

## ESS10: Stakeholder Engagement and Information Disclosure



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

# Stakeholder Engagement Plan

May 2023

CEPF Grant 113721

**Northern Cockpit Country Local Forest Management Committee Benevolent Society**

***Maintaining Biodiversity Through Sustainable Livelihoods and Environmental Awareness in Northern Cockpit Country, Jamaica***

## Grant Summary

- 1. Grantee organization:** Northern Cockpit Country Local Forest Management Committee Building Society (NCCLFMCBS)
- 2. Sub project title:** Maintaining Biodiversity Through Sustainable Livelihoods and Environmental Awareness in Northern Cockpit Country, Jamaica
- 3. Grant number:** 113721
- 4. Grant amount (USD\$):** \$47,022
- 5. Proposed dates of grant:** 1 June 2023 – 31 May 2024
- 6. Countries where activities will be undertaken:** Jamaica
- 7. Date of preparation of this document:** 24 May 2023

## 8. Overview of the Caribbean Hotspot Project

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

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

## 9. Project Components

Linton Park Mountains is a designated Forest Reserve in Cockpit Country Protected Area, Jamaica supporting several CEPF Trigger Species and CEPF Priority Species. Typical of other forest reserves across Jamaica the Linton Park Mountains are threatened by habitat loss and fragmentation associated with deforestation. Specifically, the Forest Reserve is threatened by forest fires as a result of the slash and burn land clearing technique used by some farmers and illegal logging for charcoal and in influx of additional farmers as a result of the decline in the sugar cane product that sustained many of them for decades.

The Northern Cockpit Country Local Forest Management Committee Building Society (NCCLFMCBS) aims to address these threats through the following:

Component 1: Building capacity for community-based forest reserve management. Ten NCCLFMCBS members and local community members will be trained in reforestation and circle weeding techniques and will be engaged to plant and maintain 4 hectares of forest reserve. Additionally, 160 community members – especially those residents from the communities who contribute to the degradation of the forest - will benefit from 4 environmental awareness sessions.

Component 2: Increasing the NCCLFMCBS's organizational capacity. This component not only includes the preparation of the sustainable financing strategy but will also undertake the training of at least 12 members of the LFMC in viable economic activities identified.

Component 3: Increased stakeholder awareness of forest conservation through livelihood opportunities. This component seeks to improve communities’ awareness and willingness to support biodiversity conservation activities by using practical experiences with real benefits to demonstrate the importance of biodiversity to their livelihoods. This will be done through two separate streams – beekeeping and youth agro-forestry - and will include awareness sessions as well as facilitating practical experiences.

### 10. Summary of previous stakeholder engagement activities

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

This sub-project idea has been discussed in monthly meetings starting in February 2022 when the initial Call for Proposals was released. The views discussed were welcomed and there was a mutual decision among members to compile the document. Typical partnering agencies such as the Forestry Department, Rural Agriculture Development Authority (RADA), Social Development Commission (SDC), Trelawny 4-H Clubs and members from surrounding communities such as Bunkers Hill, Kinloss, Sherwood Content, Friendship and the wider community of Duanvale participated in the initial planning and development of the sub-project approach and activities.

### 11. Project stakeholders

The below table outlines the key stakeholders for this project.

Table 11.1: Project stakeholders.

Stakeholder Group	Type of Stakeholder <i>(partner / target stakeholder)-</i>	Involvement in project	Interest <i>(low / medium / high)</i>	Influence <i>(low / medium / high)</i>	Component under which will be engaged
<b>Government:</b> Forestry Department, Rural Agricultural Development Authority, Jamaica 4H Club, Social Development Commission	partner	The FD will provide technical support, a ready supply of seedlings as well as training in reforestation activities. The FD will provide guidance during the reforestation activities, including reforestation surveys.  RADA will provide training and	high	high	All

		<p>technical support on the importance of, benefits, care and protection of plants (navel string component), and the local monitoring and maintenance of apiaries.</p> <p>The Jamaica 4H Club will provide assistance in mobilizing the schools. Specifically, the organization will assist in the identification of students to participate in the navel string activity as well as lead the training in fruit tree planting and care.</p> <p>The SDC will assist in community mobilization and governance.</p>			
<p><b>Communities:</b> Bunkers Hill, Kinloss, Duanvale, Sherwood Content, Friendship</p>	Target stakeholder	For education and to identify farmers for weeding and apiculture	medium	high	Component 1 and 3
<p><b>Schools:</b> Bounty Hall Primary, Brampton Primary, Clark's Town Primary, Duanvale Primary, First Hill All-Age, Hastings Primary, Kinloss Primary, Perth Town Academy, St. Michael's Infant,</p>	Target stakeholder	<p>These are target schools from which the students will be engaged under the navel string project. They will receive seedlings which they will maintain and help report on.</p>	medium	high	Component 3

Unity Primary, Wakefield Primary, Westwood High					
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## 12. Stakeholder engagement program

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

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

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

When working with stakeholders on a project like this, there are several social risks to consider which can be mitigated through proper stakeholder engagement. In Component 1, several community farmers will be selected, and be given a stipend for conducting maintenance work (circle weeding) in the reforested areas. To prevent social exclusion, the sub-grantee will conduct the selection process in a transparent manner with clear selection criteria. The sub-grantee will conduct open discussions during meetings and will, as extensively as possible, invite participation in the activity from the wider community. From experience, it is anticipated that approximately 50-60% of the community workers will be female as they are more willing to undertake this type of work. In addition, interactions will be held at local corner shops and social gatherings, which traditionally has been a very effective method of stakeholder engagement. The grievance mechanism will be available in all communities from which weeders will be drawn.

In Component 3, community members (school children) will be engaged in agroforestry (navel string project) and apiculture. Resources from CEPF will be invested in these activities and there is a risk that the members selected will lose motivation to continue the work needed to sustain the impact. In order to prevent this, the grantee will engage participants with constant training and monitoring, especially the navel string component, as this may be new to some students who will need continuous motivation.

New and existing bee farmers will be facilitated in the initial stage, with the required basic equipment, protective gear and first aid supplies made available for the duration of project implementation. These bee farmers will be chosen in a transparent manner with clear selection criteria, including having a vested interest in the field and a basic understanding that unforeseen

possibilities may arise, in order to manage expectations. In the past, persons who were fearful of bees, have now become mentors for newcomers in the bee-farming industry. These mentors will assist in stakeholder engagement through their success stories.

Stakeholder engagement mechanisms will vary depending on the group and their level of interest / influence. Table 12.1 below provides possible methods for engagement for stakeholder groups identified above but is not a commitment to utilize all methods. The appropriate method for each engagement will be chosen.

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

Stakeholder group	Possible methods for consultation and engagement
National government agencies	Scheduled meetings based on activity, including one on one and within a group setting with other stakeholders.
Local communities including, but not limited to women, unemployed young people, elderly, LGBTI persons, persons with disabilities, and immigrants	Information sharing through one-on-one meetings, LFMC group meetings, and targeted engagement at local gathering spots
Community schools	The Project Manager will communicate in writing and telephone contact with the Trelawny 4-H Parish Manager. Participating schools will be engaged through written communication in the initial stage, by the 4-H Parish Manager with follow-up visits, before, during and after by the project team.

### 13. Consultation methods

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

### 14. Other engagement activities

Not Applicable

### 15. Timeline and resources

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

*Table 15.1: Indicative timeline for implementation*

Action	Cost Estimate (USD)	Implementation Schedule				
		2023			2024	
Monthly LFMC meetings	\$1,680/In-kind	x	x	x	x	x
Community meetings for general awareness	\$300	x	x	x	x	x
Engagement with persons interested in participating in maintenance activities	\$200	x	x	x		

Action	Cost Estimate (USD)	Implementation Schedule				
		2023		2024		
Consultant meetings to develop business plan and model	\$60		x	x	x	
Awareness-raising activities for apiculture activities	\$150		x	x	x	
Awareness-raising activities for agroforestry activities	\$90		x	x	x	
Continuous engagement with schools in the navel string project	\$350		x	x	x	x

## 16. Monitoring and arrangements

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

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

- Registration and sign-in sheets will be used
- The number of persons, including their gender and age range, involved in each engagement activity will be recorded
- Notes from consultations will be recorded and any feedback or suggestions incorporated into any final document.

## 17. Grievance mechanism (GM)

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

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 The NCCLFMCBS's and the CEPF RIT. This will be done through a printed handout or other locally appropriate means.

### Objectives of the GM

The objectives of the GM are as follows:

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

## First Level of Redress

1. *Receive Grievance:* At the project level, all complaints should be received by Richard Hudson. 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	
Position	Project Manager
Telephone	876-853-3253
Email address	northlfmc@gmail.com
Physical address	Main St., Duanvale Dist., Duanvale P.O., Trelawny, Jamaica

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

Contact	
Position	Project Manager
Telephone	876-853-3253
Email address	northlfmc@gmail.com
Physical address	Main St., Duanvale Dist., Duanvale P.O., Trelawny, Jamaica

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

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Chairman within 48 hours of receipt and the complainant will be informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately. The Chairman will seek to ensure the speedy resolution of the grievance. If the grievance cannot be resolved at this level, it is taken to the next level.
3. *Record:* The grievance will be registered in NCCLFMCBS's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
  - a. If it is concerning the project, communication to the Project Manager
  - b. Notification will also be made to the CEPF Grant Director and Regional Implementation Team Manager within 15 days.
  - c. If it is concerning general NCCLFMCBS operations/activity, communication to the Chairman.
5. *Assessment:* A decision is made on the nature of the investigation that will take place.
6. *Investigation:* Appropriate investigation of the grievance by an internal team assigned to this task (for example, this may include staff directly involved). The investigation may include meetings with the complainant and other stakeholders and a review of relevant documents. An impartial party shall be involved in meetings with the complainant. Community representatives or representatives of the complainant will be allowed to sit in on these meetings. Minutes of meetings and documents will be added to the grievance file.



7. *Resolution:* Depending on the findings of the investigation:
  - a. A resolution is decided immediately
    - i. The complaint is rejected
    - ii. A response is agreed
    - iii. The complaint is referred to as appropriate
  - d. A resolution cannot be achieved, and the case is presented to the RIT Manager or NCCLFMCBS's Grievance Committee for further input
  
8. *Communication:* Once a resolution has been reached, the decision is communicated to the complainant in writing. Documents are added to the grievance file.
  - e. *Satisfaction:* If the complainant is not satisfied with NCCLFMCBS's response, it can be taken to the second level of redress. At all stages, documents are added to the grievance file.

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

#### Second Level of Redress

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

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

#### Third Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level two, they can contact the CEPF Grant Director via the telephone: +1-703-341-2400 or email: [cepf@cepf.net](mailto:cepf@cepf.net)

#### Fourth Level of Redress

If the complainant is not satisfied with the way in which their grievance has been handled at level three, they should avail themselves of the services of the national labour disputes tribunal through the Pay and Conditions of Employment Branch (PCEB) of the Industrial Relations (IR) Department of the Minister of Labour and Social Security, telephone (876) 922-2468 or (876) 922 9500-14. Once complainants formally file a grievance, which includes filling out the appropriate forms, officers and inspectors from the PCEB will carry out an investigation. The name and identity of anyone who submits a complaint to the PCEB will be kept confidential.

If the complainant is still not satisfied, they have the option of submitting their grievance to the World Bank's Grievance Redress Service, but this should only be accessed after other GRM options

have been exhausted by the claimant. The RIT and CEPF Secretariat will aim to resolve all grievances within 60 days of receipt.

#### The World Bank Grievance Redress Service (GRS)

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. It must be noted that this GRS should ideally only be accessed once the project's grievance mechanism has first been utilized without an acceptable resolution. World Bank Procedures require the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank's GRS complaint form, which can be found at the following link: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5> . Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: [grievances@worldbank.org](mailto:grievances@worldbank.org)  
Fax: +1-202-614-7313  
By letter: The World Bank  
Grievance Redress Service (GRS)

MSN MC 10-1018 NW,  
Washington, DC 20433, USA

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

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

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

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

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

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

Sexual harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

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

The survivor-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: <https://canari.org/wp-content/uploads/2022/06/CEPF-II-GBV-Service-Providers-Jamaica2.pdf>.

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

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

perpetrator's employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the designated person responsible from the Grantee can close the case.

### ACTION 2: INCIDENT REPORTING

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

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

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

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

### ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

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

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

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

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**.

### **19. Disclosure**

CEPF also requires that all direct, contracted and community and community workers be provided with Conservation International's (CI) Code of Ethics and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at [www.ci.ethicspoint.com](http://www.ci.ethicspoint.com)

The code of ethics will be consistent with the code of conduct of the WB:

[*enter name of Personnel*] has signed a contract with the sub-grantee for [*enter description of the Terms of Reference (ToR)*]. This assignment will be carried out at XXXXX. This contract requires you to implement measures to address environmental and social risks related to the sub-project, including the risks of sexual exploitation, sexual abuse, and sexual harassment.

Herewith, all persons are referred to as "**Sub-grantee's Personnel**" and are subject to this Code of Conduct.

This Code of Conduct identifies the behaviour that is required from all Sub-grantee Personnel.

The workplace is an environment where unsafe, offensive, abusive, or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

Sub-grantee's Personnel shall:

1. carry out his/her duties competently and diligently.
2. acknowledge that adherence to this Code of Conduct is a condition of employment.
3. comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Sub-grantee's Personnel and any other person.
4. maintain a safe working environment including by:
  - a. ensuring that workplace equipment and processes under each person's control are safe and without risk to health.
  - b. wearing required personal protective equipment when visiting construction sites and following sub-project COVID-19-related protection guidelines, as described in the Stakeholder Engagement

Plan (SEP), Labour Management Procedure (LMP), Environmental and Social Management Framework (ESMF) and plans (ESMPs), or other relevant instruments.

- c. using appropriate measures relating to chemical, physical and biological substances and agents; and
- d. following applicable emergency operating procedures.
5. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation that he/she reasonably believes presents an imminent and serious danger to his/her life or health.
6. avoid any conflicts of interest (such that benefits, contracts, employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection).
7. respect reasonable work instructions (including regarding environmental and social norms).
8. protect and properly use property (for example, to prohibit theft, carelessness, or waste).
9. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers, or children.
10. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with Sub-grantees or other Personnel.
11. not engage in Sexual Exploitation, which means 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.
12. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
13. protect children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behaviour towards children, limiting interactions with children, and ensuring their safety in project areas).
14. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage.
15. shall have access to a referral system for victims of Gender Based Violence/Sexual Exploitation and Abuse of employees and any individual that may be associated with the sub-project. Where such an incident would have occurred, it should immediately be reported to the Employer or his/her designate who would ensure that the victim is referred to a service provider trained to handle GBV cases.
16. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH).
17. shall have access to a Grievance Redress Mechanism, which will afford effective remedies.
18. report violations of this Code of Conduct to the Employer under this project.
19. not retaliate against any person who reports violations of this Code of Conduct, whether to the Employer or the Project's Grievance Redress Mechanism; and,
20. the Grantee staff will follow the relevant requirements set out in LMP.

## **RAISING CONCERNS**

If you observe any behaviour that is believed may represent a violation of this Code of Conduct, or that otherwise concerns you, you should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter the name of the Employer's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Employer to handle these matters*] in writing at this address [ ] or by telephone at [ ] or in person at [ ]; or

2. Call [ ] to reach the Employer’s hotline (*if any*) and leave a message

The person’s identity will be kept confidential unless reporting of allegations is mandated by the laws of Jamaica Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

**CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT**

Any violation of this Code of Conduct by Sub-grantee Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

**FOR GRANTEE PERSONNEL:**

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of the Employer’s contact person(s) with relevant experience*] requesting an explanation.

Name of Sub-grantee Personnel: [insert name]

Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_

Countersignature of an authorized representative of the Employer:

Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_

**ATTACHMENT 1:** Behaviours constituting Sexual Exploitation and Abuse (SEA) and behaviours constituting Sexual Harassment (SH)

## ATTACHMENT 1 TO THE CODE OF CONDUCT FORM

### BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviours:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A Sub-grantee Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g., cooking and cleaning) in exchange for sex.
- A Sub-grantee Personnel that is connecting electricity input to households says that he can connect women-headed households to the grid in exchange for sex.
- A Sub-grantee Personnel rapes, or otherwise sexually assaults a member of the community.
- A Sub-grantee Personnel denies a person access to any project Site unless he/she performs a sexual favour.
- A Sub-grantee Personnel tells a person applying for employment under the Project that he/she will only hire him/her if he/she has sex with him/her.

(2) **Examples of sexual harassment in a work context**

- Sub-grantee Personnel comment on the appearance of another Sub-grantee Personnel (either positive or negative) and sexual desirability.
- When a Sub-grantee Personnel complains about comments made by another Sub-grantee Personnel on his/her appearance, the other Sub-grantee Personnel comment that he/she is “asking for it” because of how he/she dresses.
- Unwelcome touching of a Sub-grantee or Employer’s Personnel by another Grantee Personnel.
- A Grantee Personnel tells another Grantee Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.