



GRIEVANCE REDRESS MECHANISM FOR

**CARIBBEAN REGIONAL COMMUNICATIONS INFRASTRUCTURE
PROGRAMME (CARCIP)**

GOVERNMENT OF SAINT VINCENT AND THE GRENADINES

MAY 2019

Ministry of Finance, Economic
Planning, Sustainable Development, and Information Technology
1st Floor, Administrative Centre, Bay Street, Kingstown,
St. Vincent and the Grenadines
Tel.:784-457-1746•Fax: 784-456-2430•E-mail:cenplan@svgcpd.com

CONTENTS

- Acronyms 3
- 1. Introduction 4
- 2. Governance..... 5
- 3. Project description..... 6
- 4. Definition of Grievances Redress Mechanism..... 8
- 5. GUIDELINES TO GRIEVANCE REDRESS 9
- 6. Grievance Redress STEPS:..... 11
 - A. NOTIFICATION:..... 11
 - B. REGISTRATION OF GRIEVANCE 12
 - C. ADDRESSING A GRIEVANCE 13
- 7. INSTITUTIONAL ARRANGEMENTS 14
- 8. THE GRIEVANCES REDRESS committee 15
- Roles OF MEMBERS OF GRC 16
- 9. Review and monitoring of Grievance Redress Mechanism 17
- Best practices:..... 17
- Annex 1 18
- ANNEX 2 20
- Contractual arrangement 20
- Annex 3 – Grievance register 22
- Reference 23

ACRONYMS

CARCIP- Caribbean Regional Communication Infrastructure Programme

CLS – Cable Landing Station

GoSVG- Government of St. Vincent and the Grenadines

GRC - Grievance Redress Committee

GRM- Grievance Redress Mechanism

GWAN – Government Wide Area Network

ICT- Information and Communication Technologies

MOF- Ministry of Finance

NTRC – National Telecommunications Regulatory Commission

NEMO- National Emergency Office

PAI – Project Area of Influence

PAP – Project Affected Persons

PPP- Public Private Partnership

PSC – Project Steering Committee

PSIPMU- Public Sector Investment Programme Management Unit

SET- Safeguards Team

1. INTRODUCTION

The Government of St. Vincent and the Grenadines, with funding from the World Bank, is implementing the Caribbean Regional Communication Infrastructure Program (CARCIP). CARCIP is a communication improvement program initiated collaboratively by the Governments of Saint Lucia, Grenada and Saint Vincent and the Grenadines. The main objective of the project is to increase access to regional broadband networks and to advance the development of an Information Technology-Enabled Services (ITES) industry in St. Vincent and the Grenadines and the Caribbean region. The three main components of the project are: Regional Connectivity Infrastructure; ICT-Led innovation; and project implementation support.

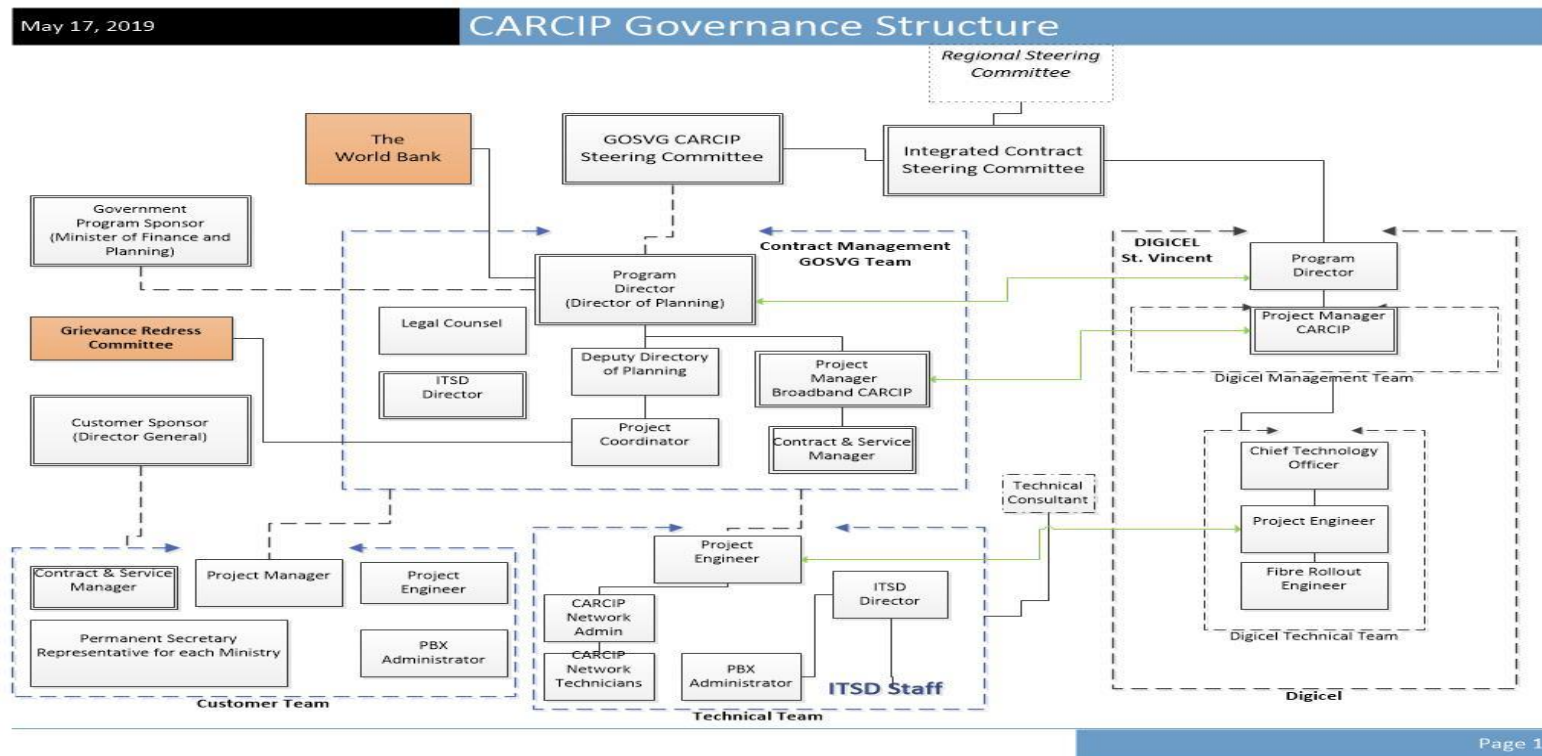
The World Bank's Operational Policy (OP) 4.12 requires that persons affected by the project (PAP) should be meaningfully consulted and should have opportunities to participate in planning and implementing program. OP 4.12 recommends that a Grievance Redress Mechanism (GRM) be created to address all concerns. The GRM is an effective tool for early identification, assessment and resolution of complaints. The Government of St. Vincent and the Grenadines recognizes a GRM as an integral tool in the development process. In the country's National Economic and Social Development Plan (2013-2025), Goal three (3) promoting good governance and increasing the effectiveness of public administration, outcome 3.3 solicits avenues to educate the public about their legal rights and avenues for redress.

This GRM provides the residents of Saint Vincent the Grenadines, an opportunity to voice complaints or concerns and to clarify and resolve misconceptions about the CARCIP project activities, it provides a simple transparent and timely manner in which concerned residents can voice their opinion or grievance related to the installation of the fiber optic submarine cable.

2. GOVERNANCE

Under the CARCIP, there is a public private partnership contract between the Government of St. Vincent and the Grenadines and DIGICEL OECS Limited. Digicel will install, maintain and operate an undersea cable system. Diagram 1 depicts the governing structure of the subproject/component.

Diagram 1: CARCIP Lot 1 & 3 Governance Structure



3. PROJECT DESCRIPTION

INSTALLATION OF SUB MARINE CABLE

This component aims at bridging the remaining gaps in the regional broadband communications infrastructure. It addresses (a) the physical connectivity infrastructure; and (b) the enabling environment that would ensure Public Private Partnership (with Digicel) in the ownership or management of connectivity infrastructure, as well as competitive access to such infrastructure.

The CARCIP submarine cable System will comprise all Equipment necessary to establish the optical transmission paths and electrical paths between the Cable Landing Stations (CLS's) including the SLTE at each CLS.

The CARCIP submarine cable System is configured as a trunk System between the islands of St Vincent and Grenada with branches off to the islands of Bequia, Mustique, Canouan, Union and Carriacou with an interlink on St Vincent between Fancy and Chateaubelair.

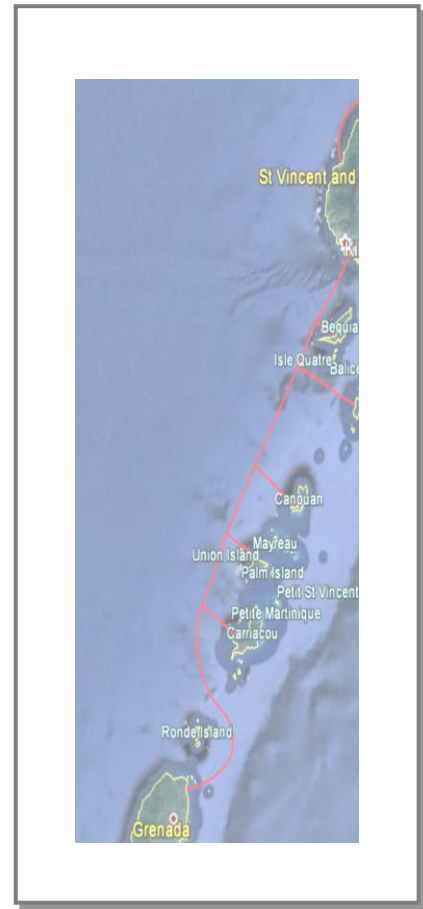


Figure 1: Submarine Cable

Submarine cable

Approximately 225km of fiber optic cable, incorporating Branching Units (BUs) laid on the sea floor. Both double and single armor cable will be used and a bench manhole landing facility at each landing site, from the beach manhole a cable will be installed to connect with new and existing fiber optic cabling ashore. The Undersea Cable System includes the laying of submarine cable and connection to cable landing stations in St. Vincent and the Grenadines at:

- (a) Arnos Vale – Arnos Vale Stadium
- (b) Bequia – Lower Bay
- (c) Canouan – Nen’s Bay
- (d) Chateaubelair – Chateaubelair Jetty Customs house
- (e) Mustique – Endeavor Bay
- (f) Owia – Owia Fisheries
- (g) Union Island – Union Island Airport

Government Wide Area Network (GWAN)

The GWAN consist of the following:

- Dedicated Network infrastructure
- A fibre-based network connecting all Government locations as per attached list
- Geo-diverse Primary & Secondary Core sites for critical site redundancy
- Centralized Security Services to protect the network against complex and malicious threats.
- 100Mbps Dedicated Internet Access from Service Provider
- Integration to the existing Government of St Vincent and the Grenadines (GoSVG) GOVNET Fibre network
- Government and 911 Unified IP Telephony Communications System.

The IP PBX includes:

- Implementation of a new IP telephony system for the GoSVG and an Emergency 911
- Fully redundant systems which will ensure maximum uptime
- Integration of PBX systems with the GWAN to provide toll-free inter office communications
- Technical and user training for relevant staff

4. DEFINITION OF GRIEVANCES REDRESS MECHANISM

A **grievance redress mechanism** (GRM) refers to methods and processes by which a redressal to a grievance is sought and provided. Its design can be specific to a project or it can build 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** – complaints about the perceived impact (social, economic, environmental)
- **Implementation** – complaints about construction noise or dust, displacement or land acquisition, compensation
- **Close** – non-fulfillment of project activities

Types of Grievances

Different types of complaints can be filed depending on the specific issue or concern of the project beneficiaries.

These may include and not limited to:

Land acquisition

Temporary Access

Disruption of service

Lack of information

5. GUIDELINES TO GRIEVANCE REDRESS

Grievances can be made orally or in written form. The public, especially persons living in the project area of influence, must be informed about the project activities, as well as where they can lodge their concerns, who will be responsible and the timeframe of the response.

Who are the main actors?

Public Sector Investment Programme Management Unit (PSIPMU); the governing unit responsible for the execution of the fiduciary and safeguard aspects of the project.

Project Coordinator: overall in charge of the project, the Project Coordinator will receive all complaint, the aggrieved will be provided with a registration number and the timeframe the social specialist will contact the aggrieved.

Government Technical Team: Carry out periodic quality check on the broadband installation

Safeguards Team: a team comprising of social, environment and technical officers (SET Team) to provide communication and consultation to all beneficiaries.

Project Steering Committee: Committee of various stakeholders that provide guidance and direction of the project activities.

The Steering Committee shall comprise of the following members:

- a. Director of Planning (Chair)
- b. Permanent Secretary with responsibility for Telecommunications, Science and Technology
- c. Director of Information Technology Services Division (ITSD)
- d. Senior Economist, Department of Telecommunications
- e. General Manager, National Centre for Technological Innovation (NCTI);
- f. General manager, Centre for Enterprise Development (CED);
- g. Two representatives from the private sector one of which is the Chamber of Industry and Commerce.
- h. Project Coordinator

The Chair may invite other technical personnel to advise the Committee from time to time.

Grievance Redress Committee: To facilitate all appeals. The committee comprise of the

- Director of Planning;
- CARCIP Project Manager Digicel;
- Project Coordinator;
- Government Legal Person,
- Broadband Manager,
- Safeguard team;
- Director NTRC;
- Director ITSD

(see section 8 for composition of committee and the function)

DIGICEL: Private Partner implementing the project activities

6. GRIEVANCE REDRESS STEPS:

A. NOTIFICATION:

The project coordinator shall ensure that notification about the GRM is placed on the project sign board.

Process: Notification about the project development should be provided:

- a) On radio via public service information
- b) Flyer distribution in the project area
- c) Newspaper
- d) All possible public media

After the final demarcation of a project site, a sign post would be erected to notify the public about the project development. On the sign post, a rectangular portion would be allocated to provide information on where to direct all grievances. A sample is shown below.

Sample Notification to the Public on how to submit grievance

All grievances relating to the development of this project
are to be directed to:

The Project Coordinator

<Name of the Project>

Caribbean Regional Communications Infrastructure
Program

<Ministry >

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

<Ministry address>

First Floor Administrative Building, Kingstown

<Relevant contact info: telephone, email>

Telephone: 784-457-1746

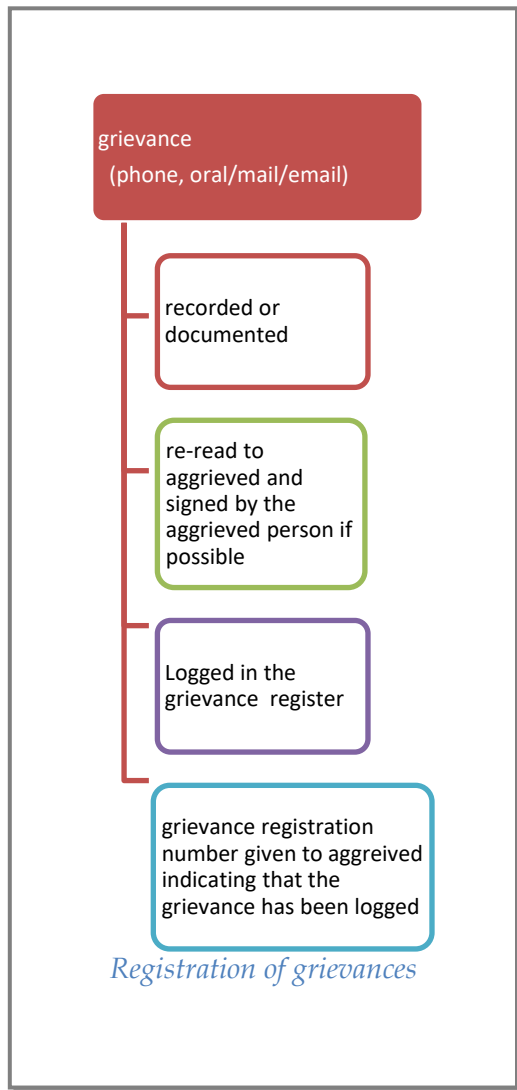
Email - cenplan@svgcpd.com

B. REGISTRATION OF GRIEVANCE

- a) All grievance representations received under the project (via, telephone, mail, e-mail, in-person or through a third party) should be recorded on a grievance registration form (Annex 1). The grievance registration form¹, should be dated by the project coordinator, who will assign a registration number to the aggrieved person, and lodge the number in the

What information is needed?

- Identify the project
- Identify who you are (provide contact information)
- State how the project activity affects you or your community



grievance register²(Annex 3).

- b) If the grievance registration form is **not** available, the following key information should be noted:

- The project name
- The name of the affected person
- Contact information of affected person
- How the project activity affects you or the community

A registration number should be given to the aggrieved, indicating receipt of Grievance

- c) The project coordinator must: (i) inform the aggrieved of the name, designation, office and telephone number of the Safeguards team member responsible for processing the complaint; (ii) inform the aggrieved individual that the safeguards team member will contact the person within 10business days³.

¹ See annex 1 for grievance form

² See annex 3 for log, log should commence at the beginning of all new project

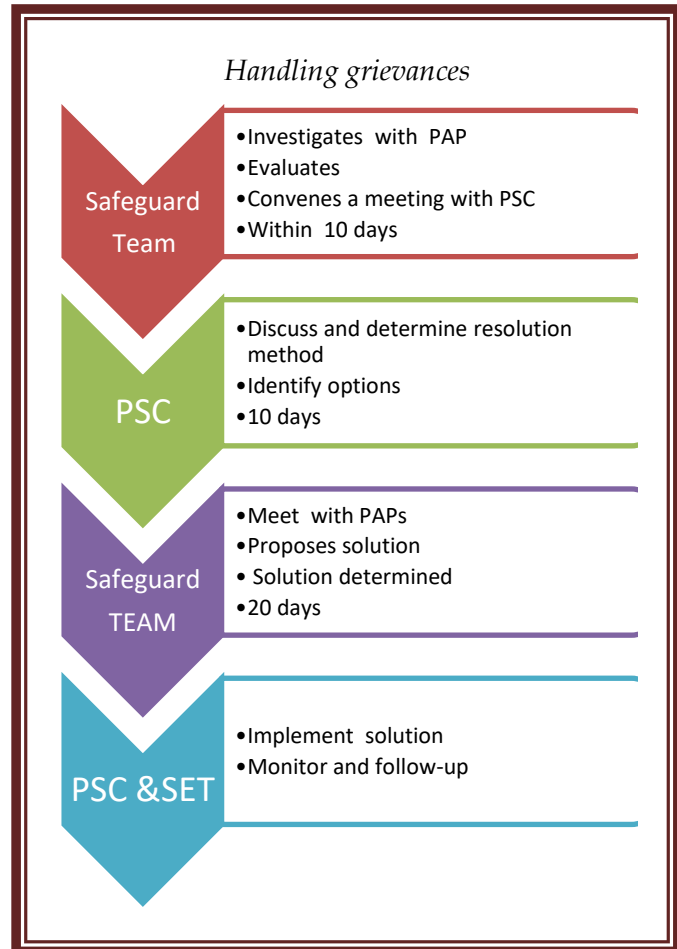
³ The assigned safeguard personnel should contact the aggrieved.

C. ADDRESSING A GRIEVANCE

(i) No grievance is to be rejected without having been independently examined by the safeguard team, issued a reason and a reply.

(ii) The Safeguard team (SET) will investigate and evaluate the claim within ten (10) business days of receipt. The SET team must contact the aggrieved person, to provide a response to the grievance, within 10 days.

(iii) If grievance is beyond the scope of the SET, the team will meet with the technical stakeholders and other relevant Ministries (e.g. Chief Surveyor – land Acquisition issues). The appropriate personnel would ascertain the period (not exceeding Thirty (30) business days) necessary for the Project Steering Committee to address the grievance. The aggrieved person must receive notification regarding the status of grievance within thirty (30) business days.



(iv) Grievances that cannot be resolved by the Grievance Redress Committee shall be submitted to the Hon. Attorney General and to the executing agencies. Should grievances remain unresolved at this level, they can be referred to the Court of Law.

(v) The Safeguard team should monitor and follow up these grievances to enable timely attention.

(vi) All aggrieved persons whose grievances have been satisfactorily resolved will sign off on the grievance form and the sign off will be logged in the register.

7. INSTITUTIONAL ARRANGEMENTS

I. Public grievances (outside the project environment) are received by the Attorney General Office on behalf of the Government of St. Vincent and the Grenadines.

II. During the life cycle of the CARCIP projects where safeguards are monitored by the PSIPMU, the CARCIP project coordinator will receive, and log all grievances.

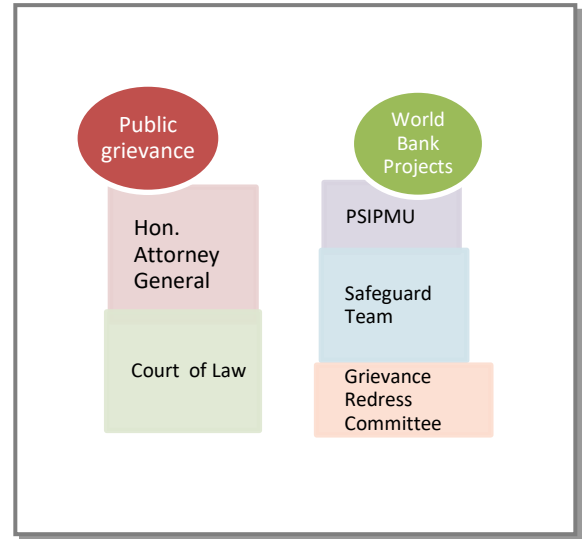
Grievances will then be transferred to the Safeguards team (SET) for investigation.

III. In the event that the DIGICEL country manager receives and records any grievance, a copy of the recorded grievance should be sent to the project coordinator *within one day* for the registration of the grievance.

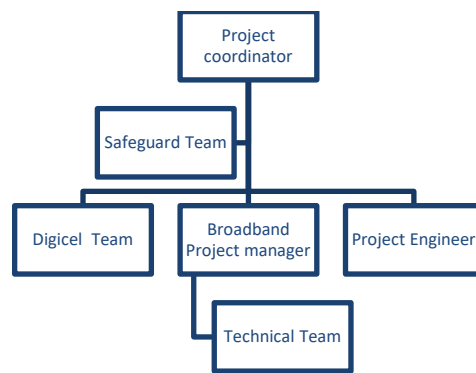
IV. If the recorded grievance is outside the scope of the SET, as set out above, the SET will refer the grievance to the Grievance Redress Committee (GRC) for resolution.

V. If the grievance remains unresolved, the matter will be directed to the Office of the Attorney General.

VI. The PSIPMU will continuously monitor grievance handling, and all possible expropriation/ reports and discuss outcomes in the Project Steering Committee (PSC) meetings.



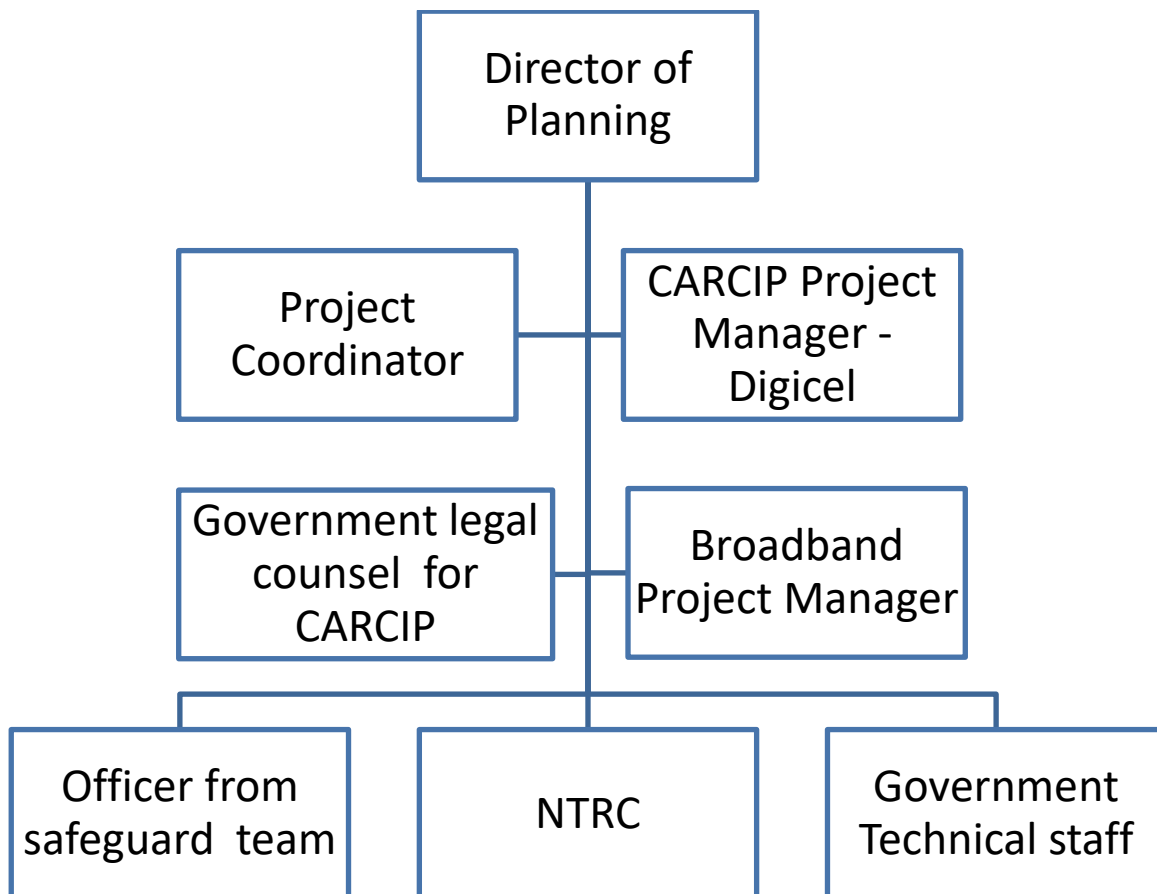
The diagram shows the institutional arrangement for the Broadband aspect of the CARCIP



8. THE GRIEVANCES REDRESS COMMITTEE

The Grievance Redress committee would be headed by the Director of Planning. The other members of the Redress Committee include: the Project Coordinator, Government technical team, Digicel CARCIP Project Manager, National Telecommunications Regulatory Commission (NTRC), Government Legal Counsel for CARCIP, officers from the environmental and social development team. Other relevant officers may be co-opted depending on the nature of the grievance being reviewed. The committee will meet as often as a grievance needs to be addressed.

Figure 2: Composition of Grievance Redress Committee



ROLES OF MEMBERS OF GRC

The role of the members of the GRC is outlined below:

Director of Planning	Responsible for the overall decision of the committee
Legal counsel	Provide guidance as it relates to the Law of the Country and the Rights of the Citizens
Project Coordinator	Provide information regarding the project activity affecting the PAP
Digicel CARCIP Project Manager	Provide status information and clarification regarding project activity affecting the PAP, especially regarding Digicel interventions
Safeguard Team	Liaison for the PAP, responsible for follow up on all grievances received, ensuring that they are recorded in the grievance log. Follow up and monitoring on grievance implementation process.
Technical Officer	Provides guidance regarding best options to minimize adverse effects from the project.

9. REVIEW AND MONITORING OF GRIEVANCE REDRESS MECHANISM

The safeguard team should ensure meaningful review of the performance of grievance redress process of the project. The Project Coordinator should ensure that all grievances are addressed within one month.

Best practices:

- The better method to redress a grievance is not to allow the grievance to arise in the first instance:
- When project sites have been identified a consultation and information session will be scheduled with residents to discuss the nature of the project and to note and address any concerns on the project development.
- Identify areas susceptible to grievance generation and identify possible opportunities or alternatives. Recommendations should be made and discussed with Project Coordinator *[where necessary discussion with Project Steering Committee]*, if the grievance cannot be avoided, then compensation or alternate options should be communicated to the potential aggrieved individual.
- On the determination of the project site, screening should be conducted for boundaries, agriculture produce, and other assets which may be affected by the project. When identified, discussions should be undertaken with Project Coordinator *[where necessary discussion with Project Steering Committee]*, to minimize grievance.
- Address every grievance in a fair, objective and just manner.
- Properly document and track grievances (number received, number resolved)
- Develop and issue informative materials including booklets/pamphlets about the /services available to the public indicating the procedure and manner in which the grievances can be availed and the right authority to be contacted for service.
- At the end of all projects, the project coordinator should meet with the SET to ensure that all grievances and compensation are resolved.

ANNEX 1

DATE:

GRIEVANCEREGISTRATION FORM

Please use capital:

Contact No: _____-

Name (of aggrieved): _____

Address: _____

Name of Project Site:

As per the Caribbean Regional Communications Infrastructure Program, Grievance Redress Mechanism, I register my grievance as detailed:

“Details of Grievance”

(a) Outline your concerns: why and how you are affected by the project. (use overleaf if necessary)

(b) If land or other properties are being affected e.g. (crops), include copies of relevant documentations you have to support your claim.

List documents: attach copies

- (a) _____
- (b) _____
- (c) _____
- (d) _____

Undertaking: I hereby certify that statements made in my Grievance and documentation enclosed are true and complete to the best of my knowledge. If at any time any part of the Grievance or the documentation is found to be false, I

will be liable for any legal action that the Government of St. Vincent and the Grenadines may deem necessary.

Date: _____ (Signature of aggrieved person)

Name _____ of _____ recording Officer:

(Signature)
(Please print)

Grievance Resolved to my satisfaction: _____ (Signature of aggrieved person)

Date:

ANNEX 2

Contractual arrangement

MEMORANDUM OF UNDERSTANDING FOR THE TEMPORARY USE OF LAND OR OTHER FACILITIES DURING PROJECT CONSTRUCTION

The following agreement has been made on..... day of..... between.....resident of(the Owner) and _____.(the Recipient).

1. That the Owner holds the transferable right of acres/square feet of land/structure/asset in.....
2. That the Owner testifies that the land/structure is free of squatters or encroachers and not subject to other claims.
3. That the Owner hereby grants to the Recipient this asset for the construction and development offor the benefit of the villagers and the public at large.
(Either, in case of donation:)
4. That the Owner will not claim any compensation against the grant of this asset.
(Or, in case of compensation:)
5. That the Owner will receive compensation against the grant of this asset as per the attached Schedule.
6. That the Recipient agrees to accept this grant of asset for the purposes mentioned.
7. That the Recipient shall construct and develop the.....and take all possible precautions to avoid damage to adjacent land/structure/other assets.
8. That both the parties agree that the.....so constructed/developed shall be public premises.
9. That the provisions of this agreement will come into force from the date of signing of this agreement.

Signature of the Owner
Recipient

Signature of the

Witnesses:

1. _____

2. _____

(Signature, name and address)

ANNEX 3 – GRIEVANCE REGISTER

Notes:

- 1 Complainants should be provided with acknowledgement of grievance within 7 to 10 days from the date of receipt (the social specialist should insert the number of days that the project has allocated for acknowledgement of grievance, which should vary from 2-7 days. For simple issues, complaints /queries should be responded to within this allocated number of days).
- 2 Expected time of redress should be entered in this register.
- 3 Records of Grievances should always be entered in the GR Register and updated as needed, until the grievance is settled.
- 4 Grievances should normally be settled within 4 weeks of initial receipt. If not, reasons for delay should be communicated to the complainant and entered in the Register. (The social specialist should insert the number of weeks allocated for settling grievances under the project, which should vary from 2 weeks to one month. The same approach as detailed above in Note 1 should be followed).

Grievance Details

Claim Number	Name of sub project Site	Date Complaint Received	Name & Contact Information of Person Making Complaint	Date of Acknowledgement of Receipt of Complaint (Issue involve) (informing complainant of response time) / Response to Complaint for Simple Issues	Actions Taken to Resolve Complaint	How Complaint Resolved	Date Complaint Resolved	If Not Resolved, Date Sent for Appeal	Status of Appeal	Date Resolved	Sign off by aggrieved person

REFERENCE

Laws of St. Vincent and the Grenadines Land Acquisition Act (2009).

World Bank (2008). A Guide to Designing and Implementing Grievance Mechanisms for Development Projects, Washington, D.C.

International Finance Corporation (2009) Good Practice Note Addressing Grievances from Project – Affected Communities: Guidance for projects and companies on designing grievance mechanisms. World Bank, Washington DC

SVG National Development Plan