GRIEVANCE REDRESS MECHANISM (GRM)



CARIBBEAN DIGITAL TRANSFORMATION PROJECT (CARDTP) (P171528)

Division of Public Sector Modernization Department of Public Service Bourbon Street, Castries, St. Lucia

Acronyms and Abbreviations

- ESS- Environmental and Social Standard
- **GBV** Gender Based Violence
- **GRC-** Grievance Redress Committee
- GRE- Grenada
- **GM-** Grievance Mechanism
- PAI- Project Area of Influence
- PAP(s)- Project Affected Persons
- PDO- Project Development Objective
- PIU- Project Implementation Unit
- PSC- Project Steering Committee
- SEA- Sexual Exploitation and Abuse
- SH- Sexual Harassment
- SLU- Saint Lucia
- SST- Social Safeguards Team
- SVG- Saint Vincent and the Grenadines
- WB World Bank

Contents

Acr	onyms and Abbreviationsi			
1.	Project Background and Description1			
2.	Introduction1			
3.	Purpose of the Grievance Redress Mechanism2			
4.	Objectives of the Grievance Redress Mechanism2			
2	1.1 What is the Grievance Redress Mechanism3			
2	1.2 Types of Grievances			
2	I.3 The main actors for the GRM4			
5.	Grievance Redressal Process6			
5	5.1 The Levels of Redress			
5	5.1 Levels of Grievance Redress7			
	5.1.1 First Level of Redress8			
	5.1.2 Second Level of Redress10			
	5.1.3 Third Level of Redress			
5.2 World Bank Grievance Redressal Service (GRS)				
6.	Addressing Sexual Exploitation and Abuse and Sexual Harassment			
7.	Grievance Redress Mechanism Budget14			
8.	Building Grievance Redress Mechanism Awareness15			
9.	Monitoring and Reporting15			
10.	Periodic Review by Grievance Redress Committee15			
11.	Annexes			
ļ	Annex 1- Grievance Information Form16			
ļ	Annex 2- Grievance Acknowledgement Form (GAF)18			
A	Annex 3 - Grievance Redressal Registration Monitoring Sheet19			
ļ	Annex 4: Grievance Meeting Record Form20			
ļ	Annex 5 - Grievance Closure/Release Form21			
ŀ	Annex 6: List of GBV Service Providers in Saint Lucia22			

1. Project Background and Description

Rapid digital transformation is re-shaping the global economy, permeating virtually every sector and aspect of daily life, changing the way we learn, work, trade, socialize, and access public and private services and information. In 2016, the global digital economy was worth some USD 11.5 trillion, equivalent to 15.5 percent of the world's overall GDP. The project countries are lagging on all foundational elements of the digital economy, with common areas requiring improvement. Varying regulatory environments and market development trajectories have resulted in differing market outcomes in areas such as broadband adoption. However, the countries are at similar, low levels of development of cross-cutting areas like cybersecurity, and the use of digital platforms – public and private. Professional digital skills development remains low and concentrated. Digital entrepreneurship lags behind countries at a similar level of socio-economic development.

The project adopts a regional approach to strengthening the foundations of the digital economy. The project is expected to contribute to increased digital connectivity, digital public services and the creation of technology enabled businesses and jobs across the participating countries: the Commonwealth of Dominica, Grenada, Saint Lucia and Saint Vincent and the Grenadines. The project consists of four components:

- <u>Component 1: Digital Enabling Environment:</u> 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.
- <u>Component 2: Digital Government Infrastructure, Platforms and Services:</u> This component will support public sector modernization, resilience and delivery of digital public services to individuals and businesses.
- <u>Component 3: Digital Skills and Technology Adoption:</u> This component aims to better equip individuals and businesses across the region for the jobs and economy of the future and to spur innovation and productivity growth.
- <u>Component 4: Project Implementation Support:</u> This component will support national and regional level Project Implementation Units (PIUs) with management and implementation of the project and associated activities.

Financing at the national level for project activities is, USD 28 million in Dominica, USD 8 million in Grenada, USD 20 million in Saint Lucia and USD 20 million in Saint Vincent and the Grenadines, and a regional grant of USD 8 million implemented by the Organisation of Eastern Caribbean States (OECS). The specific project information for each component is presented in detailed in Section 2 of this report.

2. Introduction

The World Bank's Environmental and Social Standards (ESS) mandates that persons affected by the project (PAPs) be meaningfully consulted and given the opportunities to participate in planning and implementing the program. ESS2 [Labour and Working Conditions], ESS10 [Stakeholder Engagement and Information disclosure] recommends that a Grievance Redress Mechanism (GRM) be created to address all concerns of the PAPs.

The GRM is an effective tool for early identification, assessment and resolution of complaints and provides project affected persons (PAPs), an opportunity to voice complaints or concerns, and clarify and resolve misconceptions about the project activities. It provides a simple, transparent and timely manner to express their opinion or grievance related to the execution of project activities.

This document presents the Grievance Redress Mechanism for the Caribbean Digital Transformation Program (CARDTP) (P171528). The GRM is an effective tool for early identification, assessment and resolution of complaints.

3. Purpose of the Grievance Redress Mechanism

The project and its associated activities may have some short term and reversible impacts. 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 a robust GRM was developed. The GRM will enable the Project Implementation Unit (PIU) 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 as presented in the Stakeholder Engagement Plan (SEP); in the Resettlement Policy Framework (RPF) and/or the Resettlement Action Plans (RAP).

Grievances that relate to project workers will be handled by a separate Workers Grievance Redress Mechanism which is included as part of the project's Labour Management Procedures (LMP) that has been prepared. The GRM also specifies the Environmental and Social Specialist (ESS) as the individual who is responsible for dealing with any gender-based violence (GBV) issues, should they arise

4. 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.

4.1 What is the Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) refers to methods and processes by which a redressal to a grievance is sought and provided. The GRM can be designed specifically and separately for a project or it can be built on existing institutions and processes, whether they are formal or informal. GRMs are designed to benefit both the project and the project affected persons (PAPs).

A grievance refers to an issue, concern, problem or claim, whether actual or perceived, that affects the physical, social and economic conditions of individuals and or communities in the project area of influence. They can occur at different stages of the project cycle. The project activity often determines the nature of the grievance.

Grievances can occur at various stages in the project cycle:

- Inception these are complaints about the perceived macro impact (social, economic, environmental) of the project
- Implementation these are complaints about the micro context of the project emerging from its specific activities. For example, complaints related to construction noise or dust, displacement or land acquisition, compensation etc.
- Close these are complaints on the non-fulfilment of project activities.

4.2 Types of Grievances

Aggrieved persons can file different types of complaints depending on the specific issue or concern. Grievances can be related to a number of issues including provision of service, environmental impact, social impact, health and safety or project execution. The table 4.2 below identifies some of the grievances for this project. These may include but are not limited to the following categories:

Category	Potential factors which may result in a grievance
Service	Disruption of Services
	crashes
	network problems
Environmental	Noise
	Poor garbage disposal practices
	Dust or chemical pollution
	waste management issues (e-waste
	management)
Social	Lack of engagement
	Restriction to access
	Infringement of privacy
	Violence (Physical or sexual) from workers
Health and Safety	Risks to public health from improper handling of
	waste
	Traffic related impacts
Project Execution	Lack of stakeholder engagement
	Failure to implement the project scope
	Encroachment on private property

Table 4.2 Categories and potential factors which may lead to grievances

4.3 The main actors for the GRM

Listed below are the main actors responsible for the process of grievance redress:

a. The Permanent Secretary of the Ministry of the Public Service and head of the Grievance Redress Committee.

b. Project Implementing Unit is the governing agency tasked with the responsibility of project execution, including the fiduciary and safeguard aspects of the project.

c. Project Coordinator (PC): The PC is responsible for managing the project's implementation. The PC will receive all complaints and select a grievance owner who will be responsible for liaising with the complainant.

d. The Environmental and Social Specialist: Responsible for overseeing, monitoring and evaluating the grievance redress process and solely responsible for sexual harassment, sexual abuse and sexual exploitation and abuse related complaints.

e. Project Steering Committee (PSC): The PSC comprises various stakeholders that provide guidance and direction of the project activities, as designated in the project's operations manual. More specifically, the members of the PSC are:

Chairperson	Permanent Secretary of the Ministry of Public Sector (Director of Public Sector Modernization
Deputy Chairperson	National Competitiveness and Productivity Council (NCPC)
Members	Permanent Secretaries of: Department of Finance / NCPC
	Department of Education, Innovation, and Gender Relations;
	Ministry of Equity, Social Justice, Local
	Government and Empowerment; Department of National Security, Social Justice;
	Department of Economic Development,
	Transport and Civil Aviation; SALCC
Member/Coordinator	Project Implementation Unit (PIU) PM
Ex officio members	NCPFWD, GITS ICT Association

f. Grievance Redress Committee (GRC): comprising representatives of the PSC 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.

Note: The Chair may invite other technical personnel to advise the Committee as required.

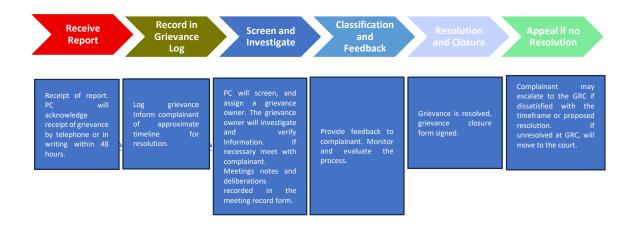
5. Grievance Redressal Process

The key stages involved in the project's grievance redressal process are summarized in **Error! Reference source not found.** and described in the sections that follow.

The key stages involved in the project's grievance process are listed below and described in the sections that follow.

- 1. Uptake (locations and channels),
- 2. Sort and Process,
- 3. Acknowledge and follow-up;
- 4. Verify, Investigate and Act;
- 5. Monitor and Evaluate;
- 6. Provide feedback;
- 7. Closure

Figure 5 Illustration of the Grievance Redress Mechanism



5.1 Levels of Grievance Redress

Figure 5.1 below	presents three	levels of griev	ance redress
I Iguic Dir Deloit		iciters of Brief	

Redress Level	Process
Level One	 Grievance dealt with by the PIU in accordance with the steps listed above The Project Coordinator takes responsibility for grievance redress and assigns a grievance owner. Acknowledgement of receipt of grievance within 48 hours. The grievance is screened, and logged. Complainant informed of approximate timeline for addressing the grievance. The grievance is investigated. During the investigation a meeting or meetings can be held with the complainant to discuss the complaint. Ideally Resolution within 10 to 14 working days of receipt of a complaint. If the grievance is resolved the complainant signs the grievance closure form (GCF).
Level Two	 If no resolution at Level One, the grievance is escalated to level 2, the Grievance Redress Committee (GRC). The Chair of the GRC assumes responsibility for redress at this stage The Chair will call a meeting of all parties in an effort to reach a resolution. If the GRC lacks the expertise required to address the grievance, the GRC can seek assistance / advice from technical officers outside of the GRC. Ideally resolution within 35 working days can be extended to 60 working days with consent of the complainant. If the grievance is resolved, the complainant signs the GCF. If no resolution at this level the grievance moves to level three.
Level Three	 If no resolution at the GRC the grievance can be brought to the Local Courts. The Office of the Attorney General will take responsibility at this level. Note: While complainants are encouraged to use the project level GM, they maintain the right to access the local courts at any time that they may wish to.
the issue. It must be n	the option of approaching the World Bank, if they find the established GRM cannot resolve noted that this GRS should ideally only be accessed once the project's grievance mechanism I without an acceptable resolution.

5.1.1 First Level of Redress

Receive Grievance

All complaints will be received by the Project Coordinator and or the Environmental and Social Specialist of the PIU. Through the consultation process, stakeholders will be informed 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 anonymously. The point of receipt of complaints is listed in Table 5.1.1.

Table 5.1. 1 Contacts Information for Submission of Grievances

Receiving grievances from affected parties	Grievances can be made verbally to the Environmental and Social Specialist (E&S Specialist) in person at stakeholder engagement meetings.
	Grievances can be reported to contractors' personnel.
	Additionally, the complaint can be made to the PIU by telephone and the person receiving the call will guide the complainant toward the proper channel.
	Complaints could be anonymous;
	All GBV complaints will be handled directly by the E&S Specialist who has been trained in the handling of these cases, consistent with the WB guidance notes, hence, all project workers will be trained on the use of the GRM and its SEA/SH aspects.
	By email to the following address: <u>slu.cardpt@gmail.com</u>
	By letter addressed to: Project Coordinator
	Project Implementation Unit (PIU) – Caribbean Digital Transformation Digital Project
	Division of Public Sector Modernization
	Department of Public Service
	Bourbon Street, Castries, St. Lucia
	By phone at telephone number: (758) 468-4977 / 468-1407
	Mobile phone: 758-285-4419
	Grievances related to the Project Coordinator can be addressed to:
	The Permanent Secretary Ministry of Public Service 2 nd Floor Greaham Louisy Administrative Building Waterfront

Castries
Or at <u>ps.publicservice@govt.lc</u>
Tal. 759 469 2202 / 2202
Tel: 758-468-2202 / 2203

All grievances received by the established points of contact should be forwarded to the Project Manager / Coordinator of the PIU within 24 hours of receipt.

If anonymous complaints are received all information required to complete the form will be recorded except the name of the complainant.

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 Coordinator (PC) at the 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 PC using the Grievance Acknowledgment Form (Annex 2) 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 PC will work with the 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).

<u>Screen</u>

The PC will review the complaint and assign a grievance owner. The complaint will be forwarded to the grievance owner who will be responsible for investigating the claim and liaising with both the aggrieved party and project staff in order to come to a mutually acceptable resolution. The grievance 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 14 working days of receipt of grievance and notified to the concerned party through the Grievance Closure Form (Annex 5). If the grievance is not 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. Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained on the Grievance Closure 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 PC.

5.1.2 Second Level of Redress

A Grievance Redressal Committee (GRC) of relevant representatives will be formed. 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 Permanent Secretary of the Department of Public service who also chairs the Project Steering Committee. The permanent secretaries of the participant ministries represented on the PSC will assign their respective representative to the GRC. The Chair of the GRC may choose to invite an active NGO to select a representative to serve on the GRC. When required the GRC can request assistance and advice from technical experts.

Terms of Reference for the 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 PC will coordinate the convening of the meetings of the GRC. The PC 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 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 grievance closure form as in Annex 5.

If the complainant does not accept the resolution 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 towards a resolution the matter may be retained at this level for a maximum of 60 working days.

5.1.3 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 withing the local courts.

5.2 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 <u>GRS complaint form</u> 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
_	

Fax:+1-202-614-7313By letter:The World BankGrievance Redress Service (GRS)MSN MC 10-1018 NW,Washington, DC 20433, USA

6. Addressing Sexual Exploitation and Abuse and Sexual Harassment

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person's rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

The project's E&S Specialist will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The GM should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works". This GM will follow the official WB definitions described on the Technical Note as shown below:

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH)

Sexual Harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider

An organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Survivor-centered approach

The survivor-centered approach is based on a set of principles and skills designed to guide professionals regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

SEA/SH grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity

and confidentiality of the complainant and applying the survivor-centered approach7. Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the GM, as appropriate and keeping the survivor information confidential. Specifically, following steps will be taken once an incident occurs:

ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the E&S specialist fills in a complaints form excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her/his consent can be verbally received. If needed or desired by the survivor, the PIU E&S Specialist refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures (See Appendix 4 for Referral Pathway). The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The PIU safeguards specialist will keep the survivor informed about any actions taken by the perpetrator employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the PIU Safeguards Specialist can close the case.

ACTION 2: INCIDENT REPORTING

The PIU E&S Specialist needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Project Manager who will in turn inform the World Bank Task Team Leader (TTL) or directly to the TTL. Complaint Forms and other detailed information should be filed in a safe location by the PIU Safeguards Specialist. Neither the PIU E&S specialist nor the Project Manager should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the PIU E&S Specialist needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to PIU and WB; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved or disciplinary action taken.

As long as the SEA/SH remains open the PIU Safeguards Specialist and/or Project Manager should update the World Bank TTL on the measures taken to close the incident.

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

Each SEA/SH incident should be verified to determine if it was related to the WB financed project. The PIU E&S specialist should form a SEA/SH verification committee comprised by her/him, one member of the PIU, one member of a local service provider and a representative of the contractor (if relevant). The PIU E&S Specialist should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project¹8, the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labor legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in the St. Lucian legal system, the PIU Safeguards Specialist should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU E&S Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

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

- Refer complainants to the SEA/SH Services Provider; and
- Record the resolution of the complaint

7. Grievance Redress Mechanism Budget

Item	Cost (US\$)
Meetings of GRC (10 meetings @ USD1000)	10,000.00
Information Production and Dissemination (100 collateral materials @	10,000.00
USD100)	
Total	20,000.00

¹ Project actors are: (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

8. Building Grievance Redress Mechanism Awareness

The ESS will initially brief all staff of the project office, the Project Steering Committee (PSC), the subprojects including consultants and contractors, 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 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 will be conducted targeting project stakeholders to inform them on the availability of the mechanism; various mediums will be used- as detailed in the Stakeholder Engagement Plan (SEP). The GRM will also be published on the website of the GoSL and the Ministry of the Public Service as well as the project's website or Facebook. 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 also be promoted through a public awareness and publicity campaign utilising the mass media.

9. Monitoring and Reporting

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

10. 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.

11. Annexes

Annex 1- Grievance Information Form

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

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

Grievant	/Complainant	Signature	(if applicable)	1
Unevant	/ Complainain	. Jighature	(II applicable)	1

Date (dd-mm-yyyy)

Blocked road access	nell oblem with project staff .her (specify):

Annex 2- Grievance Acknowledgement Form (GAF)

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

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

Annex 3 - Grievance Redressal Registration Monitoring Sheet

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

Annex 4: Grievance Meeting Record Form

Date of the Meeting:	Grievance No:

Venue of meeting:

Details of Participants:

Complainant	Project/Government/OECS
Summary of Grievance	
Meeting Notes:	
5	
	(
Decisions taken in the meeting / Recommendation	ons of GRC
Issue Resolved / Unresolved:	
Signature of Chairperson of the meeting:	
Name of Chairperson:	Date (DD/MM/YYYY):

Annex 5 - Grievance Closure/Release Form

Grievance No:				
Name of				
Grievant/Complainant:				
Date of Complaint:				
Summary of Complaint:				
Summary of Resolution:				
Resolved at:	First Level	Second Level	Third Level	
Date of grievance resolution				
(DD/MM/YYYY):				

Result of Grievance Redressal

Signature of Complainant in acceptance of the suggested grievance resolution:

Name:	
ID number: Type	e of ID:
Date (DD/MM/YYYY):	
Signature of Environmental and Social Specialist a	nd Project Coordinator:
1	2
1.Name	
Place	
Date:(dd –mm – yyyy):	
2.Name	
Place	
Date:(dd –mm – yyyy):	

Annex 6: List of GBV Service Providers in Saint Lucia

GBV Service Providers in St. Lucia

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2 nd Floor Francis Compton Building, Waterfront,	468-3202	
		Castries		
Office of the Director	Case Management		452-3636	slucps@gmail.com
of Public Prosecution			468-3185	
			468-3017	
Family Court	Case Management	Peynier Street,	468-3308	familycourt.slu@gmail.com
		Castries	456 2770	
Criminal Investigations	Case Management	Castries	456-3770	
Department			456-3817	
		Vieux Fort	456-3926	
Vulnerable Persons	Case Management	Vulnerable Persons	456-3908	
Unit	Investigates sexual	Team South		
	offences against	North	456-4050	
	minors, women and		4051	
	men.		4052	
St. Lucia Against	Provides human	Ministry of Home	468-3754	_police@antitraffickingslu.org
Human Trafficking	trafficking victims	Affairs, Justice and		
	and survivors with	National Security		
	access to critical	1 st Floor Sir		
	support and	Stanislaus Bldg.		
	services to get help	Waterfront Castries		
	and stay safe.			
Department of Gender	Psychosocial	Ground Floor		
Affairs	Support	Georgian Court	716-3123	gender.relations@govt.lc
	Livelihood Support	Bldg. John		
		Compton Highway, Castries		
Abuse Hotline	Psychosocial		202	
	Support			
St. Lucia Crisis Centre	Psychological	107 Chausse Road,	453-1521	stluciacrisis@gmail.com
	Support	Castries	712-7574	
	Livelihood Support			
	Assistance with			
	basic needs such as			
	food and shelter			

Service Providers	Service Provided	Address	Telephone	Other
Women's Support	Legal Aid		458-4470	WSCCENTER2001@GMAIL.COM
Centre	Psychological			
	Support			
	Livelihood Support			
	Assistance with			
	basic needs such as			
	food and shelter			
Raise your Voice St.	Psychological	Manoel Street,	726-0473	raiseyourvoiceslu@gmail.com
Lucia Inc	Support	Castries	487-2329	https://ryvslu.org/
	Livelihood Support			
Positive Reactions	Psychological	PO Box 973	724-9991	info@prosafe.org
Over Secrets And	Support	Castries		https://prosaf.org
Fears (PROSAF)				
United and Strong	Assistance for	P.O. BOX 772	450-0976	unitedandstrongstlucia@yahoo.c
	LGBTI persons	Castries,		<u>om</u>
				www.facebook.com/Unitedandst
				rongstlucia/
St. Lucia Planned	Sex education	52 John Compton	452-4335	
Parenthood	counselling,	Highway	Hotline:	slppa758@gmail.com
Association	Sexual and		459-7933	
	reproductive		Whatsapp	
	health services		722-1234	
OKEU Hospital	Medical Health	Castries	458-6500	
	Services			
St. Jude Hospital	Medical Health	Vieux Fort	454-6041	
	Services			
Castries Health Centre	Medical Health	Chaussee Road	452-4416	
	Services	Castries		
Gros Islet Polyclinic	Medical Health	Gros Islet	450-9661	
	Services			
Babonneau Wellness	Medical Health	Babonneau		
Centre	Services			
National Mental	Psychological	Castries	458-2713	
Wellness Centre	Support		453-0069	