

ESS10: Stakeholder Engagement and Information Disclosure



CRITICAL ECOSYSTEM
PARTNERSHIP FUND



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

Stakeholder Engagement Plan (SEP)

15 December 2022

CEPF Sub-Grant (113998)

Saint Lucia National Trust

Establishing the Enabling Environment for Sustainable Management of the PSEPA, Saint Lucia

Saint Lucia

Introduction

- 1. Sub-Grantee organization:** Saint Lucia National Trust (SLNT)
- 2. Sub-Project title:** Establishing the Enabling Environment for Sustainable Management of the PSEPA, Saint Lucia
- 3. Sub-rant number:** 113998
- 4. Sub-Grant amount (USD\$):** \$49,717.51
- 5. Proposed dates of Sub-Grant:** January 2023 – December 2023
- 6. Countries where activities will be undertaken:** Saint Lucia
- 7. Date of preparation of this document:** 15 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

Briefly describe the sub-project: Its objectives, Location, Activities to be undertaken, Short Summary of environmental and social risks, Include the purpose of the Stakeholder Engagement Plan

This sub-project seeks to improve the conservation-enabling environment of the Pointe Sable Protected Area (PSEPA) through two main components (i) Supporting the establishment of an enabling policy and management framework for protected areas (PA) at the national level and (ii) Assessing and strengthening SLNT's PA management and capacity needs with particular focus on sustainable management and conservation of the PSEPA.

The project will be implemented in 3 Component-3. Component 1 will support the establishment of an enabling policy and management framework for PAs at the national level through the following activities:

- Establishing a steering committee comprising of agencies with a national PA mandate
- Developing terms of reference for undertaking a consultancy to draft the desired policy that facilitates review of available literature and research on PA management in Saint Lucia
- Convening Stakeholder consultations to inform drafting the PA Policy;
- Reviewing existing literature and legislation to establish the basis for development of the PA policy
- Producing an initial draft of the policy
- Piloting the policy as a draft for public consumption and contribution

Component 2 includes assessments that geared towards strengthening SLNT's PA management and capacity needs with particular focus on sustainable management and conservation of the PSEPA. Two types of assessment will be undertaken. The first will inform building internal capacity for conservation and sustainable management of the PSEPA; and updating the PSEPA management plan (2020 – 2030)

through a participatory process. This process will place special emphasis on key biodiversity areas within the PA (Maria Islands, Ma Kôtè Mangrove including protecting priority/critically endangered species, and integrating climate change indicators. This activity will be carried out with technical and financial support from the BIOPMA project, with some costs being covered by that initiative and others. The second will inform the development of a sustainable financing strategy that can support the implementation of the updated PSEPA Management Plan. This strategy should be based on legal and governance parameters and be definitive in identifying income generating activities and funding sources. The funding mechanism will follow World Bank (WB) and CEPF guidelines and be definitive in terms of purpose; legal parameters; sources of funds; mechanics for disbursement; and its governance.

The final component covers CEPF project management and monitoring and is geared towards the following:

- Ensuring that the SLNT obtains formal permission to implement the CEPF project in the PSEPA; complies with Environmental and Social Standard (ESS) instruments; and applies CEPF monitoring tools for gender and civil society capacity
- The SLNT conducts Protected Areas Management Effectiveness (PAME) or Management Effectiveness Tracking Tool (METT) assessments; and using other tracking and monitoring tools to measure the effectiveness of engagement activities. Tracking and monitoring are essential for responding to threats, understanding the status and trends of biodiversity, and assessing the effectiveness of conservation efforts

10. Summary of previous stakeholder engagement activities

Briefly describe engagement conducted towards preparation of work to be executed under this grant e.g., partner meetings, community engagements, etc. Please provide the names of any organizations met with for this engagement and provide an indication of general response and any issues raised.

Preparatory activities for this project included discussions with project partners from protected area management agencies such as the Department of Sustainable Development, The Department of Physical Planning, the Forestry Department and the Department of Fisheries. The design phase was also informed by gaps identified during implementation of other projects. The main issue identified during these discussions was the absence of an overarching policy for PA management which contributed to the limited successes experienced with PA management activities. All agencies provided letters of support to the Trust

11. Project stakeholders

This section should include a general description of project stakeholders before completing the table 11.1 below. This description should include partners and target stakeholders. Please include any consideration your project will have for gender disaggregated information as this is a key consideration for the CEPF Phase II Investment e.g., number of men/women on project team including grantee organisation as well as executing partner organisations.

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
International CSOs:	The Durrell Wildlife Trust	Durrell Wildlife Trust has been an important partner of the Saint Lucia National Trust since the 1980's. The international agency provides technical support and capacity building for important Trust biodiversity and species programmes on the Offshore islands.	High	High	2
Local CSOs/Livelihood Groups:	Aupicon Charcoal and Agricultural Producers Group (ACPG)	The ACPG has long been associated with local livelihood activities within the Ma Kôtè Mangrove. The group is a direct beneficiary of the ecosystem services provided by the Ma Kôtè mangrove forest. Members are actively involved in the sustainable production of charcoal used as a source of fuel for cooking. and in recent times, ACPG members have also been engaged in seamoss farming and bee keeping to reduce their dependence on the mangrove trees for charcoal production and their livelihoods generally. There is evidence that suggests a strong linkage between quality honey production and the health of mangrove plants and other tree species that thrive in and around the mangrove (e.g., logwood) and honey producers located within and on the fringes of the mangrove continue to be key stakeholders	High	High	All
	Eau Piquant Seamoss Farmers Association	The EPSFA is another direct beneficiary of the ecosystem services provided by the Ma Kôtè mangrove forest. This group plants and of seamoss farmers, bee keepers and representatives from the Aupicon Charcoal and Agricultural Producers Group. Like the Charcoal producers, they have an intimate relationship with the Ma Kôtè Mangrove and have registered their commitment to ensuring that the ecosystem remains healthy.	High	Medium	All
	Coconut Bay Beach Resort and Spa	The property is located within the PSEPA and shares a boundary with the Ma Kôtè Mangrove. The property expands up to 85 acres	High	High	1 & 2

		along Saint Lucia's exotic south coast. The close proximity of the resort to key biodiversity areas like the Ma Kôtè Mangrove, the beaches of PSEPA and the Maria Islands makes it imperative that the entity be considered an important stakeholder.			
	Small Tourism Businesses operating at Sandy Beach	A similar situation applies to small business along the stretch of beach within the PSEPA that serve as public recreation, dining, entertainment and bathing areas for members of the public, and nesting grounds for turtles during nesting season. It is also imperative that the owners of these businesses and the members of the public who frequent the area be engaged as important stakeholders to ensure they understand the benefits of conservation and sustainable management of the area.	Low	Low	All
Academia:	Sir Arthur Lewis Community College (SALCC)	From time to time the Trust engages students from SALCC on internships at the College's request. These interns become integrally involved in the Trust's ongoing project activities.	Medium	Medium	All
Government:	Department of Sustainable Development (DSD)	The DSD provided technical support and guidance for the establishment of the PA policy agency policy development with strategic links with critical UN agencies and programmes. Lead advocate for the PA policy	High	High	All
	Forestry Department	In addition to advocacy and technical support and guidance for the establishment of the PA policy, the Forestry Dept. is legally mandated (Forest, Soil and Water Conservation Act CAP 7.09, Wildlife Protection Act CAP 6.03) as the enforcer of laws governing some protected areas and Wetlands fall under the purview of that agency.	High	High	All
	Ministry of Agriculture, Fisheries, Food Security and Rural Development	Ministry of Agriculture, Fisheries, Food Security and Rural Development is another important stakeholder with regards to Marine Protected Areas as this forms part of their mandate under the Fisheries Act CAP 7.15. The agency is strategically	High	High	1 & 2

		positioned to advocate for the PA policy and to provide technical support and guidance for its development and implementation. A letter of support from the Ministry has been provided.			
	Department of Physical Development and Urban Renewal	This government agency has the mandate for the Physical Planning and Development Act CAP 5.12. The agency is strategically positioned to advocate for the PA policy and to provide technical support and guidance for its development and implementation. A letter of support from the Department has been provided.	High	High	1 & 2
	Department of Physical Development and Urban Renewal	This government agency has the mandate for the Physical Planning and Development Act CAP 5.12. The agency is strategically positioned to advocate for the PA policy and to provide technical support and guidance for its development and implementation. A letter of support from the Department has been provided.	High	High	1 & 2
	Invest Saint Lucia (ISL)	ISL is the state corporation which owns and manages much of the land within the PSEPA; and their engagement will be key to receiving the necessary approvals for actions in areas where there are strategic interests.	High	High	1 & 2
	The National Conservation Authority (NCA)	The NCA was established in 1999 (Act No. 16 of 1999) which gives the agency the mandate to manage beaches within the PSEPA. 32 As such the NCA is a key stakeholder in the management of resources within the PSEPA. The agency will be consulted during the process leading to the establishment of the PA policy.	High	High	1 & 2
	The Crown Section, Ministry of Physical Development and Urban Renewal	This agency is the management authority for the Queen/s Chain. It's authority for carrying out this function exists under the Crown Lands Act CAP 5.02 Amended 1960 and 2002. The Queen's Chain is that expanse of land running 186.5 feet inland from the high-water mark around the island	High	High	1 & 2

		with the exception of a few areas. The agency is strategically positioned to advocate for the PA policy and			
Communities:	The Vieux Fort North and Vieux South Constituency Councils	These are Local Government Authorities located near or bordering the PSEPA. These local government authorities will be consulted as important stakeholders during project implementation.	High	High	All

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:

- An advanced draft of the national Protected Area Policy
- Cabinet Memo on national PA Policy disseminated to governmental agencies and decision-maker
- An updated holistic PSEPA Management Plan complete with targets, timelines and resources required for implementation
- A sustainable financing strategy for Trust conservation and sustainable use programmes and activities within the PSEPA

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 CSOs	Meetings and Consultations, Presentation of Consultancy Reports
Academic institutions	Internships and engagement in project activities
Local communities including, but not limited to women, unemployed young people, elderly, LGBTI persons, persons with disabilities, and immigrants	Meetings and Consultations, Interviews, Presentation of Consultancy Reports
National government agencies	Consultations, Interviews, Presentation of Consultancy Reports

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 in person and virtual meetings or a blend of both, interviews, consultations, presentation of project reports, and requests for comments on project documents.

14. Other engagement activities

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

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			
		Q1	Q2	Q3	Q4
Output/ Deliverable 1.1 Steering committee and consultancy for drafting the national PA Policy established 1.2 An advanced draft of the national Protected Area Policy 1.3 Cabinet Memo on national PA Policy disseminated to governmental agencies and decision-makers	\$2500		X	X	X
Output/ Deliverable 2.1 An updated holistic PSEPA Management Plan complete with targets, timelines and resources required for implementation 2.2 Capacity-building of SLNT from an organisational and programming development perspective 2.3 A sustainable financing strategy for Trust conservation and sustainable use programmes and activities within the PSEPA	\$650		X		X
Output / Deliverable 3.1 Formal permissions received from relevant protected area authority to permit SLNT to conduct CEPF-funded activities in the PSEPA	\$325			X	

Action	Cost Estimate (USD)	Implementation Schedule 2023			
		Q1	Q2	Q3	Q4
3.2 ESS policies implemented, monitored and reported every six months to the CEPF RIT to ensure full compliance, verified through bi-annual progress reports					
3.3 Institutional Capacity of SLNT evaluated through submission to CEPF of the CSTT and GTT					
3.4 Protected Area Tracking of the PSEPA evaluated 3.4.1 Baseline assessment using the METT at first quarter of project 3.4.1 Baseline assessment using the METT at first quarter of 47 through submission to CEPF of the METT Scorecard and the IBA Site Monitoring Tool					
3.5 Submission of an article and photograph demonstrating project benefits to local communities and biodiversity					

16. Monitoring and arrangements

This section aims to outline what steps you will take to monitor and evaluate the effectiveness of the stakeholder engagement activities listed in Sections 12 to 14.

17. Disclosure

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

18. Grievance mechanism (GM)

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

The following is the GM for the project to address concerns of [Saint Lucia National Trust] external stakeholders. The GM will be made available to stakeholders, including via [Saint Lucia National Trust] website, 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 Procedures.

This GM is streamlined, considering the limited scope of project activities at the community level and the low risk of adverse social impacts. The key measures will be to explain the purpose of any visit to stakeholders, explain the existence of the GM and make available contact information of [Saint Lucia National Trust] 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 Director of the Saint Lucia National Trust. 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	Jeannine Compton-Antoine
Position	Director
Telephone	1-758-452-5005/ 1-758-285-6260
Email address	director@slunatrust.org
Physical address	Pigeon Island National Landmark, Gros-Islet, Saint Lucia

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

Contact	Alison King
Position	Chair, Council of the National Trust
Telephone	1-758-452-5005
Email address	alison.g.king@gmail.com
Physical address	Pigeon Island National Landmark, Gros-Islet, Saint Lucia

All grievances received by SLNT's staff should be forwarded to the Director of the Saint Lucia National Trust within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Director of the Saint Lucia National Trust 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 Director 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 SLNT's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
 - a. If it is concerning the project, communication to the Director at SLNT.
 - b. Notification will also be made to the CEPF Regional Implementation Team (RIT) Manager within 15 days.
 - c. If it is concerning general SLNT operations/activity, communication to the Director of the Saint Lucia National Trust.
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 Director at SLNT. 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
 - b. A resolution cannot be achieved, and the case is presented to the CEPF RIT for further input
8. *Communication:* Once a resolution has been reached, the decision is communicated to the complainant in writing. Documents are added to the grievance file.
9. *Satisfaction:* If the complainant is not satisfied with SLNT'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 Director for the SLNT.

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 RIT for the CEPF Caribbean Islands Biodiversity Hotspot, who can be contacted as follows:

Contact	
Title	RIT Manager for the CEPF Caribbean Islands Biodiversity Hotspot Grant Director for the Caribbean Islands Biodiversity Hotspot
Telephone	+1-868-638-6062+1-703-341-2400
Email address	caribbeanrit@canari.org cepf@cepf.net
Physical address	Caribbean Natural Resources Institute, #105 Twelfth Street, Barataria, Trinidad & Tobago 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 Grant Director via the telephone: +1-703-341-2400 or email: cepf@cepf.net.

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 sub-grantee will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. 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. A list of SEA/SH service providers is available at the RIT's page: link - <https://canari.org/wp-content/uploads/2021/11/CEPF-II-GBV-Service-Providers-Saint-Lucia.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.

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".

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 sub-grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The RIT and the CEPF will be notified as soon as the designated persons from the sub-grantee organization learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the sub-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 sub-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 sub-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 sub-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 sub-grantee needs to report the anonymized SEA/SH incident as soon as it becomes known, to the RIT Manager 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 sub-grantee. Neither the designated person responsible for the sub-grantee nor the RIT Manager should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the designated person responsible from the sub-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 sub-grantee and RIT Manager; (3) when the verification commences or when a determination is

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.

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 sub-grantee and/or RIT Manager 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 sub-grantee should form a SEA/SH verification committee comprised by her/him, one member of the sub-grantee organization, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible from the sub-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 sub-grantee or a contractor. The designated person responsible from the sub-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 sub-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 sub-grantee does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Any cases of SEA/SH brought through the sub-grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. This 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.**

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).