



GOVERNMENT OF SAINT LUCIA



# Stakeholder Engagement Plan (SEP)

**Windward Islands Sector Transformation for Learning Enhancement (WISTLE) Project  
(P508559)**

March 11, 2026

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## Acronyms and Abbreviations

<b>CAP</b>	Corrective Action Plan
<b>CARICOM</b>	Caribbean Community
<b>CDB</b>	Caribbean Development Bank
<b>CDGC</b>	Child Development and Guidance Centre
<b>CAMDU</b>	Curriculum and Material Development Unit
<b>CARDTP</b>	Caribbean Digital Transformation Project
<b>EdTech</b>	Educational Technology
<b>ESF</b>	Environmental and Social Framework
<b>EMIS</b>	Education Management Information System
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>E&amp;S</b>	Environmental and Social
<b>ESS</b>	Environmental and Social Standard
<b>GBV</b>	Gender Based Violence
<b>GM</b>	Grievance Mechanism
<b>GPE</b>	Global Partnership for Education
<b>GRC</b>	Grievance Redress Committee
<b>GOSL</b>	Government of Saint Lucia
<b>ISRs</b>	Implementation Status and Results Reports
<b>LMP</b>	Labour Management Procedures
<b>MOE</b>	Ministry of Education
<b>NPA</b>	National Principals' Association
<b>NEMO</b>	National Emergency Management Organisation
<b>ODDMP</b>	OECS Data for Decision Making Project
<b>OECS PEARL</b>	OECS Program for Educational Advancement and Relevant Learning
<b>PIU</b>	Project Implementation Unit
<b>PTAs</b>	Parent Teacher Associations
<b>PAD</b>	Project Appraisal Document
<b>RCA</b>	Root Cause Analysis
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SH</b>	Sexual Harassment
<b>SEN</b>	Special Educational Needs
<b>SEP</b>	Stakeholder Engagement Plan
<b>SLTU</b>	St. Lucia Teachers' Union
<b>SUMMA-KIX LAC</b>	Knowledge and Innovation Exchange- Research and Innovation Laboratory in Education for Latin America and the Caribbean
<b>UNICEF</b>	United Nations Children Fund
<b>UNESCO</b>	United Nations Educational, Scientific and Cultural Organisation
<b>WISTLE</b>	Windward Islands Sector Transformation for Learning Environment Enhancement

## 1. Introduction and Project Description

### 1.1 Project Objective

The Windward Islands Sector Transformation for Learning Environment Enhancement (WISTLE) Project aims to (i) enhance teacher pedagogical practices at the secondary level; (ii) implement enhanced lower secondary curricula; and (iii) improve efficiency.

### 1.2 Project Description

The WISTLE, which is a regional project implemented by two OECS member states, Grenada and Saint Lucia. The project for St. Lucia comprises the following component: **Enhanced Resilience and Management for Inclusive and Quality Education in St Lucia**. This component will support the implementation of St. Lucia's priority reform: "*Climate resilient technology, infrastructural enhancement and equitable quality educational delivery towards acquisition of 21st century competencies, skills and learning outcomes.*" Particularly, the objective of this component will be to enhance education sector resilience and strengthen inclusion for improved pedagogy and decision-making. It comprises two interrelated subcomponents.

*Subcomponent 3.1 of the WISTLE. Improved Instructional Delivery.* This subcomponent seeks to strengthen teaching practices and delivery of quality education for all, including when face-to-face instruction is not possible. The Ministry of Education (MOE) has identified the need to strengthen sector resilience by improving teaching practices and teacher digital skills and efficient integration of Educational Technology (EdTech) in the classroom. To support this, the subcomponent will finance:

- The development of a capacity-building program for practitioners (education officers, teachers, principals) at the lower secondary level focused on digital skills and effectively integrating EdTech into teaching practices. The training would be gender-responsive, and a specific module would be developed for students with Special Educational Needs (SEN).
- An Edtech pilot in selected primary (higher grades) and secondary schools.
- The development of a condensed curriculum for upper-primary and lower-secondary, and the accompanying assessment framework, which will focus on foundational learning to be used in emergencies and for targeted teacher training to improve teaching at the right level efforts, including gender differentiated teaching.
- Edtech equipment, including software and hardware, and SEN equipment, such as assistive devices.

*Subcomponent 3.2 of the WISTLE. Strengthen education management information system (EMIS).* This subcomponent seeks to strengthen evidence-based decision-making and overall management of the education sector in St. Lucia. The MOE plans to develop an enhanced EMIS to improve informed and data-driven decision-making. To support this effort, this subcomponent would finance:

- The first phases of implementation of an Education Data and EMIS policy currently being developed under the Project Development Grant based on an EMIS assessment, which would inform the development and deployment of the new EMIS.
- The required capacity building, including end-user training for operationalization of the EMIS platform. The EMIS platform would be financed under the regional World Bank-financed Caribbean Digital Transformation Project (CARDTP) and is planned to be finalized before June 2026.
- Devices for EMIS reporting to be further informed based on the needs assessment.

Further details on the WISTLE are available in the [Project Information Document](#).

The WISTLE is being prepared following applicable national environmental and social laws and regulations and the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 (of the WB ESF) on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

## 2. Objective and Description of 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

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

- *Openness and life-cycle approach:* Public consultations for the project(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 projects 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<sup>1</sup>

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category: Education practitioners (education officers, teachers, principals), Parents and students (primary and secondary education), MOE Information Technology Unit, MOE Special Educational Needs (SEN) Unit, MOE Curriculum and Material Development Unit (CAMDU), MOE Educational Assessment and Evaluation Unit, and the MOE Policy and Administration Unit.

The projects' stakeholders also include parties other than the directly affected communities, termed *other interested parties*. These include parties engaged in training, SEN, EdTech, gender, education in emergencies, parental engagement, overarching sector oversight and development project financing and coordination. The parties to be engaged include, teacher training institutions, St. Lucia Teachers' Union (SLTU), National Principals Association (NPA), National Information and Communication Technology (ICT) in Education Council, Government of Saint Lucia Training and Development Advisory Committee, Department of the Public Service, SEN providers, Division of Gender Affairs, National Emergency Management Organisation (NEMO), Parent Teacher Associations (PTAs), Ministry of Finance, Ministry of Economic Development and the Youth Economy. Development Partners and related project implementation units working on EdTech, curriculum development, SEN, and educators professional development, such as the Global Partnership for Education (GPE) OECS Program for Educational Advancement and Relevant Learning (OECS PEARL), climate smart education, (EMIS), Caribbean Development Bank (CDB), CARDTP and OECS Data for Decision Making Project (ODDM), United Nations Children's Fund (UNICEF), Global Affairs Canada<sup>2</sup>, and Partnership Compact multi-stakeholder groups which will be developed to coordinate the implementation and monitoring of the Compact would also have an interest in the Project. The regional nature of the Project and complementarity with initiatives under development by the OECS Commission warrants consultation with the Commission during preparation and implementation.

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<sup>1</sup> **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

**Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.

<sup>2</sup> Global Affairs Canada is financing the Blueprints for gender equality project with a focus on integrating Gender equality and social inclusion into public policies, programs and services

### 3.3. Disadvantaged/vulnerable individuals or groups<sup>3</sup>

Within the Project, vulnerable or disadvantaged groups may include but are not limited to students with disabilities and their parents and education practitioners with disabilities, SEN providers (the National Council of and for Persons with disabilities, the Saint Lucia Blind Welfare Association, Child Development and Guidance Centre (CDGC), and students and households on low-income. Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. It is key that these and any other disadvantaged and vulnerable individuals and groups are captured in the project's stakeholder engagement process as including them in the data collection process is significant to the project's success. To ensure the project does not further exacerbate the existing exclusion patterns, careful attention will be paid to addressing both inclusion and exclusion errors which are present within the current methods used to collect data. The EMIS will collect data on gender and disability. The project will incorporate citizen engagement into its design and include a beneficiary feedback indicator in its result framework. Description of the methods of engagement that will be undertaken by the project is provided in Table 1.

Table 1. Stakeholder group, nature of interest and method to consult

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
<b>Project-Affected Parties</b>			
Education practitioners (education officers, teachers, principals)	<ul style="list-style-type: none"> <li>- Project outputs and outcomes. The timing of deliverables and benefits to stakeholders.</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> <li>- Project risks and mitigation measures.</li> </ul>	<ul style="list-style-type: none"> <li>- Focus group discussions</li> <li>- Formal meetings</li> <li>- Emails, letters</li> <li>- Beneficiary survey</li> <li>- Bulletin and notice boards</li> <li>- Social media</li> </ul>	<ul style="list-style-type: none"> <li>- Project preparation</li> <li>- August 2025 (after Project effective date)</li> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
Parents and students (primary and secondary education)	<ul style="list-style-type: none"> <li>- Project's outputs and outcomes, the timing of these deliverables and benefits</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> <li>- Project risks and mitigation measures</li> </ul>	<ul style="list-style-type: none"> <li>- Focus group discussions</li> <li>- Consultations</li> <li>- Emails, letters</li> <li>- Beneficiary survey</li> <li>- Bulletins, newsletters and notice boards</li> <li>- Social media</li> </ul>	<ul style="list-style-type: none"> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
MOE Information Technology Unit	Project areas for technical leadership	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Structured agenda</li> <li>- One-on-one</li> <li>- Interviews</li> <li>- Internal MOE channels</li> <li>- Emails</li> </ul>	<ul style="list-style-type: none"> <li>- Project Preparation</li> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
MOE Special Educational Needs (SEN) Unit	Project areas for technical leadership	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Structured agenda</li> <li>- One-on-one</li> <li>- Interviews</li> <li>- Internal MOE channels</li> <li>- Emails</li> </ul>	<ul style="list-style-type: none"> <li>- Project preparation</li> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
MOE Curriculum and Material Development Unit (CAMDU)	Project areas for technical leadership	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Structured agenda</li> <li>- One-on-one Interviews</li> <li>- Workshops</li> <li>- Internal MOE channels</li> <li>- Emails</li> </ul>	<ul style="list-style-type: none"> <li>- Project preparation</li> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
MOE Educational Assessment and Evaluation Unit	Project areas for technical leadership	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Structured agenda</li> <li>- One-on-one</li> <li>- Interviews</li> <li>- Emails</li> <li>- Internal MOE channels</li> </ul>	<ul style="list-style-type: none"> <li>- Project preparation</li> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
MOE Policy and Administration Unit	Project areas for technical leadership	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Structured agenda</li> <li>- One-on-one</li> <li>- Interviews</li> <li>- Emails</li> <li>- Internal MOE channels</li> </ul>	<ul style="list-style-type: none"> <li>- Project preparation</li> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>

<sup>3</sup> **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
St. Lucia's Teacher's Union	<ul style="list-style-type: none"> <li>- Project's outputs and outcomes, the timing of these deliverables and benefits</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> </ul> Project risks and mitigation measures	<ul style="list-style-type: none"> <li>- Focus group discussions</li> <li>- Consultations</li> <li>- Emails, letters</li> <li>- Beneficiary survey</li> <li>- Bulletins, newsletters and notice boards</li> <li>- Social media</li> </ul>	<ul style="list-style-type: none"> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
National Principals Association	<ul style="list-style-type: none"> <li>- Project's outputs and outcomes, the timing of these deliverables and benefits</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> </ul> Project risks and mitigation measures	<ul style="list-style-type: none"> <li>- Focus group discussions</li> <li>- Consultations</li> <li>- Emails, letters</li> <li>- Beneficiary survey</li> <li>- Bulletins, newsletters and notice boards</li> <li>- Social media</li> </ul>	<ul style="list-style-type: none"> <li>- During Project implementation</li> <li>- Prior to launch of activities of potential interest</li> </ul>
<b>Other interested parties</b>			
Teacher training institutions	Information sharing	<ul style="list-style-type: none"> <li>- Focus group meetings and discussions, social media</li> <li>- Correspondence to leaders</li> </ul>	During Project implementation Prior to development of training activities for educators
National ICT in Education Council	Information sharing	Structured agenda	<ul style="list-style-type: none"> <li>- During Project Implementation</li> <li>- Prior to implementation of EDTech activities and policy development</li> </ul>
Government of Saint Lucia Training and Development Advisory Committee	Advisory and guidance.	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- One-on-one interviews</li> </ul>	<ul style="list-style-type: none"> <li>- During Project implementation</li> <li>- Prior to development of training activities for educators</li> </ul>
Department of the Public Service	Advisory and guidance	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- One-on-one interviews</li> </ul>	<ul style="list-style-type: none"> <li>- During Project implementation</li> <li>- Prior to development of training activities for educators and development of policies</li> </ul>
Division of Gender Affairs	Advisory and guidance	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- One-on-one interviews</li> </ul>	During Project implementation
National Emergency Management Organisation (NEMO)	Advisory and guidance	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- One-on-one interviews</li> </ul>	During Project implementation
Parent Teacher Association (PTA)	<ul style="list-style-type: none"> <li>- Project implementation, outputs and outcomes, the timing of these deliverables and benefits</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> <li>- Project risks and mitigation measures</li> </ul>	<ul style="list-style-type: none"> <li>- Focus group meetings and discussion</li> <li>- Social media</li> <li>- Correspondence to leaders of association</li> </ul>	During Project implementation
Ministry of Finance, Economic Development and the Youth Economy	Project implementation, outputs, and outcomes. Risks and mitigation strategies	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- One-on-one interviews</li> <li>- Implementation Support Mission Meetings</li> <li>- Implementation Status and Results Report</li> </ul>	During Project preparation and implementation
Development Partners and related project implementation units	Project implementation, outputs, and outcomes. Risks and mitigation strategies. Donor coordination Knowledge transfer. Lessons learned	<ul style="list-style-type: none"> <li>- One-on-one interviews</li> <li>- Education Partners Forum</li> </ul>	During Project preparation and implementation
Partnership Compact multi-stakeholder group	Project implementation, outputs, and outcomes. Risks and mitigation strategies	Structured agenda	During Project implementation, schedule to be determined
<b>Disadvantaged and vulnerable individuals or groups</b>			
SEN providers The National Council of and for Persons with disabilities, the Saint Lucia Blind Welfare Association,	Information sharing, including on aspects of GRM and inclusion	<ul style="list-style-type: none"> <li>- Focus group meetings and discussions,</li> <li>- Social media,</li> <li>- correspondence to leaders of organisations</li> </ul>	<ul style="list-style-type: none"> <li>- During Project implementation</li> <li>- Prior to development of SEN activities</li> </ul>

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
Child Development and Guidance Centre)			
Students and teachers with Disabilities	Project information, including aspects on gender inclusion	<ul style="list-style-type: none"> <li>- Community consultations</li> <li>- One-on-one interviews</li> <li>- Focus group discussions</li> <li>- Notices</li> <li>- Brochures</li> </ul>	During Project implementation
<u>Students and households on low-income</u>	<u>Project information and issues of access to initiatives (for example parent’s access to EMIS parent functions and student’s access to LMS)</u>	<ul style="list-style-type: none"> <li>- <u>One on one interviews</u></li> <li>- <u>Community consultations</u></li> <li>- <u>Letters, brochures</u></li> </ul>	<u>During Project preparation and implementation</u> <u>Prior to the completion of relevant activities such as EMIS, LMS</u>

To gain the feedback and input from the stakeholders who may be less able to participate in consultation activities such as students and education practitioners with disabilities, individuals from low-income households, and parents who are single heads of households, specific strategies are required. For example, specific group discussions, selection of central locations which are accessible to the target groups, use of culturally appropriate language, such as sign language or Saint Lucian Creole if needed. Further considerations are provided in Table 2.

Table 2. Potential factors limiting full participation of stakeholders and mitigation measures

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

#### 4. Stakeholder Engagement Program

##### 4.1. Summary of stakeholder engagement done during project preparation

During project preparation, public consultation meetings were conducted with technical teams from the MOE to design the Project. As a precursor to preparation of this project, the Partnership Compact was developed, and this informs the WISTLE components. The development of the Partnership Compact

involved many meetings and dialogues with education stakeholders, partners and government agencies. Regional and international partners including the following participated at various stages in the development of the Partnership Compact: OECS, the Caribbean Community (CARICOM), UNICEF, United Nations Educational scientific and Cultural Organisation (UNESCO), CDB, Knowledge and Innovation Exchange- Research and Innovation Laboratory in Education for Latin America and the Caribbean (SUMMA-KIX LAC), and GPE. In December 2023, technical consultations were held on December 14, 28 and 29 with MOE officials to discuss and identify the priority reforms for transformation of the Saint Lucia education system. These consultations involved 10 participants, eight of whom were consistently engaged across these three technical consultations. Eight of the stakeholders were female. In January 2024, a regional workshop was held to develop the theory of change and discuss the draft enabling factor analysis. A second regional workshop and further stakeholder engagements were conducted in March 2024 to inform the development of the full partnership compact. In November 2024 project preparation consultations were held to determine the priority reform areas for system transformation grant financing within the WISTLE Project. These consultations held with the MOE technical teams discussed the WISTLE Project components, theory of change, budget and requirements on gender, climate, inclusion and stakeholder engagement. In January 2025, further consultations were held with technical teams to finalize the budget, implementation arrangements, lessons learned, refinement of components and agree on project beneficiaries. Consistently the consultations involved the same group of MOE technical experts.

In January 2025, regional consultations were held with teams from Saint Lucia, Dominica, and Saint Vincent and the Grenadines and the World Bank to discuss the WISTLE Project’s regional synergies, fiduciary arrangements, and environmental and social matters. There were 23 participants. Arising from the agreements on regional activities on SEN and EMIS further technical discussions were arranged. In February 2025 consultation was held with the MICO University College to discuss teacher training activities on SEN. These discussions concretized the need to take a regional approach to SEN and these findings are reflected in the Project Appraisal Document (PAD). On EMIS, the follow-up actions resulted in a technical assistance mission to Saint Lucia and Saint Vincent and the Grenadines by an EdTech expert. The EMIS consultations held with the MOE technical teams in March 2025 included the presentation of EMIS diagnostic assessment findings, an update on EMIS procurement process, discussion of scope of business requirements, development process and agreement on way forward, review of key policy issues requiring incorporation into draft EMIS policy, discussion on three-year implementation plan, review of human resource requirements within Ministry of Education and EMIS implementation arrangements. Feedback received during consultations was focused on strategies for transformation of the education system based on a priority reform and was considered within the Project Appraisal Document (PAD). A summary of the main recommendations received and integrated into the Stakeholder Engagement Plan is provided in Annex 7.

The environmental and social reports and plans will be disclosed on the webpages of the Government of Saint Lucia (GOSL) and the MOE and the World Bank WISTLE Project page.

#### 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. These include structured agendas, focus group meetings/discussions, community consultations, formal meetings, one-on-one interviews, surveys, and use of social media. The engagement plan is outlined in Table 3.

#### 4.3. Stakeholder engagement plan

Table 3. Stakeholder engagement plan

Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Preparation	January – April 2025	Consultations on Project scope, components, regional synergies and solicit feedback	Structured agenda Formal meeting	<ul style="list-style-type: none"> <li>- MOE technical teams</li> <li>- Ministry of Finance</li> <li>- Development partners</li> <li>- National Principals and Teacher Associations</li> </ul>	MOE – Planning Unit
	April 2025	Technical consultations to develop Project implementation plan.	Structured agenda Formal meeting Workshop	MOE Units including: <ul style="list-style-type: none"> <li>- Information Technology Unit</li> <li>- SEN Unit</li> <li>- CAMDU</li> <li>- Training Division</li> </ul>	MOE – Planning Unit

Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
				<ul style="list-style-type: none"> <li>- Educational Assessment and Evaluation Unit</li> <li>- Administration and Policy Unit</li> </ul>	
	May 2025	Consultations to raise awareness of Project. Discussion on SEP and GRM	Workshop Formal meeting	<ul style="list-style-type: none"> <li>- Education Practitioners</li> <li>- SEN Providers</li> <li>- Teacher Training Institutions</li> <li>- Division of Gender Affairs</li> </ul>	MOE – Planning Unit
<b>Implementation</b>	July 2025	To share information on Project, to solicit feedback on lessons learned, and national good practices to inform implementation	Project web pages (GOSL, MOE, WB) Consultation meetings	<ul style="list-style-type: none"> <li>- National ICT in Education Council</li> <li>- GOSL Training and Development Advisory Committee</li> <li>- Department of the Public Service</li> <li>- SEN providers</li> <li>- Division of Gender Affairs</li> <li>- NEMO</li> <li>- Parent Teacher Association</li> </ul>	MOE
	August 2025	Project awareness, GRM	Focus group Outreach activity	All stakeholders	PIU
	September 2025	Project Launch	<ul style="list-style-type: none"> <li>- Press release</li> <li>- Press conference</li> <li>- Workshop</li> <li>- Project brochures</li> <li>- Social media</li> </ul>	MOE, MOF, education practitioners, students, parents, development partners	PIU
	Bi-annual	<ul style="list-style-type: none"> <li>- Update on launch of key Project initiatives of pertinence to categories of stakeholders</li> <li>- Review list of Project-affected parties</li> <li>- Build ownership for Project</li> </ul>	<ul style="list-style-type: none"> <li>- Community consultations</li> <li>- Outreach activities</li> <li>- Social media</li> <li>- Formal meetings</li> <li>- Focus groups</li> <li>- Discussions</li> <li>- Public notices</li> </ul>	- All Stakeholders	PIU
	Monthly in year 1 and year 2 Bi-monthly and ad hoc in years 3 to 5.	<ul style="list-style-type: none"> <li>- Update on Project progress and requesting feedback and technical inputs for implementation planning.</li> </ul>	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- Formal meetings</li> <li>- One –on one interview</li> <li>- Internal government and MOE notices and communication channels</li> <li>- Workshops</li> </ul>	<ul style="list-style-type: none"> <li>- MOE Units</li> <li>- Information Technology Unit</li> <li>- SEN Unit,</li> <li>- CAMDU</li> <li>- Training Division</li> <li>- Educational Assessment and Evaluation Unit</li> <li>- Administration and Policy Unit</li> <li>-</li> </ul>	PIU
	Timed to coincide with completion of studies and diagnostics	Presentation of findings of studies and policies.	<ul style="list-style-type: none"> <li>- Structured agenda</li> <li>- Formal meetings</li> <li>- Community consultations</li> <li>- Media</li> </ul>	<ul style="list-style-type: none"> <li>- Project affected parties</li> <li>- Other interested parties</li> <li>- Disadvantaged and vulnerable individuals and group</li> </ul>	PIU
	Quarterly	<ul style="list-style-type: none"> <li>- Update on Project implementation schedule for pertinent milestones (EMIS rollout, training</li> </ul>	<ul style="list-style-type: none"> <li>- Notices</li> <li>- Email</li> <li>- Formal meeting</li> <li>- Structured agenda</li> <li>- MOE inter-office channels</li> <li>- Survey</li> </ul>	Education practitioners (education officers, teachers, principals)	PIU

Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		activities, Smart Classroom development and pilot, classroom observation)			
	Quarterly and ad hoc - timed to coincide with completion of studies and diagnostics	- Update on Project progress of pertinence and to solicit feedback and technical inputs (for example EMIS interoperability and EdTech policy, data policy)	- Education Partners Forum - One-on one interviews	- Development Partners and related project implementation units -	PIU
	Timed to coincide with completion of Key milestones	- Update on Project milestones of pertinence to the target group	- Special meetings - Focus group discussions - Brochures - Letters	- Students and households on low income	PIU
	Bi-annual	- Update on Project milestones to assess progress on Partnership Compact priority reform agenda	- Structured Agenda - One on one interview - Formal meeting	- Partnership Compact broad based stakeholder committee - Ministry of Finance, Economic Planning and Information Technology -	PIU

Information will be disclosed on the Government of Saint Lucia and the MOE webpages and the World Bank external website where applicable. The following information will be disclosed, the SEP; relevant E&S documents including the Labor Management Procedures (LMP), the Environmental and Social Commitment Plan (ESCP); Grievance Mechanism (GM) procedures; and regular updates on project developments through the implementation status and results reports (ISRs). In addition to disclosure on the above website, the information will be shared with stakeholders at consultation meetings, separate focus group meetings, and through official correspondence to heads of pertinent organizations such as parent teacher associations and SEN providers.

Throughout project implementation, stakeholders will be informed on milestones and attainment of key results indicators. The information will include disclosure of the Project's environmental and social performance (as defined in the applicable ESS instruments); the implementation of the SEP (ESS10), and the status of the GM. The reporting on these will be presented on a semi- and annual basis in line with the reporting requirements of the Financing Agreement. However, reporting may increase to coincide with heightened activities when the impacts of the Project on the affected parties and other interested parties will be higher. During these periods, disclosure, and dissemination of information on future activities of the Project may be provided on a quarterly basis. English will be used as the main language to disclose information. In certain warranted circumstances the Saint Lucia Creole could be used to deliver verbal communication.

#### 4.4. Reporting back to stakeholders

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

### 5. Resources and Responsibilities for implementing stakeholder engagement activities

## 5.1. Resources

The Environmental and Social Specialist to the Project Implementation Unit will oversee stakeholder engagement activities for the WISTLE Project.

The budget for the SEP is \$17,000 and is included in component 5 – Regional collaboration and project management of the project, Table 4.

Table 4. Budget for Stakeholder Engagement

Budget Category	Quantity	Unit Costs (USD)	Times/Years	Total Costs (USD)
<b>1. Consultations</b>				
1a. Outreach meetings	4	500	3	6,000
1b. Resource materials	1,000	1	2	2,000
<b>2. Events</b>				
2a. National project launch	1	3,000	1	3,000
<b>3. Communication campaigns</b>				
3a. Social media campaign	4	250	2	2,000
<b>4. Trainings</b>				
4a. Training on social/environmental issues for PIU and MOE staff	2	250	1	500
<b>5. Beneficiary surveys</b>				
5a. Mid-project perception survey	1	1,000	1	1,000
5b. End-of-project perception survey	1	1,000	1	1,000
<b>6. Grievance Mechanism</b>				
6a. Training of GM committee	2	250	1	500
6.b Meetings of the GRC including for handling of cases by the Gender Affairs Department	5	100	2	500
<b>7. Other expenses</b>				
7a. Press releases and other public notices	4	250	1	1,000
<b>TOTAL STAKEHOLDER ENGAGEMENT BUDGET:</b>				<b>17,500</b>

## 5.2. Management functions and responsibilities

The entity responsible for carrying out stakeholder engagement activities is the MOE through the Project Implementation Unit, specifically the E&S Specialist. The stakeholder engagement activities will be documented and reported on through the periodic ESCP reports and project progress reports. These would also be documented where revisions to the SEP are required.

## 6. Grievance Mechanism

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM which will be adopted by the WISTLE is described in Table 5.

### 6.1. Description of GM

Table 5. Grievance Mechanism details

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	<p>The PIU will manage the Project's GM. The responsibility for addressing the grievance and determining the mitigating measures will be dependent on the type of grievance. In the Project's preparation phase the GM will be managed by the MOE's WISTLE PIU.</p> <p>Grievances can be lodged in person, via telephone call or writing (this may include WhatsApp messaging, postal mail, email or online form). A dedicated email address and telephone number are provided for all grievances. All grievances received will be recorded in a Grievance Office Log (<b>Annex 1: Grievance Office Log</b>). All complainants will be encouraged to submit their complaint via a Complainant Form which will be available at the PIU's office and on the PIU's website/social media page(s) (<b>Annex 2: Complainant</b></p>		E&S Specialist Administrative Specialist

Step	Description of Process	Time Frame	Responsibility
	<p><b>Form</b>). The Grievance Redress Mechanism will be disseminated through e-brochures and discussed at every stakeholder event.</p>		
Grievance uptake	<p>Grievances can be submitted via the following channels, with the option to submit anonymously:</p> <ul style="list-style-type: none"> <li>● Telephone: A complainant may call the following numbers to informally register concerns: <b>mobile</b>: 1758 719 2635 The E&amp;S Specialist will subsequently direct the complainant to complete and formally submit a signed grievance form via email, postal mail or in person. The complainant will also be notified that a completed and signed PDF version of a complaint may be submitted as an attachment via:</li> <li>● What's App: A complainant may submit a completed and signed PDF version of a complaint via WhatsApp messaging mobile number 1 758 719 2635. A notification of receipt of a complaint will be issued by the Administrative Secretary to the PIU via WhatsApp and Email.</li> <li>● E-mail: Stakeholder grievances may be submitted to: <b><a href="mailto:grievances.wistle@learning.edu.lc">grievances.wistle@learning.edu.lc</a></b>. In the interest of confidentiality, this email address will be accessed solely by the E&amp;S Specialist to the PIU, the Environmental and Social Assistant and the Project Manager. An email acknowledging receipt of a complaint will be issued by the E&amp;S Specialist/Environmental and Social Assistant.</li> <li>● Letter to Grievance focal point at the PIU: Stakeholders may submit completed grievance forms via the post. Envelopes should be addressed to:  E&amp;S Specialist Windward Islands Sector Transformation for Learning Environment Enhancement (WISTLE) 2nd Floor, Hasache Complex Goodlands, Castries, SAINT LUCIA.</li> <li>● In-person: Complainants can visit the PIU office of the WISTLE to complete and submit a grievance form. The PIU's address is as follows:  2nd Floor, Hasache Complex Goodlands, Castries, SAINT LUCIA.</li> </ul> <p>Online: Complaints can be lodged online at the MOE website using the grievance reporting form which can be accessed through this link <a href="https://www.education.gov.lc/wp-content/uploads/2026/03/WISTLE-Project-Grievance-Reporting-Form.pdf">https://www.education.gov.lc/wp-content/uploads/2026/03/WISTLE-Project-Grievance-Reporting-Form.pdf</a> and the complaint form can be submitted via any of the above channels.</p>		E&S Specialist Administrative Secretary
Sorting, classifying, processing	<p>Grievances will be registered in the Grievance Office Log (<b>Annex 1</b>). All updates and information related to the management and resolution of the grievance will be recorded in this log. Grievances will also be recorded in a Grievance Acknowledgement Form (<b>Annex 3</b>).</p> <p>When registering the grievance in the Grievance Office Log, the Administrative Secretary will classify grievances in accordance with the level of risk/threat posed by the grievance. Grievances classified as <b>Level 1</b>, will be addressed by the Project Manager. <b>Level 2</b> grievances will be escalated by the Project Manager to the Permanent Secretary to the Ministry of Education. Grievances classified as <b>Level 3</b>, will be escalated to the Grievance Redress Committee, and where necessary to the World Bank team for action or intervention.</p> <p>Grievances at Levels 2 and 3, will be drawn to the immediate attention of the Project Manager by the E&amp;S Specialist/Environmental and Social Assistant.</p> <p>Where a grievance is specific to the Project Manager, the Project Manager will recuse herself or himself from the complaint, and have the matter turned over to the office of the Permanent Secretary to the Ministry of Education by the/E&amp;S Specialist/Environmental and Social Assistant.</p>	Upon receipt of complaint	Administrative Secretary E&S Specialist

Step	Description of Process	Time Frame	Responsibility
	<p>In cases where a stakeholder’s grievance lies directly with the Project Manager, or the E&amp;S Specialist, the stakeholder will be notified to submit the complaint to the office of the Permanent Secretary to the Ministry of Education. (<b>Annex 2</b>)</p> <p>The complaint types are coded as follows:</p> <p><b>Level 1 Grievance:</b> Low risk including Remuneration and contractual dispute, hours of work, minor unsafe working conditions.</p> <p><b>Level 2 Grievance:</b> Medium risk, including Minor work-related injuries, health risks, moderately unsafe working conditions, discrimination, harassment, bullying, disciplinary action</p> <p><b>Level 3 Grievance:</b> High risk including major work-related injuries, major GBV, SE, SH, fraud and corruption accusations.</p> <p>All grievance documents will be confidentially maintained.</p>		
Acknowledgment and follow-up	<p>Receipt of the grievance is acknowledged to the complainant by the PIU. The E&amp;S Specialist/Environmental and Social Assistant will issue in writing (via email) an acknowledgment of receipt of a grievance (<b>Annex 3: Grievance Acknowledgement Form</b>). This is to be issued within five (5) working days of receipt of a complaint.</p>	Within 5 working days of receipt	E&S Specialist Administrative Secretary
Verification, investigation	<p>Depending on the grievance level, Investigation of the complaint is led by the Project Manager (level 1 Grievance), or the Permanent Secretary (Level 2 Grievance) or the Grievance Committee (Level 3 Grievance).</p> <p>Levels 2 and 3 complaints may require an investigation into the matter. Where commissioned by the Project Manager or Permanent Secretary to the Ministry of Education, the Project Manager, E&amp;S Specialist, other relevant PIU and/or MOE staff, or Grievance Committee will conduct investigations into the submitted grievance. This should occur within <b>10-15 working days</b> of receipt of a complaint. Level 3 or high-risk complaints may require a maximum of <b>15-30 working days</b> for completion of an investigation.</p> <p>The investigation may require the Project Manager, relevant PIU and/or MOE staff, or Grievance Committee members to conduct site visit and liaise with the complainant(s), where the complainant(s) has not opted to be anonymous. All consultations and discussions will be documented by the E&amp;S Specialist/Environmental and Social Assistant during the investigative process (<b>Annex 5: Grievances Redress Meeting Notes Form</b>).</p> <p>Information gathered during the investigation will be analyzed by the relevant personnel and will assist in determining the optimal approach to resolving the grievance</p>	Within 10 – 15 working days	<p>Project Manager (Level 1) Permanent Secretary (Level 2) Grievance Redress Committee (GRC) composed of</p> <ul style="list-style-type: none"> <li>- MOE Permanent Secretary or proxy (Chair)</li> <li>- PIU Project Manager</li> <li>- E&amp;S Specialist</li> <li>- GOSL or public sector agency representative (for example Ministry of the Public service, Home Affairs, Labour and Gender Affairs, or Ministry of Justice and national Security or other Government Ministry, Department or Agency.</li> <li>- The complainant or representative (as observer)</li> </ul> <p>A quorum of three members is required for mobilisation of the GRC.</p>
Action	<p>The Project Manager, E&amp;S Specialist, other relevant PIU and/or MOE staff, or Grievance Committee will formulate a strategy or action plan for resolving a complaint and implement this strategy (<b>Annex 4: Corrective Action Plan</b>).</p> <p>The Complainant will be informed in writing of the measures taken to address the grievance.</p>		Project Manager, E&S Specialist, and/or Grievance Committee
Feedback	<p>The complainant will be invited to provide feedback as to whether the given redress and outcomes are accepted/rejected/whether additional follow-up is required. (<b>Annex 6: Results of Grievance Redress</b>).</p>	10 business days (for submission of feedback)	Complainant E&S Specialist
Monitoring and evaluation	<p>The PIU, through the E&amp;S Specialist/Environmental and Social Assistant, will document the outcome(s) of the grievance process, the redress applied, and the complainant’s level of satisfaction with the selected response strategy and the overall resolution of the complaint (<b>Annex 1: Grievance Office Log; Annex 6: Results of Grievance Redress</b>).</p> <p>To ensure confidentiality and the integrity of the grievance process, all records under the Grievance Redress Mechanism (including the grievance office log, complainant forms, reports, investigation notes, meeting notes or minutes of meetings) will be securely filed. Hard copy documents will be filed in a security enabled filing cabinet. Keys to this cabinet will be available to solely the E&amp;S Specialist and the Project Manager. All hard copy grievance documents will be scanned by the E&amp;S Specialist and filed in a password protected grievance filing system of the Project. Access will be limited to solely the E&amp;S Specialist and the Project Manager.</p> <p>The E&amp;S Specialist/Environmental and Social Assistant will prepare an overall monthly report on grievances received. This is inclusive of the number of grievances, the strategies employed to resolve the grievance(s) and general outcomes of the grievance process. This</p>	Throughout active grievance	Project Manager E&S Specialist

Step	Description of Process	Time Frame	Responsibility
	report will be available for submission to the World Bank, upon request or as per the Project's reporting schedule and requirements detailed in the Financing Agreement.		
Closeout	<p>The Project Manager will <b>continuously</b> monitor the outcome(s) of the grievance process with a view towards ensuring that the matter is resolved expeditiously and satisfactorily. Where a complainant is satisfied that the matter is resolved, the PIU can proceed with recording the matter in the Grievance Office Log as closed out or resolved.</p> <p>In circumstances where a grievance proves irreconcilable the MOE, on the advice of the Grievance Committee, will refer the matter to the World Bank for its intervention. The World Bank's decision on the matter will hold as the final tier of WISTLE's internal grievance redress mechanism.</p>	10 business days after notification to complainant of action	Project Manager E&S Specialist Administrative Secretary
Training	<p>Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows:</p> <p>PIU staff will be trained by the E&amp;S Specialist and/or other suitable personnel to respond to complainants. professionally. PIU staff will be trained to assist complainants with completing a grievance form. The World Bank will provide training to the PIU and related MOE teams on E&amp;S including GM. On GBV and SEA/SH matters the PIU will request training from the GOSL's Department of Gender Relations.</p>	On request	Project Manager

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they may exercise their right to legal recourse in a state Court.

The WISTLE GM extends to all direct workers and contracted workers (and any other type of workers that may be engaged during the project). On employment, all direct and contracted workers will be informed that the Project's grievance mechanism is implemented to protect them against any reprisal or victimisation. Whilst the GM will be easily accessible to all workers, it does not preclude their access to other judicial procedures which may be available under the laws of Saint Lucia. This includes arbitration, mediation, general court proceedings, or terms binding within existing collective agreements. The GM facilitates an appeals process for complainants who are not satisfied with the proposed resolution to a lodged complaint. Where all avenues have been explored to resolve a complaint objectively and ethically and the complainant remains dissatisfied, it is incumbent on the PIU to advise such parties of the right to legal recourse. The GM of contractors will be linked to the Project level GM and will be monitored and reported regularly.

A Labor Grievance Mechanism will be developed for the WISTLE. All Project workers within the WISTLE will have access to the Labor GM. It will be guided by the Labour Act (Revised 2022) of the Government of Saint Lucia (GoSL) and the recently ratified Minimum Wage Bill serve as core pieces of legislation applicable to all Project Workers. Further details on the Labor GM will be described in detail in the Labor Management Procedures (LMP) for the Project.

As a risk mitigation strategy, and as part of the contractual process, direct workers, consultants, contractors or suppliers will be briefed on applicable laws of Saint Lucia, on acceptable and unacceptable conduct and the avenues available for redress. Grievances can be submitted anonymously. In such circumstances, pseudonyms may be provided for the aggrieved party. Whereas supporting evidence regarding the complaint is not necessary, complainants will be advised that relevant evidence will prove helpful in reviewing and resolving a complaint. Complainants will also be encouraged to propose suggestions on how a perceived grievance may be resolved satisfactorily. All complaints will be treated with confidentiality such that the GRM will not disclose details which are likely to reveal the identity of complainants without their consent.

## 6.2 Handling GBV, SEA and SH Cases

The project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. In case Gender based violence (GBV) and sexual exploitation and abuse / sexual harassment (SEA/SH) grievances are submitted to the Project via the PIU's GM, the PIU will action the [GBV Referral Pathway](#) as formulated by the Department of Gender Relations. This referral pathway is intended to guide institutions and adversely affected persons on the reporting mechanisms and supports in place for survivors. The PIU will also solicit active guidance from the Director of Saint Lucia's

Department of Gender Relations on the matter. The affected party or parties would also be referred to the Department of Gender Relations for continued support or interventions – on receipt of consent from the aggrieved. The Department of Gender Relations is the government agency responsible for capacity development in the management of cases associated with Gender Based Violence (GBV), and the coordination of the relevant protections and interventions for victims of GBV.

All GBV-related incidents reported through the PIU's GM, will be managed appropriately by the PIU's E&S Specialist ensuring confidentiality regarding the incident and the affected party's information. Whereas it is expected that the contracted E&S Specialist should possess training or experience in the management of GBV matter, should this not be the case, the Project Manager will solicit guidance and capacity development training from the GOSL's Director, Department of Gender Relations.

The GRM will, as a matter of protocol regarding a GBV complaint, require record of solely the following details:

- The nature of the complaint - as presented verbatim by the complainant or survivor, without questioning.
- Whether to the best of a survivor's knowledge the perpetrator in question is or was associated with a World Bank (WB) financed project under preparation, active, or that has been closed for less than 15 months.
- If possible, the age and sex of the survivor.
- Whether the survivor was referred to a GBV service provider.

Any cases of GBV presented via the Project's GM will be documented confidentially. GBV files on record will be sealed, password protected, and accessible solely by the Project Manager. Given the sensitivities of the matter and the specialised and remedial interventions which may be required, the Project's GM will only serve to:

- Confidentially record GBV complaints.
- Refer complainants to the authorised GBV agency (Department of Gender Relations)
- Record the status and resolution of the complaint (where the matter is resolved).

In circumstances where the GBV complainant alleges that the perpetrator in question is the Project Manager or direct worker under the WISTLE, the complainant can submit his or her complaint directly to the Permanent Secretary of the Department of Education who is chairperson of the Grievance Redress Committee (GRC) at telephone number 468 5207, the Director of Gender Relations, or other staff within the purview of the Director of Gender Relations at telephone number 468 5195 with whom the complainant feels comfortable airing the grievance.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

## **7. Monitoring and Reporting**

### **7.1. Summary of how SEP implementation will be monitored and reported**

The SEP will be periodically reviewed and revised by the PIU, particularly where there are major changes to Project related activities and schedules. This should allow for relevant activities to be updated, as necessary, and any lessons learnt effectively incorporated. The PIU will formally notify the World Bank of all changes to the SEP and disclose the revised SEP on the GOSL, MOE and World Bank websites. The Project will maintain data summarizing public consultations, details on disclosure and grievances lodged throughout the Project life cycle. This will be available for public review on request. The PIU will be guided by GOSL data and privacy guidelines to maintain confidentiality of grievances, especially those of a GBV, SEA/SH nature. Stakeholder engagement will be periodically evaluated by the PIU using SEP results indicators (see section 7.2). Progress on the SEP results indicators will be reported in the semi-annual Project progress report.

## **7.2. SEP Results Indicators**

SEP specific result indicators will be monitored by the Project Manager and E&S Specialist, as needed. These include:

1. Beneficiary surveys completed
2. Level of involvement of project-affected parties, other interested parties, and vulnerable groups in stakeholder consultations.
3. Number and type of public engagement activities and number of attendees (disaggregated by gender and disability where possible)
4. Number and type of media materials published/broadcast/distributed on various communication outlets.

## **7.3. Reporting back to stakeholder groups**

The SEP will be periodically revised and updated as necessary in the course of project implementation. Monthly 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 the Environmental and Social Specialist and referred to the Project manager. The monthly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Progress on SEP results including stakeholder events, grievances, and resolutions will be reported in the semi-annual project implementation report and in the ESCP reports. Information on stakeholder engagement activities undertaken by the Project during the year will be conveyed to stakeholders in various ways: in-person and virtual meetings, websites and social media pages (GOSL, MOE, PIU), radio, television, and newspapers.

**Annexes**

**Appendix 1: Grievance Office Log**

<b>Project/Office :</b>	<b>Name of Grievance Log Officer:</b>
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									Grievance Monitoring and Evaluation						
Complainant's Contact Details								Signatures	Complaint Status				Complainant Satisfaction with Resolution		
No .	Name	Alias (if applicable)	Date of Complaint	Complaint Classification	Telephone	Email	Log Officer	Complainant	Pending Review	Under Review	Retracted	Resolved	Satisfied	Indifferent	Unsatisfied

**Appendix 2: Grievance Reporting Form**

*(To be completed by the Complainant/ or officer receiving the complaint)*

\_\_\_\_\_ **Grievance Ref. No.:** GR\_XX/DD/MM/YR

<b>Complainant Information</b>	
Name:	
Address:	
Telephone:	
Email:	
<b>Complaint Details</b>	
Date of complaint filing:	
Location of Grievance:	
Grievance:	
Proposed resolution to the problem/grievance:	
Name of officer receiving the complaint:	
Signature of Complainant:	
Date:	
Signature of Receiving officer:	
Date:	

**Appendix 2 (b): World Bank Incident Form**

Part B: To be Completed by Borrower within 24 Hours

<https://docs.google.com/document/d/1B9uEL7jJUadPUB9vMZ4iDHRI3ANhFOVN/edit?usp=sharing&ouid=102162920235521689961&rtpof=true&sd=true>

Part C: To be Completed by Borrower (Following Investigation)

<https://docs.google.com/document/d/10CGc5YShnYgzIiMNHs-rrbRuTdYc2cO/edit#heading=h.gjdgxs>

**Appendix 3: Grievance Acknowledgement Form**

This form should be completed by a Social and Environmental Specialist or designate, upon receipt of a grievance. This is to assure the complainant that the issue has been received and that action will be taken towards a resolution.

Date of complaint (dd/mm/yyyy):	
Name of Complainant/Aggrieved:	
Grievance Reference Number:	
Summary of Grievance or Complaint:	
Date, venue and time of Proposed Grievance Redress Meeting:	
Follow up action requested of grievant:	Submission of documentary evidence <input type="checkbox"/> Submission of name of representative to attend redress meeting <input type="checkbox"/> Nil: <input type="checkbox"/> Other ( <i>please specify</i> ):
Name of Project Staff Acknowledging Grievance:	
Signature:	Date:

#### Appendix 4: Guidance on Reporting Incidents/Accidents by the PIU

In case of incidents and accidents that are likely to have a significant adverse effect on the environment, the affected communities, the public or workers, the PIU will notify the World Bank within 48 hours of learning of the event. An Incident Form ([Appendix 2 \(b\)](#)) is to be completed and submitted promptly to the Bank in a timeframe acceptable to the Bank and/or as requested. The PIU will provide relevant details about the incident or accident, including information provided by any contractor and supervisory entity, as appropriate, and immediate measures taken to address the situation.

At the Bank's request, a more detailed report on the incident may be submitted delineating outcomes of the investigation and lessons learnt. The application of Root Cause Analysis (RCA) techniques and tools should prove useful in the investigative process as this methodology allows for a comprehensive understanding of the key contributors to an incident/accident. The availability of such crucial data/information, should allow for the development of more effective response strategies as it pertains to the minimization or elimination of the risk of incident/accident reoccurrence.

The core objective of the RCA is **prevention** and is to be carried out by personnel managing the site in question. Such personnel may include a consultant, contractor, subcontractor, etc. The RCA seeks to:

- a. **Determine what happened** by identifying and describing an incident / accident. Include photos.
  - i. What happened? Who was affected?
  - ii. Where and when did the incident/accident occur?
  - iii. What is the source(s) of the information? How was the incident/accident discovered?
  - iv. Are the basic facts of the incident/accident clear and indisputable, or is there ambiguity and contradictions?
  - v. What were the prevailing circumstances under which the incident/accident occurred?
  - vi. Is the incident ongoing or is it contained?
  - vii. Is there loss of life or serious damage?
  - viii. How severe or destructive was the incident/accident? (Appendix 3 - Incident and Risk Classification Guide)
  - viii. What is the root cause of the incident/accident?
    1. Labor procedures
    2. Equipment and technology
    3. Organizational/systemic issues
    4. Human factors
- b. **Document the incident/accident**, taking note of the following:
  - (i) Where available, the RCA should be based on existing country processes/procedures. In the absence of capacity within the PIU, consultants (national or international) may be recruited to undertake the RCA.
  - (ii) The Borrower (GOSL) is responsible for funding the preparation of the RCA from project funds or GOSL resources.
  - (iii) The RCA should be completed as soon as possible, ideally within 10 days of the incident/accident.
  - (iv) Findings of RCA will inform measures to be included in a Corrective Action Plan (CAP) (Appendix 6).
  - (v) Provide complete information about the incident/accident to the Borrower and the Bank and facilitate site visit(s).
- c. **Identify immediate corrective measures**, follow-up actions (where required) and relevant deadlines. These additional follow-up actions may be inserted into the CAP with the aim of preventing similar incidents/accidents in the future.

**Appendix 5: Incident / Accident Reporting Sheet**

<b>INCIDENT / ACCIDENT REPORT FORM</b>			
<b>EVENT IDENTIFICATION -INCIDENTS / ACCIDENTS</b>			
Project name and ID:			
Name and ID of subproject:			
Event -Incident / Accident #:			
Date:		Time:	
<b>Place of occurrence:</b>			
<b>Consultant / Contractor:</b>			
<b>District/Constituency:</b>			
<b>Community:</b>			
<b>Incident / accident Information Source:</b>			
<b>INCIDENT / ACCIDENT DESCRIPTION</b>			
Event Severity Level	Weather condition	Scope of the event	Event relation to the Project
<input type="checkbox"/> Indicative	<input type="checkbox"/> Sunny	<input type="checkbox"/> Local	<input type="checkbox"/> Linked with the project
<input type="checkbox"/> Serious	<input type="checkbox"/> Cloudy	<input type="checkbox"/> Regional	<input type="checkbox"/> Not linked with the project
<input type="checkbox"/> Severe	<input type="checkbox"/> Rainy	<input type="checkbox"/> National	
	<input type="checkbox"/> Night	<input type="checkbox"/> International	
	<input type="checkbox"/> Other <i>(explain)</i>		
<b>Scope of the Incident / Accident</b>			
<input type="checkbox"/> Environmental		<input type="checkbox"/> Social	<input type="checkbox"/> Occupational Health and Safety
<b>Detailed Description of the Incident / Accident Event</b>			
<b>RESPONSE ACTIONS FOR THE INCIDENT / Accident</b>			
Status of resolution	Field Response Urgency		
<input type="checkbox"/> Resolved	<input type="checkbox"/> Need for immediate response		
<input type="checkbox"/> In progress	<input type="checkbox"/> No immediate response		
<input type="checkbox"/> Other (explain)			
<b>Description of Response to Event - Incident / Accident</b>			
<b>Recurrence of Similar Events / Incidents / Accidents</b>			
<input type="checkbox"/> No		<input type="checkbox"/> Yes	Number of times ____
<b>In case of recurrence, indicate the period in which the events were repeated:</b>			

INCIDENT / ACCIDENT REPORT FORM	
IMPACT ON THE PROJECT	
Does the event affect the execution of the work?	Is there a need for additional specialized resources to investigate, evaluate, or resolve the event?
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes
<input type="checkbox"/> NO	<input type="checkbox"/> No
	<input type="checkbox"/> Other ( <i>Explain</i> )
Other observations	

**Appendix 5a: Incident and Risk Classification Guide**

<p><b>Level 1 (Low)</b></p> <p>A relatively minor and small-scale incident or non-compliance that is limited in its immediate effects but may be indicative of wider-scale issues within a project that could lead to serious or severe incidents. It may be escalated to serious or severe under certain circumstances, including recurrence of the incident within a six-month period, severity of impact of the incident, or inability or unwillingness to rectify the condition within the agreed timeframe.</p>
<p><b>Level 2 (Medium)</b></p> <p>An incident that is causing or will cause significant harm to the environment, workers, communities, or natural or cultural resources, is complex and/or costly to reverse and may result in some level of lasting damage or injury. This may include repeated non-compliance. Serious incidents for example could involve injuries to workers that require off-site medical attention and result in lost time, improper treatment of vulnerable groups, inadequate consultation, consistent lack of OHS plans in a civil works environment, and medium-scale deforestation. These types of incidents require an urgent response.</p>
<p><b>Level 3 (High)</b></p> <p>An incident or repeated pattern of non-compliance of sufficient seriousness that it may, in addition to the actual or potential harm caused, pose a corporate risk. A severe incident is complex and expensive to remedy, and likely irreversible. A fatality is automatically classified as severe, as are large-scale deforestation, major contamination, forced or child labor, human rights abuses of community members by security forces or other project workers, including GBV, violent community protests against a project, and trafficking in endangered species.</p>

**Appendix 6: Corrective Action Plan**

<b>General Information</b>	
Corrective Action Plan ID:	
Action Plan Title:	
Corrective Action Plan Owner:	
Priority (Critical, High, Medium, Low):	
Project Change Request Necessary (Yes/No):	
Expected Action Plan Implementation Date:	
Actual Date Implemented:	

<b>Corrective Action Information</b>
Issue or Problem Definition (be specific and quantify if possible):
Root Cause Evaluation:
Action Steps:
Alternatives Considered (if applicable);
Improvement Metric and Timeframe:
Implementation Verification (Monitoring and Evaluation):

**Appendix 7: Grievances Redress Meeting Notes Form**

**Date of Meeting:**

**Grievance Ref No:**

**Venue of Meeting:**

**Attendees:**

<b>Category</b>	<b>Name</b>	<b>Designation/Affiliation with Project</b>
<b>Complainant</b>		
<b>Representative of Complainant</b>		
<b>Grievance Committee Members</b>		

**Summary of Grievance:**

**Grievance Level:** 1  Level 2  Level 3

**Meeting notes:**

**Decision points:**

**Next steps:**

**Outcome:**

Issue resolved  Issue unresolved

**Name of Grievance Committee Chair:**

**Signature of Grievance Committee Chair:**

**Date:**



# Gender Based Violence (GBV) Referral Pathways

## 1 A SURVIVOR DISCLOSES GENDER-BASED VIOLENCE TO SOMEONE TRUSTED

The survivor tells a trusted family, friend, or a community member OR The survivor self-reports to any service provider

- IMMEDIATE RESPONSE**
- Respect the confidentiality and wishes of the survivor
  - Provide reliable and comprehensive information on the available services and support to survivors of GBV
  - Obtain and document informed consent.
  - When family/guardians make decision on behalf of the child, ensure the best interest of the child is given priority. Preferably, the accompanying adult should be selected by the child
  - Support survivors of rape to access medical care within 72 hours (but it is their choice).

<p style="text-align: center;"><b>DO</b></p> <ul style="list-style-type: none"> <li>• DO believe the survivor. Reassure the survivor that this was not his /her fault.</li> <li>• DO make sure that both the survivor and you are safe from immediate danger.</li> <li>• DO provide practical care and support (e.g. offer water, somewhere to sit, etc.)</li> <li>• DO listen to the person without asking questions.</li> <li>• DO be aware of and set aside your own judgments.</li> <li>• DO respect the right of the survivors to make their own decision.</li> <li>• Inform, do not give advice.</li> <li>• DO limit the number of people informed about the case (refer the case confidentially to appropriate GBV focal point, and only with the informed consent of the survivor).</li> </ul>	<p style="text-align: center;"><b>DO NOT</b></p> <ul style="list-style-type: none"> <li>• DO NOT force help on people, be intrusive or pushy.</li> <li>• DO NOT pressure the survivor into providing information or further details.</li> <li>• DO NOT doubt or contradict the survivor.</li> <li>• DO NOT investigate the situation or provide advice</li> <li>• DO NOT mediate between the survivor and the perpetrator or a third person (e.g. family).</li> <li>• DO NOT write down or share details of the incident or personal details of the survivor</li> <li>• DO NOT assume you know what a survivor wants or needs. Some actions may put the survivor at further risk of stigma, retaliation, or harm.</li> <li>• Once a GBV referral has been made, DO NOT ask for extra information or contact the survivor directly.</li> </ul>	<p style="text-align: center;"><b>ALWAYS PRACTICE THE SURVIVOR CENTERED APPROACH</b></p> <ul style="list-style-type: none"> <li>• <b>PRIORITIZE</b> the needs, wishes, and decisions the survivor expresses</li> <li>• <b>ENSURE</b> the survivor makes ALL decisions about accessing services and sharing information regarding her case</li> <li>• <b>DO NOT TELL THE SURVIVOR WHAT TO DO</b></li> <li>• <b>NEVER</b> blame the survivor</li> <li>• Be patient, be a <b>GOOD LISTENER</b>, and be <b>NON- JUDGEMENTAL</b></li> </ul>
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## 2 IF THE SURVIVOR HAS GIVEN INFORMED CONSENT, THE IMMEDIATE RESPONSE SHOULD BE:

<p><b>PRIORITIZE URGENT HEALTH CARE!</b></p>	<p><b>PRIORITIZE SAFETY AND SECURITY!</b></p>	
<p style="text-align: center;"><b>SEXUAL VIOLENCE</b></p> <p>If the survivor needs it - ensure immediate access to available medical care (within 3 days /72 hours for emergency HIV treatment; within 5 days for emergency contraceptives and prevention of sexually transmitted infection).</p>	<p style="text-align: center;"><b>PHYSICAL VIOLENCE</b></p> <p>If the survivor needs it - seek medical care if he/she is experiencing severe pain, bleeding, or for the treatment of non-sexual violence related injuries</p>	<p style="text-align: center;"><b>IF THERE IS AN IMMEDIATE RISK OF SAFETY FOR THE SURVIVOR/THERE IS A LIFE-THREATENING CONCERN</b></p> <p>Contact competent authorities (police,) or other appropriate emergency support.</p>

## 3 IF THERE ARE NO URGENT HEALTH OR SAFETY & SECURITY NEEDS, RESPOND TO OTHER SERVICE NEEDS

These can include Mental Health Services, Shelter, Non-food Items, Food, or Legal Information & Advice.



## GBV REFERRAL PATHWAYS - ST LUCIA

(TO BE USED ONLY BY TRAINED CASE WORKERS/SOCIAL WORKERS)

### MEDICAL & SECURITY SERVICES - DIRECTORY OF OTHER CENTRES NOT LISTED ON PATHWAYS



#### FAMILY PLANNING SERVICES

**Ansa La Raye - (Mon- Fri- 08.00-16.30)**  
 Anse La Raye Health Centre - 451-4225  
 Jacmel Health Centre - 451-4004  
**Babonneau - (Mon- Fri- 08.00-16.30)**  
 Fond Assau Health Centre - 450-5939  
 La Guerre Health Centre - 458-9222  
**Canaries - (Mon- Fri- 08.00-16.30)**  
 Canaries Health Centre - 459-4430  
**Castries - (Mon- Fri- 08.00-16.30)**  
 Castries Health Centre - 452-4416  
 Babonneau Health Centre - 450-5858  
 Bexon Health Centre - 452-1261  
 Ciceron Health Centre - 453-7934  
 Antrepot Health Centre - 452-1873  
 La Clery Health Centre - 452-4303  
 La Crois Maingot Health Centre - 451-4248  
 Ti Rocher Health Centre - 452-3529  
 Vanard Health Center - 451-4247  
**Choiseul - (Mon- Fri- 08.00-16.30)**  
 La Fargue Health Centre - 459-3238  
 Mongouge Health Centre - 459-3123  
 Saltibus Health Centre - 455-1589  
 Delcer Health Centre - 459-3971  
**Dennery - (Mon- Fri- 08.00-16.30)**  
 La Ressource Health Centre - 453-3312  
 Richford Health Centre - 453-3355  
**Gros Islet - (Mon- Fri- 08.00-16.30)**  
 Grand Riviere Health Centre - 450-1651  
 Monchy Health Centre - 450-1319  
**Micoud - (Mon- Fri- 08.00-16.30)**  
 Desruisseaux Health Centre - 455-0449  
 Micoud Health Centre - 454-4230  
 Mon Repos Health Centre - 455-3229  
 Ti Rocher Health Centre - 455-4520

#### FAMILY PLANNING SERVICES

**Soufriere - (Mon- Fri- 08.00-16.30)**  
 Etangs Health Centre - 459-7582  
 Fond St Jacques Health Centre - 459-7595  
**Vieux-Fort - (Mon- Fri- 08.00-16.30)**  
 Laborie Health Centre - 454-6930  
 Grace Health Centre - 454-8357  
 Vieux-Fort Health Centre - 454-6337  
 Belle Vue Health Centre - 454-8001

#### **SPECIALIZED SEXUAL AND REPRODUCTIVE HEALTH SERVICES**

**Castries - (Mon- Fri- 08.00-16.30)**  
 Adolescent Health Clinic  
 Castries Health Centre - 452-4417  
**Vieux-Fort - (Mon- Fri- 08.00-16.30)**  
 Vieux-Fort Health Centre - 454-6338

**SEE AMPHSS DIRECTORY FOR  
 LICENSED MENTAL HEALTH &  
 PSYCHO-SOCIAL SUPPORT  
 (private)**

#### COMMUNITY POLICE STATIONS

**Ansa La Raye - (24/7)**  
 Anse La Raye Police Station - 456-3600  
**Canaries - (24/7)**  
 Canaries Police Station - 456-3610  
**Castries - (24/7)**  
 Babonneau Police Station - 4506-4120  
 Marchand Police Station - 456-3885  
**Choiseul - (24/7)**  
 Choiseul Police Station - 456-3635  
**Dennery (24/7)**  
 Dennery Police Station - 456-4090  
 Richford Police Station - 456-3690  
**Gros Islet - (24/7)**  
 Gros Islet Police Station - 456-3839  
 Rodney bay Police Station - 456-4062  
**Marigot - (24/7)**  
 Marigot Police Station - 456-3829  
**Micoud - (24/7)**  
 Micoud Police Station - 456-3670  
**Soufriere - (24/7)**  
 Soufriere Police Station - 456-3620  
**Vieux-Fort - (24/7)**  
 Laborie Health Police Station - 456-3645  
 Vieux-Fort Police Station - 456-3905

BLUE TEXT = REMOTE SERVICE PROVISION / RED TEXT = HOTLINE

**Appendix: 10 Consultation Minutes**

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
<p>MOE technical units</p> <p>Policy and Administration Educational Unit Evaluation and Assessment Unit Technical Vocational Education and Training Unit Early Childhood Services Special Education Unit National Enrichment and Learning Unit Curriculum and Materials Development Unit Plant and Equipment Unit Human Resource Development Unit Human Resource Management Unit School Safety Unit MOE Legal Unit Corporate Planning Unit</p>	<p>December 14, 28, 29, 2023</p>	<p>Identified key components of the policy reform.</p> <p>Outlined gaps in attaining priority reforms</p>	<p>To review discussions and use findings to inform priority reform agenda.</p>	<ul style="list-style-type: none"> <li>- Develop enabling factor analysis of the priority reform.</li> <li>- Define actions to address gaps in the enabling factors.</li> <li>- Complete draft enabling factor report.</li> <li>- Prepare theory of change for priority reform</li> </ul>	<p>January to February 2024</p>
<p>EMIS affected parties (MOE, OECS Commission)</p>	<p>March 24, 2025</p>	<ul style="list-style-type: none"> <li>- Identified challenges, opportunities, and priorities in ongoing strengthening of EMIS.</li> <li>- Reviewed draft EMIS diagnostic assessment report</li> <li>- Reviewed of key policy issues requiring incorporation into draft EMIS policy</li> <li>- Reviewed HR requirements for EMIS</li> </ul>	<ul style="list-style-type: none"> <li>- Identified key activities and outputs</li> <li>- Identified EMIS (post-secondary level) support complementarities under OECS SKIP.</li> <li>- Discussed timelines for the EMIS 3-year implementation plan</li> <li>- Discussed EMIS procurement process</li> <li>- Identified the scope of business</li> </ul>	<ul style="list-style-type: none"> <li>- Develop a comprehensive EMIS policy and accompanying governance framework</li> <li>- Draft detailed statements of the business requirements of all aspects of the national EMIS</li> <li>- Establish a dedicated unit or team to implement and monitor the EMIS</li> <li>- Develop an EMIS budget</li> <li>- Develop a monitoring and</li> </ul>	<p>May 2025</p>

			<p>requirements development process and agreement on way forward.</p> <p>-</p>	<p>evaluation framework</p> <ul style="list-style-type: none"> <li>- Invest in ICT infrastructure for EMIS activities</li> <li>- Enhance data capturing, processing, analysis, and distribution</li> <li>- Develop a change management plan</li> <li>- Participate in regional EMIS workshops in May 2025</li> </ul>	
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