

S I N T M A A R T E N

DIGITAL GOVERNMENT TRANSFORMATION PROJECT - P172611

Stakeholder Engagement Plan

Version for Appraisal, July 20, 2020



1. INTRODUCTION/PROJECT DESCRIPTION

Following the devastation caused by hurricanes Irma and Maria in 2017, the Government of Sint Maarten renewed its commitment to digital government reforms aimed at fundamentally transforming how the government interacts with citizens and the private sector. The Digital Government Transformation project aims to enhance the efficiency, access, and resiliency of selected administrative public services for citizens and businesses.

The project will be structured under four (4) components

Component 1: Strengthening the legal, regulatory and institutional environment (Estimated cost: US\$ 4.37 million)

This component will strengthen the institutional and human capacity within the Government to manage digital transformation and will lay the groundwork for the platforms and digital services to be delivered under components 2 and 3.

Sub-component 1.1: Institutional, legal and regulatory reforms. This sub-component will finance the following activities: (i) the institutional design and arrangements for managing digital Government transformation in Sint Maarten; (ii) the design of a dashboard to track progress on digital reforms in Sint Maarten; (iii) the design and implementation of a Government-wide Enterprise Architecture (EA), following established methodologies, and associated outputs for deploying the cross-cutting platforms required to enable digital service delivery; and (iv) the review, development and implementation of existing and new policies, laws, and regulations to enable and build trust in digital Government services and support the development of the digital economy, particularly (cybersecurity, cybercrimes, ICT procurement, data protection and privacy, digital payments and digital identity). This includes support for the institutions and agencies responsible for implementation and oversight of the enabling legal and regulatory environment.

Sub-component 1.2: Change management and project management. This sub-component will finance:

- a) the services of a project management and technical advisory firm to help the NRPB and the Special Project Unit manage the technical implementation of this project and change management aspects of digital transformation;
- b) additional support for project coordination, monitoring, institutional strengthening to respond to citizen feedback to ensure accountability, fiduciary and safeguards tasks, as well as internal controls and audit for the project;
- c) the design and implementation of external communications and outreach programs; and (iv) the design and implementation of a digital literacy program for civil servants.

Component 2: Building digital platforms to enable service delivery

This component will focus on establishing the technical foundations for citizen-oriented services to be delivered under Component 3. By digitizing core Government records and mirroring critical service delivery platforms in the Cloud, this component will also contribute to increasing resilience by reducing

the vulnerability of selected services to delivery disruptions due to cyberattacks and natural disasters and pandemics.

Sub-component 2.1: Cross-cutting digital service platforms. This sub-component will fund the design and development of the following cross-cutting platforms:

- a) Digital Identity (Single Sign-On Platform): (i) Assessment of the Unique Identifier issued by the Civil Registry to design and implement an authentication platform with Single Sign On (identity and access management solution based on open standards) for accessing public sector services with appropriate security features and credential choice for users with different levels of assurance (e.g. two-factor authentication); and (ii) Development of Standard Operating Procedures for identity recovery for adults and minors.
- b) Electronic Payment Platform: (i) Development of the Electronic Payment Platform Technical Architecture; and (ii) Design and implementation of a payment interface, through integration with the Government's Instant Payment platform, that will support credit/debit card payment options for the e-services to be digitized.
- c) Interoperability Platform: (i) Design of a technical, applications, and data architecture to identify the appropriate interoperability platform (anchored in the Enterprise Architecture); and (ii) Implementation of the interoperability platform to link critical registries including Civil Registry; CRIB (Tax ID); Social Registry (in development); Business Registry; Land Registry (cadaster) and the Address Registry.
- d) Electronic Signatures Platform: (i) Design and implementation of electronic signatures for G2G, C2G and B2G transactions; and (ii) Technical evaluation of and recommendations for a whole-of-Government digital signatures platform.

Sub-component 2.2: System resilience and Records Management. This sub-component will finance the following activities:

- a) Upgrades to system resilience to maintain business continuity during and after natural and man-made disasters and pandemics including procuring and implementing cloud services;
- b) Technical assessment of key registries (i.e. data governance, software, hardware, data formats, duplication, etc.);
- c) Hardware, software, and business process reengineering that will ensure harmonization of registries across Government; and
- d) Hardware solutions and additional human resource capacity to register and digitally archive Government documents.

Sub-component 2.3: Just-in-time digital services. This sub-component will invest in “just-in-time” digital services and platforms that have not been planned, but that would be required to support emerging needs during implementation.

Component 3: User-centered public services

This component will enhance public service delivery in Sint Maarten by transforming and scaling-up the existing Public Service Centers (PSCs) to include additional public services offered through multiple channels.

Sub-component 3.1: Modernization of one-stop shops. This sub-component will leverage the existing PSCs located in Philipsburg and Simpson Bay and enhance their operations. Activities include:

- a) assessment and implementation of recommendations to expand the scope and enhance customer orientation of the PSCs;
- b) (ii) software and/or hardware upgrades;
- c) (iii) office furniture; and
- d) (iv) the development of continuity of operations procedures.

Sub-component 3.2: User-centric e-services. Activities financed under this sub-component include the re-design, development, and deployment of the following set of priority e-services¹ through an Online Government Portal:

- a) Certificate of Good Conduct (Pubic Service Center);
- b) Change of Address (Civil Registry);
- c) Registration of a Death, Divorce or Marriage (Civil Registry);
- d) Building Permit Application (Department of Permits);
- e) Economic Licenses (Business, Director, Branch Licenses at Department of Economic Licenses); and
- f) Request for Vaccination Records (Collective Prevention Services).

Sub-component 3.3: This sub-component will improve the efficiency of and access to services offered by multiple service delivery channels including the PSC. It will also invest in:

- a) The design and launch of an Online Government Portal, which will serve as a single point of entry for information and transactions related to all public services;
- b) Kiosk machines for conducting services online;
- c) The design and implementation of a multi-channel customer service feedback mechanism; and

¹ These services have been identified as high priority by the Government based on stakeholder consultations.

- d) The design and implementation of user-friendly mobile applications.

Component 4: Contingent Emergency Response Component

This component has zero funds allocated and can be triggered following a natural disaster or emergency. Once the requirements for activation have been met, uncommitted funds from the project can be reallocated immediately to this component and made available for crisis or emergency response to support the continuity of core public sector functions. The definition of the key aspects of this component will be detailed in the Project Operational Manual during project preparation.

2. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement and input in all stages of the project harmonizes involvement for all stakeholders from the inception of the project. The Government of Sint Maarten, through its Department of Interior and Kingdom Affairs, actively promotes equality, transparency, inclusion, participatory democracy, and decision-making as set out in the principles of the Sustainable Development Goals (SDGs). A series of high-level technical engagements to discuss the objective of the project were held with key representatives of all the ministries, including their Secretaries-General of these ministries. During this exchange, the status of ongoing e-government initiatives was expounded upon as well as some of the challenges involved. (August 2019, February 2020). These are listed below.

Date	Activity
August 2019	Meetings were held with other semi-government agencies who provide services on behalf of government or may be dependent on government services as well.
October 2019	A Workshop/Masterclass was also held involving a cross-sector of government and semi-government agencies.
February 2020	During the World Bank Mission, A sensitization meeting was held with SG's from all ministries during which the project objectives were conveyed.
February 2020	During the World Bank Mission, a meeting was convened with both Telecommunications providers on Island. The objective was to determine the status of plans and/or activities toward the establishment of a Government WAN
Jun 17 2020	DigiGov project page live. ESF documents published on NRPB website, PSC Facebook page and GoSXM facebook page.
June 19 2020	Stakeholder Consultation planning commenced
June 23 2020	Stakeholder planning meeting convened
June 24 2020	Press release published on the single print newspaper (Daily Herald) and on a number of online media platforms.
June 26 2020	Direct email solicitation for ESF feedback

As per the project requirements, the ESF documents were published on the NRPB website (<https://nrpbxsm.org/digitalgov/>) on June 17,2020. The project press release which included a call for feedback was sent to 62 print and online news media on June 24th. The publication of the ESF documents on the NRPB website, on social media platforms (<https://www.facebook.com/SXMGOV/>; <https://www.facebook.com/sxmnationalrecovery/>), and online news platforms and print media included a link to an online feedback form to allow respondents to provide input into the finalization

Activity Log. The survey form requesting feedback from beneficiaries was also emailed to 35 representatives within Government.

Given the challenges of consulting during COVID restriction few responses were received from respondents. These were overall supportive and included that: (a) the project consider part-time employment options for persons 16 and older so as to build digital skills of that age group; (b) more clarity on the operationalization of the CERC and negative list of activities to be excluded from financing; and (c) query on the types of capacity building and training to be provided under the projects; and welcoming of the increase in transparency with regard to registering of business and individuals to reduce fraud.

3. STAKEHOLDER IDENTIFICATION/ANALYSIS

This project affects and targets the entire population of Sint Maarten. As such, the main stakeholder groups can be classified as follows:

a. Governmental Ministries, Departments, and Agencies

The governmental ministries, departments, and agencies are integral to the overall success of the project in all stages but especially in component one. They are crucial to the establishment of the physical, technical, legal, and regulatory framework of the project as well as providing the human resources for the digital transformation. Collaborations and cooperation inter-and intra-agencies will be essential for the implementation of the project and activities in component one. While all the agencies and departments are expected to be part of the process, there are some that will lead the process and others, which will participate at various stages or sub-activities. The main governmental ministries are as follows:

- Ministry of General Affairs
- Ministry of Public Housing, Spatial Planning, Environment and Infrastructure
- Ministry of Finance
- Ministry of Justice
- Ministry of Education, Culture, Youth and Sport
- Ministry of Public Health, Labor and Social Affairs
- Minister of Tourism, Economic Affairs, Transport and Telecommunication

b. Users of E-services

The users of the e-services would encompass all people of Dutch Sint Maarten indirectly but a certain segment of the population directly. The segments of the population that will use the service includes business owners (incl. small business), government workers, parents, students, vulnerable population, visitors, and taxpayers, among others.

c. Civil Society and Non-Governmental Organizations (NGOs):

Sint Maarten's civil society consists of several organizations, entities, and agencies. Among civil society, bodies are the private sector, which includes businesses and enterprises, small and medium-sized businesses, Non-Governmental Organizations (NGOs), Community Councils, Labour Unions. These organizations are relevant in component one as they should be consulted

in the design of the digital infrastructure. They are especially important as they will form the representatives of, and end-users of the digital technologies produced. The main civil society actors are as follows: St. Maarten Chamber of Commerce & Industry, the Social Insurance Bank, the Youth Council.

d. Educational Institutes and Centers for Learning

The University of St Martin is Sint Maarten’s leading institution for tertiary and higher education. This institution will be explored for opportunities and further collaboration to enhance digital awareness, literacy, and cyber-security training for civil servants and the population at large.

e. Other organizations and entities

These may include: the Central Bank, Banking Association, the Social Insurance Bank, the Pension Fund (APS), Social Economic Council, Civil Society, the University of St. Martin, Telecommunication companies and Utilities Company, Postal Services

3.1 Affected parties

The most important stakeholders for the Digital Government Transformation Project (DGTP) include the government of Sint Maarten, and the residents and businesses that avail of public services. In order to ensure understanding of the project aims, implementation strategy, and choices made in project, but also to ensure access and effectiveness of the activities. Key to the success of the project will be civil servants who will both directly utilize back-end upgrades and front-end modernizations. The project will work closely with government to gain insight and provide information on the design and implementation of project activities. Throughout implementation, consultation will regularly take place in order help train staff, gain feedback and adapt activities when necessary. Ensuring their buy-in from government workers will greatly impact uptake of the project and the ability to achieve its planned aims.

Residents, citizens, families and businesses of Sint Maarten comprise another large stakeholder group of the project. The project will regularly consult with these relevant stakeholders to help gather feedback, provide training, facilitate utilization and improve uptake. The project will use numerous means of communication to provide information about the project and provide feedback on its design, aims, implementation, and outcomes. **Table 1 below shows how each group will be targeted.** The PIU is developing a budget to resource the plan.

3.2 Other interested parties

Parties not directly affected, but closely linked to the implementation and communities are local NGOs, community councils, community-based organizations, and telecom networks. These parties will also be closely involved and consulted throughout the process. Community meetings will be organized where local organizations are also invited to attend. Their local knowledge of the selected areas is also key in providing information on in which areas it is most likely to identify potential beneficiaries, advice on communication, and identifying risks.

NRPB will play a coordinating role with regards to informing and consulting governmental parties. Consultation of different parties should never hinder the timeline of the project. The World Bank Trust Fund, the Steering Group, and government departments of the Sint Maarten and Netherlands governments will be informed regularly on project progress through existing lines of communication.

3.3 Disadvantaged/vulnerable individuals or groups

In absence of real time data or community sampling, community members that may be considered disadvantaged or vulnerable are the poor, elderly, homemakers, at-risk youth, persons with basic educational levels, or lack digital skills and access to technology who may be left out of consultations and project benefits if extra measures are not taken to insure they are consulted and their needs considered in project design. Another notable obstacle that can prevent persons from participating in the planned project is the language barrier. According to a report by UNICEF, immigration has brought cultural diversity that can be seen in the number of languages spoken. Although Dutch and English are the official languages, others are also common. According to the 2001 census, 67.5 percent of the population speak English as the first language, 13 per cent Spanish, 8 percent Creole, 4 percent Dutch, 2 percent Papiamentu, 1.5 percent French and 3.5 percent other languages.²

Consultations through their community councils or help desks can serve as a central point to disseminate information. Furthermore, translating the information in various languages can assist in the digital divide.

3.4 Proposed strategy to incorporate the view of vulnerable groups

The project will make special provisions to gather the views and inputs of vulnerable or disadvantaged groups. The following mechanisms will be used:

Table 2: Strategy to incorporate views of Vulnerable Groups

Characteristics	Accessibility to the project	Language	Preferred means of communication
Elderly	Consultations will be held with elderly and proxies or family members are encouraged to participate	Translator will be provided if required for English, Dutch, French or Spanish.	<ul style="list-style-type: none"> • Telephone calls/Zoom • Large print • News paper • Elderly organizations • Word to mouth • Flyers on community boards
People with disabilities	Workshops will be held in the community with disability access, for example wider doors or	Depending on disability, a family member or friend might be asked to	<ul style="list-style-type: none"> • Telephone call/Zoom • News paper • Radio • Disabilities

²UNICEF, Sint Maarten Overview: https://www.unicef.nl/media/1359112/sint_maarten_sitan_public_version_28english_29.pdf.

	ramps. Proxies or family members are encouraged to participate	translate in sign language.	organizations <ul style="list-style-type: none"> • Social media – face book • Flyers
Single parent households	Workshops will be available at different times to accommodate schedules.		<ul style="list-style-type: none"> • Telephone call/Zoom • Facebook • News paper • Word to mouth • Through other projects • Flyers on community boards at childcare and school facilities
(Undocumented) migrant groups	Good communication on the approach that lists are not shared with government or other organizations.	Languages other than English (mainly Spanish and Haitian Creole) needed for communication, hand-outs, community meetings etc. Relevant languages are spoken in the group of current staff.	<ul style="list-style-type: none"> • Radio • Word to mouth • Churches • Flyers

STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Purpose and timing of stakeholder engagement program

The objectives of this stakeholder plan are as follows:

1. To identify the roles and responsibility of all stakeholders and beneficiaries and ensure their participation in the complete project cycle
2. To input the knowledge, experience, and skills of stakeholders and beneficiaries to enhance the design and implementation of the project
3. To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder and beneficiaries
4. To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation

4.2 Proposed strategy for information disclosure

An essential component of the Stakeholder Engagement Plan is a stakeholder communication strategy and plan. The Strategy will be further developed and actioned by a communications specialist (preferably a local provider) contracted for that purpose. The strategy will employ both traditional methods of

communication and the use of social media platforms. The following media will be employed in the delivery of the communication plan messages and the dissemination of project information.

Table1: Stakeholder Engagement Action Plan	
Means	Elucidation
Inside Government	Inside Government is a government program during which a series of interviews are conducted on activities the government is embarking upon.
Government Information Page (GIP)- Daily newspaper	The GIP will be used to announce salient activities relating to the project.
Facebook and Social Media	The project will develop a Facebook page within 60 days of project effectiveness ,which will serve as its main social media handle to disseminate project information. The page will also enhance the project visibility platform among both internal and external stakeholders and the public. Other Social Media platforms may also be leveraged.
Public Service Announcements	Through the Department of Communication’s radio station 107.9 FM, PSA’s can be developed about the project highlighting the transformation in a creative way.
Publications: Brochures, information sheets, and press releases	These publications will be utilized to offer information on the project activities, impacts, and contributions to society. They will also be used to provide specific details such as community tailored awareness material and behavioral change messages.
Branded Materials and Merchandise	Items will be branded with a logo designed specifically for the project. This will be the main tool to achieve project visibility.
Briefs and Information Notes	These will target decision-makers, donors, and other technical stakeholders. They will provide project information in technical language, project statistics, lessons learned, and synopsis of project reports, including evaluation reports.
Town Hall engagements and workshops	This face to face interaction (observing proper health protocols) will provide a useful means of engaging beneficiaries and stakeholders, securing real-time feedback and engaging in Change Management exercises.

The strategy should include means to consult with project-affected stakeholders if there are significant changes to the project resulting in additional risks and impacts. Following such consultation, an updated ESCP will be disclosed

4.3 Proposed strategy for communication

An essential component of the Stakeholder Engagement Plan is a stakeholder communication strategy and plan. The strategy will be iterative in response to both target response and the stage of the project cycle. It will employ both traditional methods of communication and newer methods such as social media and list serv. The following mediums will be employed in the delivery of the communication plan messages and the dissemination of project information.

- Social Media Posting
- Print Media
- Press Conferences
- Annual Reports
- Launch Events
- Presentations
- Publications
- Press Releases
- Websites
- Internal Notices
- Video Recordings
- All Staff emails
- Ads
- PSAs
- Newsletters
- Facilitation Meetings
- Info-sessions
- Orientation
- Whatsapp Messaging
- Radio
- Television
- Blogs/Websites

4.5. Timelines

Project stage	Information disclosed	Method	Location & frequency	Target stakeholders	Reach	Responsible staff
Project Preparation	This SEP, the ESCP, the ESMP, as drafts or final documents.	Online, and in person meetings.	Facebook Page, locations TBD.	Potential beneficiaries, wider public	General	Head of Mission, Sint Maarten
Start-up	Project aims, timeline, selection criteria	Community meetings, Radio, Printed media (Daily Herald), Social media (PSC Facebook), flyers and posters (notice boards)	Within 2 weeks of grant agreement, (social) media will announce the project and will repeat the message throughout beneficiary selection. Community meetings will	Potential beneficiaries, wider public	With multiple sources and repeat frequency, assumption is to have a reach of 25% of communities. A lot of information will be spread by word-of-mouth and direct engagement	Project Manager or Communications specialist

Project stage	Information disclosed	Method	Location & frequency	Target stakeholders	Reach	Responsible staff
			take place in relevant communities after they have been selected		→ see beneficiary identification phase	
Start-up	Consultation and involvement of community based organizations	Direct meetings	At least 2 meetings per community	Community Councils, CBOs and local NGOs exact organizations are unknown (depending on final site selection) but will be determined during start-up.	Meetings will aim to reach 75% of relevant CBOs throughout life of project	Project Manager or Communications specialist
Beneficiary identification & selection	Information about the project, aims, activities, etc.	Citizen surveys	Multi-channel. Paper forms available in the PSC and online versions on website.	Beneficiaries	Active and recurring availability of the survey in areas, combined with media campaigns as described in the start-up phase will together reach a near 100% of relevant communities	TBD
During Implementation	Updates on progress, results and lesson learned	Community meetings, Radio, Printed media (Daily Herald), Social media (RC SXM Facebook)	Once every 2 months	Beneficiaries, wider public	25%	Project Manager or Communications specialist

Project stage	Information disclosed	Method	Location & frequency	Target stakeholders	Reach	Responsible staff
Monitoring & closure	Evaluation of process and lessons learned	Community meetings, focus groups with beneficiary	Once per community at the end project	Community Councils, CBOs and local NGOs	5%	Project Manager or Communications specialist

4.6 Budget

Project stage	Information disclosed	Method	Location & frequency	Target stakeholders	Reach	Budget \$US
Project Preparation	This SEP, the ESCP, the ESMP, as drafts or final documents.	Online, and in person meetings.	Facebook Page, locations TBD.	Potential beneficiaries, wider public	General	Draft safeguards instruments have been completed
Start-up	Project aims, timeline, selection criteria	Community meetings, Radio, Printed media (Daily Herald), Social media (PSC Facebook), flyers and posters (notice boards)	Within 2 weeks of grant agreement, (social) media will announce the project and will repeat the message throughout beneficiary selection. Community meetings will take place in relevant communities after they have been selected	Potential beneficiaries, wider public	With multiple sources and repeat frequency, assumption is to have a reach of 25% of communities. A lot of information will be spread by word-of-mouth and direct engagement → see beneficiary identification phase	Refreshments At community meetings \$1000
Start-up	Consultation and involvement of community-based organizations	Direct meetings	At least 2 meetings per community	Community Councils, CBOs and local NGOs exact organizations are unknown (depending on	Meetings will aim to reach 75% of relevant CBOs throughout life of project	Refreshments \$1500.00

Project stage	Information disclosed	Method	Location & frequency	Target stakeholders	Reach	Budget \$US
				final site selection) but will be determined during start-up.		
Beneficiary identification & selection	Information about the project, aims, activities, etc.	Citizen surveys	Multi-channel. Paper forms available in the PSC and online versions on website.	Beneficiaries	Active and recurring availability of the survey in areas, combined with media campaigns as described in the start-up phase will together reach a near 100% of relevant communities	Printing and supplies \$1000
During Implementation	Updates on progress, results and lesson learned	Community meetings, Radio, Printed media (Daily Herald), Social media (RC SXM Facebook)	Once every 2 months	Beneficiaries, wider public	25%	Refreshments and printing and supplies \$5000.00
Monitoring & closure	Evaluation of process and lessons learned	Community meetings, focus groups with beneficiary	Once per community at the end project	Community Councils, CBOs and local NGOs	5%	Refreshments and printing and supplies \$1500.00
Total						\$10,000

This is an indicative budget which will be re-assessed periodically to take into consideration COVID 19 situation. Costs for staff to undertake consultations will be assumed as part of project costs.

ESS4 is considered relevant. The Government will take every measure to avoid COVID-19 transmission that may be associated with workers on the project by abiding by the Government of Sint Maarten COVID 19 Guidelines which are already in place and are also referenced in the ESMF. Stakeholder engagement consultations will be held according to Government restrictions on COVID 19.

RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

The NRPB will provide oversight of the SEP implementation of the project and any support to the Unit staff. Certain aspects, however, may be delegated to staff in the Special Project Unit for more regular managing and monitoring. The SPU project manager is responsible for delegating tasks, but also for following up and ensuring tasks (such as monitoring) are adequately executed. The SPU project manager will ensure that the objectives of the plans are met and successful implementation of the plan by the allocation of the necessary resources for its implementation.

GREIVANCE REDRESS MECHANISM

The National Recovery Program Bureau (NRPB) has an existing Grievance Redressal Mechanism (GRM) in place to fairly, efficiently and effectively handle concerns and grievances received from project stakeholders. The Digital Government Transformation Project (DGTP) will leverage the NRPB's GRM in the design of its arrangements. The system is well established and provides a credible avenue for all Project beneficiaries and stakeholders to file their complaints during the Project's implementation.

Project stakeholders

The project's key stakeholders are all seven ministries and their departments within the government of Sint Maarten, as well as citizens and businesses that require public services.

Objectives of the Grievance Redressal Mechanism

The Project's GRM aims to ensure that all complaints are received and processed fairly and efficiently. The GRM aims to achieve these objectives by ensuring that:

- All Government of Sint Maarten and World Bank's Environmental and Social Framework are adhered to in all activities;
- All grievances emanating from the project's activities are resolved fairly and efficiently, and;
- That a relationship of trust and transparency is developed between the Project's staff/consultants, local communities and stakeholders.

Responsibility of the GRM

The NRPB has the overall responsibility for the GRM for all Bank financed projects in Sint Maarten. The NRPB will relay any complaints received about the project to the Project Manager within the Special Project Unit who will be tasked with following up on the complaints, resolving all issues relating to the Project's activities in accordance with the laws of Sint Maarten and the GRM relayed in this SEP and ESMF and report back to NRPB. supported by the Unit's Communications & Environmental and Social Specialist as well as the Environmental and Social Specialist within the NRPB.

The NRPB has the overall responsibility for the GRM as the implementing agency for the project. When a complaint is received relating to the Project the NRPB will relay the complaint to the Project Manager within the SPU located in the MGA who will be tasked with the follow-up. The Project Manager will be supported by the SPU's Communications & Environmental and Social Specialist, who will be designated as the key officer in charge of the GRM. :

- Coordinate the GRM prior to the commencement of Project activities and resolve issues;
- Create awareness of the GRM amongst all the stakeholders through building public awareness;
- Regularly contact the NRPB for receipt of complaints, receive the complaints made and facilitate the redressal of all grievances by coordinating with the concerned parties;
- Act as the focal point on grievance redressal issues and facilitate access to all Ministries/Agencies and Departments;
- Assist in Redressal of all Grievances by coordinating with the concerned parties;
- Maintain information and prepare progress reports of grievances and redressal, and;
- Monitor the Project's activities of contractors and consultants on redressal of grievances.

Grievance Redressal Mechanism Structure:

The Project will leverage existing GRMs in Sint Maarten, namely the mechanisms of the NRPB and that of the Ombudsman to create a three-tier GRM system. The NRPB has a functioning GRM system that is accessed by all World Bank financed projects in Sint Maarten.. The intention of the GRM is to ensure that all persons impacted by the Project throughout its implementation have a medium for seeking redress for any complaints that may arise.

First Tier GRM:

All written complaints will be received by the NRPB's office. A complaint is a written formal expression of dissatisfaction made to or about the Project's services, products or staff. Requests for information, service requests and reports of problems or wrongdoing merely intended to bring a problem to notice with no expectation of a response are to be distinguished from complaint³. Complaints may be submitted in writing to the NRPB as below:

- Via an online form available on the NRPB's website; <https://nrpbxm.org/complaints-procedure/>
- By email to complaints@nrpbxm.org with the complainant's project name "Digital Government Transformation Project" as the email's subject;
- By mail to:
National Recovery Program Bureau
#57 Walter A. Nisbeth Road
Philipsburg, Sint Maarten
- In person at the address above where the person will be given a complaint form to complete.

The NRPB will immediately direct all complaints received to the Project Manager of the SPU.

³ NRPB – Complaint and Grievance Redress Mechanism, page 1

The Project Manager will request the Communications & Environmental and Social Specialist (Comms/E&S) within the Special Project Unit to confirm receipt of the complaint and to ascertain any additional information that may be required from the complainant within five working days of its receipt by NRBP.

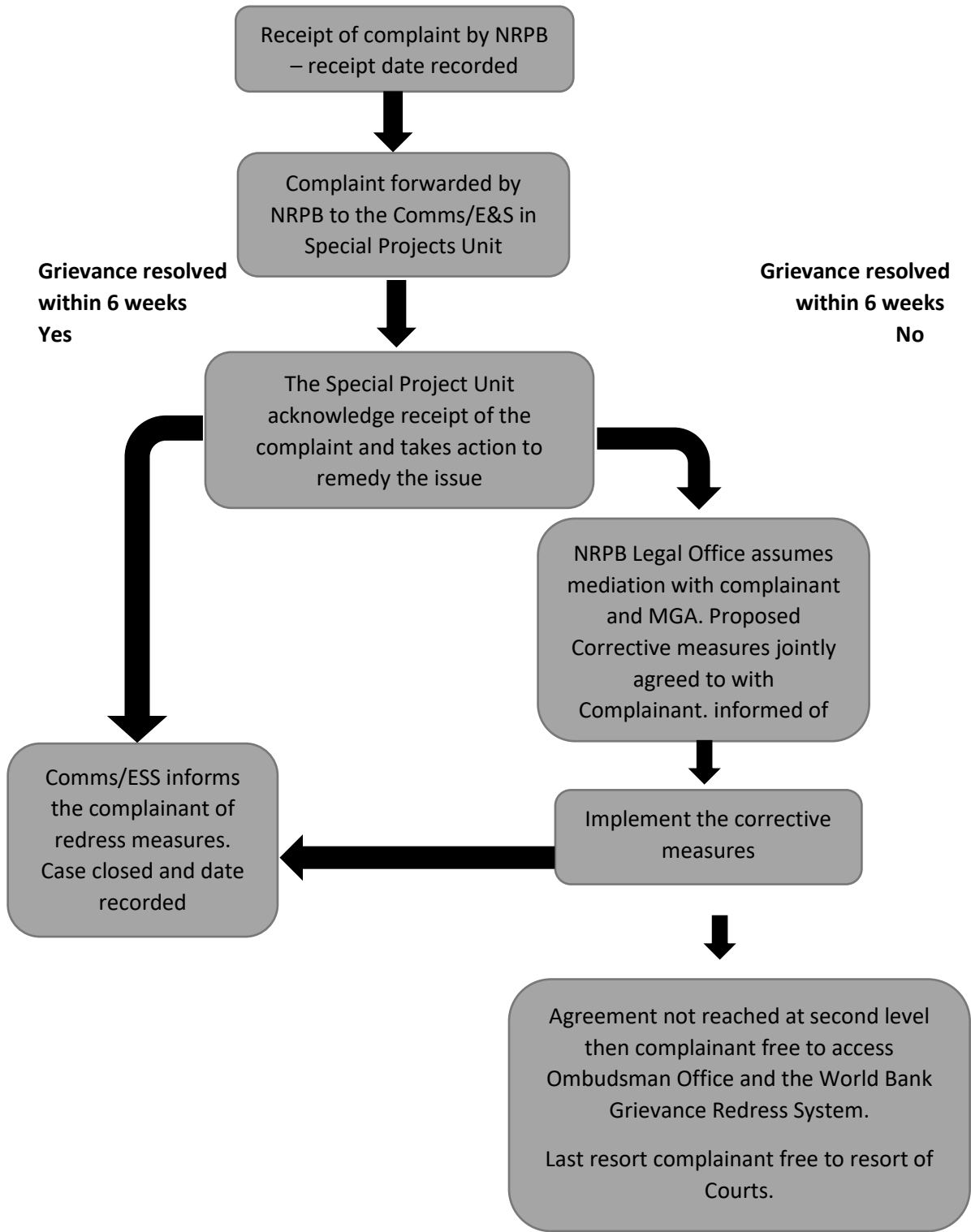
The Communications/Environmental & Social Specialist will thereafter communicate the grievance to the relevant project activity team lead/management firm/consultant and follow-up to ensure a fair and efficient redress is achieved.

The resolution at the first tier will normally be completed within six weeks with progress notification to the complainant and to NRBP to document agreement and confirm closure of case..

Should the complaint remain unresolved at this level it shall be escalated to the second tier. The NRBP's legal counsel will consider any relevant legislation/regulations that may be required to resolve the complaint. If matters necessitate, meetings will be held between the complainant and the relevant person(s) in an effort to agree on a solution and plans for redress. The deliberations of the meetings and decisions taken will be recorded.

Should the complainant still not be satisfied, they are free to pursue the issue at a third level through the World Bank Grievance Redress System. The GRS is not an escalation mechanism. Instead we need to reference them to legal proceedings in country. The GRS is in parallel.

Process flow for the GRM



Monitoring and Reporting

Monitoring and reporting responsibilities lie with NRPB in the ESCP who will also be supported by the Special Project Unit Staff. The project has three main forms of monitoring: 1) monitoring the design and roll-out of stakeholder engagement activities, 2) gathering beneficiary satisfaction and feedback throughout and after implementation 3) monitoring of progress and expenditure on project level overall for project management and donor reporting.

Results of the stakeholder engagement activities will help inform the design and implementation of the project. Feedback, and any corresponding change in project activities or considerations, will be reported back to the appropriate stakeholders regularly.