



GOVERNMENT OF SAINT LUCIA



Stakeholder Engagement Plan

Organisation of Eastern Caribbean States (OECS) Skills and Innovation Regional Project (P179210)

Date: 22 August 2023

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Abbreviations and Acronyms

CANTA	Caribbean Association of National Training Agencies
CERC	Contingent Emergency Response Component
CXC	Caribbean Examination Council
EMIS	Education Management Information System
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
GRM	Grievance Redress Mechanism
GRC	Grievance Redressal Committee
KTIPS	Knowledge Technology and Innovation Platform
LMP	Labour Management Procedures
MOE	Ministry of Education
NEWLO	New Life Organisation
NSDC	National Skills Development Centre
NTA	National Training Agency
OECS	Organisation of Eastern Caribbean States
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PIU	Project Implementation Unit
REPs	Regional Enhancement Plan
SALCC	Sir Arthur Lewis Community College
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
TAMCC	T.A. Marryshow Community College
TVET	Technical and Vocational Education Training
UWI	University of the West Indies

1. Introduction and Project Description

The Organization of Eastern Caribbean States (OECS) Skills and Innovation Project (the Project) aims to enhance transversal and technical skills and foster regional collaboration and innovation in post-secondary education. The Project comprises of four components: (i) Fostering regional collaboration for youth skills and innovation in the post-secondary space; (ii) Strengthening post-secondary institutions to deliver priority skills and participate in collaborative innovation; and (iii) Project Management and Technical Assistance; and (iv) Contingent Emergency Response Component (CERC).¹

The first component, implemented by the OECS Commission (OECSC) and financed by an International Development Association (IDA) grant will benefit all OECS Member States by enhancing regional collaboration in post-secondary education (subcomponent 1.1), improving collection and use of post-secondary data (subcomponent 1.2), and fostering the participation of post-secondary institutions in regional innovation ecosystems (subcomponent 1.3). This component will be implemented by a Project Implementing Unit created within the OECS Commission.

Component 2, implemented by Project Implementation Units (PIUs) in Grenada and Saint Lucia, will provide direct support to National Colleges and selected post-secondary institutions in participating countries to implement Regional Enhancement Plans (REPs), [support collaborative innovation projects](#), and develop new or enhance existing programs for priority skills, with the objective of promoting improved learning environments and fostering better skills and innovation in the OECS region. Subcomponent 2.1 will support assessment of capacity and needs of post-secondary institutions, and the development and implementation of regional enhancement plans, which will feature explicit mechanisms for sharing resources and conducting knowledge exchanges with other OECS Member States. Sub-component 2.2 will support the identification of institutional and regulatory constraints to innovation across post-secondary institutions and provide technical assistance and funding through matching grants to collaborative innovation projects. Priority transversal and advanced technical skills will be further supported through subcomponent 2.3 to make post-secondary education provision more effective, relevant, and personalized, with developed resources and lessons learned being shared with OECS Member States.

Component 3 will provide technical assistance to support the implementation of Project activities and finance the establishment and functioning of three Project Implementation Units (PIUs) – OECS Commission, Grenada, Saint Lucia. This component will also strengthen select aspects of the OECS' post-secondary education system's performance, including (i) a consultancy to analyze pathways between secondary and post-secondary education; (ii) a consultancy to provide recommendations on how to develop sustainable financing mechanisms for the post-secondary education sector in OECS countries. (iii) Technical support to identify the barriers men face to participation in post-secondary education; (iv) Just-in-time technical assistance related to priority topics for the post-secondary education system.

Due to the OECS's high vulnerability to natural disasters, including those exacerbated by climate change, and its

¹ Additional details are available in the Project Information Document, available [here](#). Access to Project documents during preparation and implementation will be available [here](#).

vulnerability to global shocks, a CERC will be included in the Project as Component 4. The CERC is designed as a mechanism for rapid response in the event of an eligible emergency, which can be activated upon request from the Government. In the event of an emergency, uncommitted Project funds could be reallocated from other components in accordance with an Emergency Action Plan prepared by the Governments and the CERC's implementation modalities. The CERC has zero initial funds.

The Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure,² the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation. This Stakeholder Engagement Plan (SEP) presents and describes the stakeholder engagement activities proposed for the Project. Throughout the Project's life cycle the stakeholder engagements set forth in this document will be ongoing and as such the SEP will be revised to reflect these activities, new developments, and any changes. This plan will guide stakeholder engagement carried out by the Governments of Grenada, Saint Lucia and the OECS Commission in their roles as Borrowers for this Project.

2. Objective of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines how the Project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about Project activities or any activities related to the Project.

3. Stakeholder Identification and Analysis

3.1 Methodology

To meet best practice approaches, the Project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: Public consultations for the Project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback*: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity*: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the Project is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of Project benefits,

² World Bank (WB) Environmental and Social Standard (ESS) 10 – *Stakeholder Engagement and Information Disclosure* is available [here](#).

particularly women, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

3.2 Affected parties and other interested parties

Affected parties include local communities, community members, and other parties that may be subject to direct impact from the Project. The Project has low ratings for both environmental risk and social risk. Given the focus of the Project on technical assistance, capacity building, provision of matching grants, and strengthening post-secondary education systems, there are limited actual impacts or potential risks to the physical environment, health, security, cultural practices, well-being, or livelihoods to the OECS Commission and benefitting Member States. As such the Project affected parties are few. These include students, faculty, staff and administrators of post-secondary institutions and the private sector in Grenada and Saint Lucia in respect of Component 2.

The Project's focus on promoting higher quality teaching and learning in higher education and better preparation of current and future students for employment will positively affect the skills and employability of these groups. Further the Project's investment in innovation and technology transfers would have positive impacts on employment and business development for these students. However, to manage expectations, to share timely and transparent information on Project initiatives, it would be important to hold consultations with students, faculty, staff, and leadership of post-secondary institutions throughout the Project cycle.

The Project will not undertake new construction, however minor civil works are envisaged in four targeted post-secondary institutions in Grenada and Saint Lucia, consisting of repair works to laboratories and workshops, and installation of modern laboratory equipment and digital hardware and software. The undertaking of these civil works at the post-secondary institutions may have short term negative impacts such as noise and dust, on students, faculty, staff and leadership at the post-secondary institutions and community members in the vicinity of these institutions. Finally, there are potential temporary occupational health and safety (OHS) risks from minor civil works for users of the post-secondary institutions and contracted workers engaged to undertake the civil works.

The private sector (established firms, entrepreneurs, chambers of commerce) will benefit from technology transfer, research and incubation support resulting from innovation activities financed by the Project.³ The list of potential Project-affected parties are presented in Table 1, with details on the nature of their interest, methods to consult with these stakeholders and the timing of consultation.

Table 1. Potential Project-affected parties

³ To reach the private sector actors the PIU will coordinate with existing mechanism including CARICOM Private Sector Organization (CPSO), Caribbean Chambers of Commerce (CARICHAM), national chambers of commerce, and associations (for example, Saint Lucia Industrial and Small Business Association; Saint Lucia Manufacturers Association; Grenada Cooperative Nutmeg Association; Grenada Cocoa Association, among others) as determined during implementation.

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
Project affected parties			
Professors, lecturers, staff, and administrators of post-secondary institutions	<p>They are interested in:</p> <ul style="list-style-type: none"> - Project's outputs and outcomes, the timing of these deliverables and benefits to the identified stakeholders. - Factors that may affect access to Project initiatives and options for equitable access. - Project risks and mitigation measures. 	<p>Focus group discussions Formal meetings</p> <p>Correspondence including emails, letters</p> <p>Students and teachers satisfaction survey</p> <p>Bulletin and notice boards</p> <p>Social media</p>	<p>During Project preparation: Already consulted in April 2023</p> <p>Planned in September 2023</p> <p>During Project implementation: Every 6 months throughout implementation, including prior to launch of key activities such as matching grants, inputs on diagnostics, and survey</p>
Students	<p>They are interested in:</p> <ul style="list-style-type: none"> - Project's outputs and outcomes, the timing of these deliverables and benefits - Factors that may affect access to Project initiatives and options for equitable access. - Project risks and mitigation measures. 	<p>Focus group discussions Consultations</p> <p>Correspondence including emails, letters</p> <p>Students and teachers satisfaction survey</p> <p>Bulletin and notice boards</p> <p>Social media</p>	<p>During Project preparation: Planned in September 2023 as part of Project preparation, led by the OECS</p> <p>During Project implementation: Periodically, Including prior to launch of key activities such as matching grants, inputs on diagnostics, and survey</p>
Private sector actors	<p>Opportunities to collaborate on regional innovation ecosystems and knowledge, technology, and innovation platforms. Procurement and supplier opportunities. Articulation of labour market needs.</p>	<p>Focus group discussions Structured agenda Correspondence Formal meetings</p>	<p>During Project preparation: Already consulted in March 2023)</p> <p>During Project implementation: Periodically, including prior to launch of activities of potential interest, starting in year 1</p>
Community members	<p>Project activities, risks, and mitigation measures.</p>	<p>Community consultations Bulletin/notice boards Information leaflets Outreach activities</p>	<p>During Project preparation: Planned in September 2023 prior to disclosure of documents</p>

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
			During Project implementation: Prior to launch of activities that may have impacts on the community (Laboratories and Workshop repairs)

Project stakeholders also include parties (termed other interested parties) that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and could affect the Project and the process of its implementation in some way. These include regional stakeholders and government ministries with an interest in the Project’s targeted sectors and activities (such as matching grants and technical assistance).⁴ Also, regional stakeholders such as the Caribbean Examination Council (CXC), Caribbean Association of Training Agencies (CANTA), University of the West Indies (UWI) research centers would have an interest in the various aspects of the Projects’ regional components – regional strategic framework, common learning standards and learning assessment frameworks, collaborative innovation. The Project’s sponsoring of collaborative innovation in component 2.2 will draw interest from members of the diaspora and other innovation actors (e.g., TVET institutions, universities, research centers, civil society organizations) and regulatory bodies. The media have an interest in informing the public of Project activities and key results with impact at the national and regional levels. The list of other interested parties is provided in Table 2.

Table 2. List of other interested parties

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
Government officials in Ministries, Departments and Agencies with interest in Project’s targeted sectors (sustainable agroindustry, blue economy, smart and sustainable tourism, clean/renewable energy, health sciences, creative industries, innovation and technology)	Project implementation, outputs, and outcomes. Risks and mitigation strategies	Correspondence Formal meetings Structured agenda	<ul style="list-style-type: none"> - During Project preparation: - Planned in September 2023 - During Project implementation: - Prior to launch of activities of potential interest
Caribbean Examinations Council (CXC)	Technical assistance, and collaboration with other key regional actors, to develop micro-credentials and certification, research, and data exchanges.	One-on-one interview Structured agenda	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of relevant technical assistance activities

⁴ The Project’s defined priority areas are sustainable agroindustry, blue economy, smart tourism, renewable energy, health, creative industries, and transversal innovation and technology adoption, with focus on climate action.

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
UWI branches and research centers	Technical assistance, and collaboration with other key regional actors, to develop micro-credentials and certification, research, and data exchanges. A potential partner for Project's regional innovation ecosystem.	One-on-one interview Structured agenda	<ul style="list-style-type: none"> - During Project Preparation: - Consulted in September 2022 and April 2023 - During Project implementation: - Prior to launch of relevant technical assistance activities - Presentation of findings of pertinent diagnostics and research
Regional Organizations with interest in Project's targeted sectors (for example, Caribbean Community Climate Change Centre (CCCCC), Caribbean Center for Renewable Energy and Energy Efficiency (CCREEE), Caribbean Public Health Agency (CARPHA), Eastern Caribbean Institute of Tourism, Caribbean Agricultural Development Institute (CARDI), Caribbean Natural Resources Institute (CANARI), Caribbean Industrial Research Institute (CARIRI).	These organizations are interested in knowledge transfer and innovation. Technical expertise on climate change, beneficial for the Project's establishment of regional innovation ecosystems in potential priority areas of renewable energy, and use of technology to mitigate climate change in the Caribbean region	One-on-one interview Structured agenda Roundtable Discussions	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of activities in targeted sectors - Presentation of findings from diagnostics and studies
Caribbean Area Network for Quality Assurance in Higher Education (CANQATE)	Project's technical support for strengthening post-secondary quality assurance system in the region.	One – on -one Interview Structured Agenda Correspondence	<ul style="list-style-type: none"> - During Project preparation: - Planned in September 2023 - During Project implementation: - Prior to launch of Component 1.1
<p>Training Agencies:</p> <ul style="list-style-type: none"> - Caribbean Association of National Training Agencies (CANTA) - Grenada TVET Council - National Training Agencies 	Responsible for the promotion of TVET standards and regional qualification framework. These agencies are interested in Project components on standards, quality assurance systems, information systems, new credentials, and certifications. Interest in Technology adoption, knowledge transfer, and research, resulting from innovation activities financed by the Project.	Discussions Formal meetings	<ul style="list-style-type: none"> - During Project preparation: - Consulted in February 2023 - During Project implementation: - Prior to launch of activities of potential interest

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
Youth (OECS Youth Advisory Network (YAN), Caribbean Youth Environment Network (CYEN))	Project's technical assistance to identify barriers faced by young men in OECS to participate in post-secondary education. Project's opportunities for training and scholarships. Updates on Project's expected outcomes.	Focus group meeting Social media	<ul style="list-style-type: none"> - During Project preparation: - Planned in September 2023 - During Project implementation: - Project launch - Prior to launch of activities of potential interest
Regulatory Agencies	These entities provide regulatory oversight and the Project's development of innovative activities and improvements to laboratories and workshops, diagnostics on gaps and regulatory frameworks would be of interest.	Structured agenda One-on-one interviews	<ul style="list-style-type: none"> - During Project implementation: - Prior to drafting procurement bidding documents (year 1) - Prior to acceptance of final diagnostics and studies
Alumni Associations of post-secondary institutions Diaspora Associations	These associations would be interested in collaboration and partnerships with post-secondary institutions on innovation activities and knowledge transfer.	Focus group meetings and discussions, social media Correspondence to leaders of community groups	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of component 2.2 (year 1)
Development Partners (Caribbean Development Bank (CDB), British High Commission)	Sharing their lessons learned from the design and implementation of skills-related projects in the OECS (including in Saint Lucia and Grenada. Understanding this Project to leverage partnerships and explore complementarities for their current and future projects with post-secondary institutions and the private sector in OECS Member States.	One-on-one interviews Education Partners Forum Platform	<ul style="list-style-type: none"> - During Project preparation: - Already consulted in April 2023 - Planned in September 2023 - During Project implementation: - Annually

3.3. Disadvantaged and vulnerable individuals or groups

Within the Project, vulnerable and disadvantaged individuals or groups may include but are not limited to single parent households, youth at risk, unemployed youth, women, the poor, people identifying as LGBTQ+ and those with disabilities and their caretakers. The PIUs will coordinate where possible with groups and organizations representing the rights of disadvantaged groups to facilitate the participation of their member in consultations to

ensure their full understanding of Project activities and benefits. Table 3 identifies potential disadvantaged and vulnerable individuals and groups and analyses their interest in the Project, methods to consult and the timing of consultations.

Table 3. List of disadvantaged and vulnerable individuals and groups

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
People with Disabilities and their caregivers	Project information, particularly the aspects on disability inclusion.	Community consultations One-on-one interviews Group discussions	<ul style="list-style-type: none"> - During Project preparation: - Planned in September 2023 - During Project implementation: - Prior to launch of key Project activities
Single parent households	Project information of relevance to this sub-group and issues of access to initiatives.	Community consultations	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of key Project activities
Women	Project information of relevance to this sub-group and issues of access to activities.	Community consultations Focus group	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of key Project activities
People identifying as LGBTQ+	Project information of relevance to this sub-group and issues of access to activities. Cultural sensitivities that may limit access.	One-on-one interviews	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of key Project activities
People on low incomes	Project information of relevance to this sub-group and issues of access to initiatives.	Outreach activities	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of key Project activities
Unemployed youth	Project information of relevance to this sub-group and issues of access to initiatives.	Outreach activities Focus groups Notice/bulletin boards	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of key Project activities
Youth at risk	Project information of relevance to this sub-group and issues of access to initiatives.	Outreach activities Correspondence to youth organizations working with these groups Group discussions	<ul style="list-style-type: none"> - During Project implementation: - Prior to launch of key Project activities

4. Summary of stakeholder consultations during Project preparation

During Project preparation public consultation meetings were conducted in September 2022, February 2023, and in March – June 2023 through in-person and virtual meetings with stakeholders. The OECS Commission and Ministry of Education teams met with stakeholders from the private sector, national colleges, post-secondary TVET institutions, other government ministries, national training agencies, and civil society organizations.

In Saint Lucia, consultations were held with the Ministry of Commerce, Manufacturing, Business Development, Cooperatives and Consumer Affairs; Sir Arthur Lewis Community College (SALCC); National Skills Development Center (NSDC); and UWI Open Campus. A total of 46 stakeholders, consisting of 19 females were consulted in Saint Lucia from September 2022 to June 2023.

In Grenada, the following stakeholders were consulted during the in-person meetings with further deep dives with specific groups by virtual meetings: T.A. Marryshow Community College (TAMCC); Ministry for Economic Development, Planning, Tourism, ICT, Creative Economy, Agriculture and Lands, Fisheries and Cooperatives; Ministry of Education, Youth Sports and Culture (MOE); Ministry of Climate Resilience, the Environment and Renewable Energy; Ministry of Mobilization, Implementation and Transformation; New Life Organization (NEWLO); La Boucan Creative Center; Grenada Union of Teachers; Chamber of Commerce; National Training Agency; St. David's secondary school; and Center for Development and Certification Training. An estimated 105 stakeholders, including 42 females were consulted in Grenada from September 2022 to June 2023.

The meetings were held to discuss and gather input and feedback on the Project scope, components, implementation arrangements, stakeholders' innovative and transformative initiatives and activities in progress and planned, collaboration and partnership arrangements between private sector and national colleges, resources required for innovation, challenges, constraints, lessons learned in potential risks and mitigation strategies.

During the consultations that took place in March to April 2023 with the private sector, they highlighted issues limiting collaboration for skilling and innovation activities including the lack of policies and policy instruments, lack of clarity of rules and knowledge about mechanisms and intellectual property rights reflected in distrust about sharing information, red tape, restrictive regulations (e.g., for youth work), among others (for example, financial constraints and red tape of banking sector). This feedback was instructive for Project design resulting in technical assistance for the identification and addressing of institutional and regulatory constraints and gaps hindering collaboration around technology adoption and innovation across post-secondary institutions and other relevant innovation ecosystem actors in the OECS and the inclusion of matching grants component to foster collaborative innovation (component 2.2).

Professors and lecturers from national colleges and training providers in recounting the innovative projects undertaken by their institutions mentioned projects related to energy transition and sustainable agriculture. Likewise, entrepreneurs and firms from the private sector highlighted their ventures in solar energy, logistics, technology solutions, health services, agriculture, and fisheries. The public sector mentioned advances in forestry research and the need to join efforts. The Eastern Caribbean Green Entrepreneurship Initiative and the Eastern Caribbean Greenpreneurs Incubator Programme implemented by the OECS Commission, and the Strengthening the Entrepreneurship and Innovation Ecosystem in the OECS project financed by Compete Caribbean and executed by the OECS Commission were mentioned as relevant examples of initiatives that could be leveraged to implement component 2. The feedback contributed to refocusing of the Components to include targeted sectors

and technical assistance to fill gaps and benefit stakeholders.

Details on the stakeholders consulted, dates of consultations, matters discussed and the process for integration into Project design are provided in Annex 1. The feedback from these consultations was used to inform Project design.

A summary of the main recommendations received and integrated into the Stakeholder Engagement Plan is provided in Annex 1.

4.1 Summary of Project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- i. **Structured Agenda:** This engagement method will be used to discuss specific components or sub-components of the Project during the consultation. The use of a focused agenda ensures that the MOEs, OECS Commission and PIUs collect the required information as defined in the structured agenda. This engagement type also ensures that the relevant target stakeholders are included in the consultation. This method will be used for both Project affected parties and other interested parties.
- ii. **Focus Group Meetings/ Discussions:** This method assembles stakeholders with the same interests or common characteristics into a meeting to discuss specific topics or Project components in a focused manner. For example, focus group meetings and discussions may be used to explore issues that are relevant to specific groups or sub-groups– such as youth, single parents, women, students, and people with disabilities.
- iii. **Community consultations:** These consultations are convened to identify and discuss stakeholder concerns and to disclose project information to Project-affected parties and to a lesser extent to other interested parties and disadvantaged and vulnerable individuals or groups. These consultations, wherever feasible, will make use of local languages and be accessible (location, time, open invitation) to reach a broad range of groups and individuals within communities. Participation of both men and women would be encouraged.
- iv. **Formal meetings:** These meetings are held to identify and discuss specific stakeholder concerns and disclose Project information. Participation in these meetings will depend on the issues under consideration and should include adequate representation of women as well as other marginalized and vulnerable people where possible.
- v. **One-on-one interviews:** The interviews will be organized to provide Project-affected parties, other-interested parties, and vulnerable individuals an opportunity to raise concerns or feedback on the Project.
- vi. **Site visits:** This method allows for on-site meetings with users who use or live in proximity to the sites that will be impacted by minor Project financed civil works.

4.2 Stakeholder engagement plan

The OECS Commission and Governments of Grenada and Saint Lucia through the PIUs will engage stakeholders

at different points during the Project cycle. The objectives of the stakeholders’ consultations during Project implementation include: (i) to inform stakeholders of the proposed Project; (ii) to gather stakeholders’ input and feedback on the implementation of activities; (iii) to identify or clarify project -affected parties; and (iv) to build broad based ownership of the Project and its outcomes. The stakeholder engagement plan in Table 4 outlines the time period, messages to convey, the methods to be used, the target stakeholders, and the responsibility for engagement during different Project phases.

Table 4. Stakeholder engagement plan

Project stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method used	Target Stakeholders	Responsibility
Preparation	January – June 2023	Feedback on Project scope and components	Structured Agenda	<ul style="list-style-type: none"> - Leadership, professors, lecturers, and staff of post-secondary institutions - Private sector actors - Training agencies 	OECS Commission MOE (Grenada) MOE (Saint Lucia)
	July – September 2023	Project risk and mitigation	<ul style="list-style-type: none"> - Structured agenda - Formal meeting 	<ul style="list-style-type: none"> - Government entities - Leadership of post-secondary institutions - Other interested parties working in Project’s targeted sectors 	OECS Commission MOE (Grenada) MOE (Saint Lucia)
	September 2023	Consultations to raise awareness of Project. Discussion on SEP and GRM	<ul style="list-style-type: none"> - Community consultation - Focus group meetings - Formal meetings 	<ul style="list-style-type: none"> - Government entities - Leadership of post-secondary institutions - 	MOE (Grenada) MOE (Saint Lucia)
	September 2023	Consultations to share Project information and determine areas for partnerships	<ul style="list-style-type: none"> - Structured Agenda - One-on-one meetings - Education Partners Forum Platform 	<ul style="list-style-type: none"> - Development Partners 	OECS Commission MOE (Grenada) MOE (Saint Lucia)
	September 2023	Consultations to share Project information, and solicit feedback	<ul style="list-style-type: none"> - Structured agenda 	<ul style="list-style-type: none"> - Regional organizations 	OECS Commission MOE (Grenada) MOE (Saint Lucia)

Project stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method used	Target Stakeholders	Responsibility
	Before Project Appraisal (~September 2023)	Consultation to seek feedback on Project. Information sharing on SEP and GRM. Clarification of Project stakeholders and gathering of inputs and feedback	<ul style="list-style-type: none"> - Formal meeting - Discussion - Community consultation - disclosure of Project's ESS documents in a culturally appropriate and accessible manner on the websites of the Borrowers 	<ul style="list-style-type: none"> - Project Affected parties including students, professors, instructors, staff and leadership of post-secondary institutions, private sector, community - CXC - Youth (beyond students, to be led by the OECSC) - People with disabilities - Other interested parties including Government entities 	OECS Commission MOE (Grenada) MOE (Saint Lucia)
	Following Signature of Financing Agreement	Information on Project	<ul style="list-style-type: none"> - Press release - Public notice through media channels 	<ul style="list-style-type: none"> - Projected affected parties - Other interested parties - Vulnerable groups 	OECS Commission MOE (Grenada) MOE (Saint Lucia)
Implementation	Periodically throughout implementation	<ul style="list-style-type: none"> - Update on launch of key Project initiatives of pertinence to categories of stakeholders (for example technical assistance, matching grants, forging partnerships) - Review list of Project-affected parties - Build ownership for Project 	<ul style="list-style-type: none"> - Community consultations - Outreach activities - Social media - Formal meetings - Focus groups - Group Discussions - Public notices 	<ul style="list-style-type: none"> - Project affected parties - Other interested parties - Disadvantaged and vulnerable individuals and groups 	PIU
	Timed to coincide with completion of studies and diagnostics	Presentation of findings of studies and diagnostics	<ul style="list-style-type: none"> - Structured agenda - Formal meetings - community consultations - Media 	<ul style="list-style-type: none"> - Project affected parties - Other interested parties - Disadvantaged and vulnerable individuals and groups 	PIU
	Continuously throughout implementation	Project implementation progress	<ul style="list-style-type: none"> - Project website - Community consultations - Correspondence - Formal meetings 	<ul style="list-style-type: none"> - Project affected parties - Other interested parties - Disadvantaged and 	PIU

Project stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method used	Target Stakeholders	Responsibility
			- Discussions	vulnerable individuals and groups	
	Twice annually, following completion of Project semi-annual reports	Project environmental and social performance	- Project website - Community consultations - Discussions	- Project affected parties - Other interested parties - Disadvantaged and vulnerable individuals and groups	PIU
	Continuously during implementation	Implementation of SEP and GRM	- Project website - Community consultations - Discussions	- Project affected parties - Other interested parties - Disadvantaged and vulnerable individuals and groups	PIU

4.3 Proposed plan to incorporate the view of vulnerable groups

The SEP recognizes that the inputs from vulnerable groups are important for this Project throughout the life cycle. To access these viewpoints requires strategies to get attendance from women, female-headed households, the disabled, the poor, students with disabilities, among others, who may be less able to participate in stakeholder engagement activities. They must be invited and given an equal opportunity to participate in stakeholder engagement activities for the OECS Skills and Innovation Project, in line with the requirements of the ESS10. The following will be undertaken to ensure their participation:

- i. **Special Group Discussions:** Such discussions will be held with vulnerable individuals in communities where Project activities and components are being undertaken to ensure they can participate. These group discussions will depend on the presence of vulnerable groups and individuals in the community.
- ii. **Organization and location:** Meetings will be held in central locations which are easily accessible by members and at times which will not limit the attendance of certain groups as they interfere with economic and household activities. Meetings should also be announced with advance notice and enough information provided to raise awareness of meetings and allow stakeholders to plan to attend.
- iii. **Language: All information will be shared culturally appropriately.** Meetings will be undertaken in the language(s) (for example French creole, sign language) understood by the stakeholders and interpretation should be provided as needed.

The factors which could limit full participation of stakeholders and mitigation measures are highlighted in Table 5.

Table 5. Potential factors limiting full participation of stakeholders and mitigation measures

Factors	Vulnerable population	Mitigation measure
Access to technology	Individuals with no internet access, or unreliable access	Rely on dissemination of project information via radio and community newspapers, make hard copies of key documents available from community-based locations, and offer opportunities for one-on-one consultation via phone or WhatsApp
Disability	Impaired hearing or vision, limited literacy	Ensure availability of different channels to disseminate information and obtain feedback (oral, written, virtual).
Language	Creole is spoken in informal settings	Where virtual consultation is provided, ensure local languages are accounted for as appropriate. For in-person, ensure local languages are included in presentation, where appropriate.
Time	Individuals requiring more time to prepare to attend event, for example single parents, stakeholders with non-traditional work hours	Not applicable for virtual consultation. For in person, provide on-site care for children during the consultation. Design consultations occur in remote communities rather than in major urban centers.
Transport	Individuals with limited access to a private vehicle and/or located in remote communities	Not applicable for virtual consultation. For in-person, consider a monetary allocation for participants to secure their attendance. If several stakeholders are from a particular vicinity a single means of transport can be contracted.
Location	For individuals with limited mobility or capacity to travel to primary urban centers.	Not applicable for virtual consultation. The design of consultation events should ensure communities in remote locations are reached through several consultation methods, including but not limited to radio, hard copy brochures, in-person community events.
Financial	Individuals who are employed and poor with limited disposable income have financial constraints affecting their participation in consultations.	Convene meetings in locations accessible to stakeholder groups and consider financial constraints which may affect attendance. Provide incentive such as refreshments.

4.4 Proposed strategy for document disclosure

Throughout project implementation, stakeholders including the public will be informed on milestones and attainment of key results indicators. The information will include disclosure of the Project’s environmental and social performance (as defined in the ESS instruments, i.e., the applicable ESS 1-4); the implementation of the SEP (ESS10), and the status of the GRM. The reporting on these will be presented on a semi- and annual basis in line with the reporting requirements of the Financing Agreement. However, reporting may increase to coincide with heightened activities (such as the refurbishment and equipping of laboratories and other minor civil works) when the impacts of the Project on the Project affected parties and other interested parties will be higher. During these periods, disclosure, and dissemination of information on future activities of the Project may be provided on a quarterly basis. The information to be disclosed, the format, timetable and

target stakeholders is outlined in Table 6. The information will be disclosed in English.

Table 6. Document disclosure strategy

Project Stage	Information to be disclosed	Method proposed for Disclosure	Timetable: Locations /dates	Target Stakeholders	Responsibility
Preparation	Stakeholder Engagement Plan with Grievance Redress Mechanism	Public consultations Websites	Before Project Appraisal. Disclosed on Government website	All	MOEs OECS Commission
	Environmental and Social Commitment Plan	Public consultations Websites	Before Project Appraisal Disclosed on Government website	All	MOEs OECS Commission
	CERC Environmental and Social Management Framework	Consultations	Developed by Project Appraisal and finalized by Project negotiations.	Government, Civil service organizations	MOEs OECS Commission
Implementation	Labour Management Procedure	Government and OECS websites Meetings	Finalized by effectiveness	All stakeholders	PIU
	Environmental and Social Management Guidance document	Government and OECS websites	Prior to start of refurbishment activities and purchase of lab equipment.	All Stakeholders	PIU
	Stakeholder Engagement Plan (updates) with GRM	Public consultations and disclosed on Governments, OECS and World Bank website	Updated as necessary with ongoing disclosure	All Stakeholders	PIU
	Updates on Project development	Press releases Project website Community consultations	At a minimum quarterly.	All stakeholders	PIU

4.5 Reporting back to stakeholders

Stakeholders will be kept informed as the Project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

5. Resources and responsibilities for implementing stakeholder engagement activities

5.1 Resources

The budget for the SEP is US\$ 205,000 and is included in component 3 – Project management and technical

assistance of the Project. Table 7 shows the budget per PIU for their respective SEPs.

A provisional budget for implementing the SEP over the five-year Project duration is provided in Table 7 for the OECS, Grenada and Saint Lucia. Financing of the Project launch, human resources to implement the SEP, implementation of the beneficiary satisfaction surveys, and training of Project staff and contractors on environmental and social issues and on gender-based violence are not included in this budget as these costs are covered within the general Project Management costs of Component 3.

Table 7. Budget for implementation of SEP (USD)

Category	OECS Commission	Grenada	Saint Lucia	Total
Consultations	15,000	16,000	20,000	51,000
Information production and dissemination	15,000		20,000	104,000
- Social Media		7,000		
- Website		9,000		
- Project brochures, information sheets and press release		20,000		
- Project materials – Billboard, posters, bulletin		15,000		
- Project Briefs and information notes/ TV and Radio		10,000		
- Outreach meetings sensitizations sessions		8,000		
-				
Beneficiary Surveys		10,000	10,000	20,000
Grievance Redress Mechanism implementation	10,000	10,000	10,000	30,000
Total	40,000	95,000	50,000	205,000

The costs for the OECS Commission are lower as participation in existing stakeholder relationships with OECS institutions, regional institutions, and international Development partners provides an organized network for engagement. Further, the OECS Commission will utilize its website and electronic mediums to reach key stakeholders across the region, thereby limiting the need for paper-based communication tools.

5.2 Management functions and responsibilities

The OECS Commission will execute Component 1 through the addition of technical positions to support implementation, through a PIU. In Grenada and Saint Lucia PIUs will be created to execute Project activities and processes. These PIUs will also have the responsibility for carrying out stakeholder engagement activities, see Table 8.

Table 8. Entities responsible for stakeholder engagement activities

Borrower	Responsible
OECS Commission	OECS Skills for Innovation Project Implementation Unit OECS Commission Morne Fortune, Castries Saint Lucia
Grenada	OECS Skills for Innovation Project Implementation Unit

Borrower	Responsible
	Ministry of Education Building Sir Eric M. Gairy Botanical Gardens Tanteen, St. George's Grenada
Saint Lucia	OECS Skills for Innovation Project Implementation Unit Ministry of Education, Sustainable Development, Innovation, Science, Technology and Vocational Training 4th Floor Francis Compton Building, Castries Saint Lucia

The stakeholder engagement activities will be documented through tools and forms to be prepared during Project launch and tailored if required during implementation.

6. Grievance Redress Mechanisms

The Grievance Redress Mechanism (GRM) is a means for individuals and communities to submit complaints directly to the OECS Commission, the Government of Grenada, and the Government of Saint Lucia, if they believe that this Project – the OECS Skills for Innovation project – has or is likely to have adverse effects on them, their community, or their environment. Transparency, fairness, and avoidance of adverse Project impacts are key to the success of the OECS Skills for Innovation Project. The GRM is open to Project affected parties or any member of the public to express concerns, raise issues and seek satisfactory resolution to grievances they may have relating to Project activities. For the Project team, an effective GRM leads to early identification of problems, before they become serious or widespread, thereby minimizing reputational risk and preserving the Project's funds for its intended uses.⁵

Concerns and complaints may be raised orally or in writing, via short message service, email, phone call, online form, in person. The email addresses and phone numbers specified in the below subsections will be displayed at the OECSC, in the Government of Saint Lucia and Grenada's buildings, and at the post-secondary institutions' sites. Stakeholders may also contact the PIU to make inquiries, recommendations, suggestions, or requests for Project information. To benefit all parties, the GRM is designed to expeditiously acknowledge complaints and concerns and resolve disputes.

For this Project, as a part of the ESS2 – *Labour and Working Conditions*, a Labour Management Procedures (LMP) is required, there is a separate GRM for the specific labour related issues of the Project, and this will be included in the LMP chapter of the Project Operations Manual. The GRM described in this section is in accordance with ESS10- Stakeholder Engagement.

The main objective of this GRM is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. This GRM provides an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

⁵ World Bank, How-to-Notes, feedback matters: designing effective grievance redress mechanisms for Bank Financed Projects.

The Project has other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. The World Bank and the Borrowers do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

6.1 OECS GRM implementation structure

To report an issue about the impacts or potential impacts of any aspect of this Project implemented by the OECS Commission, any individual or group may file a complaint to the Commission’s GRM or to the Ethics Committee. The Commission has an online GRM capture form available at <https://www.oecs.org/en/grievance-redress>. The Phone numbers and email for the Ethics committee are, Telephone: 1-758-455-6304; Email: ethics.committee@oecs.int

The PIU functions under the umbrella of the OECS Commission and will utilize existing mechanisms of the Commission. The PIU’s Environmental and Social Management Specialist will work alongside the Ethics Committee linked to the Legal Directorate, to address Project complaints. A breakdown of the steps, description of process and the corresponding periods and responsibilities for the OECS GRM is provided in Table 9.

Table 9. Description of OECS GRM

Step	Description of Process	Time Frame	Responsibility
Grievance uptake	Grievances can be submitted via the following channels: <ul style="list-style-type: none"> • Telephone hotline/Short Message Service (SMS) line • Online complaint form • E-mail • Letter to Grievance focal points at PIUs • Complaint form to be lodged via any of the above channels Walk-ins may register a complaint in a grievance logbook at a PIU or suggestion box at office of Borrower		OECS: Ethics Committee and PIU (Environmental and Social management Specialist)
Sorting, processing	<ul style="list-style-type: none"> • Any complaint received is forwarded to E&S specialist Logged in and categorized according to complaint types. 	Upon receipt of complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the OECS GRM.	Within 7 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by the E&S specialist. A proposed resolution is formulated by the specialist and communicated to the complainant by the OECS GRM.	Within 15 working days	Complaint Committee

Monitoring and evaluation	Data on complaints are collected in OECS GRM and reported to the WB in the E&S monitoring reports.		
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected in the OECS GRM.		
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows: <ul style="list-style-type: none"> - Training of GRM committees on procedures to manage complaints training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff 	Within 3 months of creation of PIU Subsequent training for new hires during onboarding	Environmental and Social Management Specialist and OECS Commission Legal Officer
	-		

6.1.1 Sexual Exploitation, Abuse and Sexual Harassment

In relation to Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH), the OECS Commission has a policy to address these allegations.⁶ The Policy is underpinned by six principles, (i) Preventing SEA/SH is a shared responsibility. (ii) Zero tolerance of inaction. (iii) Strong leadership accelerates culture change. (iv) Victim/survivor redress needs are prioritized; (v) Gender inequality and other power imbalances are addressed. (vi) Stronger reporting will enhance accountability and transparency. These six principles which reflects the OECS Commission’s commitments to address SEA/SH are guided by Legislation for Saint Lucia including the Domestic Violence (Summary Proceedings) Act Chapter 4.04 “2005 Rev;” Criminal Code Chapter 3.01 “2005 Rev;” The Equality of Opportunity and Treatment in Employment and Occupation Act 2000; and the common law.

OECS staff and partners (civil society, sponsorship partners, grant agencies, partner governments and multilateral organizations) and their employees who have agreements with the Commission must report any alleged incidents of sexual exploitation, abuse or harassment or Policy non-compliance. Reporting is for any suspected or alleged cases of SEA/SH perpetrated by anyone in connection with official duties or business related to the Project.

The Commission encourages all employees to report incidents of workplace violence to their supervisor/Unit Head promptly to avoid escalation of the situation. The Commission also refers victims of workplace violence or partner violence to the appropriate bodies to seek additional assistance if needed. Managers and supervisors are encouraged to deal expeditiously and fairly with allegations of sexual harassment within or outside their units

⁶ OECS policy on SEA/SH is available here <https://www.oecs.org/en/our-work/knowledge/library/sexual-exploitation-and-harassment-policy/viewdocument/3370>

whether there has been a written or formal complaint. Reports of sexual harassment and discrimination can be made directly to the OECS Ethics Committee. Core Units at the Commission have key roles in the SEA/SH process.

i. **The role of the Human Resources Unit**

- Ensuring that both the individual filing the complaint (complainant) and the accused individual are aware of the seriousness of a sexual harassment complaint.
- Explaining the OECS Commission's SEA/SH policy and investigation procedures to the complainant and the respondent.
- Exploring informal means of resolving sexual harassment complaints.
- Notifying the police if criminal activities are alleged.
- Work with local police where the situation gives rise, to arrange for an investigation of the alleged harassment and the preparation of a written report.
- Submitting a written report summarizing the results of the investigation and making recommendations to Unit Head and Director General.
- Notifying the complainant and the accused of the corrective actions to be taken, if any, and administering those actions.

ii. **The role of the Procurement Unit**

- Ensuring that contractors are aware of the Commission's policy on SEA/SH.
- Ensuring that all partners sign off on the minimum standards for SEA/SH.

iii. **The role of the Legal Unit**

- Ensuring that all contracts include a clause on the Commission's position on SEA/SH.

The OECS Commission has the following steps to report SEA/SH incidents.

- All reports of alleged SEA/SH incidents should be made using the OECS SEA/SH Incident Notification Form by either the victim, person identified by victim or a witness.
- Authorized individuals receiving the report must also complete the OECS SEA/SH Incident Receiving Report Form.
- Once an incident has been reported by an employee, the Human Resources Unit will work with the local police where necessary to proceed with investigations into the matter.

For additional information on the formal and informal complaints mechanisms, sanctions, and disciplinary measures, and monitoring and evaluation refer to the OECS Commission SEA/SH Policy (2020).

6.2 Grenada GRM implementation structure

Grievance Redress Mechanism structure: A three-tier redressal structure is employed to address all complaints in the Project.

6.2.1 First tier of grievance redressal

- i. **Complaints uptake.** The complaints are received at various established points at Parish and village levels. The various points of receiving complaints at the Parish level are as follows: (i) Elected representative; (ii) Pastors of the Anglican Church; (iii) Chairpersons of Women Organizations; (iv) Designated Representative of Contractor (v) The PIU. The person receiving the complaints should try to obtain relevant basic information regarding the grievance and the complainant and will immediately inform the Project Manager and/or the Environmental and Social Specialist. The Complaints Form to capture the essential information will be developed by the PIU during the Project launch. In the implementation of the SEP, stakeholders will be notified of the GRM process, the various points for making complaints and providing feedback on the Project.

Complaints can also be made in writing, email, telephone or anonymously through a suggestion box to: Office of the Permanent Secretary Ministry of Education, Youth, Sports, and Culture for the attention of the OECS Skills and Innovation Project. Telephone: (473) 440-2217 or (473) 440-2181, E-mail Address: ps@moe.gov.gd (the telephone numbers and email address will be changed to reflect the information for the PIU, once it is created). The Environmental and Social Management Specialist will train all PIU staff on the steps for complaints uptake. Complaints by telephone will be made to the direct number of the Environmental and Social Management Specialist, in their absence the call will be redirected to the Project Manager. During the telephone conversation pertinent information will be collected to complete the Grievance Complaint Form. The email address provided for complaints will be linked to the emails of the Environmental and Social Specialist and the Project Manager. On receipt of complaints by email, the Environmental and Social Management Specialist uses the information therein to complete a Grievance Complaint Form.

- ii. **Logging and registration of complaints.** The contact points for receiving complaints at the parish level will notify the PIU within one business day of receiving a complaint to relay the information. The Project Manager and Environmental and Social Management Specialist will collect the complaints from these drop-off points within one business day of the notification if this is provided in writing. These complaints are then documented on a Complaints Form.⁷ They are thereafter registered into the Project's GRM database.
- iii. **Acknowledgement and follow-up.** After registering the complaint in the Grievance Redressal Registration and Monitoring Sheet of the Project's GRM database, the Environmental and Social Management Specialist and Project Manager will review the complaint made in detail and forward the complaint to the concerned individuals to address the grievance with specific dates for replying and redressing the complaint. In parallel, the Project Manager and the Environmental and Social Management Specialist acknowledge the complaint by contacting the concerned

⁷ PIUs will develop the GRM templates to capture key information to verify, investigate and find a solution to the grievance. PIU in developing the templates must inform complainants that while contact information facilitates acknowledgement and follow-up, anonymous complaints are accepted.

individuals or groups to acknowledge the complaint.

- iv. **Verification and investigation.** Meetings are held with the affected individual or groups to verify and investigate the complaints and to find a solution. The deliberations of the meetings and decisions taken are recorded. All meetings in connection with Redressal of Grievances will be recorded in established formats. Community representatives or representatives of the complainant will be allowed to attend the meetings.
- v. **Action and resolution.** The resolution at the first tier will normally be made within 14 working days and the complainant is notified through a disclosure form. If the Grievance is not resolved within this period, it would be referred to the next level of the Grievance Redress Mechanism. However, if the Project Manager and Environmental and Social Management Specialist think that progress is being made towards a solution, a decision may be taken to retain the issue at this first level. If the issue cannot be resolved within 21 working days, it will be automatically transferred to the next level. The complainant may also request that the issue be transferred to the next level, after the 14-day period, if they think it is not being adequately addressed at tier 1. Tier 2 is the Grievance Redress Committee (GRC).

6.2.2 Second tier of redressal

A Grievance Redress Committee (GRC) will be formed consisting of members of the Ministry of Social and Community Development, Housing and Gender Affairs, the Ministry of Education, Youth, Sports and Culture and civic leaders and representatives. This committee will be chaired by the Permanent Secretary of the Ministry of Education, Youth, Sports and Culture or the Minister. The roles and responsibilities of the GRC are as follows:

- i. Provide relief and support to the affected parties.
- ii. Prioritize grievances and resolve them promptly.
- iii. Provide information to Project Manager and Environmental and Social Management Specialist on serious cases.
- iv. Coordinate with the affected party to collect and provide timely information on the resolution of grievance.
- v. Verify and investigate the grievance and advise the Project Manager and Environmental and Social Management Specialist on steps for resolution.

The Project Manager, with assistance from the Environmental and Social Management Specialist will coordinate the convening of the meetings of the GRC. They are responsible for briefing the GRC on the first level of Redressal deliberations and on the views of the parties - Complainant and the Project. The GRC will convene meetings with the affected party / complainant to find a solution acceptable at all levels. The GRC would record the meeting minutes through the Environmental and Social Management Specialist, the Secretary of the Committee.

The decisions of the GRC are communicated to the complainant formally. If the resolution is accepted, the complainants' acceptance is obtained on the disclosure form. If the complainant does not accept the solution offered by the GRC, then the complaint is either passed on to the next level or the complainant can activate the next level. The duration of tier 2 is a maximum of 60 working days to reach a resolution acceptable to all parties.

6.2.3 Third tier of redressal

If the affected party/ complainant does not agree to the resolution at tier 2, or there is a time delay of more than 60 working days in solving the issue, the complainant can opt to consider taking it to tier 3. This is the national judiciary to the local court system.

6.3 Saint Lucia GRM

Communities and individuals who believe that they are adversely affected by this Project financed by the World Bank may physically submit complaints to the PIU's Environmental and Social Management Specialist. The Grievance Redress Mechanism ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaints to the PIU for resolution. The contact information for the GRM contact point: Telephone (758) 468-5202/ 5206 (758) 451-6725; Email pssecretaryed@gov.lc. The contact information will be updated once the PIU is created.

Dissemination of GRM information. As part of the effort to promote the use of the GRM, a flyer with information about the GRM will be developed and will be distributed in all public activities and relevant public offices. The GRM flyer will contain among other information: What is a GRM? The Project's GRM; how to file a Grievance; contact information and appeal process.

Grievances whether by project staff, consultants, or other stakeholders (project beneficiaries, Project affected parties and interested parties) will be addressed through the following steps:

- i. **Grievance uptake.** Grievance and complaints can be submitted in writing by mail, email, telephone, in-person, and through what's app. The Project Manager and the Environmental and Social Management Specialist are the direct point of contacts for lodging complaints and grievances.
- ii. **Sorting, processing, logging, acknowledgement, and follow-up of grievances.** The PIU acknowledges the initial complaint and requests the complainant to complete and sign a complaints form. This form can be returned to the environmental and social management specialist either electronically or in-person to the PIU. All complaints or grievances received by the PIU will be registered in the grievance logbook. PIU staff will be trained to assist complaints with completing the complaints form. The logbook and completed form will be passed to the Environmental and Social Management Specialist for further action.
- iii. **Investigation.** If needed, a full investigation will be carried out by the PIU Grievance team (Environmental and Social Management Specialist and the Project Manager) and all relevant evidence gathered. The

findings will be sent to the complainant in advance of the meeting. Findings and solutions of grievances will be disclosed and made available online (on the Ministry of Education, the OECS Commission and the World Bank's websites or any other platform that the PIU will direct) and or communicated at stakeholder consultations. The PIU will exhibit confidentiality and privacy throughout the grievance process.

- iv. **The grievance will be addressed within one (1) to fourteen (14) working days depending on the matter reported.**
- v. **A grievance meeting** will be arranged, and the complainant will be invited to present their case.
- vi. **Grievance Redress Committee.** In the absence of a resolution at the level of the PIU, the Grievance will be elevated to Tier 2, the Grievance Redress Committee (GRC) for deliberation. The GRC is composed of six members including:
 - a. **Project Manager** – PIU representative
 - b. **Environmental and Social Management Specialist** – PIU representative and secretary of the GRC
 - c. **Representative** - Ministry of Education, Sustainable Development, Innovation, Science, Technology and Vocational Training (Chair of the GRC)
 - d. **Representative** - Ministry of Public Service, Home Affairs, Labour and Gender Affairs or Ministry of Justice and National Security or other Government Ministry, Department or Agency⁸
 - e. Representative selected by the complainant.
- vii. **GRC review process.** The GRC will convene a meeting to review the grievance under consideration. The GRC will be briefed by the PIU representatives – Project Manager and Environmental and Social Management Specialist on the complaint or grievance. If an investigation was undertaken by the PIU, which resulted in a declaration of insufficient evidence to support complaint, the complainant will be granted five (5) business days to provide evidence or witness statements to the PIU for onward submission to the GRC. Once the GRC is satisfied with the quality, accuracy and authenticity of the information, the Committee will submit this information to the World Bank for review and support in arriving at a resolution. The resolution agreed by the GRC with World Bank guidance will be communicated to the complainant. The complainant will be notified of the resolution officially in writing by the PIU.
- viii. **Documentation and record keeping of grievances** will be kept including the outcomes of every stage of the grievance process. The records will be maintained by PIUs of Ministry of Education and the OECS Commission. All comments, responses, and grievances are logged using grievance logging forms and thereafter entered into the Grievance register. The log form and the grievance register include details of the complaint/ grievance and contact details of the complainant. The PIU's grievance database records and tracks all stages of grievances. All documents related to the grievance are confidential and will not be released to an external party without the permission of the complainant.

⁸ This representative will be selected based on the nature of the complaint or grievance.

6.3.1 Addressing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SEA/SH)

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risks are considered low due to the nature of Project activities which are not expected to involve labour influx or interactions with community members. A list of available gender-based violence services, including contact information, and a sample of Code of Conduct will be included in the Environment and Social Standards Guidance document. The Environmental and Social Management Specialist will be assigned and trained to deal with SEA/SH grievances, should they arise. Direct and contracted workers will be required to sign a workers' code of conduct, including provisions on SEA/SH.

6.4 Building awareness on GRM structure

The Environmental and Social Management Specialist assigned to the Project will initially brief all staff of PIUs, the Regional Steering Committee, consultants, staff of the implementing Ministries, and Project-affected parties on the Grievance Redress Mechanism.⁹ The briefing will explain the procedures and formats to be used and reporting processes. Awareness campaigns would be conducted targeting stakeholders to educate the different parties on the mechanism's availability. Various mediums will be used. The SEP containing the GRM will be published on the Ministries of Education and the OECS Commission's websites, the Project website or Facebook if there is one and the World Bank's Project page (Project number: P179210). Project billboards will be erected by the Ministries of Education and the OECS Commission in strategic locations to highlight the Project, including information for activating the GRM. The GRM will be communicated in local languages (for example in Saint Lucian Creole) if determined to be needed.

Reporting. The Environmental and Social Management Specialists of the PIUs would prepare the reports on Grievance Redressal issues of the Project for inclusion in reports mandated by the Loan Agreement and defined in the Project Operations Manual.

Periodic review by the Grievance Redress Committee. The Grievance Redress Committee may review the nature of grievances presented and recommend suitable changes in implementation procedures to the Project Manager for consideration.

GRM authority. This is a Project specific GRM intended to resolve concerns of project-affected stakeholders. It is not intended to bypass Governments own redress process; however, it is intended to address affected parties' concerns and complaints promptly, making it readily accessible to all segments of affected people and is scaled to the risks and impacts of the Project. In conducting consultations, the Project team will be guided by the World Bank's ESS10 Grievance checklist.

⁹ The Grenada PIU will receive support from the Ministry of Environment on all aspects related to Environmental and Social issues. An Environmental and Social Specialist will be recruited to the PIUs in Saint Lucia and at the OECS Commission.

7. Monitoring and Reporting

7.1 Reporting back to stakeholders

Details on the progress of the Project will be reported to stakeholders. The minutes of stakeholder meetings will record the PIUs commitment to each stakeholder group and form the basis for reporting back on action items and progress on Project progress pertinent to the stakeholder group.

7.2 Monitoring and evaluation

Monitoring and evaluation are essential to ensure successful implementation of this SEP. The SEP will be periodically reviewed and revised, as needed, to adjust the required activities to be relevant and effective and to incorporate any lessons learned. Any major changes to Project related activities and schedules will be duly reflected in an updated SEP. The PIU must formally notify the World Bank of all changes to the SEP and disclose the revised SEP. The Project will maintain data summarizing public consultations, details on disclosure and grievances lodged throughout the Project life cycle. This will be available for public review on request. The PIU will be guided by data and privacy guidelines to maintain the confidentiality of grievances, especially those of a SEA/SH nature. Stakeholder engagement will be periodically evaluated by the PIU using SEP results indicators. These results indicators will be developed and agreed upon during Project launch. Progress on the SEP results indicators will be reported in the semi-annual Project progress report.

7.3 Reporting

To effectively implement this SEP requires documents for consultations, and for monitoring and reporting. During Project launch the PIUs will develop templates for consultation minutes, forms to log, and acknowledge grievances, and a checklist to confirm that meaningful consultations are undertaken. Additional tools will be developed by the PIUs during Project launch as needed.

Various levels of reporting will be undertaken during the Project life cycle:

- i. **Incident reporting.** The Loan Agreement mandates notifying the World Bank of any grievances or issues affecting the normal implementation of the project. The PIU will inform the Bank immediately of any complaint of grievance which would directly affect Project implementation or poses a reputational, environmental, or social risk.
- ii. **Monthly reporting.** The Environmental and Social Management Specialist assigned to the PIU will prepare monthly reports on stakeholder engagement, complaints, and grievances. These reports for the attention of the Project Manager will cover the following areas:
 - Stakeholder engagement activities conducted.
 - Public outreach activities and meetings with stakeholders and feedback received.
 - Entries to the grievance register.

- New stakeholder groups (where relevant).
- Stakeholder engagement activities planned for the next month.
- Status of implementation of associated corrective/preventative actions.

These monthly summary reports will provide a mechanism for assessing the number and the nature of complaints, requests for information, as well as the Project's ability to respond in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year will be conveyed to key stakeholders in quarterly progress reports. SEP specific result Indicators will be monitored by the Environmental and Social Management Specialist. These include:

- Project stakeholders' level of understanding of the Project,
 - Numbers of grievances received within a given reporting period (e.g., monthly, quarterly, or annually).
 - Level of involvement of project-affected parties, other interested parties, and vulnerable groups in stakeholder consultations.
 - Frequency and type of public engagement activities and number of attendees (disaggregated by gender where possible); and
 - Number and type of media materials published/broadcast/distributed on various communication outlets.
- iii. **Semi-annual and annual reporting:** The PIU will prepare reports in satisfaction of the contractual clauses of the Financing Agreement. These reports will include a summary of SEP results, public consultation issues, grievances, and resolutions.

8. Conclusion

The ESS10 guidance note suggests ways to make consultations meaningful. These suggestions are provided in Box 1.

Box 1. What makes consultations meaningful?

Box 1. What Makes Consultations Meaningful?

To make consultations effective and meaningful the Borrower should:

Provide relevant information to stakeholders in a form and language they can understand, sufficiently before the proposed date of public meeting. In the case of other forms of consultations (electronic or by mail), such information should be provided well before the date by which comments and suggestions are supposed to be provided by the stakeholders to the Project implementation Unit.

Document the overall process, the various consultation events, and the results of the consultations. The documentation should reflect key issues discussed, any agreements reached, and any concerns expressed by stakeholders.

Discuss, in project documents and in the documentation on consultations, how comments and suggestions made by the stakeholders during consultations have been considered in project design and implementation.

Describe and discuss, in project documentation as well as in documentation on consultations, any suggestions from stakeholders that cannot be considered, along with the reasons/ justifications as to why they cannot be incorporated in project design and implementation.

Disseminate the documentation on consultations, along with details on how stakeholders can register any comments or disagreements on the way the process and results of the consultation process have been documented.

Respond to any comments and suggestions received, or any disagreements expressed by stakeholders on any aspect of consultations based on their review of the consultation documentation.

Bibliography

- Agarwal, S., Nora, L., Kemppainen, L., & Pfeil, H. (2019). *Practical Guide for preparing a Stakeholder Engagement Plan*. Washington D.C.: World Bank.
- World Bank. (2016). *World Bank Environmental and Social Framework*. Washington D.C.: World Bank.
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Annex 1: Project Preparation Stakeholder Consultation Reports

For further details on the focus groups discussions with National College Faculty and Private Sector Representatives refer to Annex 4 of the Project Appraisal Document. Table A.1 summarizes a subset of consultations held with key stakeholders during Project preparation.

Table A.1. Record of Stakeholder consultations convened during early Project preparation

Stakeholder	Date of Consultation	Summary of Feedback from consultations and process for Integration into Project design	Response of Project Implementation Team	Follow-up Action(s)/ Next Steps	Timetable/ Date to Complete Follow-up Action(s)
Sir Arthur Lewis Community College professors	22 March 2023	<p>SALCC identified innovative activities in renewable energy, agriculture, environment, and blue economy.</p> <p>Partnerships exist with Ministry of Agriculture, Ministry of Transport, Canadian universities with parallel collaboration with Caribbean countries.</p> <p>The college engages with the private sector and community through internships and community service projects.</p> <p>Two SALCC lecturers are pursuing graduate in South Korea as part of an innovation hub.</p>	<p>Discussion on potential areas for implementation within Component one and the links to the national level.</p> <p>Discussion on the benefits of the development of Regional Enhancement Plans.</p> <p>To hold follow-up discussions with the SALCC.</p>	<p>Follow-up meeting on 29 March 2023 including team from the SALCC Innovation Hub.</p> <p>SALCC team will provide feedback on the vision of the college on upscaling innovation projects.</p>	To incorporate feedback for this meeting and the follow-up meeting into the Project Appraisal Document prior to the World Bank's internal Decision Meeting (May 2023)
Sir Arthur Lewis Community College professors ¹⁰	29 March 2023	<p>SALCC has two innovation institutes:</p> <ul style="list-style-type: none"> - Vaughn Arthur Lewis Institute for Research and Innovation (VALIRI) - Innovation Hub <p>The college is engaged in innovation activities involving:</p> <ul style="list-style-type: none"> - Vertical access wind turbines 	Discussion on the hubs for research and innovation	<p>Revision of Project Appraisal Document to expand the linkages between the regional component (Component 1) and the national component 2.</p> <p>To incorporate in PAD means to strengthen and formalize collaboration between national colleges and private sector.</p>	Before World Bank's internal Decision Meeting in May 2023.

¹⁰ This meeting on 29 March 2023 was a continuation of the meeting held on 22 March 2023.

Stakeholder	Date of Consultation	Summary of Feedback from consultations and process for Integration into Project design	Response of Project Implementation Team	Follow-up Action(s)/ Next Steps	Timetable/ Date to Complete Follow-up Action(s)
		<p>- Recycling refrigerants (partners include the National refrigeration and air-conditioning society, Saint Lucia National Ozone Unit within the Ministry of Sustainable Development)</p> <p>Partnership potential exists with the diaspora. For example, annually five scholarships are provided by a United States based Saint Lucian for a six-month online DevOps training and certification course.</p>		<p>Broadening the scope of innovation to include KTIPs at the regional level and incorporating the HEInnovate self-assessment tool to support post-secondary education institutions in exploring their entrepreneurial and innovative potential at the institution, group, and individual level.</p> <p>The diaspora was added in the PAD as a key partner for component 1.1 and 1.3 and 2.2.</p>	
T.A. Marryshow Community College faculty	23 March 2023	<p>Innovation activities are currently ongoing or planned in: Environmental sustainability, geomatics, blue economy.</p> <p>TAMCC collaboration with other institutes include skills to access the green economy funded by the Government of Canada and managed by colleges and institutes in Canada.</p> <p>TAMCC identified the need for laboratories to facilitate (i) practical experience for students in the medical laboratory technician associate degree program, and (ii) to develop new and innovative courses in manufacturing of pharmaceuticals, natural health care and cosmetics using indigenous herbs and products and veterinary pharmacy. Lack of key enabling inputs to complement provision of innovation. For example, informational technology hardware and software.</p>	<p>The Project did not foresee major civil works, however, the gaps in physical infrastructure identified by the TAMCC are important for the successful implementation of Component 2.</p> <p>The Project noted other Bank's regional support on innovation.</p>	<p>Reframing the Project scope and budget to include minor civil works to include rehabilitation of laboratories and workshops at post-secondary institutions.</p> <p>Within sub-component 2.2 allocations were included to improve access to technology and software licenses.</p>	Before World Bank's Internal Decision Meeting

Stakeholder	Date of Consultation	Summary of Feedback from consultations and process for Integration into Project design	Response of Project Implementation Team	Follow-up Action(s)/ Next Steps	Timetable/ Date to Complete Follow-up Action(s)
Grenada Chamber of Industry and Commerce and private sector	28 March 2023	<p>Informal arrangements exist between the private sector and TAMCC and require formalization.</p> <p>Engagement with diaspora has not been strategic.</p>	<p>Further explored emerging trends within the private sector and potential areas for collaboration with post-secondary institutions.</p> <p>Explored the appetite and mechanisms for collaborative partnerships with post-secondary institutions. Requested information on the challenges to collaborative partnerships with post-secondary institutions.</p>		
St. Lucia private sector	March 31, 2023	<ul style="list-style-type: none"> - There is a significant concern about men and boys being left out of the work and academic systems and the related social effects. - To maintain engagement with the private sector stakeholders present at this consultation in future consultations throughout the Project cycle. - To involve the diaspora in the Project for ideas on innovation. - To engage with youth on their innovation ideas. - Bureaucracy and financing as impediments to innovation. 	<p>The Team noted the comments and clarified areas of the Project which addressed some of the points raised. The gaps identified will be included in the Project.</p>	<p>To update PAD to</p> <ul style="list-style-type: none"> - include technical support to identify barriers men face in participation in post-secondary education. - Include matching grants to support innovation projects. - Include the diaspora as a partner. 	<p>Before the World Bank internal Decision Meeting in May 2023.</p>
Regional development partners and UWI research centers	April 28, 2023	<p>The 4th Education Partners Forum, open dialogue segment was used to update on the OECS Skills and Innovation Project.</p>	<p>From deliberations during the forum and lessons learned from the OECS Commission, there is consensus to utilize the Education Partners Forum Platform to remain updated on regional education activities.</p>	<p>The SEP was updated to include the Education Partners Forum Platform to share information on the Project.</p> <p>Follow-up meetings with CDB</p>	<p>Planned in September 2023.</p>