeholder plan by engaging stakeholders through review of the METT and overall project implementation actions
- EAG staff will be involved in the overall implementation of the stakeholder outreach plan by working together to implement workshops, meetings, input into social media posts, establishment of grievance mechanism and the development and implementation of the Offshore Islands Guardian programme.
- The Executive Director will be involved in implementing the stakeholder plan through the overall monitoring and engagement in the project implementation.
- The Science Communications Officer will update the stakeholder plan as needed with input from the team and ensure that all team members are aware of and implementing the plan as agreed.

16. Monitoring and Reporting:

EAG will take the following steps to monitor and evaluate the effectiveness of the stakeholder engagement activities listed above:

- Seeking feedback from stakeholders throughout project implementation through regular virtual and face-to-face meetings, direct email, social media, feedback forms from training sessions, peer exchanges, webinars and workshops, etc.
- Reports will be prepared after stakeholder engagement activities and summaries and made available online, where necessary. Short videos and photographs will be shared on social media.
- Virtual or face-to-face site visits and discussions with stakeholders within the project.
- Seeking feedback from stakeholders at the final evaluation of the CEPF Caribbean Islands Biodiversity Hotspot investment and documenting and sharing lessons learned, best practice and recommendations.
- Reporting on stakeholder engagement activities in bi-annual programmatic reports to the CEPF.
- Reporting during meetings and supervision missions with RIT and/or the CEPF Secretariat.
- Monitoring of the Grievance Redress Mechanism (GRM). A report on any grievances received will be included in the project monitoring/ update reports submitted to CEPF/RIT.

17. Grievance mechanism:

The following is the GRM for EAG to address concerns of their external stakeholders. The GRM will be made available to stakeholders, including via EAG's social media pages, once the project starts. Grievances that relate to EAG project workers will be handled by a separate mechanism which is included as part of the project's Labor Management Procedures.

Visiting community sites may involve visits to local communities by EAG staff and consultants as well as meetings with local people, which could present risks to community health and safety. This GRM 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 GRM and make available contact information of EAG and the CEPF Secretariat. This will be done through a printed handout or other locally appropriate means such as through announcements at public meetings, workshops, through notices placed on EAG's social media sites, community notice boards (post offices, churches where possible).

Objectives of the GRM

The objectives of the GRM 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 on workers.
3. Resolve all grievances emanating from project activities in a timely manner.
4. Establish relationships of trust between project staff.
5. Create transparency among Project Workers, through an established communication system.
6. Bolster the relationship of trust among the project staff.

First Level of Redress

1. Receive Grievance: All complaints should be received by the Executive Director at EAG. 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	
Telephone	+1 268 462 6236
Email address	eagantigua@gmail.com
Physical address	Burma Road, Osbourn, St George, Antigua

All grievances received by EAG should be forwarded to the Executive Director within 24 hours of receipt. All grievances will be reported to the RIT and CEPF Director within 15 days of receipt, along with EAG's response.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by EAG 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. EAG 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 EAG's grievance file, including relevant documents.

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

- a. If it is concerning EAG's project, communication to the Executive Director and the RIT Manager.
- b. Notification will also be made to the CEPF Grant Director within 15 days.
- c. If it is concerning general EAG operations/activity, communication to EAG's Executive Director.

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 Executive Director). 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. Minutes of meetings and documents will be added to the grievance file and will be handled confidentially.

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 and 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 EAG'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 EAG's Executive Director.

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
Hotline Number	1-866-294-8674
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.

Fourth Level of Redress

If claimants are not satisfied or would prefer to engage with the World Bank directly, as the funding agency, they may follow the Grievance Redress Service (GRS) as outlined below if they are unsatisfied with the project-level response to the issue:

The GRS considers a complaint admissible when:

- The complaint relates to a World Bank-supported project that is under preparation, active, or has been closed for less than 15 months
- The complaint is submitted by individuals or communities affected by a World Bank-supported project, or by their authorized representative; and
- The complainant(s) allege that they have been or will be affected by the World Bank-supported project.

Complaints must be in writing and addressed to the GRS. They can be sent by the following methods:

- Online, access the [online form](#)
- By email to grievances@worldbank.org
- By letter or by hand delivery to the [World Bank Headquarters](#) in Washington D.C., United States or any [World Bank Country Office](#) – print and use the form available on [this site](#).

Information to include in a complaint

Complaints must:

- Identify the project subject of the complaint
- Clearly state the project's adverse impact(s)
- Identify the individual(s) submitting the complaint

- Specify if the complaint is submitted by a representative of the person(s) or community affected by the project
- If the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative.

Supporting evidence is not necessary but may be helpful in reviewing and resolving the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved. All complaints will be treated as confidential. The GRS will not disclose any personal data that may reveal the identity of complainants without their consent.

18. Addressing Gender Based Violence, Sexual Exploitation and Abuse and Sexual Harassment:

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.

EAG 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". The EAG 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.

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.² Any cases of SEA/SH brought through the EAG 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 EAG, 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 EAG 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 EAG 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 EAG 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 EAG can close the case.

ACTION 2: INCIDENT REPORTING

² 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.

The designated person responsible for the EAG 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 EAG. Neither the designated person responsible for the EAG 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 EAG 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 EAG 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 EAG 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 EAG, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible from the EAG 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 project³, 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 EAG or a contractor. The designated person responsible from the EAG 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 labor 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 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 EAG should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the

³ 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).

courts, not the SEA/SH verification committee. Unlike other types of issues, the designated person responsible from the EAG does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Any cases of SEA/SH brought through the EAG 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 EAG will also immediately notify both the CEPF and the World Bank of any SEA/SH complaints **WITH THE CONSENT OF THE SURVIVOR.**