

ESS10: Stakeholder Engagement and Information Disclosure



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

Stakeholder Engagement Plan

November 2023

CEPF 114894

Sawyers Local Forest Management Committee Benevolent Society

Project Name: *Preserving biodiversity through sustainable alternative livelihoods within the Cockpit Country, Jamaica.*

Grant Summary
<p>1. Grantee organization: Sawyers Local Forest Management Committee Benevolent Society</p> <p>2. Sub project title: <i>Preserving biodiversity through sustainable alternative livelihoods within the Cockpit Country, Jamaica.</i></p> <p>3. Grant number: 114894</p> <p>4. Grant amount (USD\$): \$50,000</p> <p>5. Proposed dates of grant: Dec 2023- Feb 2025</p> <p>6. Countries where activities will be undertaken: Jamaica</p> <p>7. Date of preparation of this document: 23 November 2023</p>

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

The overall goal of this sub-project is to protect and conserve our biodiversity and forest and increase income within the households of those persons who are currently doing unsustainable farming practices, to reduce dependence on the Hyde Hall Forest Reserve. We estimate the prolonged impact of the Covid-19 pandemic has tripled the impact of deforestation on a healthy forest, income and food security, especially for forest dependent communities. The project has four components that aim to create sustainable livelihoods, improve agricultural practices, promote biodiversity conservation, and ensure effective project management and monitoring.

Component 1: Supporting community-based sustainable livelihoods

Under this component, the project aims to introduce sustainable farming practices that alleviate pressure on forest resources. By supplying seedlings to 25 members of the Sawyers Local Forest Management Committee and Benevolent Society (LFMCBS) group and community members, and conducting training sessions, the project seeks to improve agricultural yield, generate income, and ensure proper land use practices. The project will provide 20 women and 10 elderly and disabled men with fruit trees and drought resistant crops to plant in their backyards within southern Trelawny including the communities of Sawyers, Burke, Mahogany Hall, Alps and Blagrove Drive. Activities under this component will also improve irrigation access for agricultural needs for agroforestry and homebound farmers by providing 20 recipients with 650 gallon tanks for rainwater harvesting, which will be allocated on a needs basis. Through this project we will also establish 30 colonies of bees in the Hyde Hall Forest Reserve to increase income for 20 families in the Sawyers community.

Component 2: Awareness-raising sessions for climate-smart agriculture

Under Component 2, the project will heighten awareness and build capacity for climate-smart agriculture. Thirty community members, including youths and disabled individuals, will receive comprehensive training in biodiversity conservation and sustainable agricultural practices, fostering resilience within marginalized groups engaged in farming. Additionally, 20 community members will receive specialized apiculture training, equipping them with beekeeping skills to enhance productivity and income generation through bee-related products. Moreover, business skills and entrepreneurial sessions benefit group and community members involved in livelihood activities, focusing on marketing, computer literacy, and entrepreneurship to reduce reliance on forest resources and create sustainable livelihoods.

Component 3: Reforestation

Under this component, the project will reforest one hectare of land within the Hyde Hall Forest Reserve with native, hardwood tree species. Reforestation efforts are essential to counter the negative impacts on the forest caused by human intervention and natural disasters. By restoring these areas, the project aims to protect biodiversity, encourage natural recovery, and rectify past practices that have contributed to the depletion of the forest cover in the community.

Component 4: Project management and monitoring

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

10. Summary of previous stakeholder engagement activities

The Sawyers LFMCBS 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 Sawyers LFMCBS 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 Sawyers LFMCBS, 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 participated in the initial planning and development of the sub-project approach and activities. The Heart Trust NTA has also been working with the Sawyers LFMCBS group as we try to improve business skills for community members who participate in livelihood 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
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<p>Government: Forestry Department, Rural Agricultural Development Authority, Heart Trust NTA</p>	<p>partner</p>	<p>The FD will provide technical support, a ready supply of seedlings as well as training in reforestation activities. The FD will provide guidance during the reforestation activities, including reforestation surveys.</p> <p>RADA will provide training and technical support on the importance of, benefits, care and protection of plants (navel string component), and the local monitoring and maintenance of apiaries.</p> <p>The SDC will assist in community mobilization and governance.</p> <p>Heart Trust will assist in training for business skills and entrepreneurship.</p>	<p>high</p>	<p>high</p>	<p>All</p>
<p>Communities:</p>	<p>Sawyers, Burke, Mahogany Hall, Blagrove Drive, Alps</p>	<p>For education and to identify farmers for reforestation and apiculture</p>	<p>medium</p>	<p>high</p>	<p>Component 1,2 and 3</p>

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 among members and participants;
- 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 as community workers, under the conditions outlined in the Labor Management Plan, and be given a stipend for conducting agroforestry and maintenance work in the reforested areas. Community members will also participate in backyard farming. Therefore, 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 where stakeholders will be present and will, as extensively as possible, invite participation in the activity from the wider community. In addition, interactions will be held at group meetings, zoom calls and social gatherings, which has been a very effective method of stakeholder engagement. The grievance mechanism will be available in all communities from which participants will be drawn.

In Component 1 also, community members will be engaged in rainwater harvesting and apiculture. Resources from CEPF will be invested in these activities and there is a risk that the members selected could lose motivation and interest to continue the work in the apiculture if the required training, guidance and mentorship is not provided. With this in mind, Component 2 of the project will focus on training with the intention of ensuring that recipients are properly equipped to have their alternative livelihood established and successful.

New and existing bee farmers will be facilitated in the initial stage, with the required basic equipment, protective gears 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.

In Component 3, community members will be engaged in reforestation activities in the Hyde Hall Forest Reserve and in doing so we will seek formal permission from the Forestry Department to be able to undertake the reforestation activity to increase forest cover for the Hyde Hall Forest reserve. The Forestry Department has already been preliminary engaged in discussions about planned

reforestation activities. To choose participants for this activity, we will involve stakeholders, who regularly attend our monthly meetings. They will provide guidance on how we should proceed with this activity.

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

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

Stakeholder group	Possible methods for consultation and engagement
Forestry Department (FD)	Information sharing through monthly meetings, activity gatherings and formal means of communication. The Forestry Department will assist with training activities.
Rural Agricultural Development Authority (RADA)	Information sharing through monthly meetings or activity gatherings and target engagement through training activities, site visits and practical demonstrations.
Human Employment and Resource Training/National Training Agency (HEART TRUST/NTA)	Information sharing through monthly meetings or activity gatherings. Also target engagement through training activities.
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.

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 from professional persons such as our stakeholders who has the same goal to continue protecting the forest reserves.

14. Other engagement activities

If other engagement activities arise throughout this project the Sawyers LFMCBS will report on such engagements in our report.

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			2025	
Monthly LFMC meetings	\$1,680/In-kind	x	x	x	x	x	x
Community meetings for agricultural capacity training	\$2254			x	x	x	x
Engagement with persons interested in participating in maintenance activities	\$500				x	x	x
Engagement with persons interested in participating in water harvesting	\$500	x	x	x	x		
Awareness-raising activities for backyard farming activities	\$900	x	x	x	x	x	
Engagement with persons interested in participating in business skills training	\$900				x	x	x
Consultant meetings for apiculture activities	\$500	x	x	x	x	x	
Awareness-raising activities for agroforestry	\$800			x	x	x	
Awareness-raising activities for reforestation activities	\$900			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 participants name, age range and gender. All feedback will be openly discussed and implemented if appropriate and feasible and evaluation sheets will be completed and collected.

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 SLFMCBS'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 SLFMCBS'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 Toussaint Brown. 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	Chairman & Project Coordinator
Telephone	(876)434-0177
Email address	Brownhector47@gmail.com
Physical address	Sawyers District, Sawyers PO, Trelawny.

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

Contact	
Position	Project assistant & Administrative Coordinator
Telephone	(876) 373-8701
Email address	Christinasinclair98@yahoo.com
Physical address	Sawyers District, Sawyers PO, Trelawny.

All grievances received by SLFMCBS'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 SLFMCBS'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 SLFMCBS 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 SLFMCBS'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 SLFMCBS'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	caribbeanrit@canari.org
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

Physical address: Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202, USA

Fourth Level of Redress

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

18. Addressing Gender Based Violence

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

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

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

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

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

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

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

The survivor-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.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 pre-established 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 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.

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.

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 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 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:

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 labor such as voluntary services or participation in project activities and processes (community workers).

- Refer complainants to the SEA/SH Services Provider; and
- Record the resolution of the complaint

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

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