



# DRAFT Stakeholder Engagement Plan

Caribbean Digital Transformation  
Program (P171528)

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## 1 Introduction

The purpose of this Stakeholder Engagement Plan (SEP) is to establish the timing and methods of engagement throughout the implementation of the Caribbean Digital Transformation Program. The SEP supports the development of strong, constructive and responsible relationships with project stakeholders that are important to and integral for the successful management of the project's environmental and social risks.

The Government of the Commonwealth of Dominica, the Government of Grenada, the Government of Saint Lucia, the Government of Saint Vincent and the Grenadines and the World Bank all value stakeholder engagement and stakeholder input at all stages of projects. Stakeholder engagement and input is viewed as integral to regional and national development as well as an important tool for social inclusion and reducing inequalities in society.

The scope of this Stakeholder Engagement Plan seeks to be proportionate to the nature and scale of the project and its potential risks and impacts. The SEP will be updated as necessary throughout the project's life cycle.

## 2 Specific Objectives of the Stakeholder Engagement Plan

The specific objectives of the stakeholder engagement plan are as follows:

1. To build and maintain a constructive relationship with stakeholders;
2. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account throughout the project cycle;
3. To promote and provide means for effective and inclusive engagement with stakeholders throughout the project life cycle on issues that could potentially affect them; and
4. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

## 3 Project Description

The Project's Development Objective is to increase access to digital services, technologies and skills by governments, businesses and individuals in the participating Eastern Caribbean countries. The Project comprises three components that address key bottlenecks and harness opportunities to develop the Eastern Caribbean Digital Economy as a driver of growth, job creation and improved service delivery. It follows a comprehensive, ecosystem-based approach, bringing together multiple arms of government and multiple economic and social sectors to build the core digital economy foundations simultaneously. It is intended to build on the progress made by countries in improving government connectivity through the Caribbean Regional Communications Infrastructure Program (CARCIP). The project will be implemented across four Eastern Caribbean countries - The Commonwealth of Dominica, Grenada, Saint Lucia and Saint Vincent and the Grenadines (SVG).

The project consists of four components which are described below:

### **Component 1: Digital Enabling Environment**

**This component will support the development of a positive enabling environment for the region's digital economy that drives competition, investment and innovation while promoting trust and security of online transactions.** Specific activities in this component could include the following:

- **Subcomponent 1.1: Telecommunications: Legal and Regulatory Environment, Institutions and Capacity** - This sub-component aims to support greater telecoms sector competition, investment, affordability and service quality across the region as well as enhancing resilience and emergency response capabilities for critical digital infrastructure and services.
- **Subcomponent 1.2: Digital Financial Services (DFS): Legal and Regulatory Environment, Institutions and Capacity** - This sub-component aims to spur greater innovation, investment and adoption of digital financial services across the region.
- **Subcomponent 1.3: Cybersecurity, Data Protection and Privacy: Legal and Regulatory Environment, Institutions and Capacity** - This sub-component aims to build trust in online transactions and strengthen the security of sensitive data and critical network infrastructure.

### **Component 2: Digital Government Infrastructure, Platforms and Services**

**This component will support public sector modernization, resilience and delivery of digital public services to individuals and businesses. Digitization of government services and operations is expected to help drive a wider digital transformation across the region.** Specific activities could include:

- **Subcomponent 2.1: Cross-Cutting Enablers of Digital Government Operations and Services** - This subcomponent will support the development of key enablers of digital government services and operations, in line with regionally harmonized standards and frameworks. These include protocols and standards for digital government, a payment platform, digital identification and authentication infrastructure.
- **Subcomponent 2.2: Government Productivity Platforms and Citizen-Centric Digital Services** - This sub-component supports development of priority government productivity platforms and citizen-centric digital public services.

### **Component 3: Digital Skills and Technology Adoption**

**This component aims to better equip individuals and businesses across the region for the jobs and economy of the future and to spur innovation in traditional sectors of the economies.** Specific activities in this component could include:

- **Subcomponent 3.1: Workforce-Ready Digital Skills** - This sub-component aims to identify the digital skills (technical and soft skills) in demand regionally and globally and to create a clear pathway of support from training to job placement in digitally enabled professions.
- **Subcomponent 3.2: Technology Adoption** - This sub-component seeks to increase adoption of digital platforms and technologies by businesses across the region and support creation and expansion of digitally enabled businesses.

### **Component 4: Project Implementation Support**

This component will support national and regional level Project Implementation Units (PIUs) with

management and implementation of the project and associated activities. The project can support capacity building initiatives, as well as PIU staffing through hiring of expert consultants for key areas such as project management, technical advisory and implementation support, procurement, financial management, environment and social safeguards, monitoring and evaluation and strategic communications. It will also support capacity development of participating regional institutions and regional knowledge sharing events and forums.

## **4 Environmental and Social Risks**

The environmental risk classification for the project is Moderate under the World Bank's Environmental and Social Framework (ESF) since most of the project activities will involve small-scale works for the deployment of fiber optic and for the rehabilitation of existing infrastructure located in both urban and rural areas across Dominica, Grenada, Saint Lucia, and Saint Vincent and the Grenadines. Some of the anticipated potential impacts may include: (i) soil removal and vegetation clearance for the construction of the new data center; (ii) generation of solid waste from residual construction materials; (iii) management and disposal of e-waste as a result of the decommissioning of old equipment; (iv) nuisance related to dust generation, vibration and noise during construction activities; and (v) occupational health and safety hazards for the workforce. The impacts are expected to be site-specific, short-term and reversible. The exact scale of the works will be determined during preparation, and the risk rating may be updated proportionately with the level of risk if deemed necessary as preparation advances.

The Social risk of the project is expected to be moderate because the project will be implemented in a context where social exclusion patterns exist, and where processes of community consultation and grassroots participation seem to be weak as well as the capacity for the management of the World Bank's Environmental and Social Framework. Inequitable distribution of project benefits is a risk, whose effect would produce a disproportionate impact on the most vulnerable and disadvantaged: The poor, women, young girls, youth at risk, disabled, the Kalinago indigenous territory of Dominica, among others. Project's activities may also require physical or economic displacement (in a small number of cases, if any) that would lead to loss of income sources or other means of livelihood or both.

## **5 Brief summary of Previous Stakeholder Engagement Activities**

The overall project concept, objective, and design was agreed upon at a 2-day workshop hosted by the World Bank in Washington DC in April 2019. The workshop was attended by ministerial-level representatives from the participating Eastern Caribbean countries and the relevant regional institutions. Following the workshop, the World Bank team conducted remote consultations with relevant stakeholders from government and regional institutions via videoconference, and undertook three missions for project preparation – two to the participating countries, and one reverse mission in Washington DC.

During project preparation, consultations were held with a wide range of public and private sector stakeholders. Stakeholders were identified based on priority areas for project support agreed with government, and an iterative consultation process was followed throughout the project preparation cycle. Key stakeholders consulted include ministries and public sector agencies involved in project activities (as implementors or beneficiaries), educational institutions, civil society organizations (including those with regional presence in Barbados), private sector firms in telecommunications, IT, IT enabler services,

tourism and other priority sectors, as well as aspiring entrepreneurs in each country. Specific consultations were held to identify gender issues in the region, particularly with regards to participation of women in the digital sector and ICT related jobs, which was identified as a key gap. These consultations informed the prioritization of potential activities for project support, and the design of the agreed project activities. Highlights of the various discussions held were recorded in the aide memoires prepared after each mission.

Implementing ministry in each country (Dominica, consultations expected by March 20, 2020) held consultation meetings on environmental and social issues in early March 2020. Invitations to the consultation meetings were extended to ministries and public agencies involved in project activities (as implementors, beneficiaries, or providers of input), civil society, academia, and other representative groups, in line with the stakeholders identified in the Stakeholder Engagement Plan (SEP). Virtual attendance to the meetings was also made available; this especially considering current COVID-19 situation where social gatherings is recommended to be limited.

Representatives from the line ministries presented the project outline, overview of World Bank Group's Environmental and Social Framework, the project's environmental and social risks, applicable WBG ESF standards, and mitigating measures proposed. Meeting attendees resonated the limited environmental impact of project activities, as well as lack of disruption and noise due to the nature of project activities. The concerns expressed pertained primarily with social inclusion, and the risk of excluding vulnerable groups. Youth at risk, was raised as a particularly vulnerable group at the consultation meeting in St. Lucia, that can benefit from the project. This is on account of the fact that the project aims to equip beneficiaries with digital skills and promote greater innovation in the economy. The SEP identifies youth at risk as a vulnerable group, and will be considered specifically during outreach and communication on project activities.

## 6 Stakeholder Identification and Analysis

The main stakeholders are as follows:

### 6.1 Regional Organizations

- **Eastern Caribbean Central Bank (ECCB)**

The ECCB is the Monetary Authority for the following islands in the Eastern Caribbean- Anguilla, Antigua and Barbuda, Commonwealth of Dominica, Grenada, Montserrat, St Kitts and Nevis, Saint Lucia, and St Vincent and the Grenadines. The organization was established in 1983 as the replacement for the Eastern Caribbean Currency Authority (ECCA). The ECCB is responsible for maintaining the stability of the Eastern Caribbean currency and the integrity of the banking system. ECCB will also host the regional project implementation unit (PIU) that will implement activities financed by the regional IDA grant.

- **Organisation of Eastern Caribbean States (OECS)**

The OECS is an international, inter-governmental organization dedicated to regional integration within the Eastern Caribbean States. The strategic objectives of the OECS include regional integration, resilience, social equity, foreign policies and a high performing organization. The OECS was established in 1981 with the signing of the Treaty of Basseterre by seven Eastern Caribbean nations. The treaty was revised in 2010 to further promote a common approach among these nations with respect to policies and legislation across various sectors.

- **Eastern Caribbean Telecommunications Authority (ECTEL)**

ECTEL was established in 2000 through a treaty signed by five Eastern Caribbean States- Commonwealth of Dominica, Grenada, Saint Kitts and Nevis, Saint Lucia and Saint Vincent and the Grenadines. ECTEL is the regulatory body for telecommunications in its member states. The authority consists of three components- i) Council of Ministers ii) Regional Directorate and iii) National Telecommunications Regulatory Commission in each of its member states.

- **Caribbean Community Implementation Agency for Crime and Security (CARICOM IMPACS)**

CARICOM IMPACS was established by the Twenty Seventh Meeting of the Conference of Heads of Government in July 2006, in Bird Rock, St Kitts and Nevis, as the implementation arm of a new Regional Architecture to manage CARICOM's action agenda on crime and security. Cybersecurity also falls under the agency's mandate at the CARICOM level. Resultantly, the agency will serve as the regional coordinating body for the project's activities on cybersecurity.

- **Caribbean Telecommunications Union (CTU)**

Member States of the Caribbean Community established the Caribbean Telecommunications Union (CTU) by treaty on 28th April 1989, to promote greater cooperation and coordination among Caribbean states in telecommunications. The key objectives of CTU are to: (i) facilitate the coordination of the planning, programming and development of intra-regional and international communications networks to meet the immediate and future telecommunications needs of the Region; (ii) assist the development of the national components of regional and international telecommunications networks; and (iii) promote the general awareness of the telecommunications needs of the Caribbean Region and its potential for promoting the socio-economic development of the Region. CTU is also leading the CARICOM-wide Single ICT Space initiative and will serve as an advisor to the project's regional steering committee. This will enable greater coordination between project activities in the Eastern Caribbean region and those taking place at the CARICOM level.

## **6.2 Government Ministries, Departments and Agencies**

Government ministries, departments and agencies are integral to the overall success of the project throughout the project cycle. They are critical to the establishment of the physical, technical, legal and regulatory framework of the project amongst other things. There will also be intra and inter ministry, department and agency collaboration for project implementation. It is also expected that all government entities will benefit from the project. The key government ministries, departments and agencies from each project country are outlined below:

### **6.2.1 Commonwealth of Dominica**

- **Ministry of Public Works and the Digital Economy (MOPDE)**

The Ministry of Public Works and the Digital Economy is the arm of the Government responsible for the national infrastructure namely, road network management, coastal management, irrigation and drainage. The State-owned Public Works Corporation (PWC) is directed by a board appointed by the Minister.

- **The Ministry of Information, Science, Telecommunications and Technology**

The Ministry is mandated to contribute to the dynamic synergy that feeds directly into the Growth and Social Protection Strategy of the Government of the Commonwealth of Dominica, of which priority policy areas include sustainable economic development, stimulation of the telecommunications sector and public sector reform.

- **Physical Planning Department**

Coordinates development planning and land use approval of projects, including permits.

- **Ministry of Environment, Rural Modernization and Kalinago Affairs**

The Ministry of Environment, Rural Modernization and Kalinago Affairs is responsible for, among areas, managing, monitoring and protecting the natural resources, enhancing climate resilience, monitoring climate conditions and coordinates disaster management programs across Dominica.

- **Project Coordination Unit, Disaster Vulnerability Reduction Project (DVRP)**

The main objective of the project is to reduce vulnerability to natural hazards and climate change impacts in Dominica through investments in resilient infrastructure and improved hazard data collection and monitoring systems.

- **Ministry of Finance, Economic Affairs, Investment and Planning**

This Ministry is central to the development strategy of the Government. The Dominica which we envisage is one where all citizens share in and enjoy the benefits of development. It is a vision where all have access to basic goods and services including adequate food, shelter, clothing, education, health, employment. The Ministry is also responsible for the orderly and progressive development of land and for the grant of permissions to develop land and for other powers of control over the use of land.

## 6.2.2 Grenada

- **Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation**

This is the project's implementing agency. It is the Ministry that is responsible for protecting and enhancing Grenada's infrastructure. Under this mandate, the Ministry manages the maintenance of the country's roads, bridges and government buildings, ensures compliance with building codes, develops plans for the orderly development of the country and implements cabinet's policies and directives, amongst other things.

- **Ministry of Ministry of Finance, Planning, Economic Development and Physical Development**

The Ministry of Finance, Planning, Economic Development and Physical Development is responsible for the implementation of fiscal and economic policies as well as the facilitation of social and environmental policies in co-operation with other agencies, thereby providing and enabling sustainable growth. This Ministry will support project implementation through key fiduciary activities performed by the Accountant General's Department (AGD) and the Central Procurement Unit (CPU).

- **Ministry of Legal Affairs**

The Ministry of Legal Affairs is responsible for providing quality and timely legal advice and representation to government ministries and departments thereby ensuring good and effective governance. The Ministry is mandated to ensure that all actions taken by the government and its ministries and departments are within the laws of the land and in conformity with Grenada's international obligations.

## 6.2.3 Saint Lucia

- **Ministry of Finance, Economic Growth, Job Creation, External Affairs and Public Service**

The Ministry of Finance is responsible co-ordination of development planning; mobilization of public resources; and ensuring effective accountability for the use of such resources for the benefit of all stakeholders for the delivery of services.

The National Council for Productivity and Competitiveness was established to foster competitiveness, productivity and innovation in Saint Lucia. The Council is mandated to create an enabling environment to enhance innovation, productivity and competitiveness, and foster sustainable economic growth in Saint Lucia. This strategically aligns with the project to reduce time away from work to secure services.

The Department of Customs and Excise as well as the Inland Revenue Department are responsible for the collection of funds for duties and taxes for imports and income, property and corporate taxes respectively.

The Department of Public Service leads the charge of services to the general public as well as the government employees. Public Services will be the home of Project Implementing Unit and will play a key role in project governance.

- **The Ministry of Education, Innovation, Gender Relations and Sustainable Development**

The Ministry is mandated to contribute to educate, nurture and train the population. Additionally, Departments of Sustainable Development to safeguard the environment, Research and Innovation promoting new and existing entrepreneurial initiatives and improving current manufacturing and artistic sector and reform of the education sector.

The Department of Public Sector Modernization covers the portfolios of Information and Communications Technology (ICT), E-Government and Telecommunications are also assigned to this Ministry. The DPSM was established to provide leadership, Coordination and integration to the implementation and monitoring of several key aspects of the modernisation agenda; that is, information and communications technology, e-Government, telecommunications, ICT legal and regulatory frameworks, information and knowledge management and process analysis and re-engineering. Better public service delivery through the improved management of data, information and communications, Better management of critical resources in the public sector, and Increased levels of connectivity and use of ICT. This will build on the successes to facilitate online services to locals and foreign Saint Lucians.

- **Ministry of Social Equity, Empowerment and Community Development**

With a mandate of total inclusion and non-discrimination to represent the interests of all works of life; the poor, disadvantaged, dis and differently abled as well as differing sexual orientation all have a voice to shape their future.

#### **6.2.4 St. Vincent and the Grenadines**

- **Ministry of Finance, Economic Planning, Sustainable Development and Information Technology**

Leads the process of re-engineering economic growth, promoting sustainable development and improving the quality of life of all Vincentians.

- **Ministry of Housing, Informal Human Settlements, Land and Surveys and Physical Planning**

Strives to facilitate national sustainable development through the implementation of an integrated approach to physical planning, land surveying, land management, housing development and the improvement of informal communities.

- **Ministry of Legal Affairs**

Provides a legal mechanism that will ensure the smooth and efficient running of the Legal system in Saint Vincent and the Grenadines.

- **Registry**

Provides a solid framework which facilitates the effective administration and dispensation of justice by the Supreme Court and to ensure the proper registration, preservation and retrieval of records for the use of the people of Saint Vincent and the Grenadines.

### **6.3 Civil Society and Non-Governmental Organizations**

Within the OECS civil society groups consist of a wide variety of organizations. These include private sector entities of varying sizes, chambers of commerce, non-governmental organizations (NGOs), universities technical schools and other groups. Since the project is aimed at enhancing the digital capacity and increasing employability across the participating countries, these organizations/ entities should be included in the consultation process as the project has significant implications for them. The specific civil society and NGO groups/ organizations that will be included in stakeholder consultation for each country are listed below:

#### **6.3.1 Commonwealth of Dominica**

##### **Civil Society and Non-Governmental Organizations**

Dominica's civil society consists of several organizations, enterprises and entities. Among civil society bodies are the private sector which consists of businesses and enterprises, small and medium sized businesses, Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs), Commodity Representative Bodies such as the Dominica Association of Industry & Commerce (DAIC), Women NGOs and representative groups, legal fraternities and societies, and others. These organizations are relevant in component one as they should be consulted on the rehabilitation and upgrading of the equipment and infrastructure at training centers. The main civil society actors are as follows: Dominica Association of Industry and Commerce, Dominica Hotel and Tourism Association, Women's Bureau, Association of People with Disabilities, Bar Association, Dominica Manufacturers Association, Dominica Business Trust, and the Builders and Construction Association of Dominica.

##### **Universities and Other Institutes of Higher Education**

In Dominica, there are several universities and centers of higher learning that can be included in the consultation process. These include The University of the West Indies (UWI) Open Campus, Business Training Centre, All Saints University, Dominica State College and the Lead Institute.

#### **6.3.2 Grenada**

##### **Civil Society and Non-Governmental Organizations**

Grenadian civil society consist of a number of organizations, enterprises and entities. Among civil society bodies are the private sector which consists of micro, small and medium sized businesses and enterprises, Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs), Commodity Representative Bodies such as the Grenada Cooperative Nutmeg Association and the Grenada Cocoa Association, Labour Organizations, Women NGOs and representative groups, legal fraternities and societies, and others. These organizations are relevant as they will form the representatives of, and end users of the digital technologies produced and should be consulted in the design of the digital infrastructure. Some of the main civil society actors are as follows: Grenada Chamber of Commerce, Grenada National Organization of Women, Grenada Bar Association, Grenada Human Rights Associations, Grenada AIDS organization, Agency for Rural Transformation (ART) Grenada, Grenada Red Cross Society,

Inter-Agency Group of Development Organizations (IAGDO), Grenada Coalition of Service Industries, Dynamic Youth of Grenada, Caribbean Youth Environment Network, Grenada Chapter.

### **Universities and Other Institutes of Higher Education**

There are several educational institutes and centers of learning in Grenada. These will be important as end users of digital technologies as well as assisting in the change strategies, systems and processes targeted towards citizens. The main educational institute actors are the T.A. Marryshow Community College, the St Georges University and the University of the West Indies (UWI) Open Campus.

### **6.3.3 Saint Lucia**

#### **Civil Society and Non-Governmental Organizations**

Saint Lucia's civil society consists of a number of organizations, enterprises and entities. Among civil society bodies are the private sector which consists of businesses and enterprises, small and medium sized businesses, Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs), Commodity Representative Bodies such as the Saint Lucia Chamber of Commerce, Industry and Agriculture, Women NGOs and representative groups, legal fraternities and societies, and others. These organizations are relevant in component one (1) as they should be consulted on the rehabilitation and upgrading of the equipment and infrastructure. The main civil society actors are as follows: Saint Lucia Chamber of Commerce, Industry and Agriculture; Saint Lucia Hotel and Tourism Association, Saint Lucia Blind Welfare Association; National Council of and for Persons with Disabilities; Saint Lucia Bar Association; Saint Lucia Manufacturers Association, Saint Lucia Small Business Association.

#### **Universities and Other Institutes of Higher Education**

In Saint Lucia, there are two main centers of higher learning that will be included in the consultation process. These include The University of the West Indies (UWI) Open Campus and the Sir Arthur Lewis Community College. Additionally, the Sir Vaughn Arthur Lewis Institute of Research and Innovation is also to be consulted due to their mandate.

### **6.3.4 Saint Vincent and the Grenadines**

#### **Civil Society and Non-Governmental Organizations**

Civil society in St Vincent and the Grenadines which would be consulted consists of a number of organizations, enterprises and entities. Among civil society bodies are the private sector which consists of businesses and enterprises, small and medium sized businesses, Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs), Commodity Representative Bodies such as the St Vincent and the Grenadines Chamber of Industry & Commerce and representative groups, legal fraternities and societies, and others.

#### **Universities and Other Institutes of Higher Education**

There are several educational institutes and centers of learning in St Vincent and the Grenadines that can be included in the consultation process. These include the St Vincent and the Grenadines Community College and the University of the West Indies (UWI) Open Campus.

## **6.4 Users of Government E-Services**

The users of Government E-Services would potentially be the entire population of the four participating countries. However, the specific segment of the population that will use the services directly include

business owners, government employees, parents, tourists, students, persons from the OECS who travel and taxpayers amongst others.

## 6.5 Other Interested Groups and Affected Parties

Generally, the project has the potential to have an impact on all aspects of society in the participating nations. Therefore, other interest groups and interested parties may include churches, providers of non-digital modes of communication and other development projects which are either being implemented or in planning stage for implementation.

## 6.6 Disadvantaged or Vulnerable Groups

Within the OECS there are several identifiable disadvantaged or vulnerable groups who, because of their prevailing characteristics and the countries' historical pattern of exclusion, face the risk of also being excluded from the benefits of this project if not adequately engaged. These include the poor, women, young girls, at risk youth, the disabled and the LGBTI community.

In order to ensure that the project does not further exacerbate the existing inclusion patterns, careful attention will be paid to addressing both inclusion and exclusion errors which are present within the current access to digital services. Specifically, the project will include programs such as coding bootcamps and business incubation and acceleration support explicitly targeting female students and entrepreneurs, with the aim to create a wider pool of digitally savvy women in the workforce and grow the number of female-led digital enterprises. As relevant, the project will also disaggregate results indicators by gender to create appropriate targets and measure progress, and will incorporate a citizen-oriented design and include a beneficiary feedback indicator in its result framework.

Other factors which may impede full participation are tabled below along with possible mitigation measures.

<b>Factors</b>	<b>Vulnerable population</b>	<b>Mitigation measures.</b>
Language	If the person is hearing impaired or impaired vision	Provide someone to translate the information to persons with different abilities (for example the information can be provided in Braille or an expert in sign language can be made available)
Time	They may need more time to prepare to make arrangements	Investigate in the community what is the usual time of the day and the day- that most members of the community are available; If persons not available Flyers or brochures with the relevant information are made available to be distributed about the project scope If persons are not available because they are caregiver depend on the nature of the persons who needs assistance (for example a child) a separate space can be made at the location to care for children during the 3 hours
Transportation	Everyone	For some consultation monetary allocation is given to participant to secure their attendance

		If a number of persons are from a particular vicinity a single transport can be contracted
Meal	Everyone	Depends on the time of the consultation light refreshment can be offered
Location	Everyone	Conduct separate consultation throughout the country

### 6.6.1 The Kalinago of the Commonwealth of Dominica

The Kalinago community of Dominica is a country-specific disadvantaged and vulnerable indigenous group. The most recent Country Poverty Assessment Survey (Caribbean Development Bank, 2008), reports that one out of every two persons in the Kalinago Territory is poor. The vulnerability of the Kalinagos resides in that because of their particular circumstances, they may be excluded from participating in conversations and significant consultation processes about development solution, and thus not benefiting in an appropriate way, from projects benefits.

According to the 2011 population census, approximately 2145 Kalinagos live on a collectively owned territory of 3700 acres encompassing eight hamlets (Sineku, Gaulette River, Mahaut River, St. Cyr, Salybia, Crayfish River, Battaca and Touna Concorde) along the north-eastern coast of Dominica. Given its size and population, the Kalinago Territory has the highest population density when compared to Dominica’s other parishes. Consequently, there is a high degree of land degradation as a result of the clearing of land for settlements, agricultural use and social infrastructure (trails, roads, schools etc.)

The area was the last to be connected to the electricity grid in Dominica. Additionally, this community, along with Roseau Central, has a heavy reliance on social services as it has the highest number of institutions and organizations providing services, resources and support to its residents, thereby making it have a heavy reliance on social services.

The issue of land ownership or lack thereof, (the Kalinago Council has ownership of lands in the Territory) poses serious concerns for individual socio-economic advancement. This significantly limits their access to credit at local banks since they do not possess the required collateral i.e. Certificate of Titles as per the laws governing the Territory. Whereas it is necessary to ensure the lands allocated to the Territory remains unchanged, it prohibits individual economic advancement based on requirements from the banking community.

Unemployment in the Kalinago Territory is estimated to be high, particularly among the youth. Decline in the agricultural sector coupled with delayed realization of strong and sustained growth in the tourism sector nationally continue to negatively impact employment in the Kalinago Territory. Further, sixty-nine percent (69%) of homes in the Territory suffered damage during the passage of Hurricane Maria in 2017. To mitigate, the Ministry of Kalinago Affairs has designed two Financial Interventions funded by the Government to provide temporary, short-term, financial assistance to the Kalinago people affected by Hurricane Maria. The specific focus of the intervention is on the rehabilitation of homes and support for people in the Kalinago craft industry.

## 6.6.2 Grenada

With 48 per cent of all poor households headed by single women, Grenada has the highest percentage of female-headed households recorded in the OECS. Forty-four per cent of urban households headed by women are found in the poorest quintiles compared to only 18 per cent for men<sup>1</sup>. One in every two Grenadian children lives in poverty, with 39.3 per cent of the poor found in the 0–14 years of age group (compared to 29.4 per cent of the non-poor). Although the average household size at the national level is two in the highest quintile and three in the middle, for the poorest quintile it is five. The CPA found that only 48 per cent of the poorest households had indoor sanitation or water closets and 85 per cent had electricity.

A study published in 2010 by the Institute of Development Studies (IDS) revisits ideas about the distribution of poverty, asserting that over 60 per cent of the world's poor are to be found in middle- and high-income countries such as Grenada and other Eastern Caribbean States. Although fewer people in Grenada are living in extreme poverty in 2008 than previous years, nearly 15 per cent of all households are considered vulnerable.

The 2008 CPA reported a total employed labour force of 47,581 with 49 per cent men and 51 per cent women, but the unemployment rate was estimated at 24.9 per cent with nearly double the number of women (31.8 per cent) unemployed than men (17.9 per cent). It is widely acknowledged that women and youth experience higher unemployment than national figures suggest. Many of the employed live in households whose income or consumption levels fall below the poverty level threshold, and they therefore spend considerable time looking for better-paying jobs. Research has observed that people in this group, categorized as the 'working poor', are generally clustered in the 25–44 age group, work in the informal sector and are more or less economically depressed, disenfranchised and marginalized. In 2010, it was reported that 21.2 per cent of all workers fell into the category of the working poor, with more women than men.

Young people between the ages of 15 and 25 experience the highest unemployment rates in Grenada and the Caribbean in general. A CDB study released in 2015 identifies an acute unemployment problem for youth (18–24), who make up a quarter of the region's population. It shows a rate of 25 per cent among youth compared to 8 per cent among adults, with unemployment among young females (30 per cent) considerably higher than young males (20 per cent). The 2008 CPA revealed that a total of 14.6 per cent of Grenadians were deemed vulnerable.

High unemployment and underemployment rates among women carry significant implications for the 48 per cent of the country's poor households headed by women<sup>2</sup>. With fewer women employed, higher unemployment rates among women than men, the boom in the male-dominated construction industry and the traditional gender-based barriers facing women, single female-headed households face significant disadvantages. With 42.2 per cent of Grenada's children living in poor households headed by women (compared to 34.8 per cent among male-headed poor households), unemployment of women has a profound effect on children. These households are also characterized by low levels of education (26.6 per cent of heads of poor households attended only primary school and 61.7 per cent received secondary

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<sup>1</sup> *Situational Analysis of Children in Grenada, UNICEF 2017. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf).*

<sup>2</sup> *Situational Analysis of Children in Grenada, UNICEF 2017. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf).*

education<sup>3</sup>), low school attendance rates among the children living in the household, children fathered by multiple men, inadequate adult guidance and support for children and limited access to basic health care. Typically, these poor households headed by single women support prime conditions for inter-generational poverty to take hold, promoting a 'learned helplessness'. Poverty promotes casual or dysfunctional relationships as single women pursue men who can bring monetary contributions to the household, evolving into 'revolving door hook-ups' and transactional sex. With a change in partners, the chances of pregnancy increase, adding to the already overwhelming responsibilities of the growing household. Children in these households are seriously affected by these conditions in different ways depending on their age group and sex<sup>4</sup>. Dysfunctional mating patterns and early pregnancies may lead to the girl child repeating the cycle of poverty that traps the single mother heading the household. The boy child can also get caught in this poverty trap by dropping out of school to bring more income into the household and potentially falling into gang activity and the drug trade. There may also be other far-reaching and negative consequences on children's growth, development, survival, protection and capacity to express themselves.

<sup>5</sup>Individuals aged 0-5 years display signs of physical and emotional neglect, abuse and malnutrition making them vulnerable, which are then mastered by harmful behavioural patterns, slow cognitive development with a poor socialization process. Individuals aged 5-7 coming from homes that are deep in poverty miss out on connectedness to family and community, making them vulnerable members of the general population. This in turn develops poor socialization processes and stigmatization that can have long term effects on their self-esteem. However, as the age range increases within these households, the vulnerabilities differ based on needs. Poor health and nutrition results in poor school attendance usually leads to a high rate of school dropouts. The adolescent age group of poverty ridden communities presents the greatest threats of vulnerabilities such as girls at risk of sexual violence, abuse as well as boys at risk to drop out of school w/ out certificate. Both at risk to engaging in harmful and risky behaviours leading to instances of out-of-school and out-of-work. Risk of life-long negative effect: no second chance, no higher-level education due to absence of diversion programme. These vulnerabilities are manifested in instances of – Teen pregnancy, Unemployment, Marginalization, Non-participation, Substance abuse, Crime, Early parenting, Recidivism and Economic vulnerability, all present in poverty-stricken areas such as St. Andrews.

Additionally, migrant families from these areas also face various vulnerabilities. These include, but are not limited to: Low social status associated with situation of parent in country (low paid, low skills, language barrier), Parental absence, Lack of legal status/appropriate documentation to access social services, Separation from extended family and culture and Language barrier<sup>6</sup>.

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<sup>3</sup> Government of Grenada, 2014.

<sup>4</sup> *Situational Analysis of Children in Grenada, UNICEF 2017*. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf).

<sup>5</sup> Information for this paragraph was extracted from *Situational Analysis of Children in Grenada, UNICEF 2017*. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf).

<sup>6</sup> Information for this paragraph was extracted from *Situational Analysis of Children in Grenada, UNICEF 2017*. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf).

### 6.6.3 Saint Lucia

Within Saint Lucia, there are several identifiable disadvantaged or vulnerable groups who, because of their prevailing characteristics and the countries' historical pattern of exclusion, face the risk of being omitted from the benefits of this project if not adequately engaged. These include the poor, women, young girls, at risk youth, persons with different abilities and the LGBTIQ community. Their lack of or limited access to computers, smart phones and the required connectivity places the group at a widespread disadvantage as the emphasis would be on meeting basic needs. These vulnerable groups would consequently be reliant on physically visiting and manually requesting the required government services; this will definitely be time consuming, effort and financial draining on already indigents. Participation in the consultations will facilitate them to be more efficiently access the services in a user-friendly manner that would of concern to them.

In order to ensure that the project does not further exacerbate the existing inclusion patterns, careful attention will be paid to addressing both inclusion and exclusion errors which are present within the current access to digital services. Specifically, the project will include programs such as coding bootcamps and business incubation and acceleration support explicitly targeting female students and entrepreneurs, with the aim to create a wider pool of digitally savvy women in the workforce and grow the number of female-led digital enterprises. As relevant, the project will also disaggregate results indicators by gender to create appropriate targets and measure progress, and will incorporate a citizen-oriented design and include a beneficiary feedback indicator in its result framework.

In formulating the objectives and activities of this project, stakeholders including publicsector agencies, private sector, non governmental organisations and community services organizations and representatives of these groupings have as recently as January 2020 have contributed to the process. Their contributions improve the access to and utility of the electronic government services to save time, effort and resources.

### 6.6.4 St. Vincent and the Grenadines

According to the Saint Vincent and the Grenadines Country Poverty Assessment (SVGCPA) of 2008, persons are deemed vulnerable if they are at risk of falling into poverty should any adverse economic shock or natural disaster occur. Vulnerability was estimated to be EC\$6,904 per annum or EC\$18.91 per day. According to this measure 48.2 percent of the individuals were in this category. (General population, female headed household, pregnant (school drop-out) teenagers; unemployed youth; single parent household; persons with disability).

There is a general lack of data and empirical studies on vulnerable groups and their needs, beyond the poverty assessment referenced above. There are no norms, societal practices or legal barriers that impede any Vincentian from participating in a consultation, decision making, or sharing of project benefits. The factors which may impede full participation are those like, language, time, possibility to travel to attend consultations, location, whose mitigation measures are reflected in the table under section 6.6.

## 7 Summary of Stakeholder Engagement needs

Annex 6 summarizes the needs of the different stakeholder groups to be engaged throughout the project cycle. These needs will be revisited and finalized upon establishment and staffing of the national level PIUs. Overall, a combination of face-to-face, online, and telephonic mediums will be used to engage with the various stakeholder groups impacted by the project.

## 8 Stakeholder Engagement Program

The project will adopt a multi-stakeholder engagement process which will be completed using two approaches throughout the project life-cycle- information disclosure and public consultation.

### 8.1 Proposed Strategy for Information Disclosure

A variety of methods will be utilized to disclose information to project stakeholders. Disclosed information will allow stakeholders to understand the risks and impacts of the project, and potential opportunities. They will also provide stakeholders with access to information, (a) The purpose, nature and scale of the project; (b) The duration of proposed project activities; (c) Potential risks and impacts of the project on local communities, and the proposals for mitigating these; (d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate; (e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and (f) The process and means by which grievances can be raised and will be addressed.

The information will be disclosed in a variety of ways including on relevant government websites (on the website of the ministries of the participant countries, that will be implementing the project, including the website of the ECCB), and local offices, in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility) (Table 6.1).

**Table 6.1: Information disclosure strategy**

Project stage	Information to be disclosed	Method proposed	Timetable: Locations /dates	Target Stakeholders	Percentage reached	Responsibilities
Preparation	Environmental and Social Commitment Plan, Environmental and Social Assessment	Governments and ECCB websites Public Meetings	March 30, 2020	All	TBD	ECCB and Country Ministries
	SEP with GRM	Governments and ECCB websites Public Meetings Social Media Community Bulletin Board	March 30, 2020	All	TBD	ECCB and Country Ministries
	LMP with GRM	Governments and ECCB websites	March 30, 2020	All	TBD	ECCB and Country Ministries

Project stage	Information to be disclosed	Method proposed	Timetable: Locations /dates	Target Stakeholders	Percentage reached	Responsibilities
	IPPF, with GRM. Same as the GRM under the SEP but including a representation of the Kalinago territory.	Governments and ECCB websites and Meetings in Kalinago communities	March 30, 2020	All	TBD	ECCB and Country Ministries
	RPF with GRM. Same as the GRM under the SEP	Governments and ECCB websites Public Meetings Community Billboards	March 30, 2020	All	TBD	ECCB and Country Ministries
Implementation	Environmental and Social Commitment Plan (ESMP) Grievance Redress Mechanism (GRM) RAP with GRM	Government Websites, Radio programs, and local TV spots Public Meetings Social Media Community Billboards	TBT	All	70%	ECCB and country Ministries
Operational	Project activities completed and benefits	Government Websites, Radio news, Social media	On completion of project activities	All	TBD	ECCB and country Ministries

## 8.2 Proposed Strategy for Consultation

Each of the identified stakeholder groups will be consulted on about various aspects of the project throughout the project life cycle. Methods of consultation will vary depending on the target audience and may include public meetings other and participatory methods. Table 6.2 outlines the proposed consultation strategy.

**Table 6.2: Consultation strategy**

Project stage	Purpose of engagement activity	Method used	Timetable: Location and dates	Target Stakeholders	Responsibilities
Preparation	Consult ESS instruments: ESMF, SEP, LMP, GRMs, IPPF, RPF	Public consultations and availability on the website	In all 4 countries during the month of February	All	ECCB and country Ministries
	Identify key regional priorities	Meeting	With all countries, May, 2019	Government sectors.	ECCB, OECS and ECTEL

Project stage	Purpose of engagement activity	Method used	Timetable: Location and dates	Target Stakeholders	Responsibilities
<b>Implementation</b>	Development of the core foundations of the region's digital economy	Forum, workshop and meetings	In all countries/ TBD	Government, private sector, and social sectors	ECCB and countries
	Promoting greater access of vulnerable groups to digital connectivity	Public consultations and workshops	In all countries/ TBD / every six months to evaluate and get feedback.	All	ECCB and country Ministries
	Involuntary resettlement-RAP, GRM	Census and Socio-Economic Survey	Where necessary / TBD/	Potential PAPs in affected areas	ECCB and country Ministries
	Monitoring of the implementation of ESS instruments, Citizen Engagement and Gender Approach, GRM	In-situ visit, public assemblies, meetings, and face to face visit.	In all countries/ TBD	All	ECCB and country Ministries

Considering current COVID-19 situation, the following methods will also be considered for future consultations:

1. Make a short video (that can be transmitted by WhatsApp) the video should present the objectives of the project and the main risks and benefits.
2. Share the link from where the documents are available on the Client website.
3. Distribute a feedback form on participants' opinions on the main risks and benefits - from the perspective of the stakeholders. [Copy of the Transcript of the short video can be shared]
4. Conduct feedback collection directly over the phone - especially for people who do not have Internet access.
5. Prepare the summary of the comments received and actions taken to address the comments.

### **8.3 Proposed Strategy to Incorporate the Views of Vulnerable Groups**

While some vulnerable groups have been proposed in the SEP, any additional groups will be identified throughout the consultation process. The project will include methods to remove obstacles to their participation e.g. having consultations in areas that are easily accessible to them and ensuring that they can access the project benefits.

### 8.3.1 Consultation with the Kalinago of the Commonwealth of Dominica

In adhering to the Carib Reserve Act which gives sole management of the Territory to the Kalinago Council, the Project Steering Committee must consult with the Kalinago Council at every point during implementation. To facilitate the process, a member from the Council should be represented on the Project Steering Committee. Additionally, three (3) days prior notice must be issued to the Kalinago Council in order to participate in meetings and site visits throughout the Project Cycle. The prior notice should be addressed to the Kalinago Chief, preferably in written form (either post or email) during the course of the project. Table 6.3 details specific consultation timing and methods that will be utilized with the Kalinago community. It is also included in the project’s Indigenous Peoples Planning Framework

**Table 6.3: Consultation with Kalinago community of Dominica**

Project Stage	Topic	Engagement Approach	Timetable: Locations/ Dates	stakeholders	Stakeholder Manager
Design	Project Objective, activities ESIA, ESMP, IPPF, RAF, LMP, SEP, GRM	Discussion with community leaders, Public meeting, Brochure or Flyer, Press Releases	Prior to commencement of project activities at Community Centre	Kalinago Community	Project Manager Environmental Safeguards Social Safeguards Communication Specialist
Civil works, Retrofitting and Rehabilitation	ESMP, LMP, IPPF, SEP, RAP	Public Meeting(s), nontechnical reports made available to the public	Prior to commencement of project civil works, retrofitting and rehabilitation activities	Kalinago Community	Environmental Safeguards Social Safeguards Communication Specialist
Commissioning	Project activities completed and benefits	Public Meeting(s), Radio news, Project leaflet posted on community bulletin board and distributed, Press Releases, Social Media, Government Websites	On completion of project activities	Kalinago Community,	Project Manager Communication Specialist

## 8.4 Stakeholder Feedback

Feedback from stakeholders will be solicited at every stage of the project life cycle. For public meetings, workshops, focus groups, comments will be recorded through detailed meeting minutes. The Social Safeguards Specialist at each PIU will be responsible for receiving and recording any queries, concerns or complaints against the project. Comments and decisions made on comments will be collated and reported back to stakeholders once the final decision on the course of action related to the comments has been made. Records will also be maintained on the methods used to inform stakeholders on dates and/or locations where they can gather project information and provide feedback.

In addition, stakeholders will be allowed to file complaints against the project through the Grievance Redress Mechanism detailed in Section 7 of the SEP. All records relating to this mechanism including, grievance forms, grievance log, notes, interviews, meeting minutes, release forms etc. will be also be stored.

## 8.5 Timelines

Table 6.4 outlines the timeline for project phases and key decisions.

**Table 6.4: Project timelines**

Project Stage	Timeline/Date
Design	Q2 2020
Construction	Q4 2020
Closure/Commissioning	Q3-Q4 2026

## 8.6 Future Phases of the Project

As the project progresses, stakeholders, including the general public will continuing be informed about its milestones. This information includes disclosure on the project's environmental and social performance, the implementation of the stakeholder engagement plan and the status of the grievance redress mechanism. These reports will be completed on at least an annual basis, but may increase in frequency during periods of increased activity etc. construction phases, when the public will experience more impacts or when project phases are changing. During periods of increased activity, reports may be provided on a quarterly basis.

## 8.7 Implementing Stakeholder Engagement Activities

### 8.7.1 Roles and Responsibilities

Implementation and monitoring of the Environmental and Social Management Framework (ESMF) and all other Environmental and Social Standards (ESS) instruments will be the responsibility of each implementing agency, that is ECCB for regional project activities, and the line ministry responsible for ICT in each country for national level project activities. . For this, both the regional and national level project implementation units (PIUs), will engage an Environmental and Social Specialist who will support this function, and within three (3) months of the Effective Date of the Project. Table 6.5 provides details on the roles and responsibilities for the Stakeholder Engagement Plan.

**Table 6.5: SEP roles and responsibilities**

Role/Position Title	Responsibilities
Project Manager Environmental & Social Specialist/s	<ul style="list-style-type: none"> <li>• Manage and implement the Stakeholder Engagement Plan (SEP)</li> <li>• Dissemination of project information</li> </ul>
Environmental & Social Specialist/s	<ul style="list-style-type: none"> <li>• Interface with stakeholders and respond to comments or questions about the project or consultation process.</li> <li>• Provide contact information if stakeholders have questions or comments about the project or consultation process.</li> <li>• Document any interactions with external stakeholders.</li> <li>• Maintain database, records for SEP</li> <li>• Coordinating public meetings, workshops, focus groups etc.</li> <li>• Makes sure the SEP is being adhered to and followed correctly.</li> <li>• Raise awareness of the SEP among project implementation unit, employees contracted firms and relevant external stakeholders.</li> </ul>

### 8.7.2 Budget

The budget for the implementation of the SEP will be Funded as part of overall Project management cost. Table 6.6 presents an indicative budget for the implementation of the Stakeholder Engagement Plan.

**Table 6.6: Budget for SEP implementation**

#	Concept	Dominica	Grenada	St. Lucia	SVG	ECCB	Total
		USD					
1	20% of Environmental and Social Specialist Time	11,000.00	11,000.00	11,000.00	11,000.00	11,000.00	55,000.00
2	Staff trips	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	25,000.00
3	Consultation (10 activities per year per country)	20,000.00	20,000.00	20,000.00	20,000.00	20,000.00	100,000.00
4	Information Production and Dissemination	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	50,000.00
5	<b>Total</b>	<b>46,000.00</b>	<b>46,000.00</b>	<b>46,000.00</b>	<b>46,000.00</b>	<b>46,000.00</b>	<b>230,000.00</b>

### 8.7.3 Contact details

Prior to project implementation, the following contact persons may be reached by stakeholders with any questions, concerns, recommendations etc. regarding the project at the level of each implementing entity – See table 6.7. Upon staffing of all PIUs, the contact information will be updated to that of the Environmental and Social Specialist in each PIU.

**Table 6.7: Project contact personnel**

Contact	Dominica	Grenada	St. Lucia	SVG	ECCB
Name	Jermaine Jean-Pierre	Rhonda Jones (Ms.)	Marlon Narcisse (Mr.)	Marcelle Edwards-John (Mrs.)	Imran Williams (Mr.)
Title	Director of ICT Unit	Permanent Secretary for Public Administration	Director of Public Service Modernization, Ministry of Public Service, Information, and Broadcasting	Deputy Director of Planning (Ag), Ministry of Finance, Economic Planning, Sustainable Development, and Information Technology	Project Officer, Projects and Technical Assistance Unit (GIO)
Telephone	(767) 266 3524	473) 440-2255	(758) 468-2285	(784) 457-1746	869) 465 2537
Email address	jeanpierrej@dominica.gov.dm	pmsec@gov.gd	marlon.narcisse@govt.lc	medwards-john@svgcpd.com	Imran.Williams@eccb-centralbank.org
Physical Address	1st Floor, Government Headquarters, Kennedy Avenue, Roseau, Dominica	Ministerial Complex, 6 <sup>th</sup> Floor, Botanical Gardens, St. George's, Grenada	2nd Floor, Greaahm Louisy Building, Waterfront, Castries, St. Lucia	1 <sup>st</sup> Floor, Financial Complex, Kingstown, St. Vincent and the Grenadines	Bird Rock, Basseterre, St. Kitts and Nevis

## 9 Grievance Redress Mechanism

. In order to ensure the implementation of the Project in a timely manner and effectively address any anticipated and unanticipated risks that would be encountered during implementation, including the development of the necessary actions of mitigation and avoidance, a Grievance Redressal Mechanism

(GRM) was developed. The GRM will enable the Project Authorities to address any grievances against the Project. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on people and will also be applicable when implementing the Resettlement Policy Framework (RPF) and/or the Resettlement Action Plans (RAP), as well as for the implementation of the Indigenous Peoples Planning Framework (IPPF.) In the case of the IPPF, this GRM will integrate in the Grievance Committee (GRC) a Representative from the Kalinago Territory -named by their organization.

Grievances that relate to project workers will be handled by a separate mechanism which is included as part of the project’s Labour Management Procedures (LMP).

## 9.2 Objectives of the Grievance Redress Mechanism

The objectives of the Grievance Redress Mechanism are as follows:

1. Ensure that the World Bank Environmental and Social Standards are adhered to in all subprojects and activities;
2. Address any negative environmental and social impacts of all sub-projects and activities;
3. Resolve all grievances emanating from the 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 trust amongst the project staff and the affected parties.

## 9.3 Grievance Redressal Process

The key stages involved in the project’s grievance redressal process are summarized in Figure 7.1 and described in the sections that follow.

<b>Level One</b>	<ol style="list-style-type: none"> <li>1. Receive grievance</li> <li>2. Acknowledge grievance</li> <li>3. Register/Log</li> <li>4. Screen</li> <li>5. Investigate</li> <li>6. Resolution</li> </ol>
<b>Level Two</b>	Grievance Redress Committee (GRC)
<b>Level Three</b>	Local Courts

**Figure 7.1: Project GRM process**

### 9.3.1 First Level of Redress

#### Receive Grievance

All complaints should be received by the Project Manager of each implementing PIU. This includes the project contact personnel in each of the participating countries. Through the consultation process in each participating country, stakeholders will be formed of various avenues through which the mechanism can be accessed. Complaints can be made in person, writing, verbally over the phone, by fax, emails or any other media. The point of receipt of complaints is listed below:

Contact	Dominica	Grenada	St. Lucia	SVG	ECCB
Name	Jermaine Jean-Pierre	Rhonda Jones (Ms.)	Marlon Narcisse (Mr.)	Marcelle Edwards-John (Mrs.)	Imran Williams (Mr.)
Title	Director of ICT Unit	Permanent Secretary for Public Administration	Director of Public Service Modernization, Ministry of Public Service, Information, and Broadcasting	Deputy Director of Planning (Ag), Ministry of Finance, Economic Planning, Sustainable Development, and Information Technology	Project Officer, Projects and Technical Assistance Unit (GIO)
Telephone	(767) 266 3524	473) 440-2255	(758) 468-2285	(784) 457-1746	869) 465 2537
Email address	jeanpierrej@dominica.gov.dm	pmsec@gov.gd	marlon.narcisse@govt.lc	medwards-john@svgcpd.com	Imran.Williams@eccb-centralbank.org
Physical Address	1st Floor, Government Headquarters,	Ministerial Complex, 6 <sup>th</sup> Floor, Botanical	2nd Floor, Greaaham Louisy Building,	1 <sup>st</sup> Floor, Financial Complex, Kingstown,	Bird Rock, Basseterre, St. Kitts and Nevis

Contact	Dominica	Grenada	St. Lucia	SVG	ECCB
	Kennedy Avenue, Roseau, Dominica	Gardens, St. George's, Grenada	Waterfront, Castries, St. Lucia	St. Vincent and the Grenadines	

**All grievances received by the established points of contact within the individual nations should be forwarded to the Project Manager within 24 hours of receipt.**

**Modes of Receiving Grievances**

Complaints can be made in person, writing, verbally over the phone, by fax, emails or any other media. The person receiving the complaint will try to obtain relevant information regarding the grievance and the complainant and will immediately inform the Project Manager (PM) at each PIU in the format – Grievance Information Form (GIF) as given in Annex 1.

**Acknowledge Grievance**

All grievances will be acknowledged by telephone or in writing by the PM using the Grievance Acknowledgment Form (Annex2) within 48 hours of receipt and the complainant informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately. The PM will work with the Country Ministries or contractors to ensure the speedy resolution of the grievance. If the complaint cannot be resolved at this level it is taken to the next level.

**Register/Log Grievance**

After receiving and recording the grievance on the GIF, it will be registered in the Grievance Redressal Registration and Monitoring Sheet (GRRMS) (Annex 3).

**Screen**

The concerned PM reviews the complaint and assign a grievance owner. The complaint will be forwarded to the grievance owner who will be responsible investigating the claim and liaising with both the aggrieved party and project staff in order to come to a mutually acceptable resolution. The grievant owner will be given a specific timeline for resolving the claim. Meetings with grievant/complainant will be held, if necessary, in an attempt to resolve the matter.

**Investigate**

The grievance owner will investigate the complaint. This investigation will include, but is not limited to, meetings with the grievant/complainant, site visits, meetings/interviews with project staff and collection of relevant documentation and other forms of evidence. For meetings, the deliberations and decision will be recorded on the Meeting Record Form included as Annex 4. Community representatives or representatives of the complainant will be allowed to sit in on these meetings.

**Resolution**

The resolution at the first tier should normally be completed within 15 working days of receipt of grievance and notified to the concerned party through the Disclosure Form (Annex 5). If the grievance is not be resolved within this period, it can be referred to the next level of the Grievance Redressal system.

However, once it is determined that progress is being made towards a resolution, the grievance will be retained at this first level. The complainant will be informed of this decision and an estimated time for the resolution of the matter will be given either verbally or in writing. If the issue cannot be resolved within 25 working days, it will be transferred to the next level. Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained on the Disclosure Form included as Annex 5. If the proposed resolution is not accepted the grievance will be escalated to level 2.

**NB The complainant may request that the issue be transferred to the next level if he or she does not feel that the grievance is being adequately addressed by the PM.**

### **9.3.2 Second Level of Redress**

A Grievance Redressal Committee (GRC) will be formed in each implementing entity, that will consist of members of their respective Project Steering Committees (Regional project Steering Committee, in the case of ECCB), civic leaders and relevant representatives. The GRC will be called into place when a first-tier resolution is not found, but it could also meet on a quarterly basis to evaluate the performance of the project level GRM. From this perspective it is a standing body.

This committee will be chaired by the representative of the implementing line ministry/agency in the corresponding Project Steering Committee. The permanent secretaries of the participant ministries will assign their respective representative to the GRC. The way in which the representative of the civil society will be defined is still TBD, but line ministry or the PIU can invite active NGOs to nominate a representative.

#### **Terms of Reference for GRC:**

The functions of the GRC are as follows are to:

1. Provide relief and support to the affected persons in a timely manner;
2. Prioritize grievances and resolve them at the earliest reasonable time;
3. Provide information to PIUs on serious cases at the earliest plausible time;
4. Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance;
5. Study the normally occurring grievances and advise the PM as to their scale and scope.

The PM will coordinate the convening of the meetings of the GRC. He / She is also responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both parties. (Complainant and the Project).

The GRC will hold the necessary meetings with the affected party / complainant and the concerned officers and attempt to find a solution acceptable at all levels. GRC will record the minutes of the meeting in the format using the same format detailed in Annex 4. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant's acceptance will be obtained on the disclosure format as in Annex 5.

If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level / or the complainant can activate the next level. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress is being made to resolve the matter may be retained at this level for a maximum of 60 working days.

### 9.3.3 Third Level of Redress

If the affected party / complainant does not agree with the resolution at the 2nd level, or there is a time delay of more than 60 working days in resolving the issue, the complainant can opt to consider taking it to the third level. This level involves the complainant taking legal recourse within the local courts.

### 9.4 World Bank Grievance Redressal 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 requires the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank's [GRS complaint form](http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5) which can be found at the following URL 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](mailto: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

### 9.5 Addressing Gender-Based Violence

The GRM will specify an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers will be kept available by the project. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

Any cases of GBV brought through the GRM will be documented, but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GRM will primarily serve to:

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

The GRM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR**.

## 9.6 Grievance Redress Mechanism Budget

Item	Cost (US\$)
Meetings of GRC (100 meetings @ USD1000)	100,000.00
Information Production and Dissemination (500 collateral materials @ USD100)	50,000.00

## 9.7 Building Grievance Redress Mechanism Awareness

The ESS will initially brief all staff of the project office, the Project Steering Committee (PSC), the sub-projects including consultants and contractors, and the staff of the individual country Ministries on the Grievance Redressal Mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

The ESS will brief the all project stakeholders on the Grievance Redressal Mechanism of the Project and explain the procedures and formats to be used including the reporting procedures.

Awareness campaigns would be conducted targeting project stakeholders to inform them on the availability of the mechanism; various mediums will be used- as detailed in previous sections of the SEP. The GRM will also be published on the ECCB website, responsible Ministries in each participating country's website and the project website or Facebook page if there is one. A project site board will be erected on the sites of sub-projects indicating the existence of the mechanism and a phone number, email and address for further information. The GRM will be translated into local and colloquial expressions if determined to be needed.

## 9.8 Monitoring and Reporting

The Environmental Safeguards Specialist and/or Social Specialist/s will prepare the Monthly and Quarterly Reports on the Grievance Redress issues of the project.

## 9.9 Periodic Review by Grievance Redress Committee

The Grievance Redressal Committee may review the nature of grievances that have been represented and if grievances are repeated, recommend suitable changes in implementation procedures and forward these to the PSC for implementation.

## Annex 1- Grievance Information Form

<b>Date/Time received:</b>	<b>Date: (dd-mm-yyyy)</b>  <b>Time:</b> <input type="checkbox"/> <b>am</b> <input type="checkbox"/> <b>pm</b>	
<b>Name of Grievant:</b>		<input type="checkbox"/> You can use my name, but do not use it in public.  <input type="checkbox"/> You can use my name when talking about this concern in public.  <input type="checkbox"/> You cannot use my name at all.
<b>Company (if applicable)</b>		<input type="checkbox"/> You can use my company name, but do not use it in public.  <input type="checkbox"/> You can use my company name when talking about this concern in public.  <input type="checkbox"/> You cannot use my company name at all
<b>Contact Information:</b>	<b>Phone:</b>  <b>Email address:</b>  <b>Address:</b>  (Kindly indicate the preferred method of communication)	
<b>Details of grievance:</b> (Who, what, when, where)	<input type="checkbox"/> One-time incident/complaint <input type="checkbox"/> Happened more than once (indicate how many times): _____ <input type="checkbox"/> Ongoing (a currently existing problem)	

<b>How would you like to see issue resolved?</b>	
<b>Attachments to the grievance/complaint:</b> (e.g. pictures, reports etc.)	List here:

\_\_\_\_\_  
**Grievant/Complainant Signature (if applicable)**

\_\_\_\_\_  
**Date (dd-mm-yyyy)**

\_\_\_\_\_  
**Signature- Project personnel (to confirm receipt only)**

\_\_\_\_\_  
**Date (dd-mm-yyyy)**

**For PIU use only:**

**Grievance No:** \_\_\_\_\_

**Grievance Category:**

Problems during material transport       Smell  
 Blocked road access                               Problem with project staff  
 Dust     Other (specify): \_\_\_\_\_  
 Noise

**Grievance Owner/ Department:** \_\_\_\_\_

## Annex 2- Grievance Acknowledgement Form (GAF)

The project acknowledges receipt of your complaint and will contact you within 10working days.

<b>Date of grievance/complaint:</b> (dd/mm/yyyy)	
<b>Name of Grievant/Complainant:</b>	
<b>Complainant's Address and Contact Information:</b>	
<b>Summary of Grievance/Complaint:</b>  (Who, what, when, where)	
<b>Name of Project Staff Acknowledging Grievance:</b>	
<b>Signature:</b>	
<b>Date:</b> (dd/mm/yyyy)	

**Annex 3- Grievance Redressal Registration Monitoring Sheet**

<b>No.</b>	<b>Name of Grievant/Complainant</b>	<b>Date Received</b>	<b>Grievance Description</b>	<b>Name of Grievant Owner</b>	<b>Requires Further Intervention</b>	<b>Action(s) to be taken by PIU</b>	<b>Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance</b>
1.							
2.							
3.							
4.							

## Annex 4- Meeting Record Form

**Date of the Meeting:** ..... **Grievance No:** .....

**Venue of meeting:** .....

**Details of Participants:**

Complainant	Project/Government/ECCB

**Summary of Grievance**.....  
 .....  
 .....  
 .....

**Meeting Notes:** .....  
 .....  
 .....  
 .....

**Decisions taken in the meeting / Recommendations of GRC**.....  
 .....  
 .....

**Issue Resolved / Unresolved:** .....

**Signature of Chairperson of the meeting:** .....

**Name of Chairperson:** ..... **Date (DD/MM/YYYY):** .....

## Annex 5- Disclosure/Release Form

Result of Grievance Redressal

<b>Grievance No:</b>	
<b>Name of Grievant/Complainant:</b>	
<b>Date of Complaint:</b>	
<b>Summary of Complaint:</b>	
<b>Summary of Resolution:</b>	
<b>Resolved at:</b>	<input type="checkbox"/> First Level <input type="checkbox"/> Second Level <input type="checkbox"/> Third Level
<b>Date of grievance resolution (DD/MM/YYYY):</b>	

**Signature of Complainant in acceptance of the suggested grievance resolution:**

.....

**Name:** .....

**ID number:** ..... **Type of ID:** .....

**Date (DD/MM/YYYY):** .....

**Signature of Social Development Specialist and Project Coordinator:**

1..... 2.....

**1.Name:**.....

**Place:**.....

**Date:(dd –mm – yyyy):** .....

**2.Name:**.....

**Place:**.....

**Date:(dd –mm – yyyy):** .....

## Annex 6 – Summary of stakeholder engagement needs

Information in the Table is missing the Commonwealth of Dominica and Saint Vincent and the Grenadines. The missing information will be updated after the PIU is established and staffed, and the plans for the other countries have been re-assessed.

Country	Stakeholder Group	Key Characteristics	Preferred notification means	Specific needs
Dominica	Government ministries	How many?	Email and phone	
	CSOs including: chamber of commerce, universities, technical schools,	How many?	Email and phone	
	Students	% of population?	Radio and TV	
	Users of government e-services	What sectors and how many? Taxpayers Parents registering births Persons registering deaths	Radio and TV	
	The poor	Unemployed? Low literacy levels Lack of access to technology %???	Radio and TV Community Meeting Social Media	Large print Non-technical language Uses of pictures and diagrams
	Women	Single mothers Primary childcare providers %???	Focus group/ Community meeting Social Media	Childcare Separate meeting Late afternoon/evening meetings-after work
	Young girls,	%???		
	Youth at risks	High poverty levels Involved in crime? Low literacy levels %, How many???	Focus group/ meeting Social Media	Large print Non-technical language Uses of pictures and diagrams
	The disabled	How many?	Person to person invitation or through family	
	LGBT	How many?	Person to person Social Media	Privacy and discretion
	The Kalinago indigenous people		In situ visit and invitation.	Day time meetings Use traditional accepted methods of engagement as detailed in IPPF
Grenada	Government ministries	16	Interviews/Focus Groups/Inter- and Intra-Ministerial Mechanisms	
	CSOs including: chamber of commerce, universities, technical schools,	30	Key Informant Interviews, Focus Groups, Meetings with Representative Bodies and Networks	Non-technical reports and information

Country	Stakeholder Group	Key Characteristics	Preferred notification means	Specific needs
	Students	28,660 students 9,851 pupils in secondary schools (48.5 per cent girls) <sup>7</sup>  9.2 percent of the population, but 39.4 percent of the poor; Large numbers of youths not in Education, Employment or Training (NEET) youths.	Radio and TV Social Media, Targeted Awareness Campaigns Debate, Art and other competitions	Child friendly materials and use of cartoons etc. in public messaging.
	Users of government e-services	All citizens and firms	Radio and TV Social Media	Information in non-technical language.
	The poor	24 percent unemployment (2019) 37.7 per cent of the population were poor (below poverty level) <sup>8</sup> ` Andrew and St. David account for 57 percent of the poor. 48 per cent of all poor households headed by single women. Lack of access to technology %???	Radio and TV Community meetings/ community Theater Social Media	Large print Non-technical language Uses of pictures and diagrams Transportation Meetings in communities
	Women,	Female population: 53,164 Matrifocality: Forty-five per cent of Grenadian households are headed by women  48 per cent of all poor households headed by single women	Focus group/ Community meeting? Social Media	Childcare Meetings in communities Assistance to get to meetings
	Young girls,	%???	Social Media	
	Youth at risk	21.4 percent of the population, but 27.0 percent of the country's poor.one of the highest rates of children charged per capita (about 225 per 100,000). Boys are 5.8 times more likely to be charged with offences	Focus group/ meeting Social Media	Large print Non-technical language Uses of pictures and diagrams

<sup>7</sup> *Demographics: Situational Analysis of Children in Grenada, UNICEF 2017*. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf)

<sup>8</sup> Country Poverty Assessment Grenada, Carriacou and Petite Martinique, 2007/2008.

Country	Stakeholder Group	Key Characteristics	Preferred notification means	Specific needs
		than girls (e.g., 700 boys compared to 120 girls in 2014). The top three juvenile offences are stealing, using obscene language and causing harm. <sup>9</sup>		
	The disabled,	15062 persons/14 percent of the population <sup>10</sup>	Person to person invitation or through family, Disability	
	LGBT	How many?	Person to person???	Privacy and discretion
St. Lucia	Government ministries	12	Email and phone	Information sharing Access to e-services
	CSOs including: chamber of commerce, universities, technical schools,	19	Email, social media and phone Meetings	Access to e-services Business Licenses Business Certificates Academic Certificates
	Students	42% of population	Radio and TV Social Media	Information sharing Access to e-services Birth & Academic Certificates
	Users of government e-services	Vital Statistics Education Health Trade E-Commerce Tax Reporting	Radio and TV Social Media	Access to e-services Customs Payments Educational Certificates Social Services Civil Registry - certificates Tax filings Business Licenses
	The poor	Poverty Rate 24.2% Unemployment rate 20.2% Low literacy levels Lack of access to technology	Radio and TV Community Meeting Text messages Social Media	Large print Non-technical language Uses of pictures and diagrams Community Bill Boards Civil Certificates Academic Certificates Transportation
	Women,	Unemployed 22% Single mothers Primary childcare providers	Focus group/ Community meeting Text Messages Social Media	Child care Separate meeting Late afternoon/evening meetings-after work
	Young girls,	Unemployment 22.1%	Social Media Text messages	Academic certificates Vital Statistics
	Youth at risk	Unemployment rate 36.3%	Focus group/ meeting	Large print

<sup>9</sup> *Demographics: Situational Analysis of Children in Grenada, UNICEF 2017*. Retrieved from: [https://www.unicef.org/easterncaribbean/ECA\\_GRENADA\\_SitAn\\_Web.pdf](https://www.unicef.org/easterncaribbean/ECA_GRENADA_SitAn_Web.pdf)

<sup>10</sup> Ibid

Country	Stakeholder Group	Key Characteristics	Preferred notification means	Specific needs
		High poverty levels Involved in crime? Low literacy levels	Social Media	Non-technical language Uses of pictures and diagrams
	The disabled	15%	Person to person invitation or through family	Privacy and discretion Vital Statistics Child / Special Care Transportation
	LGBTIQ	Currently no specific data on this demographic group is available	Person to person Social Media	Privacy and discretion Vital Statistics
ECCB	Organization of Eastern Caribbean States (OECS,)	HQ in St. Lucia	Email and phone	Cover transportation and allowance costs.
	Eastern Caribbean Telecommunications Authority (ECTEL),	HQ in St. Lucia	Email and phone	Cover transportation and allowance costs.
	Governor of the Eastern Caribbean Central Bank (ECCB)	HQ in St. Kitts and Nevis, with satellite locations in all participant countries	Email and phone	Cover transportation and allowance costs.
	Regional CSO example LGBT organizations		Email and phone	Privacy and discretion