



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

Stakeholder Engagement Plan (SEP)

May 2023

CEPF Sub-Grant 113724

Fitches Creek Residents Association Inc.

Building a Community Constituency for Conservation of Fitches Creek Bay and the North East Marine Management Area, Antigua and Barbuda

Antigua and Barbuda

Introduction

- 1. Sub-Grantee organization:** Fitches Creek Residents Association Inc.
- 2. Sub-project title:** Building a Community Constituency for Conservation of Fitches Creek Bay and the North East Marine Management Area, Antigua and Barbuda
- 3. Sub-Grant number:** 113724
- 4. Sub-Grant amount (USD\$):** \$48,940.00
- 5. Proposed dates of sub-grant:** 1 July 2023 – 30 June 2024
- 6. Countries where activities will be undertaken:** Antigua and Barbuda
- 7. Date of preparation of this document:** May 2023

8. Overview of the Caribbean Hotspot Project

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

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

9. Project Components

The Northeast Marine Management Area (NEMMA), inclusive of Fitches Creek Bay, is a large multi-use protected area located on the Northeast Coast of Antigua. They are both critically significant for its importance to biodiversity conservation and the role it plays in the economic development of Antigua and Barbuda. On the other hand, the area is also under severe pressure from tourism interests, fishing operators and private developers. Habitat alterations, overcrowding, pollution and improper disposal of solid waste are just a few of the drivers that threaten to deteriorate the natural environment. This sub-grant aims to provide more baseline information for environmental protection and creates the opportunity to build community awareness, capacity, and behavioural changes using an evidence-based social and behavioural approach. Below outlines the sub-grant components:

Component 1: Community Action Plan and Information Dissemination

The sub-project will build a constituency of support to strengthen the NEMMA and Fitches Creek Bay through the development and implementation of a targeted communications plan and campaign specific to the context of local populations in this area. This effort will be done in collaboration with the Lutheran Church and the collaborative social accountability (CSA) team. Some of the communication will be anchored in the rapid feasibility study. The protected area will be assessed (rapid feasibility study) to create a rapid local ecosystem profile and develop a community action plan.

Component 2: Strengthened CSO Partnerships for Conservation

The sub-project will be anchored in GPSA collaborative social accountability (CSA) methods to strengthen protected area governance through our collaboration with other NEMMA community groups, government institutions that are part of management decision-making processes, the private sector, and other stakeholders. Our constituency of CSOs located in the NEMMA and Fitches Creek Bay will work with one another and in close coordination with IHO, the government, private landowners, and the private sector to co-create analyses of and solutions to conservation challenges in non-confrontational ways.

10. Summary of previous stakeholder engagement activities

In January 2022, in response to the Call for Proposals, consultations took place with Integrated Health Outreach and two community groups in the NEMMA: the Parham Alliance Beautification and Revitalisation Organisation (PABRO) and Willikies groups. Discussions were held regarding the biodiversity issues concerning the NEMMA community and what was needed to better protect the area. From these consultations, the proposal was developed. The consultations that took place with IHO forged a partnership.

11. Project stakeholders

Table 11.1 below outlines the different types of stakeholders identified for this sub-project.

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 CSOs: Integrated Health Outreach Inc. (IHO)	partner	IHO will be the key collaborator for the GPSA social accountability training and partnership	High	High	Component 2
Government: National Solid Waste Management Authority (NSWMA)	partner	Will support waste management activities.	High	High	Component 1
Department of the Environment Antigua and Barbuda (DOE)	partner	Will support actions for conservation and collaborative partnerships for conservation for the protected area.	High	High	Component 1
Communities: Parham and Fitches Creek	Target stakeholder	Will support actions for conservation and potential project replication	High	High	Component 1

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.

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	Regular meetings, including one on one and within a group setting with other stakeholders.
National government agencies	Scheduled meetings based on activity, including one on one and within a group setting with other stakeholders.
Local communities including, but not limited to women, unemployed young people, elderly, LGBTI persons, persons with disabilities, and immigrants	Scheduled meetings based on activity, including one on one and within a group setting with other stakeholders.

13. Consultation methods

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

14. Other engagement activities

Consultations will be held with CSOs in the NEMMA, mainly PABRO throughout the project. They will also be held with government departments through the compact meetings held by IHO quarterly.

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	
Salary of direct workers to implement the CHSP (5% of budgeted compensation)	\$550	X	X	X	X
Implement cleanup initiative	\$2,000		X		
Implement mangrove replanting training	\$1,000			X	
Train environmental community ambassadors	\$1,000		X	X	X
Partake in CSA capacity building training and mentoring conducted by IHO	\$500	X	X	X	X
Participate in continuous collaborative meetings	\$500	X	X	X	X

16. Monitoring and arrangements

The Project Manager will be responsible for monitoring this SEP. This will be through one biannual report on the progress and status of the achievement of results, where the learning and achievements of the use of communication and community participation mechanisms will also be explored.

17. Disclosure

Communication routes between different stakeholders and local authorities will seek to maintain the dissemination of information relevant to the project. This will include communication via email, phone calls, issuing reports (especially for funders and sub-grants), and during key moments of the project (start and end) socialisation meetings that will include the participation of the stakeholders involved.

Regarding the complaints system, it is proposed to socialise it from the beginning of the project, using the platforms for socialisation and discussion with the community to make it known. This mechanism will also be mentioned in each of the community meetings, whether they are meetings, community gatherings, or stakeholder meetings. It is proposed that a series of posters can be used on an ad hoc basis, to be displayed at each event or meeting. A specific space will be dedicated at each meeting to explain this mechanism to encourage beneficiaries and local stakeholders to use it. The contact information will be the same as that available on the sign.

18. Grievance mechanism (GM)

The following is the GM for the project to address concerns of FCRA external stakeholders. The GM will be made available to stakeholders, including via FCRA's Facebook page (<https://www.facebook.com/fitchescreek>) 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 FCRA 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 Chairman. Complaints can be made in person, in writing, verbally over the phone, by email or any other suitable medium. Complaints can be filed anonymously. The point of receipt of complaints is listed below:

Contact	
Position	Project Manager
Telephone	268-732-1201
Email address	nemmafcra@gmail.com
Physical address	Chancellor Chambers, Island House, Newgate Street, St. John's, Antigua and Barbuda

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

Contact	
Position	Project Manager
Telephone	268-732-1201
Email address	nemmafcra@gmail.com
Physical address	Chancellor Chambers, Island House, Newgate Street, St. John's, Antigua and Barbuda

All grievances received by FCRA'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 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 FCRA'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 FCRA
 - 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 FCRA 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 as well as the Project Manager FCRA. 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 FCRA'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 FCRA'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

Fourth Level of Redress

If the complainant is not satisfied with the way in which their grievance has been handled at level three, they should avail themselves of the services the Minister of Labour and Social Security, telephone (268) 461 – 2807; email mpsl@ab.gov.ag.

If the complainant is still not satisfied, they have the option of submitting their grievance to the World Bank's Grievance Redress Service, but this should only be accessed after other GRM options have been exhausted by the claimant. The RIT and CEPF Secretariat will aim to resolve all grievances within 60 days of receipt.

The World Bank Grievance Redress Service (GRS)

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

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

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

20. 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,

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.

- 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 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

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).

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:

- 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**.