Grievance Redress Mechanism (GRM) for the Bahamas Protected Areas Fund (BPAF)

December 2025

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Contents

Abbreviations

BPAF	Bahamas Protected Areas Fund
E&CO	Ethics & Compliance Officer
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESMP	Environmental and Social Management Plan
FPIC	Free, Prior and Informed Consent
GCF	Green Climate Fund
GEF	Global Environment Facility
GRM	Grievance Redress Mechanism

Definitions of Key Terms

Affected Party(ies)	Stakeholders who are affected by BPAF or operation, both positively and negatively. Within this it is possible to distinguish between those that are directly affected and indirectly affected by the company or operation.
Environmental and Social Management System	System designed to ensure BPAF meets the environmental and social safeguards and requirements of GCF, the World Bank Operational Standards, IFC Performance Standards and Applicable Bahamian laws and regulations
Environmental and Social Impact Assessment	Process of evaluating and addressing potential social and environmental impacts resulting from BPAF Project Screening and identifying any mitigation or corrective measures that will enable the project to meet the requirements of GCF, the World Bank Operational Standards, IFC Performance Standards and Applicable Bahamian laws and regulations
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants a company or contractor to address

	and resolve.
Grievance Register/log	System for logging and monitoring all grievances received, including any records of communication/consultation and details of grievance settlement.
Records of communication / consultation	Records of communication / consultation may include key emails, letters, newsletters, memorandums, complaints, opportunities for improvement, records of distribution/attendance, records of formal and informal meetings and records of commitments.
Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and international third parties.

Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between BPAF and stakeholders (two-way communication) over the life of a project that are designated to promote transparent, accountable, positive, and mutually beneficial working relationships.
Groups	Individuals or groups within the project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's ethnicity, gender, language, religion, political views, dependence on natural resources, sickness or disability or other factors.
Interim Stay of Action	A time-limited written direction that pauses, restricts, conditions or defers one or more specified decisions, project activities, implementation steps, contractual actions, or related funding disbursements while BPAF assesses an urgent grievance or implements a corrective action. A stay is a precautionary measure and does not determine the merits of a grievance.

1. Introduction to the BPAF GRM

1.1. Background

The Bahamas Protected Areas Fund (BPAF) was established in 2014 by The Government of The Bahamas through an Act of Parliament. The purpose of the Fund is to "ensure sustainable financing into perpetuity" for scientific and policy research, education, conservation, and management of protected areas, including national parks. BPAF is the sustainable finance mechanism for the Bahamas National Protected Areas System.

BPAF is committed to supporting the country's national goals and commitments under various international conventions that are consistent with the BPAF Acts. The Fund is also committed to funding to improve the management effectiveness of Protected Areas Managers, address key threats to eco-system health and promote key partnerships for impact within the sector.

A grievance is defined as an issue, concern, problem or claim (perceived or actual) that an individual or community group wants the executing entity, the BPAF, or their contractors, to address and resolve. Examples include specific complaints about impacts, damages or harm caused by the project, and concerns about project activities during construction or operation, or perceived incidents or impacts.

1.2. Purpose

The purpose of Grievance Redress Mechanism (GRM) is to provide people affected by projects/programmes supported by the BPAF with an accessible, transparent, fair and effective process for receiving and addressing their complaints about environmental or social issues regarding the BPAF or any of its financed projects/programmes.

1.3. Scope of the GRM

This GRM applies to all activities financed and implemented by the BPAF. It applies to all employees, grantees, partners, project contractors, and representatives. The GRM covers issues including environmental and social impacts, gender equity, labor, disputes regarding eligibility or KYC (Know Your Customer) decisions, concerns about staff conduct, and administrative or procedural concerns. This GRM does not apply to issues pertaining to ethics, financial fraud, procurement and other institutional issues covered under BPAF Whistleblower Policy and Mechanism and BPAF Procurement Policy.

2. GRM General Structure, Implementation and Responsibilities

2.1. Structure of the GRM

The design of the GRM considers the existing procedures in place within the organisation. The GRM provides a systematic procedure to address environmental and social issues. It works in tandem with the Environmental and Social Management System (ESMS) which screens the BPAF initiatives for potential adverse environmental and social impacts to ensure that negative impacts are avoided or minimised while positive impacts are stimulated. The GRM applies throughout the entire project cycle, in line with national Bahamian regulatory requirements. It is applicable to all projects that receive funds from or are implemented by the BPAF. Projects may be implemented directly by the BPAF, or by an executing entity contracted by the BPAF to implement and manage certain activities/interventions. Implementation responsibilities will vary, depending on which entity is ultimately responsible.

The Grievance Mechanism is required to be:

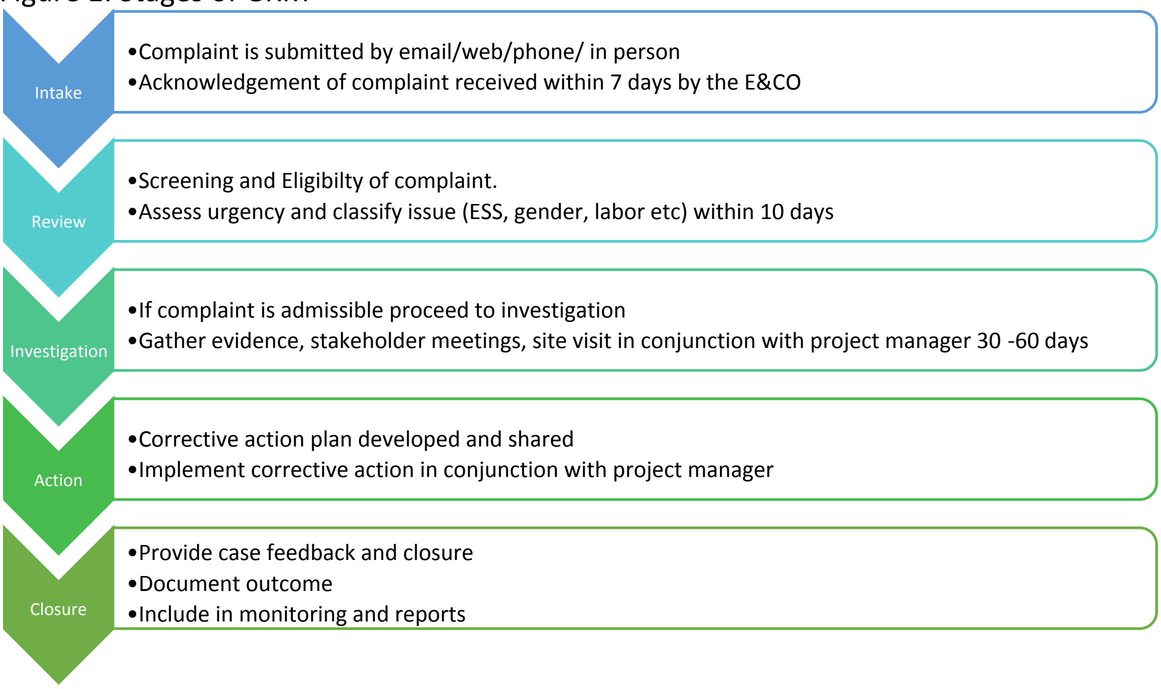
- Systematic: All forms of complaints related to the project need to be considered;
- Transparent: Stakeholders must be informed that a grievance mechanism is in place, and grievances must be documented and registered;
- Appropriate: Tailored to the Project scope, adapted to local conditions and culturally acceptable; and,
- Lead to corrective actions: Grievances must be answered as relevant and the answers must be documented. Timely resolution of grievances is vital to ensure successful implementation of the project.

Resolution of complaints should be sought at the lowest possible level. There are three (3) levels of resolution:

1) First, complainants should bring up the issue with the project management/Ethics & Compliance Officer (E&CO) to attempt to resolve the issue together;
2) If this is not effective, the concern should be escalated to the Executive Director of the BPAF, who should act as a neutral party mediating the situation;
3) The final stage is escalation to the Board/executive levels which is used as a last resort.

The general stages of processing in the GRM are outlined in Figure 1 below and further detailed in Section 4.

Figure 1: Stages of GRM



2.2. Stakeholder Engagement

Stakeholder engagement measures will work pro-actively towards identifying and addressing issues before they become grievances. However, when grievances are reported they need to be addressed in a consistent and verifiable manner. The purpose of the Grievance Mechanism is to implement a formalised process (identification, tracking and redress) to manage project related complaints from communities, workers and other stakeholders. A Grievance Mechanism needs to ensure that stakeholder comments, suggestions and objections are captured and considered. The Grievance Mechanism is designed to be a transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the stakeholders at no costs and without retribution.

2.3. Implementation of the GRM

By implementing the measures outlined in the ESMS, the BPAF will be able to provide evidence that best efforts are being made to address environmental and social issues to the extent possible given the project/stakeholder setup, the nature of the projects, and the context of implementation.

Regarding projects implemented directly by BPAF, the fund is responsible for ensuring that the requirements as stipulated in this GRM are met.

2.4. Roles and Responsibilities

To ensure effective implementation and enforcement of this policy. Table 1 below summarizes the roles and responsibilities of the GRM with further descriptions of duties provided below.

Table 1: Roles and Responsibility for GRM

Role	**Responsibility**
Ethics and Compliance Officer	Oversees entire process, ensures independence, reports to Executive Director
Project Manager	Provides project information, implements corrective measures
Internal Review Panel	Provides impartial investigation and recommendations
Executive Director	Final authority on resolution decisions & resource allocation
Human Resources	Ensure training for staff on GRM
Board of Directors	Receives GRM reports to review and acts when resolution escalation is needed

BPAF defines the following institutional responsibilities:

BPAF – as an organization

- Ensures that appropriate structures, processes, and resources are in place to support confidential and safe reporting of concerns.
- Maintains and updates the reporting platform and case management system.

- Disseminates this policy to all staff, contractors, and implementing partners.
- Provides training and awareness-raising to ensure understanding of rights and procedures under the policy.
- Monitors compliance across the organization and implementing partners.
- Ensures corrective or disciplinary actions are taken, as appropriate.

Ethics & Compliance Officer

- Serves as the primary contact for managing the case management system, including receiving, logging, and managing grievance reports.
- Maintains confidentiality and ensures protection of complainant.
- Coordinates or conducts investigations in line with this policy.
- Provides updates to senior management and oversight bodies on the status and outcomes of reports.
- Initiates and updates the compliance website.

Project Manager

- Coordinates with the ethics and compliance officer on project level grievances.
- Participates in investigations and provide project details.
- Ensures corrective actions for grievances are implemented at the project level.

Internal Review Panel

- Consists of 2-3 trained staff or impartial experts.
- Serves as an impartial advisory body on cases.
- Serves as an advisory body on complex or high-risk cases, without interfering in investigations.
- Assists with investigations as needed.
- Provides recommendations and outcomes.

Executive Director

- Provide detailed oversight of the policy and its implementation.
- Ensures resource allocation including personnel assignments to ensure implementation.
- Gives final approval and authority on resolution decisions.
- Provide resolutions for cases escalated to their level.
- Review GRM performance on a regular basis.

Board of Directors

- Provide general oversight of the policy and its implementation.
- Review periodic reports on GRM performance.
- Provide resolutions for cases escalated to their level.

Human Resources Department

- Supports employee awareness of the GRM.
- Coordinates with the Ethics and Compliance Officer to provide protective measures for internal grievance (e.g., transfers, legal support).

- Takes disciplinary action, as appropriate, based on investigation of outcomes.

All Staff and Associated Personnel

- Comply with the provisions of this policy.
- Cooperate with investigations when requested, maintaining confidentiality.

2.5. Interim Stay of Action

The Ethics and Compliance Officer ("E&CO") is responsible for urgently assessing the need for an interim stay of action, particularly during an active grant cycle where disbursements or ongoing activities are implicated. The E&CO may recommend a stay to the Executive Director and may direct an emergency precautionary pause for up to 30-60 days where the application presents a credible risk of serious or irreversible environmental or social harm, retaliation, interference with evidence, or material non-compliance with applicable safeguards.

The Executive Director has authority to approve, vary, extend or lift a stay, including a stay affecting a project decision, activity, implementation step or related funding disbursement. Where the Executive Director is implicated in the grievance or has a conflict of interest, the Chair of the Board or a Board-designated independent decision-maker will exercise this authority. The Project Manager, grantee and implementing partners must implement the written direction immediately and report compliance to the E&CO.

3. Grievance Reporting Structure

3.1. Reporting Mechanisms

Reports of noncompliance or issues pertaining to the GRM scope must be submitted through the secure online platform. Employees and external parties are encouraged to report concerns promptly. Throughout the grievance process, BPAF is committed to ensuring that all parties receive due process, including a fair opportunity to be heard, transparent procedures, and impartial review.

If desired, reports may be made anonymously through the online platform. However, providing sufficient details and supporting evidence will help in investigating the matter effectively. BPAF places a strong emphasis on strict confidentiality and will handle all reports in a confidential manner to protect the identity of the complainant. While confidentiality is paramount, the degree to which anonymity can be maintained will vary on a case-by-case basis, depending on the nature of the investigation. Complete anonymity can sometimes hinder the ability to conduct a thorough investigation and may limit the due process afforded to all parties.

3.2. Reporting Channels and Accessibility

Reports of noncompliance or issues pertaining to the GRM scope must be submitted through the secure online platform. Employees and external parties are encouraged to report concerns promptly. Throughout the grievance process, BPAF is committed to ensuring that all parties receive due process, including a fair opportunity to be heard, transparent procedures, and impartial review.

BPAF ensures the confidentiality of all parties. While reports may be made anonymously through the online platform, anonymous reporting may hinder due process and the ability to conduct a thorough investigation. Providing sufficient details and supporting evidence is encouraged to help in investigating the matter effectively.

3.3. Protection against Retaliation

BPAF will ensure no adverse action is taken against any complainant or witness. Allegations of retaliation will be investigated immediately. Employees, grantees or other external parties found to have retaliated against complainants will be subject to disciplinary actions, including termination or cessation of dealings with external parties.

BPAF may implement temporary or permanent mitigation measures such as role reassignment or suspension of retaliatory actions, to protect complainants from harm.
Temporary protective measures will be implemented if risk is identified.

4. Grievance Process and Register

4.1. Grievance Intake

The reporting channel is detailed in Section 3.2. Grievances must be submitted exclusively through the secure online platform. The E&CO will collect sufficient information to assess and investigate the grievance, including whether the complainant seeks urgent protective measures or a stay of action. Acknowledgement will normally be sent within seven days of receipt. Where an urgent stay is clearly required by the facts, the E&CO will begin the risk triage immediately and will not wait for the normal acknowledgement period.

4.2. Grievance Review

The E&CO will screen the grievance for validity, eligibility, appropriate level of handling, scope and urgency. The review will determine whether the matter concerns BPAF as an institution or a specific project; whether it falls within the environmental and social, gender, labour, eligibility/KYC, staff conduct or administrative scope of this GRM; and whether it should be referred to the Whistleblower Policy, Procurement Policy or another applicable process. The initial review should normally be completed within 10 days of receipt.

4.3. Grievance Investigation

Once a complaint is deemed admissible an investigation will be launched by the E&CO. During this investigation the E&CO will gather evidence. The E&CO will also hold stakeholder meetings and gather witness statements and conduct interviews as deemed necessary. If site visits are needed these will be coordinated with the project manager. The E&CO will draft reports and present to internal review panel to ensure independence and objectivity. This process can take between 30-60 days.

4.4. Grievance Action

Based on the investigation, actions will be recommended for the resolution of the complaint. The corrective action plan will be developed and shared with the project manager and other stakeholders. Once in agreement, the corrective actions will be implemented.

4.5. Grievance Closure

Updates on reports and outcomes will be documented and provided to relevant stakeholders, as required. If appropriate, the complainant will receive feedback on the outcome of the investigation, ensuring transparency and accountability. The results of the grievance will be included in project monitoring and final reports. The final closure date will also be documented.

4.6. Grievance Register

The Grievance Register should be kept current and used to track the status by the E&CO. This should be made available for review by the Executive Director and the Board and a summary included in the Annual Report. The Grievance Register should at least include the following categories:

- Name and contact details of contact (unless requested to remain anonymous);
- Date and description of grievance;
- Response made to the grievance / corrective action implemented. Annex 2 contains a sample of the grievance register/log.

5. Application Levels of GRM

5.1. Institutional Level GRM

The BPAF will adhere to the GRM to ensure the organization adheres to its environmental and social policy and safeguards as outlined in the ESMS.

At the institutional level, the E&CO is appointed as the Grievance Mechanism Manager. The E&CO will inform colleagues and contractors about grievance mechanism procedures, gather grievance forms, enter them into the Grievance Register, and provide input to project reporting. See section for further roles and responsibilities for the E&CO.

For institutional level issues related to ethics, fraud and other complainants not related to environmental, social and gender please refer to the BPAF Whistleblower Policy and Mechanism. Matters regarding procurement will fall under the Procurement Policy.

5.2. Project Level GRM

All projects funded by the BPAF will need to design and implement project-level GRM. The purpose of GRMs is to provide people affected by projects/programmes supported by the BPAF with an accessible, transparent, fair and effective process for receiving and addressing their complaints about environmental or social harms caused by any such project/programme.

At the project level, the E&CO is appointed as the Grievance Mechanism Manager. The E&CO will inform grantees and contractors about grievance mechanism procedures, gather grievance forms, enter them into a grievance register, and provide input to project reporting.

6. GRM Training, Monitoring, Evaluation and Review

6.1. GRM Training

All employees and relevant external parties will receive annual training on the importance grievance review mechanism and how to report concerns. This ensures awareness of GRM for proper implementation at the institutional level. Employees must acknowledge understanding of the policy annually.

For the grievance mechanism to be effective and accessible, BPAF or the executing entity must inform all relevant project stakeholders of the existence of the mechanism. This should ideally be done during the project design phase, but no later than within the first quarter of project implementation. Stakeholders need to know what issues are eligible to be dealt with using the GRM, the process, contact information and the mechanism for complaint submission. The information should be delivered in a culturally appropriate form assuring that all relevant groups are reached, including women, indigenous peoples and vulnerable groups. It can be communicated verbally (in consultation meetings or through media) and in writing. Evidence of having provided adequate information to all relevant stakeholders about the existence of the GRM needs to be included in the first progress report. All training materials will be made available on BPAF's internal portal.

6.2. GRM Monitoring

Projects are directly responsible for the day-to-day monitoring of the implementation of the E&S requirements and stakeholder engagement in their respective projects including the GRM. These should be forwarded to the E&CO. The MEL Officer is responsible for coordinating with the E&CO and project managers to ensure all project grievances are reported and reflected in the M&E report. For more details see the Monitoring and Evaluation Strategic Action Plan and Framework.

6.3. Performance Evaluation of the GRM

To ensure the GRM is effective, BPAF will conduct a performance evaluation of the mechanism every two years, or earlier if warranted by specific cases or organizational changes. The evaluation will assess:

- Utilization and accessibility of reporting channels.
- Timeliness and fairness of complaint handling.
- Complainant protection outcomes (including incidents of retaliation).
- Partner and stakeholder awareness and adherence.
- Corrective actions taken as a result of investigations.
- Trends in reported issues and responses.

The results of this evaluation will inform continuous improvement and may lead to policy revisions.

6.4. GRM Policy Review and Amendments

The GRM will undergo comprehensive review at least once every three years to ensure its alignment with international standards, applicable laws, and BPAF’s institutional practices.

Interim reviews may be conducted following major incidents, regulatory updates, or relevant organizational changes.

BPAF reserves the right to amend this policy to reflect changes in legislation, donor requirements, or operational needs. Any amendments will be developed in consultation with relevant internal stakeholders and, where appropriate, external partners or donors. Updated versions will be communicated to all employees, contractors, and implementing partners, and made publicly accessible through BPAF's website and reporting platforms.

Findings and recommendations from the performance evaluation of the GRM shall be formally documented and submitted to BPAF's senior management for review. Once established, the Audit Committee or designated oversight body will also receive the evaluation report to ensure independent oversight and accountability. This process ensures that key decision-makers are informed of the mechanism's effectiveness, risks, and areas for improvement, and can support appropriate organizational responses or reforms.

Policy Approval

The Grievance Redress Policy and Mechanism was reviewed and formally approved by the Board of Directors of BPAF on this [ ] day of [ ], 2026.

2. Annexes

Annex 1 Grievance Input Form

Annex 2 Grievance Redress Register/Log