Caribbean Regional Fisheries Mechanism

ISSN: 1995-4875
CRFM SPECIAL PUBLICATION No. 33

CRFM'S POLICY TO PREVENT AND RESPOND TO SEXUAL EXPLOITATION, ABUSE, HARASSMENT AND DISCRIMINATION

Caribbean Regional Fisheries Mechanism, 2025

[Adapted from British Columbia Council for International Cooperation's (BCCIC's) Policy to Prevent and Respond to Sexual Exploitation, Abuse, Harassment and Discrimination]

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CRFM Secretariat
Belize
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Correct Citation:
CRFM, 2025. CRFM Policy to Prevent and Respond to Sexual Exploitation, Abuse, Harassment and Discrimination. CRFM Special Publication No. 33, 18p.

ISSN: 1995-4875
ISBN: 978-976-8293-76-3

Published by the Caribbean Regional Fisheries Mechanism Secretariat
Belize and St. Vincent and the Grenadines

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01. BACKGROUND

1.1 Introduction

The 8th Special Meeting of the Ministerial Council issued a statement on gender, youth and decent work whereby: *The Council accepted that international and national norms regarding issues pertaining to gender, youth, and decent work be adhered to, and be incorporated into all CRFM policies, protocols, programmes, and plans".* In this regard, it is recognized that Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), as well as abuse of authority, constitute a violation of fundamental human rights and a betrayal of CRFM's core values and vision.[1]

CRFM is committed to creating a positive, peaceful and healthy environment for our employees, and ensuring that policy and practice reflect the values of human rights, dignity, equity, social justice, co-operation, transparency, accountability, due-process, integrity and sustainability. We will not tolerate the sexual harassment of our staff, consultants, colleagues, volunteers and members, nor will we accept the unconscionable sexual exploitation and abuse of those who depend on CRFM.

There is CARICOM model legislation on sexual offences and sexual harassment. With respect to sexual offences, Trinidad and Tobago (*Sexual Offences Act* Chap. 11:28 '2006 Rev') and Guyana (*Sexual Offences Act* 2010) are now considered to serve as the model for the rest of the English-speaking Caribbean.[2] These countries have widened the range of offences, increased penalties, removed all exemptions from marital rape prosecution, improved measures to protect victims during police investigation and court proceedings and have provisions in place to keep track of sex offenders after they have served their sentence.

As regards sexual harassment, only a handful of countries have enacted legislation which expressly prohibit sexual harassment and provide legal remedies for victims of sexual harassment. In countries which do not have sexual harassment or anti-discrimination legislation, this 'gap in the law 'may be handled through recourse to the common law, in particular the law of torts (duty of care) and the law of contract (breach of implied trust, constructive dismissal etc.). In Jamaica, there was significant development at common law: a judge of the Supreme Court found that the tort of harassment is now explicitly recognized at common law (Sykes J in *Needham and Clarke v Senior* Claim No HCV 0852/2006 decided 24 March 2006).

Working closely in partnership with our members and partners, CRFM has developed a PSEA strategy in alignment with international and national norms and standards. The draft policy has been reviewed through a rigorous consultation process. It is expected that at agreed governance hierarchy[3] meetings, CRFM leadership will report on the operationalization of this strategy, and revisions will be made when

[1] "Sexual Exploitation" means 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 Abuse" means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions; and "Sexual Harassment" means 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 offence 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 (see also Section 5 of the Anti-Sexual Harassment Act, 2024, of Belize). While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders; "Abuse of Authority" means the improper use of a position of power to coerce, intimidate, or pressure another individual into providing sexual favors or engaging in other forms of misconduct, including but not limited to actions that negatively impact the career, employment, or well-being of another individual.

[2] https://caribbean.unwomen.org/en/caribbean-gender-portal/caribbean-gbv-law-portal/gbv-developments-in-the-law <accessed 21 February 2025>

[3] This refers to the Ministerial Council, Caribbean Fisheries Forum and Executive Committee

deemed necessary. In addition, the Executive Committee will review this strategy after an incident or periodically, every four years.

1.2 Purpose and scope

This document defines CRFM's commitment to preventing and addressing SEA, and SH, outlining its vision, principles, and response framework.[4] It presents concrete strategies, mechanisms and interventions that will support the creation of a safe and respectful environment for the CFRM Governance hierarchy, staff members, contractors, consultants, volunteers, interns, beneficiaries and civil society partners.

The reporting requirements outlined in this document apply to all CRFM Governance hierarchy, staff, volunteers or contracted personnel, as well as members and local stakeholders involved in the implementation of CRFM programmes or projects, bearing in mind that allegations of prohibited conduct can be made by any person irrespective of their relationship with CRFM.

1.3 Vision statement

All CRFM staff members, related personnel, volunteers and partners feel safe, supported, respected and empowered in a work environment that recognizes, promotes and protects their human rights as a result of a zero-tolerance approach to sexual exploitation, abuse, harassment[5] and discrimination. All individuals or communities served by CRFM can access support without fear of sexual exploitation, abuse or discrimination. All survivors of sex discrimination[6], sexual exploitation, abuse or harassment, that takes place in the workplace or is linked to CRFM employment or programs, have access to safe and trusted CRFM reporting mechanisms; swift, credible and confidential investigations; timely survivor-centered assistance and ongoing support by CRFM. Partners and members are aware of accessible policies, guidance and capacity-building resources, which will be developed and disseminated via the CRFM website.

1.4 Goals

a) Strengthen accountability within CRFM;
b) Foster an organizational culture of prevention and gender-equality;
c) Empower individuals to report violations with access to safe and trusted reporting mechanisms;
d) Conduct swift, credible, fair and confidential ensuring due process for all parties and that respect for due process and human rights is applied ;
e) Provide comprehensive, survivor- centered support;;
f) Raise awareness among partners regarding sexual harassment, discrimination, abuse and exploitation prevention and response[7]

[4] This is consistent with the Staff Rules of the Caribbean Community Secretariat Staff Rules 5(xiii), 11(i)(a) and 29.4.1 (Approved at 114th meeting of the Executive Management Committee (EMC) 16th November 2012) and the *Policy and Procedures on Sexual Harassment within the Workplace* which was ratified at the 215th Meeting of the EMC, 15 June 2021

[5] The Labour Code of Saint Lucia points out that "any act of sexual harassment against an employee committed by an employer, managerial employee or co-employee shall constitute unlawful discrimination based on sex"

[6] According to the Labour Code of Saint Lucia "a person discriminates against another person if the first-mentioned person makes, on any of the grounds specified in subsection (2), any distinction, exclusion or preference, the intent or effect of which is to nullify or impair equality of opportunity or treatment in occupation or employment". See also the Employment (Prevention of Discrimination) Act, 2020 of Barbados and the "Declaration of Labour and Industrial Relations Principles" which was unanimously approved by the Thirteenth Meeting of the Standing Committee of Ministers responsible for Labour (SCML), 26-28 April 1995 in The Bahamas.

[7] Adapted from UNICEF (2019), UNICEF Strategy to Prevent and Respond to Sexual Exploitation and abuse and Sexual Harassment

1.5 Principles

- All individuals associated with the CRFM – including the CRFM Governance hierarchy, staff members, contractors, consultants, volunteers, interns, beneficiaries and civil society partners have a fundamental and inalienable right to dignity, respect and a safe working environment.[8]
- The leadership of CRFM (Directorate and Programme Managers) has a responsibility to prevent and respond to sex discrimination and sexual exploitation, abuse and harassment, and can be held accountable for failing to take appropriate action.
- All CRFM personnel including the Governance hierarchy, staff members, contractors, consultants and volunteers must act with tolerance, sensitivity and respect for gender diversity, and are expected to uphold a culture of respect, integrity, trust and accountability. All employees can be held accountable for failing to regulate their conduct accordingly, or for failing to report concerns of misconduct by a fellow worker.
- CRFM is accountable to its partners and beneficiaries for ensuring robust measures are in place to prevent and respond to sexual exploitation, abuse, and misconduct within its programs.
- Sexual exploitation and abuse by CRFM personnel – including Governance hierarchy, staff members, contractors, consultants, volunteers and interns constitute gross misconduct and should result in termination. Sexual harassment and sex/gender discrimination are also serious offences and considered acts of misconduct/ wrongdoing, and should result in disciplinary action, including dismissal.

1.6 Values

Social justice and equity are at the core of CRFM's identity and mission. As an organization, CRFM values accountability, trust, fairness, equity, respect and due process. Mutual respect and non-discrimination, along with cooperation and understanding, underly all interactions between members, staff and management. CRFM will neither tolerate nor condone behaviour that is likely to undermine the dignity or self-esteem of an individual, or create an intimidating, hostile or offensive work environment CRFM maintains a zero-tolerance stance toward any behaviour that undermines an individual's dignity or self-esteem, or that creates an intimidating, hostile or offensive work environment.

1.7 Definitions

Protection from sexual exploitation and abuse (PSEA): The term used by the United Nations and non- governmental community to refer to interventions that seek to protect and respond to sexual exploitation and abuse, experienced by vulnerable people as well as by staff and associated personnel.[9] In this policy document, PSEA will also cover sexual harassment and discrimination.

Sexual discrimination is an isolated event or pattern of conduct that affects one person, or a group of persons similarly situated. It is characterized by unfair treatment or arbitrary distinction based on a person's sex, sexual orientation or gender identification. It may manifest itself through harassment, abuse of authority, social exclusion, or denial of services, promotion, benefits or rights (e.g. right to

[8] A safe working environment can be defined as a place where employees perform their tasks free from potential hazards, risks, fear or threats to their physical and psychological well-being. C.f. https://www.culturemonkey.io/employee-engagement/safe-working-environment/ accessed 03 March 2025

[9] United Nations (2017), United Nations Glossary on Sexual Exploitation and Abuse (2nd Edition). Prepared by the Task Team on the SEA Glossary for the Special Coordinator on improving the UN response to sexual exploitation and abuse.

breastfeed).[10] Vulnerability to sexual discrimination may be caused by an intersection of "race, colour, ancestry, place of origin, religion, family status, marital status, physical disability, mental disability, sex, age, sexual orientation, political belief or conviction of a criminal or summary conviction offence unrelated to their employment," all of which are considered prohibited grounds for discrimination.

Sexual exploitation is a single incident or pattern of conduct that is an abuse or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including CRFM or partners profiting monetarily, socially or politically at the expense of the people they serve.[11] Any exchange of development assistance, money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behavior, constitutes sexual exploitation, and for this reason the CRFM includes transactional sex in its definition of sexual exploitation.[12]

Sexual abuse is a single incident or pattern of conduct that is an actual or threatened physical intrusion of a sexual nature by force or under unequal or coercive conditions.[13] This falls under the definition of sexual assault, which includes little or no physical injury; involves a weapon, threat, or bodily harm; or involves physical wounds, disfigurement, or threaten the life of the survivor.[14] Sexual assault includes all 'unwanted 'sexual activity, such as sexual grabbing, kissing, fondling, rape and stalking. Sexual activity is only legal when both parties provide consent, which is herein defined as the voluntary agreement to engage in the sexual activity in question. Sexual touching is only acceptable if the person affirmatively communicated their consent, through words or conduct. Silence or passivity does not equal consent. Even when verbal consent is given, it has been found that a power imbalance in a relationship can negate consent to sexual activity. Even though a person may take part in sexual activity or related behaviour this does not mean that they welcome it – the perceived consequences of objecting may lead the person to go along with the unwelcome conduct.[15] All sexual activity with a person under the age of 18 years, regardless of the local age of consent or age of the majority, is classified as sexual abuse in CRFM's policy.[16]

Sexual harassment (SH) is a single incident or pattern of conduct that is 'unwelcome', considering that an unequal power balance may negate consent, as discussed above. [17]It is considered an abuse of authority, involving a position of influence, power or authority against another person, but an imbalance of power is not a requirement for it to occur. Sexual harassment includes words, gestures, actions or omissions of a sexual nature or occurs because of a person's sex, sexual orientation or gender identification (and/or in intersection with age, physical or mental disability, marital status, race, ethnicity, religion, political belief, ancestry or place of origin etc.).[18]

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[10] UNFPA, "Policies and procedures manual: Prohibition of harassment, sexual harassment, abuse of authority and discrimination".

[11] Based on a standard definition adopted across UN agencies, and outlined in the Secretary-General's Bulletin, Special measures for protection from sexual exploitation and sexual abuse, ST/SGB/2003/13, 9 October 2003, Page 1.

[12] C.f. United Nations (2017), United Nations Glossary on Sexual Exploitation and Abuse (2nd Edition). Prepared by the Task Team on the SEA Glossary for the Special Coordinator on improving the UN response to sexual exploitation and abuse.

[13] Secretary-General's Bulletin, Special measures for protection from sexual exploitation and sexual abuse, ST/SGB/2003/13, 9 October 2003, Page 1.

[14] C.f. Canada Criminal Code (R.S.C., 1985, c. C-46). S.272.

[15] See Ontario Human Rights Commission (OHRC) (2011), Policy on preventing sexual and gender-based harassment, p.41

[16] In most CARICOM States, the age of consent to sexual activity is 16 years, except for St, Vincent and the Grenadines where it is 15 and Haiti where it is 18 (https://www.ageofconsent.net/world <accessed 12 February 2025>).

[17] It is important to note that sexual harassment can be severe, pervasive or some combination of both.

[18] The Labour Code of Saint Lucia defines sexual harassment as "any unwanted conduct of a sexual nature in the workplace or in connection with the performance of work which is threatened or imposed as a condition of employment on the employee, or which creates a hostile working environment for the employe ". In the case of *CA No. P407 and P408 of 2019 EOC and Maharaj v Cascadia Hotel Limited* the Trinidad and Tobago Court of Appeal ruled that sexual harassment can amount to actionable discrimination on the grounds of sex within the meaning of the Equal Opportunity Act.

Gender-based harassment is a subset of sexual harassment; it is often used as a "gender-policing tool" or bullying tactic that tries to create social exclusion or reinforce conformity with traditional same sex-role stereotypes and traditional heterosexual gender norms.[19] People who do not confirm to traditional understandings of what is considered appropriate sex-role behaviour may be singled out and pressured into conformity by being made to feel unwelcome in their environment, often through sexist jokes, pranks, pejorative slurs, unsolicited advice and social exclusion.

The CRFM opines that when deciding if sexual harassment has occurred, it is enough to show that the conduct has a discriminatory effect (i.e. focus on impact), without having to prove the intention of the harasser. In terms of impact, sexual harassment includes "conduct which causes, is perceived to cause, or might reasonably be expected to cause, offence, intimidation, belittlement, humiliation, embarrassment, alarm, fear or abuse".[20] When assessing the reasonableness or perception of offence or humiliation, the perspective of the claimant is considered.[21] It is useful to note that in British Columbia, Canada, occupational health and safety (OHS) policies use the phrase "bullying and harassment" as a single term, which includes any inappropriate conduct or comment by a person towards a worker that 'the person knew or reasonably ought to have known 'would cause that worker to be humiliated or intimidated; however, intent does not determine whether the behavior is bullying and harassment and people cannot excuse their behavior by stating that they did not intend for it to be intimidating or humiliating.[22] Sexual harassment can be seen as also including activities that interfere with work, is made a condition of employment or opportunity for training or promotion,[23] or creates an 'intimidating, hostile or offensive work environment[24]' or what the Supreme Court of Canada described as a "poisoned work environment".[25]

Managers have a legal duty to intervene and take immediate steps if they are aware that sexual harassment is taking place or if a "poisoned environment" has been created but not permit it to continue even if they themselves are not directly involved in creating that atmosphere.[26]

1.8 Policy Framework

CRFM Member States are committed to supporting policies and programs that are grounded in a respect for human rights and human dignity. At an international level, they have signed and ratified one or more of the international covenants that recognize gender rights including:

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[19] C.f. Ontario Human Rights Commission (OHRC) (2011), Policy on preventing sexual and gender-based harassment, p. 20-21.

[20] For example, a human rights tribunal in Ontario, Canada, found that "while the most common understanding of sexual harassment is conduct such as making passes, soliciting sexual favours, sexual touching, etc., the definition of sexual harassment also includes conduct that denigrates a woman's sexuality or vexatious conduct that is directed at a woman because of her sex" (Shaw v. Levac Supply Ltd. (1990), 14 C.H.R.R. D/36 (Ont.Bd.Inq).

[21] UNICEF (2019), UNICEF Strategy to Prevent and Respond to Sexual Exploitation and Abuse and Sexual Harassment.

[22] WorkSafeBC, "Toward a respectful workplace: A handbook on preventing and addressing workplace bullying and harassment (2013: 1-2). As an organisation, we need to consider what this will mean when staff, volunteers etc. come from different socio- cultural backgrounds. We will need to spend time and resources in ensuring that all staff have a common understanding of what constitutes harassment (see Section 2.1 and 2.2).

[23] E.g. The Canada Labour Code states that it might on reasonable grounds be perceived by that employee as placing a condition of a sexual nature on employment or any opportunity for training or promotion.

[24] E.g. United Nations (2017), United Nations Glossary on Sexual Exploitation and Abuse (2nd Edition). Prepared by the Task Team on the SEA Glossary for the Special Coordinator on improving the UN response to sexual exploitation and abuse. UNFPA, "Policies and procedures manual: Prohibition of harassment, sexual harassment, abuse of authority and discrimination".

[25]" Poisoned work environment" means a general climate of disrespect, offensive language and belittling that, even if not directed at anyone in particular, which makes the workplace unpleasant and difficult. (https://www.lawinsider.com/dictionary/poisoned-work-environment <accessed 12 February 2025>) See also Janzen et al v. Platy Enterprises Ltd. (1989), supra, note 1. Cited in Ontario Human Rights Commission (OHRC) (2011), Policy on preventing sexual and gender-based harassment

[26] Janzen et al v. Platy Enterprises Ltd. (1989), supra, note 1. Cited in Ontario Human Rights Commission (OHRC) (2011), Policy on preventing sexual and gender-based harassment

- The Universal Declaration of Human Rights[27]
- The International Covenant on Civil and Political Rights[28]
- The International Covenant on Economic, Social and Cultural Rights[29]
- The Convention on the Rights of Persons with Disabilities[30]
- The Declaration on the Rights of Indigenous Peoples[31]
- The Convention on the Elimination of All Forms of Discrimination Against Women[32]
- The Declaration on the Elimination of Violence Against Women[33]
- The Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.

The United Nations Declaration on the Elimination of Violence Against Women, strengthens the Convention on the Elimination of All Forms of Discrimination Against Women[34] by recognizing "sexual harassment and intimidation at work, in educational institutions and elsewhere" as a form of violence against women.[35]

The CRFM affirms its commitment to gender equality[36] in a manner consistent with donor policies such as Canada's Feminist International Assistance Policy, which speaks of the discrimination that women face in economic, social and political spheres often in intersection with race, ethnicity, religion, language, sexual orientation, gender identity, age, ability, migrant or refugee status, and other aspects of personal identity.[37] It also refers to the disproportionate levels of violence, exploitation and abuse faced by women and girls. It identifies several Action areas that target these issues, such as interventions to prevent and respond to sexual and gender- based violence (Action Area 1); the promotion of women's economic rights, access to 'decent' work and capital, and economic inclusion in line with international labour standards. (Action Area 3); strengthened legal systems and reforms to eliminate discrimination, improved access to justice and equal protection under the law (Action area 5).

Under most labour codes in the region, every employee is entitled to employment free of sexual harassment, which it defines as " conduct, comment, gesture or contact of a sexual nature that is likely to cause offence or humiliation or that might, on reasonable grounds, be perceived as placing a

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[27] Universal Declaration of Human Rights, 10 December 1948, General Assembly Resolution 217A (III), UN Doc. A/810

[28] *International Covenant on Civil and Political Rights*, 19 December 1966, 999 U.N.T.S. 171, Can. T.S. 1976 No. 47 (entered into force 23 March 1976).

[29] *International Covenant on Economic, Social and Cultural Rights,* 16 December 1966, 993 U.N.T.S. 3, Can. T.S. 1976 No. 46 (entered into force 03 January 1976).

[30] *Convention on the Rights of Persons with Disabilities,* 24 January 2007, A/RES/61/106

[31] *Declaration on the Rights of Indigenous Peoples,* 2 October 2007, A/RES/61/295.

[32] *Convention on the Elimination of All Forms of Discrimination Against Women, supra,* note 88

[33] *Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment,* 10 December 1984, 1465 U.N.T.S. 85, (1984) 23 I.L.M. 1027, Can. T.S. 1987 No. 36 (in force 26 June 1987).

[34] Convention on the Elimination of All Forms of Discrimination Against Women, 18 December 1979, 1249 U.N.T.S. 13, Can. T.S. 1982 No. 31 (entered into force 03 September 1981).

[35] *Declaration on the Elimination of Violence Against Women,* Resolution A/RES/48/104 adopted 20 December 1993, Article 2(b).

[36] Gender equality is the state in which access to rights or opportunities is unaffected by gender. It means that all genders are free to pursue whatever career, lifestyle choice, and abilities they want without discrimination. Their rights, opportunities, and access to society are not different based on their gender. Gender equality does not necessarily mean that everyone is treated exactly the same. Their different needs and dreams are valued equally. Gender equity is often discussed at the same time as gender equality for this reason.

[37] Global Affairs Canada (2017) *Feminist International Assistance Policy* (FIAP), Ottawa.

condition of a sexual nature on employment or any opportunity for training or promotion".[38] There is the tacit expectation that employers should make reasonable efforts to ensure that sexual assault does not occur.[39]

Persons should be protected from sexual discrimination and sexual exploitation. A person has the right to be free from an unwelcome sexual advance or solicitation in the workplace by a person, who is in a position to grant or deny that person employment, promotion, training or other benefits. It also prohibits all forms of sexual harassment, including gender-based harassment.[40] Employers are required to ensure that their environments are free from harassment through risk assessments, ongoing monitoring and immediate action.

Although not referring specifically to sexual harassment, some jurisdictions require employers to address bullying and harassment as they would any other hazard in the workplace, by taking all reasonable steps in the circumstances to ensure the health and safety of their workers.[41] This may include providing guidelines for employers, such as developing a policy statement to prevent and address workplace bullying and harassment; taking steps to prevent or minimize bullying and harassment; developing and implementing reporting procedures; developing and implementing procedures for dealing with incidents and complaints; informing workers about their human rights; informing workers about the policy statement and implementation plan; training supervisors and workers to recognize, respond to and report incidents and complaints of bullying and harassment; annually reviewing the policy statement and procedures for reporting and dealing with incidents and complaints.[42]

[38] C.f. https://www.canada.ca/en/employment-social-development/programs/employment-standards/sexual-harrassment.html

[39] This, for example, is not inconsistent with Canada's Act to amend the Canada Labour Code (harassment and violence), the Parliamentary Employment and Staff Relations Act and the Budget Implementation Act, 2017, No. 1 (S.C. 2018, c. 22)

[40] For example, as outlined in the Human Rights Code [RSBC 1996] Ch 210. Victoria, British Columbia, Canada

[41] Workers Compensation Act [RSBC 1996] Chapter 492.

[42] E.g. WorkSafeBC, "Toward a respectful workplace: A handbook on preventing and addressing workplace bullying and harassment (2013: 5). See also OHS policy D3-115-2, and G-D3-115(1)-3) and the WorkSafeBC bullying and harassment tool kit

02. PREVENTION

2.1 Culture of prevention and deterrence

CRFM recognizes that the ultimate responsibility for maintaining an environment free from sexual harassment, exploitation and abuse rests with the leadership of CRFM. The Executive Director together with the Executive Committee, Deputy Executive Director and Programme Managers will guide the organization and its Governance hierarchy, staff members, contractors, consultants, volunteers, interns, beneficiaries and civil society partners to proactively respond to SEA and SH. They will encourage a culture of prevention and deterrence, by means of the following activities:

a) The Executive Director and Senior Management will promote a harmonious and respectful work environment, which celebrates difference, diversity, intercultural communication and positive behaviours in relation to gender and sexuality.

b) The Executive Director will proactively monitor this environment to make sure that it is free of behavior that may contribute to sexual harassment, abuse and exploitation.

c) Persons that have a supervisory role (a.k.a. "Supervisors") will encourage Governance hierarchy, staff members, contractors, consultants, volunteers, interns and beneficiaries to express their concerns without fear of reprisals or threats of reprisals, which includes hostility, excessive scrutiny, social exclusion, or other negative behavior.[43]

d) Supervisors will uphold the highest standards of conduct and act as role models for staff, volunteers and partners.

e) Supervisors will identify SEA and SH risks and risk drivers based on a PSEA self-assessment and will define and implement risk mitigation measures accordingly. The PSEA self-assessment findings will inform the development of an Action Plan to operationalize this PSEA policy.

f) Supervisors will monitor their units for violations of this policy, respond promptly to allegations, and ensure that the necessary actions are taken.

g) Supervisors will ensure that all staff, consultants (and volunteers) have been trained on this policy; have a common understanding of what constitutes sexual and gender harassment, abuse and exploitation; are informed about their rights; and have access to information about this policy and the consequences of violating this policy, as well as specific information about reporting mechanisms and services available to survivors. Information on the PSEA policy and reporting procedures will be displayed in CRFM offices.

h) Supervisors will implement this policy in their work units and ensure that personnel are held accountable for compliance.

i) Managers will monitor the use of online technology to ensure that it is not used for sexual discrimination, harassment, abuse or exploitation on CRFM premises or off premises by CRFM staff using CRFM technology.[44]

[43] A person should be protected from reprisal or the threat of it whether the sexual harassment is ultimately proven or not. c.f. Section 7 and 8 of the Ontario Human Rights Code.

[44] E-mail, blogs, social networking sites, chat rooms, dating websites, cell phone text messaging etc. are possible domains for sexual harassment.

2.2 Gender equality

CRFM will promote gender equality across the organization's work by:

a) Identifying and assessing real or perceived imbalances of power related to gender or sexual identification within the organization and in relation to its Governance hierarchy, staff members, contractors, consultants, volunteers, interns, beneficiaries and civil society partners.

b) Taking concrete actions to address imbalances of power or the drivers thereof related to gender and its intersection with other positions and identities associated with age, disability, sexual orientation, Indigenous status, race, ethnicity and refugee/ immigrant background.

c) Highlighting and promoting positive behaviors, norms and opportunity structures at CRFM, while transforming organizational norms and structural policies that act as barriers to gender equality.

d) Providing resources for seminars or workshops on cultural sensitivity and intercultural communication around gender and sexuality, as well as positive masculinity, if these are highlighted as gaps in the PSEA self-assessment and/or if this is otherwise deemed necessary.

e) Creating safe spaces and opportunities for staff to collectively explore vignettes and case studies in order to generate a common, intercultural understanding of what constitutes positive as well as negative (or "poisonous") behaviour in relation to gender and sexuality in the workplace.

f) Including gender equality in the Theory of Change and developing an intersectional and equity-focused gender strategy for the organization.

g) Promoting gender equality and equity across the organization's work as part of a gender mainstreaming approach.

h) Measuring results using gender analysis and gender-focused monitoring and evaluation frameworks that are sensitive to intersectionality and equity.

i) Utilizing gender specialists and investing resources in the implementation of interventions that promote gender equality.

j) Promoting an intersectional gender and equity lens in the work undertaken by members and partners.

k) Strengthening the capacity of members and partners to develop and implement their own intersectional and equity-focused gender strategies.

2.3 Recruitment and training

In addition to its existing recruitment approach,[45] CRFM will maintain high standards of vetting and reference checking for staff and consultants, including background and criminal checks if deemed necessary. Adhering to this PSEA policy will be made part of the contractual terms of employment, so that any misconduct related to SEA and SH will result in disqualifying action and/ or dismissal. All personnel, including employees, volunteers, contractors, and others will be required to adhere to the PSEA policy.

New (and current) staff and subcontractors to the organization will be (a) provided with the policy as part of their orientation material during the onboarding process, (b) provided with a verbal explanation of the policy during their orientation, (c) receive training on the contents of the PSEA strategy, (d)

[45] CRFM (2020). Promoting Gender Equality in Recruiting and Hiring - Approaches for consideration in the CRFM. *Technical & Advisory Document*, No. 2020/ 0X. 17 p.

receive periodic refresher training and education on this issue, and (e) will be assessed against its core principles and values in performance reviews.

Training for managers, staff, consultants and (sub)contractors will include the following:

- How to recognize SEA and SH;
- How workers who experience or witness SEA and SH should respond;
- Procedures for reporting, including who to go to for help and what help will be provided; who to report the incident to within the organization and externally; who is responsible for following up on complaints and incidents.
- Consequences for breaching the PSEA policy.

CRFM employees working directly with beneficiaries will, to the extent practicable, receive additional training on how to receive complaints and handle them in a safe and confidential manner. Supervisors should receive training on how to support employees affected by SEA and SH (including those who experience 'ambient harassment)[46].

PSEA Focal Points should be designated and receive appropriate training on how to respond to complaints and reports.[47] They should also be afforded sufficient time to dedicate to PSEA cases that are brought to their attention.

Governance hierarchy, contractors, consultants, volunteers and interns will also be required to adhere to the PSEA policy. They should be required to sign the policy, receive training on its contents and be informed of the consequences of breaching the policy. CRFM should endeavour to track who requires training and refresher training.

2.4 Coordination and collaboration

CRFM should have a coordinated approach to the PSEA and SH in order to ensure coherence with internal and external partners, by facilitating dialogue, sharing information and establishing coordination and monitoring mechanisms. A designated PSEA Focal Point should champion PSEA in working groups and high-level political fora at provincial, national and international levels.

2.5 Engaging partners

CRFM does not condone SEA or SH perpetrated by members and third parties. CRFM will engage partners, members, communities and individuals on the issue of sexual exploitation, abuse and harassment and will strengthen their capacity, wherever possible, to prevent and respond to this human rights violation by means of the following:

- This PSEA policy should, to the extent feasible, be considered part of partnership agreements, which ideally should include a clause that requires contracted entities, individuals, employees and volunteers to abide by this policy. It could also state that CRFM has grounds to terminate the partnership agreement if partners (entities or individuals) fail to prevent and respond adequately to sexual abuse, exploitation, harassment and discrimination, as outlined in this Policy.[60]

[46] Ambient sexual harassment occurs in the workplace when rather than having an employee direct the harassment toward another person, the sexual harassment is general in nature. For example, workers may have pornographic screen savers, tell off-color jokes or pass around explicit material. It is important to treat ambient sexual harassment as seriously as targeted harassment.

[47] A PSEA Focal Point is a staff member tasked with implementing PSEA in direct coordination with the Executive Director or Head of Office, both internally and externally. The nomination of a PSEA Focal Point does not relieve the Executive Director or Head of Office of their ultimate responsibility for PSEA in the office but supports the him/her in that role.

- At the appropriate Ministerial Council Meeting, CRFM may consider enunciating a collective statement that strongly condemns sexual and gender-based abuse, exploitation, harassment and discrimination[48].
- PSEA principles and policy will be shared in accessible formats and languages and disseminated through a comprehensive communication strategy.
- CRFM will encourage its Member States and partners to develop their own PSEA strategies aligned with this document outlining their prevention, reporting and response strategies.
- PSEA training should be offered to members, focusing on how managers and staff are expected to respond to SEA and SH, how to ensure that serious and ongoing problems are reported, and what steps should be taken to assess the situation and take remedial action.
- Sub-contractors sharing space on the CRFM website or hub(s) will be made aware of the PSEA Policy. It may be included as a clause in their Hub agreements to ensure that they know that CRFM will not tolerate any forms of discrimination, harassment, abuse and violence in the workplace.
- If CRFM funds organizations, grant recipients will be required to report allegations to CRFM.
- CRFM expects partners to respond quickly and appropriately to reports. If there is a reason to believe that the response has not been adequate or appropriate, CRFM may terminate the partnership agreement and withdraw funding.
- If CRFM receives complaints about an external organization or institution, with whom it does not have a partnership agreement, it has an obligation to report the incident to the relevant authorities, groups or networks but it is not obliged to participate in the investigation.

2.6 Communication

The PSEA Focal Point will work closely with the Communications officer to develop an internal and external communication strategy. CRFM will work to raise the members' awareness about PSEA case studies, guidelines and checklists that will be developed by the PSEA Hub.

2.7 Working with communities

Mutual respect and non-discrimination, along with cooperation and understanding, will form the basis of all interactions with community members. When designing and implementing community-level programs and projects, CRFM will use a PSEA Assessment Tool in consultation with local community members to understand the risks of PSEA when implementing projects at a local level; this will include assessment questions related to power relations which might contribute to sexual exploitation, abuse, discrimination or harassment. Prevention and mitigation strategies will be developed accordingly. CRFM will actively consult with Indigenous communities in the development of PSEA materials (e.g. Codes of Conduct, reporting and referral protocols) when implementing programs and projects at a community level.

CRFM will also raise awareness about CRFM's PSEA policy in local languages, where necessary. It will maintain an open-door policy and actively encourage community members and beneficiaries to provide feedback and report complaints. It will also provide feedback to communities on how these complaints have been handled and what changes have been made as a result of the community's feedback.

[48] See Resolution No. MC 19 (08) of 2025.

03. RESPONSE

3.1 Principles

- CRFM Governance hierarchy, staff members, contractors, consultants, volunteers, interns, partners and beneficiaries must feel safe to report violations and trust that the response will be timely, decisive and respect due process.
- When CRFM works directly in communities, contextualized needs assessment and consultation with beneficiaries and stakeholders will inform the development of community-based complaint mechanisms, which are appropriate, gender-sensitive and safe. These mechanisms will be monitored and reviewed.
- CRFM will set up both informal and formal complaint reporting and resolution mechanisms for prohibited conduct. Staff, volunteers, members and partners are not obligated to use informal resolution mechanisms and if they do so, formal reporting is not precluded. There is no deadline for reporting.
- In both formal and informal mechanisms, confidentiality will be assured. Staff involved in the complaints process will be asked to sign a confidentiality agreement, which if they breach, will result in disciplinary action up to and including termination.
- The Executive Director will not disclose the names of the complainant nor alleged perpetrator, nor the circumstances related to the complaint to any person, unless disclosure is necessary for the purposes of investigating the complaint or taking disciplinary measures in relation to the complaint.
- Information will not be shared without the consent of those involved; however, if someone's life is at risk, a child is at risk, or there is a legal mandate to contact authorities, the Executive Director will consult with legal counsel and the authorities.
- The interest of survivors will be given primacy. Anonymous complaints will also be accepted, and deadlines will not be imposed on reporting. Complainants will be protected from retaliation or reprisals. Retaliatory action will result in disciplinary action, up to and including termination.
- The response will be survivor-centered. CRFM will ensure that survivors are aware of the services available, receive referral letters where appropriate and receive ongoing follow-up support.
- The respondent's rights will also be protected; respondents will be treated as innocent until proven guilty and will be treated fairly during an evidence-informed investigation process. Sanctions and/or corrective measures will be appropriate and fair, in line with existing laws and policies.
- The Executive Director will appoint a PSEA Focal Point for reporting purposes. The PSEA Focal Point will be given a PSEA-specific email account, which will be shared with all employees, volunteers, interns, beneficiaries and members.

3.2 Rights of complainants and respondents

Rights of complainants:

- To make a credible report of an incident of misconduct or file a credible complaint without fear of reprisals or threat of reprisals (including but not limited to hostility, excessive scrutiny, social exclusion, or other negative behavior);
- To be informed about the CRFM and external processes for reporting and investigation;
- To insist on confidentiality;
- To choose a person to be accompanied to meetings about the incident or complaint;
- To receive ongoing information about the status of the investigation;
- To be treated fairly while CRFM investigates the incident or complaint;
- To receive information about the action taken by CRFM because of the incident or complaint, and the right to veto the action taken;
- To refuse to engage with the person against whom the complaint has been made, especially if the complainant has reason to be afraid (as a precautionary principle in lieu of evidence until the investigation has been completed);
- To request leave to receive treatment or support related to the incident or complaint;
- To receive timely, appropriate and comprehensive survivor-centered support.

Rights of person accused (Hereafter, the 'Respondent'):

- To be told that a report or complaint has been filed, although the leadership will withhold the name of the complainants or specifics about the report, given the severity of SEA and SH reports and the risk of retaliation;
- To be told about CRFM's process for the investigation, including rights to due process and referrals;
- To choose a person (including the option of a lawyer) to accompany them to meetings about the incident or complaint;
- To be treated fairly during an investigation process that is grounded in evidence and due process;
- To be treated as innocent until proven guilty;[49]
- To have access to corrective/ reformative support programs when deemed appropriate and necessary.[50]

3.3 Informal resolution

- If affected individuals feel comfortable doing so, they may on a voluntary basis, approach the alleged offender and request that the alleged behavior cease.

[49] While the respondent will be treated as innocent until proven guilty, as a precautionary measure, the respondent may need to be separated from the complainant until the investigation has been concluded.

[50] This will only be made available to respondents who have not transgressed the Criminal Code and are still under the employ of CRFM.

- They may also inform their supervisor if they feel comfortable doing so, even if this triggers a formal process. Supervisors are required to provide advice, information and assistance in a timely, sensitive manner. They should enact appropriate available measures or consult with the PSEA Focal Point for alternative measures.
- If the affected parties would like to invoke a process of mediation, the leadership will contact third parties to assist with this process and bring the issue to resolution. If a resolution is not possible, alternative options (formal investigation and external options) will be outlined and a decision made on how to proceed.
- Either the complainant or respondent may choose to involve a third party to facilitate a discussion and offer suggestions on the way forward. The third party must be familiar with this policy and ensure that confidentiality is respected at all times. The third party has the right of refusal and may withdraw at any time. In no way should the presence of a third party contribute to further intimidation or trauma.

3.4 Formal reporting

The process for formal reporting is as follows:

1. Formal complaints should be lodged with the Executive Director and should include the following information: the name of the alleged offender; the name of the alleged victim if the complaint is made by a third party; the date(s), location(s) and description of the alleged incident(s) of prohibited conduct; the names of witnesses; and any other relevant information.[51] If the complaint involves the Executive Director, reports should be submitted to the PSEA Focal Point and the Chair of the Caribbean Fisheries Forum.
2. Complaints can also be filed anonymously using the PSEA email address. If the complaint is filed anonymously, the complainant must provide sufficient information concerning the allegation so that the matter can be investigated and pursued responsibly.
3. Relevant documents or copies that support the allegations being made, such as emails, handwritten notes, photographs, or physical evidence like vandalized personal belongings, can also be submitted directly to the Executive Director.
4. All information and documents pertaining to a formal report will be stored in a password protected database or locked cabinet, when applicable, to which only the Executive Director and PSEA Focal Point will have access.
5. If employees witness SH, but are not party to it, they may file a complaint and include as much information as possible in the complaint or report. All staff are expected to report any suspicions of sexual exploitation, abuse or harassment of others.
6. Upon receipt of the report, the PSEA Focal Point will officially acknowledge receipt within 24 hours, and a meeting will be convened with the Executive Director within 72 hours to assess immediate risks and agree upon the next steps.

Anyone filing a complaint will be informed of his/her rights under this policy. If the complaint includes an alleged violation of the national laws, the Executive Director can pursue legal proceedings and contact local police authorities to lead the investigation.

[51] C.f. UNFPA, "Policies and procedures manual: Prohibition of harassment, sexual harassment, abuse of authority and discrimination".

3.5 External reporting

All CRFM employees are protected under laws that protect and promote their human rights. Using an internal mechanism does not replace their right to file a human rights complaint. All employees are protected from retaliation from individuals, leadership or the organization. If an employee opts to use an external option, the PSEA Focal Point will provide basic information about the options available through this policy, but an internal investigation will also be undertaken.

- *Discrimination or harassment:* Employees have the right to have action taken, when they have experienced sexual harassment.
- *Sexual exploitation or abuse:* When sexual harassment involves attempted or actual physical assault, or threats of an assault, or when sexual exploitation or abuse is present, or when there is stalking, staff should file a report at the local police service. Criminal behavior should always be reported to law enforcement authorities without exception.

3.6 Investigations and sanctions

Investigations should be undertaken promptly, diligently and thoroughly; be fair and impartial for both the complainant and the respondent; be sensitive to the interests of all parties; maintain confidentiality to the extent possible; focus on finding facts and evidence; and aim to prevent further trauma.

Steps for the investigation:

1. A copy of the complaint is provided by the PSEA Focal Point to the Executive Director who is informed periodically of the status of the investigation.
2. In cases where the formal complaint is submitted by a third party, the views of the alleged victim will be considered during the preliminary assessment before decisions are made about proceeding with an investigation, except in the case of minors or in the case of transgressions to a Member State's Criminal Code.
3. The PSEA Focal Point informs the alleged offender that a complaint has been made, although it is not obliged to identify the complainant to ensure protection from reprisals and retaliation.
4. The PSEA Focal Point advises the complainant and the respondent about the confidentiality of the process.
5. The respondent is provided with a copy of the complaint and is given an opportunity to respond in writing within ten (10) working days
6. The Executive Director may consult with the Executive Committee for confidential guidance and may convene an investigative panel composed of Governance hierarchy and the Executive Director and/or contract an experienced, independent and impartial third party to conduct the investigation in order to ensure that due process is followed and the rights of complainants and respondents are both respected. Even when an investigative panel has been convened or an independent third party contracted, CRFM leadership will maintain organizational oversight of the investigation, and ensure that information is shared and communicated adequately.
7. Workers are expected to cooperate during an investigation and provide any details of acts they have experienced or witnessed; this may include interviews with the complainant, respondent and witnesses.
8. Requests for complainants or respondents to be accompanied by a third party for emotional support or receive other forms of assistance, will be honored by the Executive Director. Third parties are bound by the principles of confidentiality to which they must give written

consent and are required to disclose any conflict of interest. In no way should the presence of a third party contribute to further intimidation or trauma.

9. The alleged victim and alleged offender will be informed as appropriate of the status and outcome of the investigation.
10. A final confidential report is prepared by the PSEA Focal Point or independent investigator and the report is given to the Executive Director within ten (10) working days with recommendations for sanctions and response
11. The report will be safeguarded for confidentially and protected within a password protected file, but the Executive Director may share this report with the Executive Committee, if deemed necessary, while ensuring that the confidentiality of individuals involved is maintained.

If the complainant chooses to withdraw the formal complaint after the investigation has been started, an interview will be conducted with the complainant to ensure that the withdrawal has not been coerced. The withdrawal will be reported to the Executive Director, with follow-up recommendations. The Executive Director will pursue the investigation if the case violates a criminal code, someone's life is at risk, a child is at risk, or there is a legal mandate to contact authorities, in which case the Executive Director will consult with legal counsel and the relevant authorities. Complainants will never be asked to sign non-disclosure agreements.

3.7 Whistleblowing

Several CARICOM Member States have already enacted, or are in the process of enacting, whistleblower legislation either as dedicated Acts of Parliament or as provisions within legislations aimed at combating corruption and promoting integrity in public and private businesses. The most recent of these may be Saint Kitts and Nevis which in December 2023, enacted the Whistleblowers Protection Act, 2023. Other Member States such as Barbados[52], Guyana[53], Jamaica[54], Belize[55], Saint Lucia[56] and Trinidad and Tobago[57] are also implementing laws and policies to support whistleblowing. Whistleblowing policies are fast becoming a requirement to obtain contracts from certain governments or to be entrusted with the management of projects funded by donors and international development partners.

The CRFM Whistleblower policy[58] is intended to enable those who become aware of wrongdoing or improper activity in the CRFM to report their concerns at the earliest opportunity so that they can be properly investigated, and appropriate action taken.

- If the respondent is the PSEA Focal Point, the complaint or report should be submitted directly to the Executive Director.
- If the respondent is the Executive Director, the PSEA Focal Point will submit reports directly to the Chair of the Caribbean Fisheries Forum, who will bring it to the Executive Committee's attention within 24 hours.

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[52] Whistleblower Protection Act, 2021 (Barbados)

[53] Protected Disclosures Act 2018 - Guyana

[54] Protected Disclosures Act, 2011 (Jamica)

[55] The Protected Disclosures ("Whistleblowers'") Bill, 2021, (Belize)

[56] See Saint Lucia's Freedom of Information Act 2009, section 48; also Legal Protections for Journalists and Whistleblowers in Saint Lucia - <https://generisonline.com/legal-protections-for-journalists-and-whistleblowers-in-saint-lucia/ > Generis Global Legal Services - Accessed on: March 5, 2025

[57] Whistleblower Protection Act, # 9 of 2024

[58] CRFM 2024. CRFM Whistleblower Policy 2024. 12p. Approved by the 18th Meeting of the CRFM Ministerial Council. Resolution No. MC 18 (26) of 2024. The CRFM Whistleblower portal can be accessed at https://crfm.int/index.php?option=com_k2&view=item&id=856

- If the respondent is a Member of the Executive Committee, the PSEA Focal Point will submit the report to the Executive Director, who will then submit it to the Chair of the Caribbean Fisheries Forum. They will convene a sub-committee to discuss the report. The respondent will be excluded from all deliberations due to a conflict of interest.
- If the Chair of the Caribbean Fisheries Forum is implicated in the complaint, then the Vice-Chair of the Caribbean Fisheries Forum or another member of the Executive Committee should receive the report and convene a sub-committee meeting.
- The sub-committee in consultation with the Executive Committee will decide on the best course of action, including a letter of apology, mediation, mandatory counselling, removal from the Executive Committee or legal proceedings in the case of potential criminal wrongdoing.
- The complainant is fully within his/her rights to submit the report directly to an external authority.

3.8 Survivor-centered response

CRFM is committed to a survivor-centered response.[59] CRFM should develop a clear referral protocol for survivors of sexual harassment, discrimination, exploitation and abuse. CRFM will refer survivors of sexual exploitation, abuse, harassment and discrimination to support services that can offer them comprehensive quality assistance and support, including protection from retaliation, medical care, psychosocial support, legal assistance and reintegration support, in line with their wants and needs. Assistance may be made available regardless of whether a formal internal response or investigation has been concluded.

The PSEA Focal Point will follow up on the response received by complainants to ensure that it is appropriate, comprehensive, timely and survivor centered. Furthermore, CRFM will ensure that victims are not penalized for poor performance, outbursts, insubordination, etc. that may be an understandable reaction to sexual discrimination, harassment, physical or sexual assault.

The support received by survivors will be documented and any information related to challenges or barriers to access will be reported to the Executive Committee and relevant authorities, without breaching confidentiality. The feedback received will be used to improve the referral protocol and strengthen the PSEA strategy going forward.

The Executive Director will also ensure that employees who have experienced the spill-over psychological effects of SEA and SH in the workplace ('ambient harassment') are aware of and have access to support.

3.9 Investigation outcomes and follow-up

The PSEA Focal Point and Executive Director will use this Policy in conjunction with relevant criminal, employment and labour laws to make decisions about sanctions and response. Corrective action will be taken promptly following the investigation. Perpetrators will be held responsible for their actions.

Disciplinary measures will be applied, which could range from a verbal warning or a letter of reprimand to termination depending on the nature of the incidence. Any contravention of the Criminal Code of the relevant Member State (e.g. in the case of sexual assault and exploitation) will lead to immediate dismissal and criminal proceedings. In other instances where disciplinary measures are applied and the respondent continues to be employed by CRFM, the Executive Director will also refer the respondent to corrective/reform programs that include counselling, mentoring, workshops and

[59] C.f. UNICEF (2019), *UNICEF Strategy to Prevent and Respond to Sexual Exploitation and Abuse and Sexual Harassment. Available at: //www.unicef.org/sites/default/files/2019-05/UNICEF-Strategy-Prevent-Respond-Sexual-Exploitation-Abuse-Sexual-Harassment-January-2019.pdf*

peer-to-peer support on gender sensitivity, intercultural communication and healthy behaviours in relation to gender and sexuality.

CRFM will also take swift action to resolve the underlying problem in the work environment or organizational culture. This may include revising workplace procedures to prevent any future SEA or SH taking place in the workplace and may require other interventions to promote intercultural dialogue on gender and sexuality, as well as interventions to address imbalances in power that are related to gender and/or in intersection with other positionalities and identities. Following the incident, the Executive Director will evaluate the 'reasonableness' of the response by assessing the effectiveness of the procedures in place to deal with discrimination and harassment; the timeliness of the response; how seriously the complaint was treated; what resources were made available to deal with the complaint; whether the organization created a 'healthy environment 'for the person who complained; and how well the action taken was communicated to the person who complained. When necessary, the Executive Director will ask an independent third party bound by the principles of confidentiality to undertake this 'reasonableness assessment'. The findings will be shared with the Executive Committee and will be used to improve PSEA and SH interventions going forward.[60]

3.10 Normative and regulatory instruments

At agreed Executive Committee meetings, CRFM leadership will report on the operationalization of this strategy, outlining SEA and SH complaints in the past year, whether the management response was found to be 'reasonable 'and whether further prevention efforts have been effective. Revisions will be made when deemed necessary, however a more comprehensive review of the PSEA policy will be undertaken every four years, with particular attention to its policy statement, steps to prevent SEA and SH, reporting procedures and procedures for dealing with incidents and complaints. In addition, the Executive Committee may review this strategy after an incident.

[60] In cases where CRFM's funding for the project originates from Global Affairs Canada (GAC), CRFM will report the allegations to GAC, according to GAC's requirements as per an official letter from The Honourable Marie-Claude Bibeau of GAC to partners (May 25, 2018), which states that partners must inform GAC immediately of alleged cases of sexual exploitation and abuse (https://www.international.gc.ca/world-monde/issues_development-enjeux_developpement/sexual_exploitation-exploitation_sexuels/ministers_letter-lettre_ministres.aspx?lang=eng <accessed 21 February 2025>)

The CRFM is an inter-governmental organization whose mission is to "Promote and facilitate the responsible utilization of the region's fisheries and other aquatic resources for the economic and social benefits of the current and future population of the region".

The CRFM consists of three bodies – the Ministerial Council, the Caribbean Fisheries Forum and the CRFM Secretariat. CRFM members are Anguilla, Antigua and Barbuda, The Bahamas, Barbados, Belize, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Suriname, Trinidad and Tobago, and the Turks and Caicos Islands.

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