

ESS10: Stakeholder Engagement and Information Disclosure



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

Stakeholder Engagement Plan

April 2023

CEPF Grant 113657

International Iguana Foundation

Improve Invasive Species Management to protect the Jamaican Rock Iguana, Hellshire Hills, Portland Bight Protected Area.

Jamaica

Grant Summary

1. Grantee organization: International Iguana Foundation

2. Sub project title: *Improve Invasive Species Management to protect the Jamaican Rock Iguana, Hellshire Hills, Portland Bight Protected Area.*

3. Grant number: 113657

4. Grant amount (USD\$): 49926

5. Proposed dates of grant: 1 May 2023 – 1 May 2025

6. Countries where activities will be undertaken: Jamaica

7. Date of preparation of this document: 20 December 2022

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. Introduction to the Project

To further protect the biodiversity of the dry forest ecosystem of the Hellshire Hills, PBPA (JAM-22), improving the resilience of Jamaica and ensuring conservation and improved management, we propose three components that will target the primary threat to this area, IAS. IAS caused the near extinction of the Jamaican Rock Iguana and are currently the greatest threat to this Critically Endangered, narrow-range endemic, species. Targeting actions that will further protect this flagship species, will enhance the resilience of the dry forest ecosystem in which they occur and ensure the protection of a variety of other species, dependent upon this area. All activities will be undertaken within the PBPA and the neighboring communities. The first component focuses on assessing the presence of IAS and native species within the core iguana zone, the newly constructed buffer zone, and the greater Hellshire Hills area. Component two focuses on assessing the density and distribution of IAS within the communities found at the boundary of the Hellshire Hills as these locations likely house source IAS populations and providing information on the dangers of IAS to reduce IAS prevalence in these areas and therein entering the Hellshire Hills. The third component addresses the living conditions at the remote field station in Hellshire Hills to ensure rigorous data collection and monitoring activities are optimally effective. The risks associated with this project include road accidents, hurricanes, and transmission of Covid-19. The purpose of this stakeholder engagement plan is to ensure a constructive relationships between those involved in the project, ensure stakeholder views are considered and that there is inclusive engagement, information is shared, and there is a mechanism to raise concerns.

10. Summary of previous stakeholder engagement activities

This is a long-term program with on-going stakeholder involvement. The stakeholders are organized into an advisory committee, the Jamaican Iguana Recovery Group (JIRG). The National Environment and Planning Agency (NEPA) is the chair of the JIRG and is the governmental agency with legal authority for natural resources conservation. They employ four full time field technicians who run the long-term efforts for the program in the Hellshire Hills. Other relevant stakeholders to the actions within this particular project are the Caribbean Coastal Area Management (CCAM) Foundation, who provides boat transport and co-manages the PBPA. The Urban Development Corporation that owns the Hellshire Hills, the Hope Zoo that houses the headstart facility, and the Jamaica Gun Club located adjacent to the Hellshire Hills are other stakeholder organizations that will benefit or be involved in this project. The JIRG meets quarterly to discuss activities and needs for the program. During these meetings all project actions are discussed. This funding opportunity and the actions outlined within it were discussed with all relevant parties prior to submission and the general response was positive as all parties are interested in seeing the conservation of this species improved.

11. Project stakeholders

The National Environment and Planning Agency employs the field technicians with the primary role of managing the field activities related to the Jamaican Iguana Recovery program and partners in the oversight of field activities and community surveys. The Caribbean Coastal Areas Management Foundation is the designated manager of the protected area under a co-management agreement with the NRCA/NEPA and provides boat transportation, patrols the marine areas within the PBPA. The Urban Development Corporation is the property owner of the Hellshire Hills, grants permission to access field site, and employs EPOs that patrol and assess threats to marine and terrestrial natural resources within the Hellshire Hills. The Jamaica Gun Club is a large property owner adjacent to PBPA and a potential IAS source. The Hope Zoo houses the headstart facility for the Jamaican Rock Iguana. The core project team already exists and includes one woman and five men. Student researchers and NEPA interviewer will be chosen based on their abilities not age or gender. We will strive to interview equal numbers of men and women of across ages during the community interviews and will provide information to equal numbers of men and women across ages.

Table 11.1: Project stakeholders.

Stakeholder Group	Type of Stakeholder (partner / target stakeholder)-	Involvement in project	Interest (low / medium / high)	Influence (low / medium / high)	Component under which will be engaged
Local NGOs: CCAM, Hope Zoo	stakeholder	CCAM – boat transport to field site. UDC – property owners at field site. Hope Zoo – houses headstart facility	high	medium	Component 1 – field work in Hellshire Hills
Government: NEPA, UDC	partner	Managing the field activities related to	high	high	All

		the Jamaican Iguana Recovery program and partners in the oversight of field activities and community surveys			
Communities: PBPA adjacent, Jamaica Gun Club	target	Receives interviews	medium	high	Component 2 - Community interviews

12. Stakeholder engagement program

The stakeholder engagement program aims to ensure equal opportunities for stakeholder groups to participate in discussions, and access information arising from activities of the sub-project. Outputs to be produced and disseminated with stakeholders include a report on the presence of IAS and native species within Hellshire Hills, an updated IAS management plan for the Hellshire Hills, a report on the presence of IAS within surrounding communities, and educational materials related to IAS.

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.

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
Local NGOs	Regular meetings, including one on one and within a group setting with other stakeholders (JIRG).
Local communities including, but not limited to women,	Interviews, information sharing through one on one meetings

Stakeholder group	Possible methods for consultation and engagement
unemployed young people, elderly, LGBTI persons, persons with disabilities, and immigrants	
National government agencies	Regular meetings, including one on one and within a group setting with other stakeholders (JIRG).

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. Consultations will occur mainly through one on one meetings with community members and group meetings with the members of the JIRG at existing quarterly meetings. Regularly meetings with NEPA will continue as has been established for the last six years.

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				2025			
NEPA meetings and training sessions with field technicians	In Kind contributions from IIF	x	x	x	x	x	x	x	x	x			
JIRG meetings	In Kind contributions IIF	x	x	x	x	x	x	x	x	x			
Community interviews and information sharing	\$2445			x	x		x	x	x	x			

16. Monitoring and arrangements

The conservation biologist will be responsible for overseeing monitoring and arrangements. All meetings will be recorded with 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 numbers 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. Disclosure

We will provide all project team members and project stakeholders with the stakeholder engagement plan at the beginning of the project.

18. Grievance mechanism (GM)

The following is the GM for the project to address concerns of The International Iguana Foundation'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 International Iguana Foundation'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 the 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	Executive Director

Contact	
Telephone	817 759 7177
Email address	RHudson@fortworthzoo.org
Physical address	1989 Colonial Parkway, Fort Worth, Texas, USA, 76110

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

Contact	
Telephone	876 370 8161
Email address	dreid@nepa.gov.jm pubed@nepa.gov.jm
Physical address	10 Caledonia Ave, Kingston, 5, Jamaica

All grievances received by The International Iguana Foundation should be forwarded to the Richard Hudson within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Richard Hudson 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. Richard Hudson 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 the International Iguana Foundation's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
 - a. If it is concerning the project, communication to the Manager International Iguana Foundation
 - 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 International Iguana Foundation operations/activity, communication to Richard Hudson.
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 Manager International Iguana Foundation. 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 CEPF Grant Director or International Iguana Foundation’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 International Iguana Foundation’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	Grant Director for the Caribbean Islands Biodiversity Hotspot
Telephone	+1-703-341-2400
Email address	cepf@cepf.net
Physical address	Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202

Third Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level two, they can contact the CEPF Executive Director via the CI Ethics Hotline (telephone: +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

Fourth Level of Redress

If the complainant is not satisfied with the way in which their grievance has been handled at level three, they have the opportunity to raise it with the CEPF Executive Director via the CI Ethics Hotline. The CI Ethics Hotline consists of a toll-free telephone line (+1-866-294-8674) and a secure web portal (<https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>) that allows grievances to be made anonymously.

If the complainant is still not satisfied, following the response by the CEPF Executive Director, they will be given 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

Fax: +1-202-614-7313

By letter: The World Bank

Grievance Redress Service (GRS)

MSN MC 10-1018 NW,

Washington, DC 20433, USA

19. Addressing 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.

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/2021/11/CEPF-II-GBV-Service-Providers-DR.pdf>.

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

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

ACTION 1: COMPLAINT INTAKE AND REFERRAL

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

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

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the designated person responsible for the Grantee refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures. The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The designated person responsible for the Grantee will keep the survivor informed about any actions taken by the perpetrator's employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been

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.

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 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

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).

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**.

A list of GBV service providers for the Jamaica can be accessed through the Regional Implementation Team's (RIT's) project page at this link: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://canari.org/wp-content/uploads/2022/06/CEPF-II-GBV-Service-Providers-Jamaica2.pdf> and will be defined prior to the contracting of workers, will be kept available by the GBV trained individual, the Project Managers, Project Coordinators, and Social Specialists.