DRAFT

INDIGENOUS PEOPLES PLANNING FRAMEWORK (IPPF)

Caribbean Digital Transformation Program (P171528)

COMMONWEALTH OF DOMINICA

MARCH 26, 2020
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1 INTRODUCTION

The Caribbean Digital Transformation Program will be implemented across four countries within the Organization of Eastern Caribbean Countries (OECS) namely Dominica, Grenada, Saint Lucia and Saint Vincent and the Grenadines. The project aims to strengthen the digital connectivity and digital public services in these countries.

1.1 Project Description

The Project’s Development Objective is to increase access to digital services, technologies and skills by governments, businesses and individuals in the participating Eastern Caribbean countries. The Project comprises three components that address key bottlenecks and harness opportunities to develop the Eastern Caribbean Digital Economy as a driver of growth, job creation and improved service delivery. It follows a comprehensive, ecosystem-based approach, bringing together multiple arms of government and multiple economic and social sectors to build the core digital economy foundations simultaneously. It is intended to build on the progress made by countries in improving government connectivity through the Caribbean Regional Communications Infrastructure Program (CARCIP). The project will be implemented across four Eastern Caribbean countries - The Commonwealth of Dominica, Grenada, Saint Lucia and Saint Vincent and the Grenadines (SVG).

The project consists of four components which are described below:

Component 1: Digital Enabling Environment

This component will support the development of a positive enabling environment for the region’s digital economy that drives competition, investment and innovation while promoting trust and security of online transactions. Specific activities in this component could include the following:

- **Subcomponent 1.1: Telecommunications: Legal and Regulatory Environment, Institutions and Capacity** - This sub-component aims to support greater telecoms sector competition, investment, affordability and service quality across the region as well as enhancing resilience and emergency response capabilities for critical digital infrastructure and services.
- **Subcomponent 1.2: Digital Financial Services (DFS): Legal and Regulatory Environment, Institutions and Capacity** - This sub-component aims to spur greater innovation, investment and adoption of digital financial services across the region.
- **Subcomponent 1.3: Cybersecurity, Data Protection and Privacy: Legal and Regulatory Environment, Institutions and Capacity** - This sub-component aims to build trust in online transactions and strengthen the security of sensitive data and critical network infrastructure.
Component 2: Digital Government Infrastructure, Platforms and Services

This component will support public sector modernization, resilience and delivery of digital public services to individuals and businesses. Digitization of government services and operations is expected to help drive a wider digital transformation across the region. Specific activities could include:

- **Subcomponent 2.1: Cross-Cutting Enablers of Digital Government Operations and Services** - This subcomponent will support the development of key enablers of digital government services and operations, in line with regionally harmonized standards and frameworks. These include protocols and standards for digital government, a payment platform, digital identification and authentication infrastructure.

- **Subcomponent 2.2: Government Productivity Platforms and Citizen-Centric Digital Services** - This sub-component supports development of priority government productivity platforms and citizen-centric digital public services.

Component 3: Digital Skills and Technology Adoption

This component aims to better equip individuals and businesses across the region for the jobs and economy of the future and to spur innovation in traditional sectors of the economies. Specific activities in this component could include:

- **Subcomponent 3.1: Workforce-ready digital skills** - This sub-component aims to identify the digital skills (technical and soft skills) in demand regionally and globally and to create a clear pathway of support from training to job placement in digitally enabled professions.

- **Subcomponent 3.2: Technology Adoption** - This sub-component seeks to increase adoption of digital platforms and technologies by businesses across the region and support creation and expansion of digitally enabled businesses.

Component 4: Project Implementation Support

This component will support national and regional level Project Implementation Units (PIUs) with management and implementation of the project and associated activities. The project can support capacity building initiatives, as well as PIU staffing through hiring of expert consultants for key areas such as project management, technical advisory and implementation support, procurement, financial management, environment and social safeguards, monitoring and evaluation and strategic communications. It will also support capacity development of participating regional institutions and regional knowledge sharing events and forums.

Table 1 and 2 highlights the positive impacts and potential negative impacts of the project’s activities.
<table>
<thead>
<tr>
<th>Project Components</th>
<th>Project Benefits</th>
</tr>
</thead>
</table>
| Component 1: Digital Enabling Environment     | • Regulatory reforms will unlock private sector investment and growth beyond the life of the project  
• Capacity built among regional regulators and specialized technical institutions will be retained after the project  
• “Virtual” regional CERT will significantly reduce ongoing operations costs |
| Component 2: Digital Government Infrastructure, Platforms, and Services | • The whole of government shared infrastructure, platforms and services approach will allow for significant savings versus each ministry, department of agency maintaining their current IT infrastructure, though continual funding will be needed for operations, maintenance, and upgrading.  
• Digital services offerings include a number of revenue/fee-generating services, the partial proceeds of which can be used for IT needs.  
• Linkage of government payments and services to a unique digital ID number will reduce leakage and lower administrative costs for social insurance schemes, agriculture subsidies and other social welfare programs.  
• Efforts will be taken to ensure a more gradual transition of recurring costs to the general government budgets, including a glidepath for financing of technical experts within central IT bodies (the proportion of salaries paid from project resources will decline over time with the remainder paid though central government budget). |
| Component 3: Digital Skills and Technology Adoption | • Use of private sector service providers and where possible  
• Design platforms to crowd-in additional sources of public funding (including donor funding) |
| Component 4: Project Implementation Support   | • Use of institutionalized governance arrangements for continued implementation beyond the project closing date.  
• The change management and on-the-ground technical advisory and capacity building features built into project design are intended to generate widespread buy-in and capacity of the core IT department staff. |
### Table 2: Potential Negative Impacts and Mitigation Measures

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Mitigation Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labor, Worker Health and Safety</td>
<td>• Workers and contractors will be engaged in accordance with the labour laws of Dominica and gender considerations.</td>
</tr>
<tr>
<td></td>
<td>• best management practices to ensure worker safety and acceptable working conditions. Labor Management Procedures (LMP) has been prepared and will be implemented by the PIU throughout project implementation.</td>
</tr>
<tr>
<td>Waste Management</td>
<td>• Promote proper waste management practices</td>
</tr>
<tr>
<td></td>
<td>• Implement Environmental and Social Management Plan (ESMP) and E-Waste Management Plan (EWMP) that has been prepared.</td>
</tr>
<tr>
<td></td>
<td>• Consult Dominica Solid Waste Management Corporation (DSMC) for guidance on the disposal of e-waste and hazardous materials/substances.</td>
</tr>
<tr>
<td>Water Resource Management and Energy Efficiency</td>
<td>• Equipment selected will promote energy efficiency. Negligible change in emissions from the project, GHG</td>
</tr>
<tr>
<td></td>
<td>• No impact on water conservation</td>
</tr>
<tr>
<td>Noise Emission</td>
<td>• Standard measures will be employed to reduce impacts of noise (barriers or personal protection equipment.</td>
</tr>
<tr>
<td>Increased Traffic and Community Safety</td>
<td>• Movement of equipment and transportation of materials will be managed to avoid traffic delays in the vicinity of the project sites.</td>
</tr>
<tr>
<td></td>
<td>• Proposed project activities at the designated sites will be restricted areas and fenced.</td>
</tr>
<tr>
<td>Land Acquisition and Resettlement</td>
<td>• Project activities will not cause displacement or relocation of individuals or households as all works will be on government lands.</td>
</tr>
<tr>
<td>Loss of Natural Habitat and Biodiversity</td>
<td>• No loss of natural habitat as deployment of fiber optics and existing training facilities are on lands without essential ecosystem value.</td>
</tr>
<tr>
<td>Loss of or Damage to Archaeological and Cultural</td>
<td>• The relevant authorities will be contacted for historical or cultural artefacts “chance find”</td>
</tr>
<tr>
<td>Resources</td>
<td></td>
</tr>
</tbody>
</table>

1.2 Kalinago Territory: Indigenous People
The project will be implemented across the length and breadth of Dominica, including the Kalinago Territory. The Kalinago indigenous people will be present in the project area. This community meets the four criteria to be considered indigenous, as stated in the previous world bank project (P159653 - Caribbean Regional Oceanscape Project.) The Kalinago, formerly known as the Carib Indians, live on a 3,700-acre Territory on Dominica’s east coast. The Territory is divided into 8 Hamlets. Most of the settlements are concentrated along the coastal boundaries. It is also reported that this community (along with Roseau Central) has the highest number of institutions and organizations providing services, resources, and support to its residents. This implies that the community has a high reliance on social services. Members of the Kalinago Council believe that there is the need to “empower people and then they can help themselves” (Consultation July 2018).

Residents of the Territory find employment throughout the Island as there are limited employment opportunities within the Territory. The main types of employment within the Kalinago Territory are: Craft Production; Agriculture (banana cultivation and subsistence farming); Fishing; Boat Making; Government (schools, medical Centre, road clearing)

1.3 Indigenous Peoples Planning Framework (IPPF)

The Indigenous Peoples Planning Framework (IPPF) has been prepared during the preparation phase, with the main goal to properly and effectively manage the possible social and economic impacts of the project activities on Dominica’s indigenous community, Kalinago Territory. This is a live document and will be updated throughout project implementation and consultation with the Kalinago people.

Another goal of the IPPF is also to outline a culturally appropriate strategy for collaboration and engagement with the indigenous community of Kalinago. The revised IPPF will present details and updates on project activities to be implemented. Additionally, it will present the challenges likely to be experienced in implementation and suggest the way forward.
2 POLICY, LEGAL, AND ADMINISTRATIVE FRAMEWORK

2.1 Local Policy, Laws and Regulations

The Carib Reserve Act of 1978, amended by an act of parliament in 2015, provides for the establishment of a body corporate for the administration of the Reserve and for matters connected herewith.1 The amendment changed the name Carib to Kalinago, and since then any reference to the indigenous people of Dominica makes use of the name Kalinago.

The Act gives the Kalinago Council2 the authority and responsibility for the management of the Kalinago Territory and variously describes the establishment of the office of the Kalinago Chief, the Constitution, and powers of the Kalinago Council. Specifically, it gives various powers to the Kalinago Chief and the Kalinago Council and outlines responsibilities of the Minister responsible for the Council. Furthermore, it outlines the means of conducting elections for Council Members and the Chief. It also indicates how funds are to be used on behalf of the Territory. The Act gives the Kalinago Council powers to institute various bylaws pertinent to the management of the community.

The Council is further organized into Hamlet Development Committees, governed by a constitution prepared by the Council. There are eight (8) hamlets in the Territory, but seven (7) hamlet development committees since two (2) hamlets were combined. The committees serve as branches to the Kalinago Council which lends to the effective management of the Territory.

The Department of Kalinago Affairs was established in the year 2000 to address the needs of the local Kalinago people in the Kalinago Territory and by extension, Dominica. It was headed by a Parliamentary Secretary. In 2005, the Department was changed to the Ministry of Carib Affairs. Following the amendment of 2015, the ministry has been named the Ministry of Kalinago Affairs. The mission of the Ministry is to work towards the improvement of the socio-economic condition, the preservation and promotion of the cultural heritage of the people of the Kalinago Territory and Atkinson, and to facilitate the vigorous promotion of the integration of Dominica's Indigenous People into the socio-economic life of the wider Dominican society.

The Ministry's strategic objectives include:

1. To formulate and implement community development projects.
2. To facilitate community participation in the decision-making process re the development of the communities.
3. To work towards the improvement of access to finance and credit for the Kalinago people.
4. To increase the awareness of the traditional and cultural heritage of the Kalinago people.

2 The indigenous people of Dominica are now referred to as Kalinago, following an Act of Parliament in 2015 (See page 5 of this document)
5. To collaborate with other Ministries, departments and organisations for the implementation of development programmes/projects in the two (2) communities (Atkinson and Kalinago Territory).

6. To undertake activities aimed at the socio-economic independence of the Kalinago people.³

The village of Atkinson does not form part of the Kalinago Territory. However, it forms part of the political constituency, hence the reason for its inclusion under the Ministry of Kalinago Affairs of which the Minister of Kalinago Affairs is also the Parliamentary Representative for the Constituency.

In September 2007, the Government of the Commonwealth of Dominica ratified ILO 169, the Indigenous and Tribal Peoples Convention⁴ – and signed the UN Declaration on the Rights of Indigenous Peoples.⁵

2.2 Kalinago Territory Local Area Plan

The Kalinago Territory Local Area Plan was commissioned in 2010, under the Carib Community Capacity Building Project (CCCBP) of the Ministry of Kalinago Affairs. The final report was presented in 2012.⁶ The aim was to formulate a plan “to guide development in the Kalinago Territory (CT) to facilitate the optimal use of the land and related resources currently available for development in the Territory”. The information presented in this document is useful since it provides relevant information on the social, economic, cultural status and existing land use patterns in the Kalinago Territory.

2.3 Regional Setting and Location

The Kalinago Territory is located in the Parish of St David on Dominica’s East or windward coast. It is comprised of 3,782.03 acres of land stretching over 9 miles, covering about 2.0 percent of Dominica’s landmass (Figure 1).

³ http://caribaffairs.gov.dm/index.php/aboutus
⁵ The Declaration establishes a universal framework of minimum standards for the survival, dignity, well-being and rights of the world’s indigenous peoples. The Declaration addresses both individual and collective rights; cultural rights and identity; rights to education, health, employment, language, and others. It outlaws discrimination against indigenous peoples and promotes their full and effective participation in all matters that concern them. It also ensures their right to remain distinct and to pursue their own priorities in economic, social and cultural development. The Declaration explicitly encourages harmonious and cooperative relations between States and indigenous peoples. (UN Human Rights, Office of the High Commissioner for Human Rights)

⁶ Kalinago Territory Local Area Plan (2012)
Figure 1: Location of Kalinago Territory

The Territory is divided into eight (8) hamlets, namely:

- Sineku
- Gaulette River
- Mahaut River,
- St. Cyr,
- Salybia,
- Crayfish River,
- Battaca
- Touna Concorde

Established borders or boundaries are as follows (Figure 2):

**North:** By Big River, Lot 63 and Balata Ravine
**East:** By the Sea (Atlantic Ocean)
**South:** Lot 4 in the Majini State Lands Settlement, Aratouri Rinine, Majini River and
2.4 Demographic Information

As per the 2011 Preliminary Census, the population of the Kalinago Territory recorded 2,145 – 1,212 (56.5%) males and 933 (43.5%) females. Given the land area of 3,700 acres, the Territory, when compared to size and population of other parishes of Dominica, has the highest population density. As a result, there is a high degree of land degradation due to the clearing of lands for settlements, agriculture and social infrastructure (trails, roads, schools, etc.)

The most recent Country Poverty Assessment Survey (Caribbean Development Bank, 2008) reports that one out of every 2 persons in the Territory is poor. The Kalinago Territory was the last community in Dominica to be connected to the electricity grid, which began to be installed in 1986. It is also reported that this community (along with Roseau Central) has the highest
number of institutions and organizations providing services, resources, and support to its residents. This implies that the community has a high reliance on social services. Members of the Kalinago Council believe that there is the need to “empower people and then they can help themselves” (Consultation July 2018).

2.5 Political & Cultural Characteristics

As mandated in the Carib Reserve Act of 1978 (amended in 2015), the lands in the Territory is the property of the Kalinago Council and no individual can own land and/or be titled to land in his or her name. The Council is solely responsible for allocating land for all purposes including housing, public conveniences, government projects and community projects. The Council is comprised of seven (7) persons – the person elected as Chief and six (6) other persons elected as members. The Chief is the Chairman of the Council hence is responsible for convening meetings.

In terms of other rights and privileges, the Indigenous Peoples are entitled to all rights like all Dominicans including voting, passports, political participation etc. The Kalinago culture has evolved due to development activities undertaken on the national level. Their traditional arts and crafts produce baskets, mats, hats, jewelry and hammocks made from dried palms and reeds. This continues to be one of the main revenues earning mechanisms in the Territory.

2.6 Socio-economic Characteristics

The 2009 Country Poverty Assessment stated; “in respect of ethnic origin, indigenous persons were more likely than any other group in the population to be poor; 49.8 percent or one in two persons of indigenous origin are poor. This is a significant finding as the indigenous population represents about 5 percent of the total population of Dominica (approximately 3300 persons). However, there has been a reduction in measured poverty among the group, given that in 2003, some 70 percent was poor and half were indigent.”

The issue of land ownership or lack thereof, (the Kalinago Council has ownership of lands in the Territory) poses serious concerns for individual socio-economic advancement.

This significantly limits their access to credit at local banks since they do not possess required collateral i.e. Certificate of Titles as per the laws governing the Territory. Whereas it is necessary to ensure the lands allocated to the Territory remains unchanged, it prohibits individual economic advancement based on requirements from the banking community.

As a means for further interventions to improve the lives of the Indigenous People, the Government of the Commonwealth of Dominica through loan assistance from the Caribbean Development Bank constructed the Kalinago Barana Aute (KBA) Village. The Village offers tours including cultural dances and site visits. In the shops, local creations are centered on larouma, calabash, pottery and coconut products, from which wood carvings, baskets and other artistic...

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7 Dominica Country Poverty Assessment, Main Report, 2009
creations are created. The Indigenous people are also employed outside of the territory in various fields, similar to that of the rest of the population of the country.

Unemployment in the Kalinago Territory is estimated to be high, particularly among the youth. Decline in the agricultural sector coupled with delayed realization of strong and sustained growth in the tourism sector nationally continue to negatively impact employment in the Kalinago Territory. The development strategy for the sustainable use of land and other resources in the Kalinago Territory should thus facilitate opportunities for job creation.

Sixty-nine percent (69%) of homes in the Territory suffered damage during the hurricane. The Ministry of Kalinago Affairs has designed two Financial Interventions funded by the Government to provide temporary, short-term, financial assistance to the Kalinago people affected by Hurricane Maria. The specific focus of the intervention is on the rehabilitation of homes and support for people in the Kalinago craft industry.

The home rehabilitation aspect, $821,555.22 to be administered by WAIKADA, takes into consideration finance for the procurement of building materials, and the costs associated with local labour for successful completion projects.

The support for the craft industry will take the form of a monthly allowance of $500 for five months to beneficiaries who have lost livelihoods due to the loss of products, the unavailability of raw material along with the severe impact on the Tourism Sector.

This initiative is in tandem with the vision of the Ministry to improve the quality of life and opportunities for the Kalinago people by contributing to a relationship of mutual understanding, trust and respect between the Government and people of Dominica and the Kalinagos.

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9 Carib Territory Local Area Plan, January 2012
3 STAKEHOLDER ENGAGEMENT PLAN

At this stage, the identified stakeholders are preliminary and will be refined during project preparation and implementation. The project will adopt a multi-stakeholder engagement process which will be done through two approaches: information disclosure and public consultation throughout the project’s life cycle (design, implementation and closure).

A detailed breakdown of the stakeholders (Other interested parties, Disadvantaged or vulnerable groups, or classify by: type of leadership, youth, elders, women, organized youth and women, disabled, etc.) at the community level will be determined by the PIU during the development of the Indigenous People Policy (IPP) prior to the implementation of project activities.

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Key characteristics (How many, level of poverty or disadvantaged situation)</th>
<th>Prefer Notification Means (Radio, Physical invitations, etc., email, phone)</th>
<th>Specific Need (large print, daytime meeting etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kalinago</td>
<td>2,145 population 1,212 Males 933 Females 1 out 2 persons is poor</td>
<td>Radio and TV Community Meeting Social Media (those with access)</td>
<td>English (Language) Large print Non-technical language Uses of pictures and diagrams Day and late afternoon meetings</td>
</tr>
</tbody>
</table>

3.1 Proposed Strategy for Information Disclosure

Information will be disclosed to stakeholder groups in various formats (e.g. newspapers, posters, radio, television, government information centers, brochures, leaflets, posters, nontechnical project summary documents and reports, community meetings, project website, social media, etc.) to ensure maximum coverage and awareness of the project. The Grievance Redress Mechanism (GRM) will also be promoted and disseminated throughout the life of the project, example in meetings, public assembles etc.

3.2 Proposed Strategy for Consultation

The project will consult the Kalinago People and utilise the following approaches:

- Interviews with stakeholders and relevant organization
- Surveys, polls, and questionnaires
- Public meetings, workshops, and/or focus groups on specific topic
- Participatory methods
- Other traditional mechanisms for consultation and decision making.
Vulnerable or disadvantaged Kalinago people will be identified throughout the consultation process and where necessary measures will be used to remove obstacles to participation. This may include separate mechanisms for disseminating information, consultation and grievances to ensure participation and allow access to project benefits.

The Grievance Redress Mechanism (GRM) will also be promoted and disseminated throughout the life of the project, example in meetings, public assembles etc.

Table 3: Summary of Consultative Process: Stakeholder Engagement Plan

<table>
<thead>
<tr>
<th>Project Stage</th>
<th>Area of Influence/Interest</th>
<th>Engagement Approach</th>
<th>Timetable: Locations/ Dates</th>
<th>Stakeholders</th>
<th>Stakeholder Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design</td>
<td>Project Objective, activities, ESIA, ESMP, IPPF, RAF, LMP, SEP</td>
<td>Discussion with community leaders, Public meeting, Brochure, Flyer</td>
<td>Prior to commencement of project activities at Community Centre</td>
<td>Kalinago Community, general public, government ministries and agencies</td>
<td>Project Manager Environmental Safeguards Social Safeguards Communication Specialist</td>
</tr>
<tr>
<td>Civil works, Retrofitting and Rehabilitation</td>
<td>ESMP, LMP, IPPF, SEP</td>
<td>Public Meeting(s), nontechnical reports made available to the public</td>
<td>Prior to commencement of project civil works, retrofitting and rehabilitation activities</td>
<td>Kalinago Community, general public, Neighbouring communities</td>
<td>Environmental Safeguards Social Safeguards Communication Specialist</td>
</tr>
<tr>
<td>Commissioning</td>
<td>Project activities completed and benefits</td>
<td>Public Meeting(s), Radio news, Brochure, Flyer, Press releases, social media posts, government website updates</td>
<td>On completion of project activities</td>
<td>Kalinago Community, general public, Neighbouring communities</td>
<td>Project Manager Communication Specialist</td>
</tr>
</tbody>
</table>

3.3 Consultation with the Kalinago Community
In adhering to the Carib Reserve Act which gives sole management of the Territory to the Kalinago Council, the Project Steering Committee must consult with the Kalinago Council at every point during implementation. To facilitate the process, a member from the Council should be represented on the Project Steering Committee. Additionally, three (3) days prior notice must be issued to the Kalinago Council in order to participate in meetings and site visits throughout the Project Cycle. The prior notice should be addressed to the Kalinago Chief, preferably in written form (either post or email) during the course of the project.

3.4 Budget for Consultation

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost (US$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dominica PIU Trips (12 trips @USD583.33)</td>
<td>7,000.00</td>
</tr>
<tr>
<td>Consultation processes (10 activities @USD500)</td>
<td>50,000.00</td>
</tr>
<tr>
<td>Information Production and Dissemination (10 Presentation materials (flyer, brochures, maps, etc.) @USD500)</td>
<td>5,000.00</td>
</tr>
<tr>
<td></td>
<td><strong>62,000.00</strong></td>
</tr>
</tbody>
</table>

Following the public consultations, budgets will be reviewed throughout project implementation to ensure that costs are more realistic in terms of meeting the socioeconomic goals of the project.

3.5 Institutional Arrangement for Screening Project Supported Activities

As appropriate, sub-project specific Indigenous Peoples Plan (IPP) setting out the measures or actions proposed to minimize, avoid or manage risks (or enhance benefits) – will be developed as needed. In such case, the IP may include the following elements, as needed:

1. A summary of the Targeted Social Assessment, including the applicable legal and institutional framework and baseline data. The Targeted Social Assessment Summary will be conducted by the Dominica PIU Social Safeguards Specialist or consultant.
2. A summary of the results of the meaningful consultation tailored to IP, and if the project involves the three circumstances specified in paragraph 24 of ESS7, then the outcome of the process of FPIC carried out with the affected IP during project preparation.
3. A framework for meaningful consultation tailored to IP during project implementation.
4. Measures for ensuring IP receive social and economic benefits that are culturally appropriate and gender sensitive and steps for implementing them. If necessary, this may call for measures to enhance the capacity of the project implementing agencies.
5. Measures to avoid, minimize, mitigate, or compensate IP for any potential adverse impacts that were identified in the social assessment, and steps for implementing them.
6. The cost estimates, financing plan, schedule, and roles and responsibilities for implementing the IP Plan.
7. Accessible procedures appropriate to the project to address grievances by the affected IP arising from project implementation, as described in paragraph 35 of ESS7 and in ESS10.
8. Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the IP Plan, including ways to consider input from project-affected IP in such mechanisms.

4 GRIEVANCE REDRESS SYSTEM

The project has been classified as a project with a moderate risk in the World Bank risk classification system, the project may have some unintended impacts. In order to ensure the smooth implementation of the Project and timely and effectively addressing of the problems that would be encountered during implementation, including the necessary actions of mitigation and avoidance, a three level Grievance Redress Mechanism (GRM) is planned to address all complaints in the project.

4.1 Objectives of the Grievance Redress Mechanism

The objectives of the Grievance Redress Mechanism are as follows:

1. Ensure that the World Bank Environmental and Social Standards are adhered to in all subprojects and activities;
2. Address any negative environmental and social impacts of all sub-projects and activities;
3. Resolve all grievances emanating from the project activities in a timely manner;
4. Establish relationships of trust between project staff and stakeholders;
5. Create transparency among stakeholders including affected persons through an established communication system;
6. Bolster the relationship trust amongst the project staff and the affected parties.

4.2 Grievance Redressal Process

The key stages involved in the project’s grievance redressal process are summarized in Figure 7.1 and described in the sections that follow.
4.2.1 First Level of Redress

**Receive Grievance**
All complaints are received at the Project Implementation Unit (PIU). The PIU will inform stakeholders of various methods of making complaints, such as in writing, email, telephone or anonymously to the office of the Project Implementation. Point of receipt of complaints:

**The Project Implementation Unit Office (Dominica)**
**Name:** Jermaine Jean-Pierre, Director of ICT Unit  
**Address:** 1st Floor, Government Headquarters, Kennedy Avenue, Roseau, Dominica  
**Telephone:** (767) 266 3524  
**Email:** jeanpierrej@dominica.gov.dm

**Kalinago Territory/Council**
**Mr. Lorenzo Sandford, The Kalinago Chief**  
**Address:** Kalinago Council Office, St Cyr Resource Center  
**Telephone:** (767) 277 2679  
**Email:** micahlorenzo1234@gmail.com
All contact information will be provided by the PIU before project effectiveness or prior to commencement of subprojects (GRM related to subprojects).

**Modes of Receiving Grievances**
Complaints can be made in person, writing, verbally over the phone, by fax, emails or any other media. The person receiving the complaint will try to obtain relevant information regarding the grievance and the complainant and will immediately inform the Project Manager (PM), Environmental Safeguards Specialist (ESS) and/or Social Safeguards Specialist (SSS) – Grievance Information Form (GIF) as given in Annex 1.

**Acknowledge Grievance**
All grievances will be acknowledged by telephone or in writing by the PM, ESS or SSS using the Grievance Acknowledgment Form (Annex 2) within 48 hours of receipt and the complainant informed of the approximate timeline for addressing the complaint, if it can’t be addressed immediately. If the complaint cannot be resolved at this level it is taken to the next level.

**Register/Log Grievance**
After receiving and recording the grievance on the GIF, it will be registered in the Grievance Redressal Registration and Monitoring Sheet (GRRMS) (Annex 3).

**Screen**
The PM review the complaint and assign a grievance owner. The complaint will be forwarded to the ESS or SSS who will be responsible investigating the claim and liaising with both the aggrieved party and project staff in order to come to a mutually acceptable resolution. The grievant owner will be given a specific timeline for resolving the claim. Meetings with grievant/complainant will be held, if necessary, in an attempt to resolve the matter.

**Investigate**
The grievance owner will investigate the complaint. This investigation will include, but is not limited to, meetings with the grievant/complainant, site visits, meetings/interviews with project staff and collection of relevant documentation and other forms of evidence. For meetings, the deliberations and decision will be recorded on the Meeting Record Form included as Annex 4. Community representatives or representatives of the complainant will be allowed to sit in on these meetings.

**Resolution**
The resolution at the first tier should normally be completed within 15 working days of receipt of grievance and notified to the concerned party through the Disclosure Form (Annex 5). If the grievance is not be resolved within this period, it can be referred to the next level of the Grievance Redressal system. However, once it is determined that progress is being made towards a resolution, the grievance will be retained at this first level. The complainant will be informed of this decision and an estimated time for the resolution of the matter will be given either verbally or in writing. If the issue cannot be resolved within 25 working days, it will be transferred to the
next level. Once a resolution has been agreed and accepted, the complainant’s acceptance will be obtained on the Disclosure Form included as Annex 5. If the proposed resolution is not accepted the grievance will be escalated to level 2.

**NB** The complainant may request that the issue be transferred to the next level if he or she does not feel that the grievance is being adequately addressed by the PIU.

### 4.2.2 Second Level of Redress

A Grievance Committee (GRC) will be formed that will consist of the following members (tentatively).

1. A representative from the Line ministry implementing the project.
2. Project manager.
3. Environmental and Social specialist assigned to the project
4. A Representative from the Kalinago Territory - names by their organization.

This committee will be chaired by the Project Manager.

**Terms of Reference for GRC:**

The functions of the GRC are as follows:

i. Provide relief and support to the affected persons;
ii. Prioritize grievances and resolve them at the earliest;
iii. Provide information and advice to Project Manager and Environmental Safeguards Specialist and/or Social Safeguards Specialist on serious cases at the earliest;
iv. Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance;
v. Study the normally occurring grievances and advise the PM as to their scale and scope.

The Project Manager with assistance from Environmental Safeguards Specialist and/or Social Safeguards Specialist will coordinate the convening of the meetings of the GRC. He / She is also responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both the parties. (Complainant and the Project).

The GRC will hold the necessary meetings with the affected party / complainant and the concerned officers and attempt to find a solution acceptable at all levels. GRC will record the minutes of the meeting in the format using the same format detailed in Annex 4. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant’s acceptance will be obtained on the disclosure format as in Annex 5.
If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level / or the complainant can activate the next level. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress is being made to resolve the matter may be retained at this level for a maximum of 60 working days.

4.2.3 Third Level of Redress

If the affected party / complainant does not agree for the resolution at the 2nd level, or there is a time delay of more than 60 working days in solving the issue, the complainant can opt to consider taking it to the local courts or the World Bank Grievance Redress Service (GRS).

4.3 World Bank Grievance Redress Service (GRS)

The Complainant has also the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. World Bank Procedures requires the complainant to express their grievances by writing to World Bank office in Washington DC.

This [GRS complaint form](http://pubdocs.worldbank.org/pubdocs/publicdoc/2015/3/743201426857500569/GRScomplaint-formMarch2015.docx) which can be found at the following URL link: http://pubdocs.worldbank.org/pubdocs/publicdoc/2015/3/743201426857500569/GRScomplaint-formMarch2015.docx may be used. Complaints will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018 NW,
Washington, DC 20433, USA

4.4 Addressing Gender-Based Violence

The GRM will specify an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers will be kept available by the project. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:
● The nature of the complaint (what the complainant says in her/his own words without
direct questioning);
● If, to the best of their knowledge, the perpetrator was associated with the project; and,
● If possible, the age and sex of the survivor.

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

● Refer complainants to the GBV Services Provider; and
● Record the resolution of the complaint

The GRM will also immediately notify both the Implementing Agency and the World Bank of any
GBV complaints WITH THE CONSENT OF THE SURVIVOR.

4.5 Grievance Redress Mechanism Budget

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost (US$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meetings of GRC (100 meetings @USD 1000)</td>
<td>100,000.00</td>
</tr>
<tr>
<td>Information Production and Dissemination (500 collateral materials @USD100)</td>
<td>50,000.00</td>
</tr>
</tbody>
</table>

4.6 Building GRM Awareness

The Environmental Safeguards Specialist and/or Social Safeguards Specialist will brief all the staff
of Project Implementation Unit, relevant government ministries and agencies, consultants and
contractors, Kalinago Council, communities and community leaders on the Grievance Redressal
Mechanism of the Project and explain to them the procedures and formats to be used including
the reporting procedures.

4.7 GRM Monitoring and Reporting

The Environmental Safeguards Specialist and/or Social Safeguards Specialist will prepare the Monthly and
Quarterly Reports on the Grievance Redress issues of the project.
5   INDIGENOUS PEOPLE PLANNING FRAMEWORK MONITORING AND REPORTING

The overall monitoring of the Indigenous Peoples Planning Framework (IPPF) shall be the responsibility of the Project Implementation Unit (PIU). Within the proposed organizational structure, the Environmental/Social Safeguards Specialist shall be specifically responsible to monitor implementation of the IPPF. The Environmental/Social Safeguards Specialist will include at every stage in the project implementation, the Ministry of Kalinago Affairs and the Kalinago Council. Reports on the implementation of the IPPF will be submitted to the Ministry of Kalinago Affairs and the Kalinago Council and when necessary consultations will be held with the community (Kalinago Territory).

5.1  Community Consultations and Monitoring Visits

Regular scheduled and unscheduled monitoring visits will form part of the PIU’s efforts to ensure compliance with World Bank Safeguard policies. The PIU will work closely with the Kalinago Council to ensure that all project related activities do not negatively impact the immediate environment within the Kalinago Territory and affect the livelihoods or health and safety of the Kalinago people.

Where applicable, the PIU will consult the Kalinago Council to obtain the relevant consent and permit for project activities within the Kalinago Territory.

The monitoring exercise will consider input from project affected IP into the monitoring system, and will serve the purpose of enhancing project development deliverables,
## ANNEX 1 - GRIEVANCE INFORMATION FORM

<table>
<thead>
<tr>
<th>Date/Time received</th>
<th>Date: (dd-mm-yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time:</td>
<td>□ am</td>
</tr>
<tr>
<td></td>
<td>□ pm</td>
</tr>
</tbody>
</table>

### Name of Grievant:
- □ You can use my name, but do not use it in public.
- □ You can use my name when talking about this concern in public.
- □ You cannot use my name at all.

### Company (if applicable):
- □ You can use my company name, but do not use it in public.
- □ You can use my company name when talking about this concern in public.
- □ You cannot use my company name at all.

### Contact Information:
- Phone:
- Email address:
- Address:
  (Kindly indicate the preferred method of communication)

### Details of grievance:
- □ One-time incident/complaint
- □ Happened more than once (indicate how many times): __________
- □ Ongoing (a currently existing problem)
<table>
<thead>
<tr>
<th>How would you like to see issue resolved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attachments to the grievance/complaint: (e.g. pictures, reports etc.)</td>
</tr>
<tr>
<td>List here:</td>
</tr>
<tr>
<td>Grievant/Complainant Signature (if applicable)</td>
</tr>
<tr>
<td>Signature- Project personnel (to confirm receipt only)</td>
</tr>
</tbody>
</table>

**For PIU use only:**

| Grievance No: ____________________ |
| Grievance Category: |

- □ Problems during material transport
- □ Smell
- □ Blocked road access
- □ Problem with project staff
- □ Dust
- □ Other (specify): ____________________
- □ Noise

**Grievance Owner/ Department: ________________________________**
ANNEX 2- GRIEVANCE ACKNOWLEDGEMENT FORM (GAF)

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

<table>
<thead>
<tr>
<th>Date of grievance/complaint: (dd/mm/yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Grievant/Complainant:</td>
</tr>
<tr>
<td>Complainant’s Address and Contact Information:</td>
</tr>
<tr>
<td>Summary of Grievance/Complaint: (Who, what, when, where)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of Project Staff Acknowledging Grievance:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Date: (dd/mm/yyyy)</td>
</tr>
</tbody>
</table>
## ANNEX 3- GRIEVANCE REDRESSAL REGISTRATION MONITORING SHEET

<table>
<thead>
<tr>
<th>No.</th>
<th>Name of Grievant/Complainant</th>
<th>Date Received</th>
<th>Grievance Description</th>
<th>Name of Grievant Owner</th>
<th>Requires Further Intervention</th>
<th>Action(s) to be taken by PIU</th>
<th>Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>2.</td>
<td></td>
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<tr>
<td>3.</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Date of the Meeting: ………………………………………… Grievance No: ………………………………

Venue of meeting: ………………………………………………………………………………………………………….

Details of Participants:

<table>
<thead>
<tr>
<th>Complainant</th>
<th>Project/Government/ECCB</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Summary of Grievance: ……………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………

Meeting Notes: ………………………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………

Decisions taken in the meeting / Recommendations of GRC: ………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………

Issue Resolved / Unresolved: …………………………………………………

Signature of Chairperson of the meeting: ………………………………………………………………………………………………

Name of Chairperson: ……………………………………………… Date (DD/MM/YYYY): ……………………………………
# ANNEX 5- DISCLOSURE/RELEASE FORM

## Result of Grievance Redressal

<table>
<thead>
<tr>
<th>Grievance No:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Grievant/Complainant:</td>
<td></td>
</tr>
<tr>
<td>Date of Complaint:</td>
<td></td>
</tr>
<tr>
<td>Summary of Complaint:</td>
<td></td>
</tr>
<tr>
<td>Summary of Resolution:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Resolved at:</th>
<th>□ First Level □ Second Level □ Third Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of grievance resolution (DD/MM/YYYY):</td>
<td></td>
</tr>
</tbody>
</table>

**Signature of Complainant in acceptance of the suggested grievance resolution:**

```
……………………………………………………………………………………
```

**Name:**

```
……………………………………………………………………………………
```

**ID number:**

```
……………………………………………………………………………………
```

**Type of ID:**

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……………………………………………………………………………………
```

**Date (DD/MM/YYYY):**

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……………………………………………………………………………………
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**Signature of Social Development Specialist and Project Coordinator:**

1. Name: 

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……………………………………………………………………………………
```

**Place:**

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……………………………………………………………………………………
```

**Date:(dd –mm – yyyy):**

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……………………………………………………………………………………
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2. Name: 

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……………………………………………………………………………………
```

**Place:**

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……………………………………………………………………………………
```

**Date:(dd –mm – yyyy):**

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……………………………………………………………………………………
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