

# **SOCIAL AND AFFORDABLE HOUSING PROJECT**

## **STAKEHOLDERS ENGAGEMENT PLAN**

**18 DECEMBER 2023**

National Recovery Program Bureau

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## Abbreviations and Acronyms

C-ESMP	Contractor – Environmental and Social Management Plan
ESCP	Environment and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GRM	Grievance Redress Mechanism
LMP	Labour Management Procedures
NL	Netherlands
NRPB	National Recovery Program Bureau
SEP	Stakeholder Engagement Plan
SXM	Sint Maarten
SMHDF	Sint Maarten Housing Development Foundation
SZV	Social and Health Insurances
VROMI	Ministry of Public Housing, Spatial Planning, Environment and Infrastructure (Ministerie van Volkshuisvesting, Ruimtelijke Ordening, Milieu & Infrastructuur)
VSA	Ministry of Public Health, Social Development and Labour

## 1 Introduction/Project Description

The ***Social and Affordable Housing Project*** aims to increase access to affordable housing in Sint Maarten and strengthen the institutional capacity of the housing sector.<sup>1</sup>

The ***Social and Affordable Housing Project*** comprises the following components:

**Component 1: Institutional strengthening.** It would strengthen the institutional capacity of Sint Maarten Housing Development Foundation (SMHDF) and provide technical assistance to the Government of Sint Maarten (GoSM) to tackle bottlenecks in the broader housing market. It would be comprised of two subcomponents:

- (i) Transformation of the SMHDF strengthening its financial sustainability and technical capacity to fulfil its mandate and manage its entire portfolio of social rental housing in a sustainable manner; and
- (ii) Institutional Strengthening for Ministry of Public Housing, Spatial Planning, Environment, and Infrastructure (VROMI).

**Component 2: Social housing development and neighbourhood upgrading.** This component would finance construction of new social rental housing to be managed by SMHDF. Based on preliminary cost estimates, the project could deliver approximately 90 units, increasing SMHDF's portfolio by 10 to 12 percent.

**Component 3: Project implementation support.** This component would provide the implementation support to ensure that the governance of the project is well managed.

The location of the ***Social and Affordable Housing Project*** is in the neighbourhood of Hope Estate, which is mainly residential, within the Upper Prince's Quarter district. The plot is at a walking distance away from the capital Philipsburg.

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<sup>1</sup> For this project, social housing refers subsidized residential accommodation provided at below-market prices, targeted on the basis of socio-economic and/or vulnerability criteria, and operating under some form of (public) administrative oversight in the medium/long term. Affordable housing refers to all housing which meets low and middle income groups and which can include purchased houses (mortgage), private sector rental, and social housing

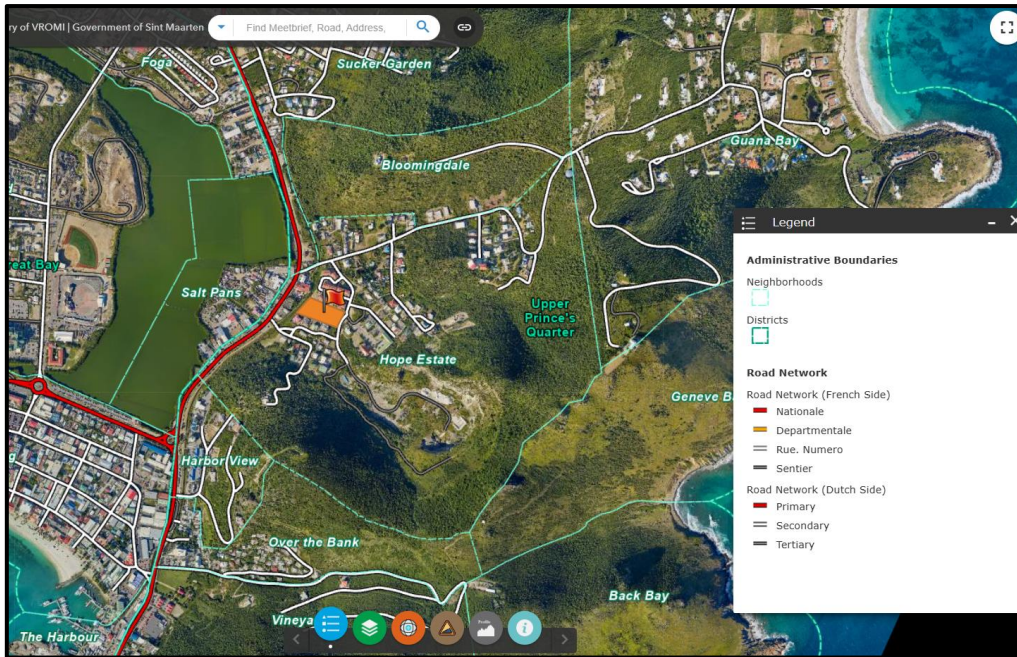


Figure 1: Overview of development plot, within the Hope Estate neighborhood of Upper Prince's Quarter district

The **Social and Affordable Housing Project** is being prepared under the World Bank's Environment and Social Framework (ESF). As per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the NRPB is providing stakeholders with timely, relevant, understandable, and accessible information, and consulting with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

## 2.1 Objectives/Description of the Stakeholder Engagement Plan (SEP)

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 the ways in which 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

In order to meet good practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: Public consultations for the project(s) 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 at all times are 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, particularly women, the elderly, 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 individuals or groups that are affected or likely to be subjected to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Existing neighbours to the building site
- SMHDF
  - Staff
  - SMHDF's client base: existing, or new tenants, with SMHDF who potentially qualify for the Housing Units

**Other interested Parties:** The project's stakeholders also include parties other than the directly affected community including:

- Civil servants, staff of Government of Sint Maarten (Specific Government Entities: Ministry of VROMI, Ministry of Finance, Ministry of VSA – Public Health; Ministry of Justice – Police Department, Ministry of General Affairs - Fire Department).
- Government of Sint Maarten (Prime Minister, Algemeen Pensioenfonds Sint Maarten (APS)
- Banks (WIB, First Caribbean, Algemeen Pensioenfonds Sint Maarten,, VidaNova pension Fund)
- Notaries
- Cadastre
- GEBE (Water and Electricity)
- Fire Department
- Telem and UTS
- Marie Genevieve DeWeever school

In the small island context of St. Maarten, it is common for persons to be active in the community within different capacities. As such, a unique aspect of stakeholder engagement on St. Maarten is that civil servants are often also project affected persons or beneficiaries, as well as representatives of Community Councils, NGO's or other Civil Society Organizations.

While the Government of Sint Maarten ((the Council of) Ministers) is the principal of this project, the Civil servants within the respective ministries are not (all) by definition, direct participants in the government's preparation or decision-making process regarding the project. These civil servants however, often possess a wealth of both practical and technical knowledge regarding Sint Maarten's housing infrastructure. For this reason, the public civil servants who were part of this consultation are not considered as principals, but rather as stakeholders who provided useful knowledge and recommendations that were or will be reflected in the design of the project activities.

The information civil servants receive and provide during interactions with NRPB, is provided from the context of their various capacities and that which is commonly used and disseminated within their own networks, taking into account any limitations. These limitations include avoidance of conflict of interest. As such, civil servants in St. Maarten are considered in the “Other Interested Parties” category of stakeholders.

### 3.3. Disadvantaged/Vulnerable Individuals or Groups

The **Social and Affordable Housing Project** defines criteria based on which households will be considered vulnerable, such as income, household characteristics such as female-headed households and households with members with disabilities and/or seniors, households displaced by natural disaster, and households currently living in inadequate or overcrowded conditions.

**Non-English-speaking Groups:** Special consideration will be given to non-English speaking persons in the community regarding the construction, and general information that will be provided on the project to the public. Communication will be multilingual and in English, Haitian Creole and Spanish, which are the most commonly spoken languages on the island.

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in Section 5.



## 4 Stakeholder Engagement Program

### 4.1 Summary of stakeholder engagement planned for project preparation

During project preparation, the following public consultations/meetings were conducted in November and December 2023.

*Table 1: Consultations Held During Project Preparation Phase*

<b>Stakeholder Group</b>	<b>Purpose of Consultation/Topics Discussed</b>	<b>Consultation Method/Strategy/Tools</b>
VROMI	Obtaining building permit Ensure compliance with building regulations. Presenting a final design	VROMI and SMHDF are key-partners in the preparation and implementation of the project. NRPB's project team has regular In-person High-level Meetings, approximately once per month, email and phone correspondence and in addition, they are engaged via online review of relevant documents with a feedback loop.
SMHDF	Design of social housing units Ensure optimization of design (apartment mix, correct level of fittings) Enabling realistic timing for start of exploitation (Start dates for allocation of units and use by tenants; collection of rental fees)	
Utility Companies	Connection to sewage, electrical and water systems, telephone and Internet service	

Representatives of (Senior Citizens Centre)	<p>To assuage users of the day care/senior citizens center that all will be done to impede their normal functioning as little as possible and that constant communication will be maintained.</p> <p>Information about overall design of the project, key E&amp;S risks and mitigation measures, information about E&amp;S instruments, GRM.</p>	In-person meetings
Residents of Hope Estate Neighbourhood, including persons with disabilities	<p>Overall design of the Social Housing Project, key E&amp;S risks and mitigation measures, information about E&amp;S instruments, GRM, Time frame for commencement of construction and estimated duration of the project.</p>	<p>Online review of documents with feedback loop</p> <p>In person meetings with formal agendas</p>
Police Department – Community Police Officers	<p>First introduction to the project to start developing understanding about needs for traffic management, site security, etc.</p>	
Hope Estate/Guana Bay Community Council	<p>Community Council: Overall design of the Social Housing Project, key E&amp;S risks and mitigation measures, information about E&amp;S instruments, GRM,</p> <p>Time frame for commencement of construction and estimated duration of the project.</p>	In person meetings with formal agendas

The first consultation took place on November 20, 2023. Participants were invited via email on November 13<sup>th</sup>, 2023 (See Annex 1). A total of ten (10) stakeholders attended this consultation. There were residents of the existing Sint Maarten Housing Development Foundation (SMHDF) social housing units, (specifically those of the Assisted Living Foundation) and representatives of the Senior Citizens Center (where the consultation was held). Information about the project was presented by the Project Manager – an overview of the goals of the project, the site chosen, environmental and social risks and mitigation measures which will be put in place to minimize these risks. The GRM was also briefly explained, with instructions on how it is operated. A summary of the consultation is integrated into the Stakeholder Engagement Plan. The presentation slides are provided in Annex 2.

Feedback received during consultations was mainly about the location of the project site in relation to the existing social housing units. One participant posed a question on whether the project included repairs to the existing units. Further details on this consultation can be found in Annex 3.

The second consultation was held on December 7<sup>th</sup>, 2023, at the office of the NRPB. There were seven (7) participants who attended both online and in person. These attendees were representatives of VROMI, Utility Companies (more specifically GEBE), Fire Department and the SMHDF.

Participants listened with interest to the information shared with them and the planned future engagement with stakeholders. It must be realized that the members of the VROMI housing working group, like the SMHDF participants, are also party to the frequent Performance Agreement development and negotiation sessions, they were already well informed about the project.

For the utility company, GEBE NV, this early information is of interest, but once the details of the construction, as well as the construction timeline are available, their stakeholder role will become more important.

It was regrettable that the people invited from the Police Service did not attend. Contact to share information will be sought at a later stage that is conducive to them.

The area around the intended construction site is not densely populated, but there is a school, and there are private residences. Both school management and PTA, as well as owners/occupants of the other residential dwellings will be included in future stakeholder consultations. The first subsequent consultation is expected to take place in Q2 2024. The frequency will be determined in collaboration with the stakeholders in the first consultation meeting.

#### 4.2. 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. Examples of stakeholder methods may include:

- (i) community consultations,
- (ii) formal meetings with structured agendas
- (iii) social media posts
- (iv) flyers
- (v) press releases

Table 2: Stakeholder Needs and Communication Methods/Strategies/Tools Used For Engagement

Stakeholder Group	Stakeholder Needs	Consultation Method/Strategy
VROMI	Confirmation that proposed design is aligned with the national regulations to allow the approval of a building permit.	Formal meetings with structured agendas
SMHDF	The design required is received, given their experience with other multi-story social housing buildings in their portfolio, avoiding the shortcomings of the existing buildings.	
Utility Companies	Understanding of the specifics regarding connections to the public electricity, water supply, wastewater and telecommunications networks.	
School Management	Assurance that school operations will not be interrupted by the construction process.  Information about the project, the complaints mechanisms and the mitigation efforts to minimize risks and nuisance.	
Representatives of the Senior Citizens Centre	Assurance that the operations of the facility will not be interrupted by the construction process.  Information about the project, the complaints mechanisms and the mitigation efforts to minimize risks and nuisance	
Fire Services	Information about the project and discussion on fire safety requirements	
Financial Partners (Banks - WIB, , First Caribbean Bank, Algemeen Pensioenfonds Sint Maarten , VidaNova Pension Fund,	Information to allow risk assessment by financial partners	Formal meetings with structured agendas
Residents of Hope Estate Neighbourhood	Information about the project, the complaints mechanisms and the mitigation efforts to minimize risks and nuisance.	Community Consultations, Press Releases, Flyers, Social Media Posts
Hope Estate/Guana Bay Community Council		

### 4.3. Stakeholder Engagement Plan (SEP)

Table 3: Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used/Description	Target Stakeholders	Responsibilities
<b>Implementation</b>	2024 – Q2 2025	<p>Presenting a final design and a business case with acceptable risk to realize part (20%) external financing.</p> <p>Ensure compliance with building regulations.</p> <p>Obtaining building permission.</p> <p>Designs for public facilities (for community sports, social activities etc);</p> <p>Facilitate discussion on rental subsidies, if required by VROMI.</p>	<p>In-person meetings, Telephone Calls, Emails, Written communication, Occasional site visits</p>	<p>VROMI</p> <p>FINANCE</p> <p>SMHDF</p>	NRPB
	Q3 2025 – Q3 2027	<p>Ensure awareness of progress, challenges, solutions, answer questions, Progress Reports</p> <p>Keep financial institutions regularly informed about any delays.</p>		SMHDF	
		Ensuring that the external electricity infrastructure can cope with additional demand		Utility Companies	

		<p>and is ready upon occupation of rental units.</p> <p>Ensuring that water storage for water autonomy is optimized</p> <p>Connection to sewerage system</p> <p>Enabling water supply company to plan and equip system for additional demand of household water supply in Hope estate.</p> <p>Ensure at critical time in construction if foreseen measures align with actual</p>			
		<p>Ensure not only compliance with fire safety regulations but also options for fire safety that have design requirements, e.g. water reservoir.</p> <p>At specific times check if foreseen fire safety measures are correctly applied.</p>	In-person Meetings, Site visits	Fire Services	NRPB
		<p>Project information – works, duration, possible inconveniences, GRM, E&amp;S Risks, mitigation measures;</p>	In-person Meetings, Telephone contact; Emails	<i>School Management:</i> Marie Genevieve DeWeever school	
			Community in-person consultations	Current neighbours of the project	
			Online Document review	Residents of the Hope Estate Neighbourhood	



## Stakeholder engagement with vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs during project implementation. The details of strategies that will be adopted to effectively engage and communicate with vulnerable groups will be considered during project implementation.

Table 4: Engagement with 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 Haitian Creole or Spanish.	<ul style="list-style-type: none"> <li>• Telephone calls/Zoom</li> <li>• Large print</li> <li>• News paper</li> <li>• Elderly organizations</li> <li>• Word to mouth</li> <li>• Flyers on community boards</li> </ul>
Differently-abled People	Consultations will be held directly with individuals in this category of vulnerability, or with their representatives.	<p>Depending on disability, a family member or friend might be asked to translate in sign language.</p> <p>Venues selected for engagement/consultation will be accessible.</p>	<ul style="list-style-type: none"> <li>• Telephone call/Zoom</li> <li>• News paper</li> <li>• Radio</li> <li>• Disabilities organizations</li> <li>• Social media – face book</li> <li>• Flyers</li> </ul>
Single parent households and/or Female Headed households	Consultations will be organized at different times to accommodate schedules.		<ul style="list-style-type: none"> <li>• Telephone call/Zoom</li> <li>• Facebook</li> <li>• News paper</li> <li>• Word of mouth</li> <li>• Flyers on community boards at childcare and school facilities</li> </ul>
Non-English Speaking Groups	Consultations will be planned with informal leaders and those who can effectively communicate with this category of vulnerable people, e.g. peer translation.	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"> <li>• Radio</li> <li>• Word of mouth</li> <li>• Church Announcement</li> <li>• Flyers on Community Boards</li> <li>• Social Media</li> </ul>

Information will be disclosed as follows:

- (I) Stakeholder Engagement Plan will be disclosed and published for public review, with a feedback loop.
- (II) The Labour Management Procedures will be disclosed on the NRPB website
- (III) The NRPB GRM is readily available on the NRPB website
- (IV) Public consultations are being planned as part of project preparation but will initially be limited to the people in the immediate neighbourhood of the project



- (V) Formats selected for stakeholder engagement include press releases, disclosure of documents on the NRPB website and consultation meetings.
- (VI) Language: The information will be in English and Haitian Creole and Spanish, where needed.

**Online Disclosure of Information:**

Table 5 below illustrates the draft E&S instruments which have been disclosed during the project preparation phase on the project website at [Sint Maarten Housing Project – National Recovery Program Bureau \(nrpbsxm.org\)](http://Sint Maarten Housing Project – National Recovery Program Bureau (nrpbsxm.org)). The project’s email address ([housing@nrpbsxm.org](mailto:housing@nrpbsxm.org)) is available for stakeholders to provide feedback. A one-pager was also published in the local newspaper of St. Maarten, the Daily Herald, on 1<sup>st</sup> December, 2023. See Annex 5.

*Table 5: E&S Instruments Disclosed*

<b>Instrument Disclosed</b>	<b>Date of Disclosure</b>	<b>Link</b>
Draft ESCP	23 <sup>rd</sup> November, 2023	<a href="https://nrpbsxm.org/wp-content/uploads/2023/11/SXM-Housing-Project-P177804-DRAFT-ESCP.pdf">https://nrpbsxm.org/wp-content/uploads/2023/11/SXM-Housing-Project-P177804-DRAFT-ESCP.pdf</a>
Draft LMP	1 <sup>st</sup> December, 2023	<a href="https://nrpbsxm.org/wp-content/uploads/2023/12/HOUSING-PROJECT-LMP-DRAFT-19-oct-2023-clean.pdf">https://nrpbsxm.org/wp-content/uploads/2023/12/HOUSING-PROJECT-LMP-DRAFT-19-oct-2023-clean.pdf</a>
Draft SEP		<a href="https://nrpbsxm.org/wp-content/uploads/2023/12/HP-Draft-STAKEHOLDER-ENGAGEMENT-PLAN-Website.pdf">https://nrpbsxm.org/wp-content/uploads/2023/12/HP-Draft-STAKEHOLDER-ENGAGEMENT-PLAN-Website.pdf</a>
Draft ESMP		<a href="https://nrpbsxm.org/wp-content/uploads/2023/12/SXM-Housing-Project-draft-ESMP-20-OCT-23-clean.pdf">https://nrpbsxm.org/wp-content/uploads/2023/12/SXM-Housing-Project-draft-ESMP-20-OCT-23-clean.pdf</a>

4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including through 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.

This and other information about the project will be shared through various means:

Table 6: Stakeholder Activities for the Short, Medium and Long Terms

<b>Time Frame</b>	<b>Activity</b>	<b>Description/Content/Purpose</b>
Short Term - Immediate	Newspaper advertisements and radio announcements, postings on NRPB website and social media platforms	General information about the project, goals, NRPB contact information and SEP. The link for the Housing webpage: <a href="https://nrpbsxm.org/projects/housingproject/">https://nrpbsxm.org/projects/housingproject/</a> and the Email address: <a href="mailto:housing@nrpbsxm.org">housing@nrpbsxm.org</a> , will be inserted on the advertisement as a means for stakeholders to provide their feedback on the instruments, the project and also to provide access to the GRM.
Medium Term	Radio Interviews with Project Team	Information about the project, the expected environmental and social risks and mitigation measures. The above information will also be provided.
Long Term – Before and During Project Implementation	Animation video	Information about the project, the expected environmental and social risks/impacts and mitigation measures; GRM

These consultation activities are being planned by the Project and Communications Teams, with support from the E&S Team. Stakeholders will be invited to review the E&S instruments prepared for the project (which are uploaded on the project website) and to provide feedback on both.

## 5. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

### 5.1 Resources

The NRPB Project Team, in collaboration with the NRPB’s Communication and E&S Department, will be in charge of stakeholder engagement activities.

The budget for the SEP is included in Component 3 of the project.

Table 7: Budget for Implementation of the SEP

Budget categories	Quantity	Unit costs	Times/Years	Total costs	Remarks
<b>1. Communication campaigns</b>					
1a. (Radio and Newspaper Announcements and Flyers)	SUM			2,000.00	Announcements of Project Activities which may cause some level of disturbance
<b>2. Consultations during Implementation (Estimate)</b>				15,000.00	
<b>TOTAL STAKEHOLDER ENGAGEMENT BUDGET:</b>				\$17,000.00	

### 5.2 Management Functions and Responsibilities

The entities responsible for carrying out stakeholder engagement activities are:

- (a) **NRPB's Environmental and Social Specialists will support the Project Team** in the communication and interaction with Stakeholders, including SMHDF, the project beneficiary. The Project Manager is responsible for planning, organizing and carrying-out stakeholder engagement activities and is supported by the NRPB’s Social Specialist and Communications Specialist. The NRPB is responsible for overseeing all stakeholder engagement activities.
- (b) **The Works Contractor** is expected to develop a contract specific Stakeholders Engagement plan (to include a Grievance Redress Mechanism) as a component of the Contractor's Environmental and Social Management Plan (C-ESMP), in-line with the provisions of this SEP, which will focus on communicating with the nearby school, homes and businesses during the construction phase. The **Environmental Social, Health and Safety (ESHS) Specialist** hired by the Works Contractor is the point person for management/development of the SEP for the Contractor. The qualifications and experience required for the position of ESHS specialist will be described in the Procurement Documents for the project.
- (c) The **Supervision Contractor, hired by the NRPB**, is responsible for ensuring that the Works Contractor develops and executes a formally prepared C-ESMP which should make provisions for stakeholder engagement, and which provides effective mitigation measures for any environmental and social impacts outlined in the C- ESMP. The **ESHS Specialist** hired by the Supervision Contractor is expected to monitor the works contractor's implementation of their SEP. Periodic reports with information relevant to the SEP will be described in these reports.

## 6 Grievance Mechanism

### 6.1 Description of GRM

The main objective of a Grievance Mechanism (GM) is to assist in the resolution of complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved.

NRPB has a Grievance Redress Mechanism (GRM) in place and available for all stakeholders. The updated GRM is disclosed on NRPB's website at: [Complaints Procedure – National Recovery Program Bureau \(https://nrpbxm.org/complaints-procedure/\)](https://nrpbxm.org/complaints-procedure/).

Table 8: Description of GRM Process

[Step]	Description of process	Timeframe	Responsibility
GM implementation structure	The NRPB reports grievances as part of the regular and/or incidental safeguards reporting obligations to the World Bank, as prescribed in the safeguard tools for the respective projects.		
Grievance uptake	<p>Complaints can be submitted via the following means:</p> <ol style="list-style-type: none"> <li>1. NRPB's website <ul style="list-style-type: none"> <li>∅ Complaints Procedure – National Recovery Program Bureau (nrpbxm.org)</li> </ul> </li> <li>2. Telephone <ul style="list-style-type: none"> <li>∅ +1(721) 542-8886/7</li> <li>∅ The complaint form will be completed for you during the phone call, providing your name and contact details is optional.</li> </ul> </li> <li>3. E-mail <ul style="list-style-type: none"> <li>∅ Download and complete the complaint form at the link below:  <a href="https://docs.google.com/forms/d/e/1FAIpQLScp07AeJ53-M_Piuf12j4owx_4d6m-MRO8BQCMDk06AfBI6g/viewform">https://docs.google.com/forms/d/e/1FAIpQLScp07AeJ53-M_Piuf12j4owx_4d6m-MRO8BQCMDk06AfBI6g/viewform</a></li> <li>∅ E-mail the completed form to <a href="mailto:complaints@nrpbxm.org">complaints@nrpbxm.org</a> with "Complaint [name] Project" in the title of the e-mail. For example, "complaint Emergency Recovery Project I". Providing your name and contact details is optional.</li> </ul> </li> <li>4. Social Media – messages on the NRPB's Facebook and LinkedIn Pages, respectively <ul style="list-style-type: none"> <li>➤ SXM National Recovery Program Bureau (facebook.com)</li> <li>➤ <a href="https://www.linkedin.com/company/sxmnationalrecovery/mycompany/">https://www.linkedin.com/company/sxmnationalrecovery/mycompany/</a></li> </ul> </li> </ol>		<b>NRPB</b>

	<p>5. By visiting the office during office hours</p> <p>Ø National Recovery Program Bureau</p> <p>#57 Walter A. Nisbeth Road</p> <p>Philipsburg</p> <p>Sint Maarten</p> <p>Ø The complaint form will be provided, for completion, for further processing of the complaint</p> <p>The NRPB will provide the necessary assistance in cases whereby complainants experience difficulty submitting a complaint. This could be, but is not limited to, recording the complaint (completing the form) for the individual.</p>		
Sorting, processing	<p>Where possible, complaints will be resolved at first contact with the NRPB and handled by a designated Complaints Officer. Complaints that are submitted via the website or e-mail, are automatically sent to the second Complaints Officer within the NRPB, to ensure complaints are received and recorded.</p> <p>Logged in[<i>insert</i>],</p> <p>Categorized according to the following complaint types: Levels 1, 2 and 3</p> <p>Level 1: The scale and scope are minor. Often related to minor non-performance of project obligations. The complaint is quickly remediable. When an answer can be provided immediately and/or NRPB is already working on a resolution.</p> <p>Level 2: The scope and scale are medium. It may relate to gross non-performance of project obligations or minor violations of the law. One-off grievance that requires considered response and actions/commitments to resolve complaint. The complaint is remediable but requires planned efforts.</p> <p>Level 3: The scale and scope are medium to major. High risk of the complaint being of an irremediable character, e.g. severe health and safety issue and/or law violations. Complaint may be of repeated nature and/or affecting an extensive area or group of persons. May requires significant, comprehensive action.</p>	First contact, upon receipt of complaint	NRPB Complaints Officer
Acknowledgement and follow-up	<p>NRPB will acknowledge receipt of each complaint promptly within 5 working days. Communication will be made either verbally or in written form, or the Complainant's preferred contact method, as indicated by the complainant on the Complaint Form. If required, the acknowledgement provides an opportunity to ask for any additional information or to clarify any issues.</p>	Within 5 days of receipt	Complaints Officer
Verification, investigation, action	<p>Reviewing Complaints/ Investigation</p> <p>To investigate a complaint, the NRPB may:</p>	As soon as possible, max. 6 weeks,	The Review Panel will consist of Senior

	<p>- Gather information from the person, group or institution making a complaint</p> <p>- Gather information about the product, area or from the person that the complaint is about</p> <p>- Review other sources of information, as relevant.</p> <p>A proposed resolution is formulated by... and communicated to the complainant by[insert],</p>	with possible extension in complex cases, if needed.	<p>Management, as follows:</p> <ul style="list-style-type: none"> <li>•Program Manager</li> <li>•ES Team Coordinator</li> <li>• Legal Officer</li> <li>• External Expert (such as a government official) and</li> <li>•Any other NRPB Management Team member, upon request of the Panel (e.g. Communications or Finance).</li> </ul>
Monitoring and evaluation	<p>The NRPB will keep a Case Management System for entering, tracking and monitoring grievances.</p> <p>Data will be collected and compiled on the following:</p> <ol style="list-style-type: none"> <li>i. the number of complaints received</li> <li>ii. the date the complaints were received</li> <li>iii. the projects that were subject of the complaint</li> <li>iv. the level and nature of the complaints</li> <li>v. the progress (and dates) on the steps of complaint resolution</li> <li>vi. the date the complaints were resolved</li> <li>vii. the outcome of complaints, including matters resolved immediately after receipt</li> <li>viii. systemic issues identified</li> <li>ix. the number of requests received for internal and/or external review of NRPB’s complaint handling. NRPB – Grievance Redress Mechanism Page 32</li> <li>x. communication activities (internal and external)</li> <li>xi. capacity building activities for organizational capacity to operate the GRM</li> </ol>	...	<b>NRPB</b>
Provision of feedback	<p>The NRPB will keep the complainant updated on the progress, particularly if there are any delays. Time frames for progress updates will depend on the nature of the complaint. Situations where complaints are complicated, or require extensive investigation, will result in extended time for the provision of updates.</p>	...	<b>NRPB</b>

	After the investigation of the complaint, NRPB will consider how to address it. Complaints will be addressed as soon as possible, in any case within six (6) weeks, with an extension possibility for complex cases. The complainant will be informed accordingly. If a person prefers or needs another person or organization to assist or represent them in the making and/or resolution of their complaint, NRPB will communicate with them through their representative if this is their wish.		
If relevant, payment of reparations following complaint resolution	[describe how reparations will be handled including amounts, recipients, etc.]	As soon as possible, max. 6 weeks, with possible extension in complex cases, if needed.	<b>NRPB</b>

## 7 Monitoring and Reporting

### 7.1. Summary of how SEP implementation will be monitored and reported upon (including indicators)

The monitoring of the SEP will be conducted on the following bases:

- The Use of the Grievance Redress Mechanism
- Effectiveness of engagement activities
- Volume of Implementation of Planned Activities

Table 9: Monitoring and Evaluation of the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<b>GRM.</b> To what extent project-affected parties have been provided with accessible and inclusive means to raise issues and grievances, and has the NRPB responded to and manage such grievances.	<ul style="list-style-type: none"> <li>• Do project affected parties have access to a mechanism to raise issues and grievances?</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of grievances received that were responded within the expected timeframe.</li> <li>• Usage of suggestion boxes placed in the project community</li> </ul>	<p>Records from the NRPB GRM</p> <p>Records from the NRPB GRM</p>

<p><b>Stakeholder engagement.</b> How have engagement activities made a difference?</p>	<ul style="list-style-type: none"> <li>• Was there a level of interest and support for the project?</li> <li>• Were inclusive engagement achieved on topics that could affect parties?</li> <li>• Was the feedback received integrated into project design and implementation?</li> </ul>	<ul style="list-style-type: none"> <li>• Representatives of vulnerable groups and members of vulnerable groups actively engaged in predefined topics</li> <li>• Yes/No</li> </ul> <p>Number of representatives of vulnerable groups, or members of these groups, participating in engagement activities</p>	<p>Stakeholder Consultation Attendance Sheets</p> <p>Feedback from consultations (responses to end of consultation evaluation forms)</p>
<p><b>Implementation effectiveness.</b> Have we been effective in implementation?</p>	<ul style="list-style-type: none"> <li>• Were the activities implemented as planned? Why or why not?</li> <li>• Was the stakeholder engagement approach correct? Why or why not?</li> </ul>	<ul style="list-style-type: none"> <li>• % implementation of SEP activities</li> <li>• key barriers to participation identified with key stakeholder representatives</li> </ul>	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face to face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

## 7.2. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project on a rolling basis, when needed.

The semi-annual reports on project implementation, which include an E&S section (including SEP implementation), will be submitted to the Bank by project management. Information on project developments and public engagement activities undertaken by the Project during the year are conveyed to the stakeholders in various ways: social media announcements, radio and television advertisements, billboards, flyers. Based on the SEP, the NRPB's Communications Department prepares a Communication Plan, which will schedule the different activities outlined in the SEP. The Communication Plan will be added to the Stakeholder Engagement Plan.



**Annex 1: Invitations to Consultations 1 and 2 and Responses**

Invitations sent out to stakeholders on November 13<sup>th</sup> (Consultation 1) and November 30<sup>th</sup>, (Consultation 2) respectively



This is a promotional flyer for a housing project meeting. It features a dark blue background with a large, stylized graphic of overlapping yellow and blue shapes on the right side. The background image shows a modern, multi-story apartment building with a white car parked in front. The NRPB logo is in the top left corner. The text is as follows:

**NRPB**  
NATIONAL RECOVERY PROGRAM BUREAU

# HOUSING PROJECT MEETING

*Information and feedback session*

**JOIN US**

 **MONDAY, 20 NOVEMBER 2023**  
6:00-8:00 PM

 **ST. MAARTEN SENIOR CITIZENS RECREATIONAL FOUNDATION, HOPE ESTATE**



This is a promotional flyer for a housing project meeting. It features a dark blue background with a large, stylized graphic of overlapping yellow and blue shapes on the right side. The background image shows a modern, multi-story apartment building with palm trees in the foreground and a white car parked in front. The NRPB logo is in the top left corner. The text is as follows:

**NRPB**  
NATIONAL RECOVERY PROGRAM BUREAU

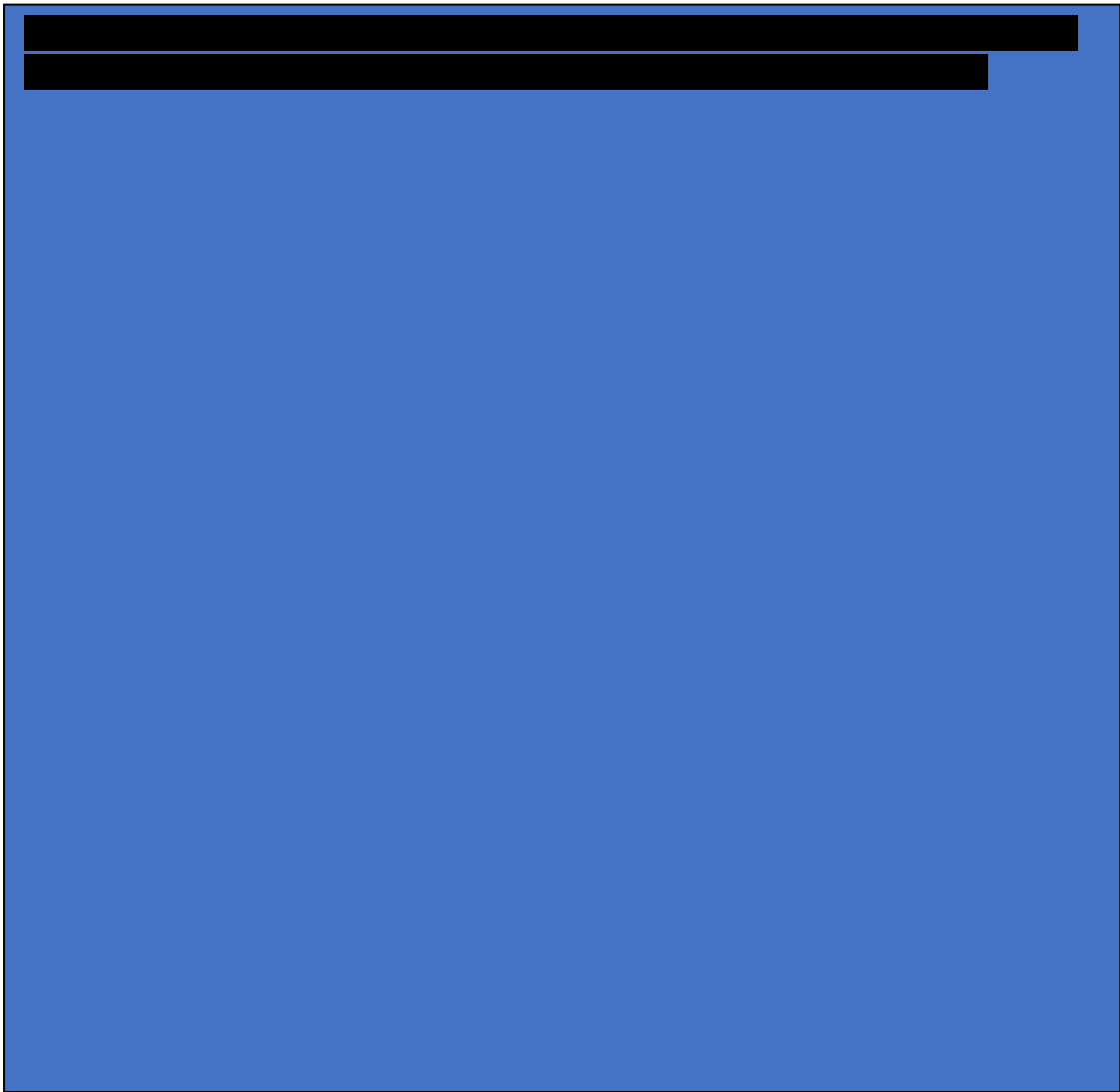
# HOUSING PROJECT MEETING

*Information and feedback session*

**JOIN US**

 **THURSDAY, 7 DECEMBER 2023**  
3:00PM-5:00 PM

 **NRPB OFFICE**  
57 WALTER J. NISBETH ROAD, PHILIPSBURG





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From: Info NRPB SXM <info@nrpbsxm.org>  
Sent: Thursday, November 30, 2023 3:26 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: NRPB - Housing Project Consultation Session Invitation  
Attachments: Housing Project In House Consultation Session.png

Good day Sir/Madam,  
Trusting you are well.

We are pleased to invite you to an upcoming event focused on the Housing Project where we will provide valuable information and seek your input to enhance our efforts in this critical area.

We believe that collaborative efforts and input from stakeholders like you are essential.

Event Details: See attached flyer.

During the session, you can expect the following:

- Presentation on Current Housing Project: Presented by the NRPB Project team.
- Feedback and Q&A Session: We value your insights and questions. Your feedback will help us refine our strategies and initiatives further.

Please RSVP via the calendar invite proceeding this email as your participation is crucial to the success of this event.

If you have any questions or require further information, please do not hesitate to reach out to us at +1 721 542-8886/7 or [info@nrpbsxm.org](mailto:info@nrpbsxm.org).



**What is the Sint Maarten Social and Affordable Housing project?**



- A planned construction of 88 apartments
  - 40 x One-Bedroom
  - 40 x Two-Bedroom
  - 8 x Three Bedroom
- 50% is for Social Housing
- 50% is for Affordable Housing
- Managed by Sint Maarten Housing Development Foundation

## World Bank Pre-conditions for the housing project



- Two conditions to the Grant
- Performance Agreement between VROMI and SMHDF
- Commercial loan by SMHDF

## Budget for Construction of 88 Apartments



- |                            |          |
|----------------------------|----------|
| • World Bank Grant         | USD. 15M |
| • Commercial Loan<br>SMHDF | USD. 2M  |
| • Total                    | USD. 17M |

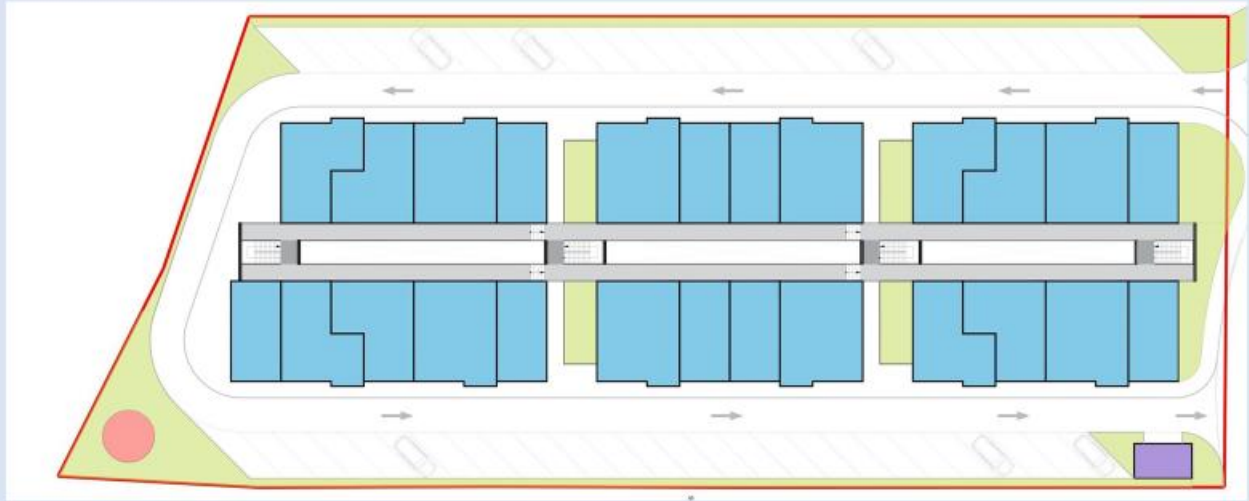
## Where will these 88 new apartments be built in Hope Estate?



## Very initial conceptual design (can still change) of Hope Estate Social and Affordable Housing Project apartments



## Very initial site plan of Hope Estate Social and Affordable Housing Project apartments

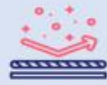


## Planned Timeline for Establishment

**Final design by November  
2024**

**Construction period:  
September 2025- October  
2027 (24 months)**

## How does construction affect the neighborhood?



- **Dust:** Keep surface wetted
- **Noise:** Timely hindrance notice
- **Traffic:**
  - Time traffic flow to/from site
  - Regulate traffic
  - Timely hindrance notice
- **Security:**
  - Limit access to site
  - Control behavior of site workers on and off site

## Environmental and Social control measures

- Minimization of nuisances and hindrances as much as possible through continuous dialogue and consultation with the residents living near the site.
- Project Management will work closely with supervisor and contractors to ensure that they comply with the rules and procedures which were put in place to guide the project.
- People who feel that they have a problem with or have been negatively affected by the construction project can lodge a complaint through the Grievance Redress Mechanism operated by the NRPB.



## The Grievance Redress Mechanism (GRM)

- What is the Grievance Redress Mechanism?

A service provided by the NRPB to enable people to lodge any problem or complaints they have with a project being implemented by the NRPB.

Website:  
<https://nrpbxm.org/complaints-procedure>



## The Grievance Redress Mechanism (GRM)

- How does the NRPB Grievance Redress Mechanism (GRM) work?

Someone who wants to lodge a problem can contact the NRPB in different ways:

- (i) Tel: +1(721) 542-8886/7
- (ii) Email: Complete the Grievance Form available on the website and send the completed form to the email address provided.
- (iii) In person at the office on #57 Walter A. Nisbeth Road, Philipsburg
- (iv) Social Media messages – Facebook and LinkedIn

The complaint will be investigated and processed, and an attempt will be made to resolve it in a manner that satisfies all parties involved.



**Are there any questions, comments  
or suggestions?**

### Annex 3: Feedback and Photographs from Consultations Held During Project Preparation Phase

#### Consultation 1

**Date:** 20<sup>th</sup> November 2023

**Objective:** Inform residents of the community about the objectives, components and activities of the project, emphasizing the direct impact on the population during and after the interventions.

**Participants:** 10 and NRPB staff

SMHDF
[Redacted], General Director Customer service [Redacted] Consultant
Residents of Existing Social Housing Unit (Hope Estate)
<b>From the Assisted Living Foundation:</b> [Redacted]
<b>Senior Citizens</b> [Redacted]
<b>White and Yellow Cross Foundation</b>
[Redacted], Staff
NRPB
[Redacted] – Director of NRPB [Redacted] - Project Manager [Redacted] – Program Manager [Redacted] – Head of E&S Department [Redacted] – Coordinating Environmental Specialist [Redacted] – Social Specialist [Redacted] – Head of Communications Department

#### Development of the session

The audience for the stakeholder consultation meeting consisted of senior citizens and clients of the White/Yellow Cross Assisted Living Foundation from nearby SMHDF managed social housing residences. The Assisted Living foundation sends staff to the residences of the assisted living clients who themselves reside in the SMHDF managed social housing on the plot next to the intended construction site. Because the intellectual capacity of these residents is below average the White and Yellow Cross Assisted Living Foundation monitor their clients just in case they need help with anything. Mostly these residents take care of their own daily tasks.

The particular special needs are related to reduced cognitive ability and the presentation of the project was therefore tailored to their needs. Firstly, a White and Yellow Cross Foundation staff member escorted the respective clients who were invited to the consultation. The information load during the consultation was short and to the point, delivered in simple language in a personable and interactive

manner. The slides were also very visually informative. The presenters used techniques which focused on building rapport with the participants so that they felt comfortable sharing their perspective.

The Head of the Communications Department started the consultation by welcoming the audience and explaining the purpose/objective of the activity. The Project Manager was introduced and went on to conduct an interactive and simplified presentation on the project. Topics included the project location, the types of units which were going to be in the building, preliminary conceptual designs, planned design and construction time frames, pre-conditions for the project and the budget.

The anticipated environmental and social impacts and the mitigation measures were explained by the Head of the Environmental and Social Department.

Questions were answered during the presentation and at a Q&A session at the end. One participant asked whether repairs to the current housing units were included in the project. The Project Manager explained that this is a new project and the existing units were not a part of the project. Another member of the audience requested information on a drain located at the edge of the community which flooded frequently. The E&S Head expressed gratitude for the question since the Project team was previously unaware of this occurrence. He promised to further investigate to determine the possible impact on the project design. There was a question requesting an indication of where the current residents resided relative to the site of the new project. The PowerPoint slide with the site plan was used to indicate the locations of the existing social housing units and the proposed project site. There were no other questions, except for a request for photos of the conceptual designs.

### **Conclusion**

The meeting was concluded with a note of thanks from the Chairperson and an indication of the plan to hold future consultations.

It is clear to the project manager that this group of highly vulnerable people living next door to the construction site will have to continue to be consulted, as the potential of the project to negatively impact their daily life, because of the nature of their vulnerability, is substantial. Future consultations will be conducted with other local stakeholders, including the management and PTA of the school and owners of a few private residences near the construction site.

## Consultation 2:

Date: 7<sup>th</sup> December, 2023

Participants: 8 and NRPB staff

SMHDF	
██████████	– SMHDF Technical Consultant
██████████	, General Director, SMHDF
██████████	– Director SMHDF
VROMI	
██████████	– VROMI Housing Working Group Member
██████████	– VROMI Housing Working Group Member
██████████	– VROMI Housing Working Group Member
UTILITY COMPANIES	
██████████	– GEBE Finance (Also SMHDF Board member)
██████████	- GEBE NV

### Development of the Session

The meeting was held with stakeholders attending both online and in person at the office of the NRPB.

The Project Manager (PM) began the presentation by explaining the purpose of the consultation to the stakeholders. This was explained as an opportunity to solicit feedback from stakeholders and to encourage continuous dialogue with stakeholders to minimize the inconveniences of the project. He also promised that similar consultations will be held with the other neighbours of the project site.

He then proceeded to give an overview of the project, guided by the Powerpoint presentation prepared for the consultation. (See Annex 1). The social and vulnerable housing project would provide affordable and subsidized housing for the people of Sint Maarten.

The Head of the E&S Department then presented the Environmental and Social Risks and Impacts of the project and the related mitigation measures put in place. This included an explanation of the E&S instruments and the Grievance Redress Mechanism. The Project Manager also disclosed that the purpose of the GRM was to find out early what are people's concerns about the project and what can be done, before there is escalation to a grievance. Changes need to be kept in mind and explained to people so that they have a better understanding and also to make adaptations where necessary.

Business card sized cards featuring information on reaching the NRPB's GRM "GRM Cards" were distributed to the stakeholders at the end of the presentation, with an explanation of their purpose. Stakeholders were encouraged to utilize the contact information and links on the cards to submit any concerns they have about this and any other project being implemented by the NRPB. (Annex 4).

### Questions, Comments, Suggestions

- Q: Will there be adequate parking at the facility?
- A: Government provided additional land for parking adjacent to the site. (PM indicated the location of the parking lot on the site map)
- Q: How successful are the GRMs on the current projects, under implementation (eg Airport, Hospital)?
- Q: Are contractors able to comply with the requirements?

A: Yes, they have their SEPs and C-ESMPs; NRPB has a monitoring role and meet with the PIUs when required

- Very good at stakeholder engagement, involvement of residents, businesses, hotels etc during project implementation
- Stakeholder consultations have been held
- GRM seems to be very well used and operational

PM: NRPB also contracts supervisors for each project, who monitor the implementation of the SEP and the other requirements of the instruments: GRM, OHS etc

Q: Have there been objections to any of the projects being implemented by the NRPB?

A: Most of the existing and past projects have been reconstructions. There haven't been any new constructions. We do not expect complaints regarding the new structure, but we monitor as we go along.

Q: What is meant by induced disagreements?

A: Disagreements brought on by the existing private homes, school, businesses due to perceived negative impacts caused by the project – some of the green space will be taken away, additional traffic and people in the area, change of view from existing residents. To mitigate this, people in the area are engaged early in the process to hear their concerns and include measures in designs and implementation.

**Comment from a stakeholder:**

We need the housing, so no one is going to object to the project.

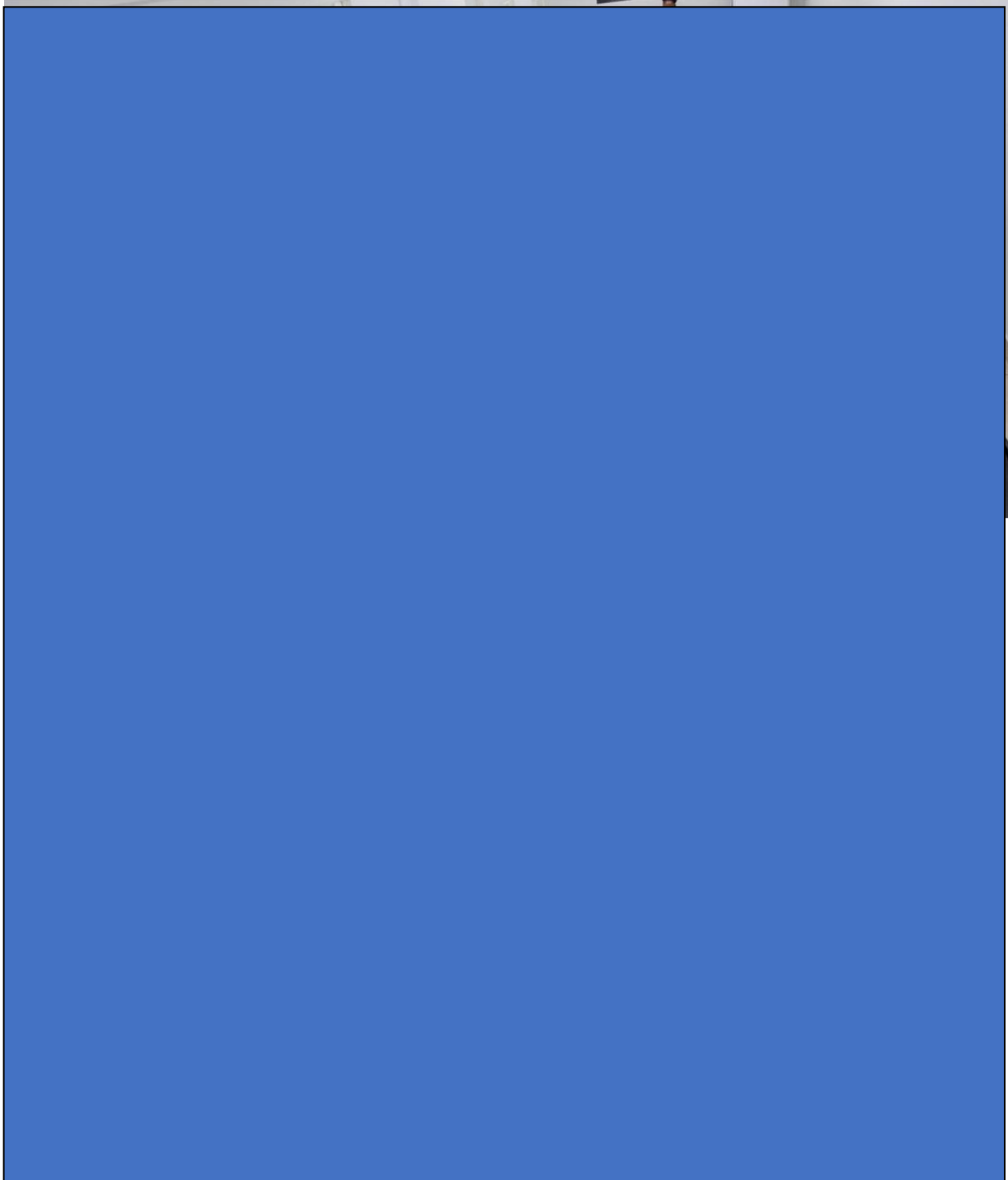
**Adjournment:** 3:54pm

**Photographs**

Consultation 1 – November 20<sup>th</sup>, 2023



**Consultation #2 (December 7<sup>th</sup>, 2023)**





**Do you have a  
complaint?**

Submit an online  
complaint form, send  
an email, give us a call,  
or pass by our office.

**We want to hear  
from you!**



Annex 5: Newspaper Publication on the Sint Maarten Housing Project



12 THE DAILY HERALD, Friday/Saturday, December 1 - December 2, 2023

## SINT MAARTEN HOUSING PROJECT

**Project Description**  
Housing is a fundamental human need. Supply of social and affordable housing has not managed to keep pace with the growing demand and there is high demand for social housing. This project aims to add between 88 and 100 new apartments to the SMHDF managed social and affordable rental units portfolio and is proposed to be situated in Hope Estate.

**Your Voice Matters!**  
We need your feedback to help us ensure that all concerns are considered, and affected parties are informed of the project and express their thoughts and perspectives.

**We Need Your Feedback!**  
The National Recovery Program Bureau would like to have your opinion on our draft Environment & Social Management Plan and Stakeholder Engagement Plan.

**How Can You Give Feedback?**  
You can read the draft documents on our website or by scanning the QR Code. Let us know what you think by sending an email to [info@nrpbxsm.org](mailto:info@nrpbxsm.org).

**Scan the QR Code to provide feedback.**

**Contact Us:**  
+1(721)542-8886/7  
[www.nrpbxsm.org/housingproject](http://www.nrpbxsm.org/housingproject)  
[info@nrpbxsm.org](mailto:info@nrpbxsm.org)

**NRPB**  
NATIONAL RECOVERY PROGRAM BUREAU

THE DAILY HERALD, Friday/Saturday, December 1 - December 2, 2023

**AGENDA**

**ST. EUSTATIUS**

Police Station 182333  
Emergency 111  
Hot Line 108  
Fire Department 120  
Hospital 182211/182371  
Landrederies 182210  
Post Office 182207  
St. Eustatius Historical Foundation Museum 182288  
Winebar Office 182362  
Lions Club meets every 1st and 3rd Wednesday at the "Dier" next to the Airport  
Diving Prevention Foundation meets every Tuesday 5:30pm at the Golden Eye Hotel  
Coastguard NARBA 113  
St. Eustatius National park: Galibaux Bay: 318 2884

**SABA**

Police Station  
The Bottom, tel. 4163237  
Emergency 111/112  
Hospital  
The Bottom, tel. 4163288-4163289  
Fire Department Aankwet

**Busy beavers are undermining infrastructure, RTL Nieuws says**

AMSTERDAM - Calls to cull beavers are getting stronger because the growing number of them is causing millions of euros in damage to dykes, railways and other infrastructure, television news programme RTL Nieuws has found.

Repairs to dykes and other water defences cost more than two million euros last year, while Dutch track manager ProRail said it clocked "from one million to 10 million euros" in damage to rail infrastructure every year.

The Eurasian beaver (Castor fiber) was reintroduced in the Netherlands in 1988. Since then, the number of "nature's engineers" has increased to more than 5,000 across much

promote biodiversity, supporters say.

However, Dutch water boards say the beaver population's steady growth is worrying. The bill to get expert help to move or chase away the beavers has amounted to more than five million euros over the last four years.

Despite their protected status, beavers are already being culled in the province of Limburg. The Hunze and Aa's water board, which manages water defences in Groningen and Drenthe, said it may have to follow suit.

"It is increasingly difficult to move beavers to sites where they can do no harm. The time is getting near

Islands



**Wedervoort appointed new manager of PCN**

ST. EUSTATIUS/SABA—Dudley Wedervoort has been appointed as the new manager of Pension Fund Caribbean Netherlands PCN, effective today, December 1. PCN formerly outsourced its administration to external executors. The organisation has been self-administering