

Grievance
Mechanism (GM)
for the OECS Data
for Decision
Making (DDM)
Project (P174986)

Acronyms and Abbreviations

ESS- Environmental and Social Standard

GBV- Gender Based Violence

GRC- Grievance Redress Committee

GRE- Grenada

GM- Grievance Mechanism

PAI- Project Area of Influence

PAP(s)- Project Affected Persons

PDO- Project Development Objective

PIU- Project Implementation Unit

PSC- Project Steering Committee

SEA- Sexual Exploitation and Abuse

SH- Sexual Harassment

SLU- Saint Lucia

SST- Social Safeguards Team

SVG- Saint Vincent and the Grenadines

WB – World Bank

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1 Introduction

The Government of Saint Lucia (GOSL), with funding from the World Bank, is implementing the OECS Data for Decision Making Project (ODDM) jointly with Grenada (GRE), and Saint Vincent and the Grenadines (SVG). The Project Development Objective (PDO) is to improve the capacity of Participating Eastern Caribbean Countries to: (i) produce and publicly disseminate statistical data for country and regional level analytics; and (ii) to provide immediate and effective response to an Eligible Emergency.

The World Bank's Environmental and Social Standards (ESS) mandates that persons affected by the project (PAPs) be meaningfully consulted and given the opportunities to participate in planning and implementing the program. ESS2 [Labour and Working Conditions], ESS10 [Stakeholder Engagement and Information disclosure] recommends that a Grievance Mechanism (GM) be created to address all concerns of the PAPs.

The GM provides project affected persons (PAPs), an opportunity to voice complaints or concerns, and clarify and resolve misconceptions about the project activities. It provides a simple, transparent and timely manner to express their opinion or grievance related to project activities execution.

This document presents the Grievance Mechanism for the OECS Data for Decision Making Project (P174986). The GM is an effective tool for early identification, assessment and resolution of complaints.

1.1 Objectives of the GM

The ideal redress mechanism for grievances would be the avoidance of situations which can give rise to them in the first place. However, given the nature of implementing projects in a dynamic environment, the GM aims at the next best option. That is, the GM aims to quickly address all relevant grievances to minimize and/or eliminate negative impacts of the project on affected persons. In satisfying its aim, the GM will ensure that grievances are identified early and that the redress mechanisms are appropriate and expeditious, ultimately preventing escalation or unmanageable circumstances. The GM can also help to minimize or eliminate conflicts with the potential to compromise the project development objective. The GM will enable the Project Authorities to address grievances against the Project. It must be noted that this GM covers grievances that relate to the impacts that the project will have on its stakeholders, as listed in the Stakeholder Engagement Plan and the Labour Management Procedures.

It must be noted that grievances which relate to project workers will be handled by a separate Workers Grievance Mechanism which is included as part of the project's Labor Management

Procedures (LMP) that has been prepared.

The objectives of the Grievance Mechanism are as follows:

1. Ensuring that the Government of Saint Lucia regulations and the World Bank's Environmental and Social Standards are adhered to in all project activities;
2. Addressing any negative environmental and social impacts affecting workers of all project activities;
3. Resolving all grievances emanating from the project activities in a timely manner;
4. Establishing relationships of trust between project staff and the Grievance Officer;
5. Creating transparency between grievance parties.

2 Project Description

The Project Development Objective (PDO) is to improve the statistical capacity of Participating Eastern Caribbean countries (i) to produce and publicly disseminate statistical data for country and regional level analytics; and (ii) to provide immediate and effective response to an Eligible Crisis Emergency.

2.1 Project Components

The project consists of four components as outlined in Table 2.1.

Table 2.1- Project components

Project Component	Description
Component 1: Statistical Modernization and Capacity Building	This component will support the modernization of the national statistical system by supporting activities that will: <ol style="list-style-type: none">1. Improve the institutional and technical capacity of the NSO to produce official statistics according to a statistical release calendar, and producing official statistics.2. Reinforce the national statistical system and its coordination across government ministries and agencies.3. Modernize information and technology equipment to improve business continuity and the efficiency and quality of statistical operations from data collection to the dissemination of results; and4. Promote the use of data and statistics and develop a user-oriented system that improves access.

Project Component	Description
	<p><i>Subcomponent 1.1: National Statistical Office Development</i></p> <p>This subcomponent will support the strengthening of the organizational and technical capacity of NSOs to produce official statistics according to a statistical release calendar.</p> <p><i>Subcomponent 1.2: Strengthening the National Statistical System</i></p> <p>This subcomponent will support progress towards an effective National Statistical System (NSS), with the NSO at its core, to coordinate statistical activities across line ministries and respond to data priorities for policy making.</p> <p><i>Subcomponent 1.3: Information Technologies for Statistics</i></p> <p>This subcomponent will support the acquisition of Information Technology (IT) equipment, software, and accessories to increase efficiency and quality from survey preparation to data collection to dissemination.</p> <p><i>Subcomponent 1.4: Promoting Data Access and Use</i></p> <p>This subcomponent will support participating countries to improve public access to data and its use to advance development objectives.</p>
<p>Component 2: Data Collection, Analysis, and Dissemination</p>	<p>This component will support the production of core data products central to the statistical system and some supplemental data to fill other key data gaps identified by participating countries.</p> <p><i>Subcomponent 2.1: Core Data</i></p> <p>This subcomponent will support the production of core data collection activities to improve the frequency of data available to monitor and analyze demographic, social, and economic conditions. The core data production activities covered by this project are the following: (i) Population and Housing Census, (ii) Survey of Living Conditions, (iii) Labor Market Statistics, and (iv) Agricultural Census. This subcomponent provides an opportunity to directly improve the availability of sex-disaggregated data.</p>

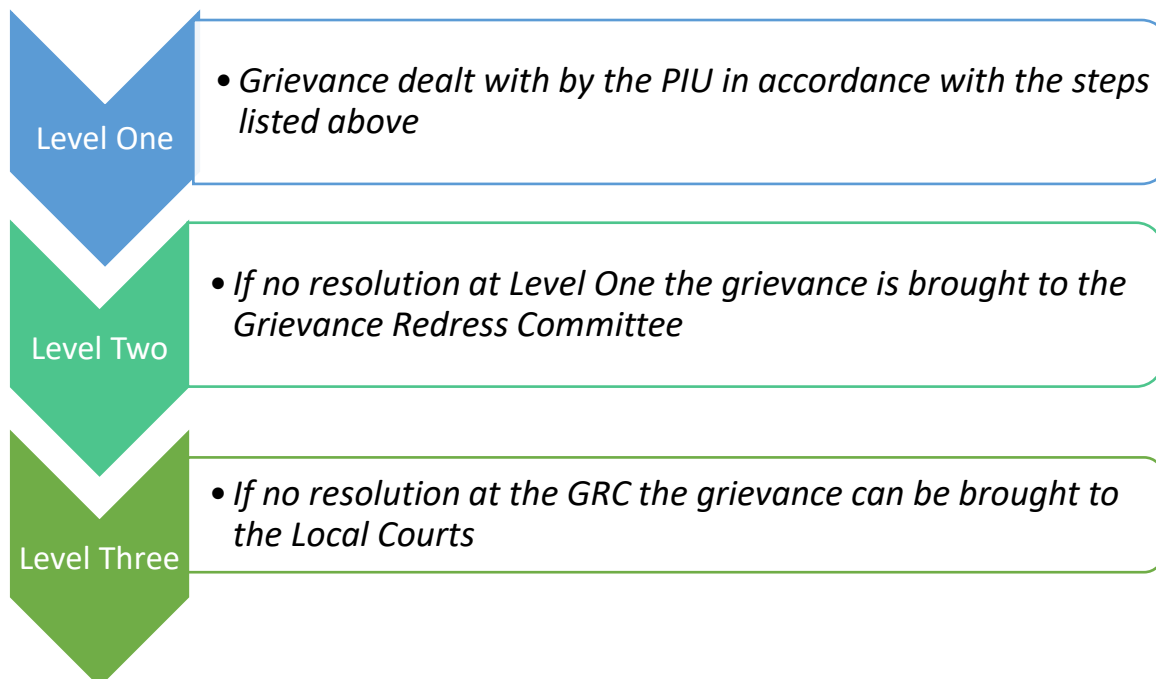
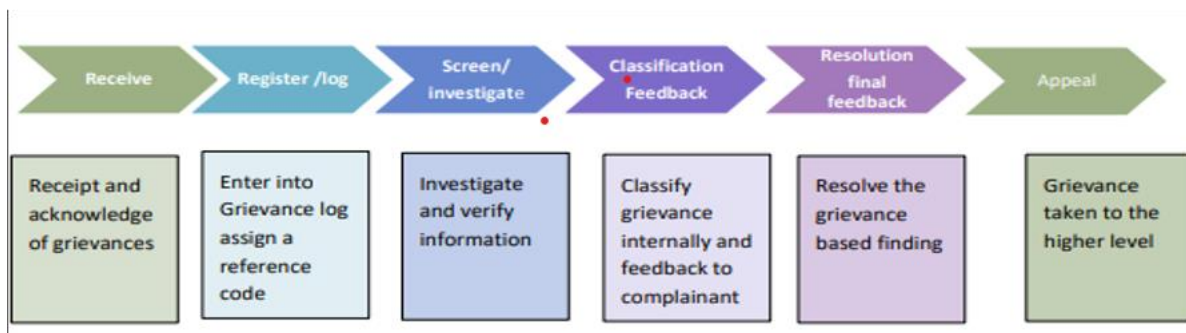
Project Component	Description
	<p><i>Subcomponent 2.2: Supplemental Data</i></p> <p>This subcomponent aims to help fill other country specific data gaps, by supporting small surveys and/or technical assistance to produce supplemental data.</p>
<p>Component 3: OECS Regional Integration</p>	<p>This component contributes to the OECS Commission’s mandate for regional integration and strengthening of the Regional Statistical System by:</p> <ol style="list-style-type: none"> 1. Supporting the creation of the OECS Regional Data Governance Council in charge of providing guidance and harmonization of key data instruments and methodologies to improve quality and comparability of data across member states; 2. Developing and testing innovations suitable for small island states in the Eastern Caribbean; 3. Strengthening regional technical assistance to NSOs and NSSs; and 4. Supporting the generation of regional analytics and their dissemination. <p><i>Subcomponent 3.1: OECS Regional Data Governance Council (RDGC)</i></p> <p>This sub-component will strengthen the OECS’s data governance structure and capacity to harmonize, coordinate and integrate regional data by establishing the RDGC and supporting its operations.</p> <p><i>Subcomponent 3.2: Data Innovation for Small Island Developing States</i></p> <ol style="list-style-type: none"> 1. This subcomponent will support experimentation of methodological innovations and alternative data that are promising for small island state contexts. <p><i>Subcomponent 3.3: Regional Technical Assistance and Capacity Building</i></p> <p>This subcomponent aims to strengthen the capacity of the participating countries to produce high quality harmonized data by providing training and technical assistance to NSO and NSS staff.</p>

Project Component	Description
	<p><i>Subcomponent 3.4: Regional Data Aggregation, Analysis, and Dissemination</i></p> <p>This subcomponent will support the production of regional analytics drawing on the major data production activities financed by this project.</p>
<p>Component 4: Project Implementation</p>	<p>This component will support project implementation in each country and at the OECS Commission.</p>
<p>Component 5 – Contingency Emergency Response Component (CERC)</p>	<p>This zero-cost component aims to provide immediate surge funding in the event of a eligible national emergency. The CERC is only triggered in the case of a public emergency and when certain actions, as agreed by the Government and Bank teams, are met. The project will develop CER manual that will be required in case there is the need to activate the CERC component. Based on this manual, a CERC ESMF will be prepared to set out the environmental and social requirements that will be applicable to the set of expenditures eligible for financing under this component. The timeline for the preparation of the CERC-ESMF has been included in the Project’s Environmental and Social Commitment Plan.</p>

3 Grievance Process

The key stages involved in the project’s grievance process are listed below and described in the sections that follow.

1. **Uptake (locations and channels),**
2. **Sort and Process,**
3. **Acknowledge and follow-up;**
4. **Verify, Investigate and Act;**
5. **Monitor and Evaluate; and**
6. **Provide feedback.**



Note: While complainants are encouraged to use the project level GM, they maintain the right to access the local courts at any time that they may wish to.

3.1 First Level of Redress

Receive Grievance

All complaints will be received by the Project Coordinator and or the Environmental and Social Specialist of the PIU. Through the consultation process, stakeholders will be informed of various avenues through which the mechanism can be accessed. Complaints can be made in person, writing, verbally over the phone, by fax, emails or anonymously. The point of receipt of complaints is listed below:

Table 3.1- Contact information for submission of grievances

<p>Grievances from affected parties</p>	<p>Grievances made verbally to the Environmental and Social Specialist (E&S Specialist) in person at stakeholder engagement meetings. All GBV complaints will be handled directly by the E&S Specialist who has been trained in the handling of these cases, consistent with the WB guidance notes. The complaint can be made to anyone chosen by the affected parties and that that person will guide the complainant toward the proper channel -Complaints could be anonymous, hence, all project workers will be trained on the use of the GM and its SEASH aspects.</p> <p>By email to the following address- geraldine.stcroix@govt.lc</p> <p>By letter, addressed to:</p> <p>Ms. Geraldine St. Croix Deputy Project Coordinator OECS Data for Decision Making Project Department of Economic Development and the Youth Economy 2nd Floor Finance Administrative Centre Pointe Seraphine Castries</p> <p>By phone at number 468 5815 / Or call, text or WhatsApp to: 1-758-284 1092</p> <p>Grievances related to the Project Coordinator can be addressed to:</p> <p>The Permanent Secretary Department of Economic Development Ministry of Finance, Economic Development and the Youth Economy Financial Administrative Centre Pointe Seraphine Castries</p> <p>Telephone – 758 468-5500</p>
<p>Access Point</p>	<ul style="list-style-type: none"> • The PIU serves as the access point for grievances

Grievance Log	<ul style="list-style-type: none"> Grievances received verbally are documented, verified and signed by both parties. Grievances will be copied to the relevant authority
Assessment	<ul style="list-style-type: none"> Grievances categorized by type. Determination of eligibility of grievance. The first assessment of the grievance is conducted by the PIU and technical officers from the pertinent Government authorities. Letters acknowledging the grievance is issued by the PIU The E&SS will communicate all disputes and grievances to the PIU immediately when received. Should a dispute arise, the applicable Laws of Saint Lucia will prevail.
Resolution and Follow-up	<ul style="list-style-type: none"> Development of an Implementation Plan for resolution of grievances, including timeframes in which each step is completed as stated above in in the section on processing grievances.
Physical Address	2 nd Floor Finance Administrative Center Point Seraphine Castries, Saint Lucia

All grievances received by the established points of contact should be forwarded to the Project Coordinator within 24 hours of receipt. Complaints about the Project Coordinator will be addressed to the Permanent Secretary Department of Economic Development.

If anonymous complaints are received all information required to complete the form will be recorded except the name of the complainant.

Modes of Receiving Grievances

Complaints can be made in person, writing, verbally over the phone, by fax, emails and anonymously. The person receiving the complaint will try to obtain relevant information regarding the grievance and the complainant and will immediately inform the Project Coordinator (PC).

Acknowledge Grievance and Feedback

All grievances will be acknowledged in writing by the PC using the Grievance Acknowledgment Form (

Annex 2: Grievance Acknowledgement Form) within 48 hours of receipt and the complainant informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately. The PC will work with the relevant agencies to ensure the speedy resolution of the grievance. 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 Log (Annex 3: Grievance Log).

Screen

The PC reviews the complaint and assign a grievance owner. The complaint will be forwarded to the grievance owner who will be responsible for 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: Meeting Record Form. Community representatives or representatives of the complainant will be allowed to sit in on these meetings if the complainant wishes.

Resolution

The resolution of the complaint, at the first tier, should be completed within 15 working days of receipt of the grievance and the proposed solution to the complaint notified to the concerned party through the Disclosure Form (

Annex 5: Disclosure/Release Form). If the grievance is not resolved within this period, it can be referred to the next level of the Grievance Redressal system, as indicated above (GRC and Courts). 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 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 and recorded in writing, 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. All these steps, exchanges with the complainants will be recorded in detail in the grievance log for the project under the responsibility of the ES Specialists.

Feedback

Feedback will be provided to the complainant throughout the redress process, first when receipt of the grievance is acknowledged and the complainant informed of the approximate timeline for addressing the complaint, and following the investigation of the grievance.

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 PC.

3.2 Second Level of Redress

A Grievance Redressal Committee (GRC) will be formed in the PIU, that will consist of members of the Project Steering Committee, civic leaders and relevant representatives. The GRC will be called into place when a first-tier resolution is not found, but it could also meet on a quarterly basis to evaluate the performance of the project level GM. From this perspective it is a standing body.

This committee will be chaired by the representative of the implementing line ministry/agency in the corresponding Project Steering Committee. The permanent secretaries of the participant ministries will assign their respective representative to the GRC. The line ministry or the PIU can invite active NGOs to nominate a representative.

Terms of Reference for GRC:

The functions of the GRC are as follows, to:

1. To assess the eligibility of the revised claim and recommend actions to be taken by the PIU.
2. Prioritize grievances and resolve them at the earliest reasonable time;
3. Provide guidance to the PIU on serious cases at the earliest possible time;
4. Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance;
5. Study the normally occurring grievances and advise the PC as to their scale and scope.

The PC 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 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 recorded 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 towards resolution, the matter may be retained at this level for a maximum of 60 working days.

3.3 Third Level of Redress

If the affected party / complainant does not agree with the resolution at the 2nd level, or there is a time delay of more than 60 working days in resolving the issue, the complainant can opt to consider taking it to the third level. This level involves the complainant taking legal recourse within the local courts.

The complainant is always free to resort to the project GM, including local courts, without any fear of retaliation, which is strictly prohibited under the project.

4 Addressing Complaints with Allegations of Sexual Harassment and/or Sexual Exploitation and Abuse

The GM identifies the E & S Specialist as the individual responsible for dealing with any SH/SEA complaints, should they arise. A list of gender-based violence (GBV) service providers shall be kept available by the project. The GM 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 SH/SEA project-related incident and complaint occurs, it will be reported through the GM, as appropriate and keeping the survivor information confidential. Specifically, the GM will only record the following information related to the SH/SEA 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 SH/SEA brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GM will primarily serve to:

- Refer complainants to the GBV Services Provider; (A list of GBV Service Providers in St. Lucia is in Annex 9.6) and
- Record the resolution of the complaint

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

5 GM Budget

Table: 5.1 Budget for implementation of the GM

Item	Cost (US\$)
Meetings of GRC	2500.00
Information Production and Dissemination	5000.00
Contingency	2500.00
Total	10, 000.00

6 Building GM Awareness

The E&S Specialist will initially brief and train staff of the project office, any consultants and/or contactors, and the staff of the associated Ministries on the Grievance Redressal Mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

The E&S Specialist of the project team will disseminate information to all project stakeholders on the Grievance Mechanism of the Project and explain the procedures and formats to be used including the procedures for filing complaints. Awareness campaigns would be conducted targeting project stakeholders to inform them on the availability of the mechanism; various mediums will be used- as detailed in previous sections of the SEP, and also the prohibition of retaliation for anyone that may wish to lodge a complaint. The GM will be promoted at all stakeholder consultations and meetings, and will also be published on the website of the Central Statistics Office, the website of responsible Ministries and the project website or Facebook page if there is one. The GM will be translated into local and colloquial expressions if needed.

7 Monitoring and Reporting

The E&S Specialist will prepare the Monthly and Quarterly Reports on the Grievances of the project, including status, accountability and timeframes for resolution. GM reporting will also be included in the reports submitted to the World Bank.

8 Periodic Review by the Grievance Redressal Committee

The Grievance Redressal Committee may review the nature of grievances that have been represented and if grievances are repeated, recommend suitable changes in implementation procedures and forward these to the regional PIU for implementation.

9 Annexes

Annex 1. Grievance Information Form

Date/Time received:	Date: (dd-mm-yyyy) Time: <input type="checkbox"/> am <input type="checkbox"/> pm	
Name of Complainant:		<input type="checkbox"/> You can use my name, but do not use it in public. <input type="checkbox"/> You can use my name when talking about this concern in public. <input type="checkbox"/> You cannot use my name at all.
Company (if applicable)		<input type="checkbox"/> You can use my company name, but do not use it in public. <input type="checkbox"/> You can use my company name when talking about this concern in public. <input type="checkbox"/> You cannot use my company name at all
Contact Information:	Phone: Email address: Address: (Kindly indicate the preferred method of communication)	
Details of grievance: (Who, what, when, where)	<input type="checkbox"/> One-time incident/complaint <input type="checkbox"/> Happened more than once (indicate how many times): _____ <input type="checkbox"/> Ongoing (a currently existing problem)	

How would you like to see issue resolved?	
Attachments to the grievance/complaint: (e.g. pictures, reports etc.)	List here:

Annex 2: Grievance Acknowledgement Form

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

Date of grievance/complaint: (dd/mm/yyyy)	
Name of Grievant/Complainant:	
Complainant's Address and Contact Information:	
Summary of Grievance/Complaint: (Who, what, when, where)	
Name of Project Staff Acknowledging Grievance:	
Signature:	

Date: (dd/mm/yyyy)	

Annex 3: Grievance Log

No.	Name of Grievant/Complainant	Date Received	Grievance Description	Name of Grievant Owner	Requires Further Intervention	Action(s) to be taken by PIU	Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance
1.							
2.							
3.							
4.							

Annex 4: Meeting Record Form

Date of the Meeting: Grievance No:

Venue of meeting:

Details of Participants:

Complainant	Project/Government/OECS

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

Grievance No:	
Name of Grievant/Complainant:	
Date of Complaint:	
Summary of Complaint:	
Summary of Resolution:	
Resolved at:	<input type="checkbox"/> First Level <input type="checkbox"/> Second Level <input type="checkbox"/> Third Level
Date of grievance resolution (DD/MM/YYYY):	

Signature of Complainant in acceptance of the suggested grievance resolution:

.....

Name:

ID number: **Type of ID:**

Date (DD/MM/YYYY):

Signature of Environmental and Social Specialist and Project Coordinator:

1..... 2.....

1.Name:.....

Place:..... **Date:(dd –mm – yyyy):**

2.Name:.....

Place:..... **Date:(dd –mm – yyyy):**

Annex 6: List of GBV Service Providers in St. Lucia

St. Lucia GBV Service Providers

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2 nd Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	slucps@gmail.com
Family Court	Case Management	Peynier Street, Castries	468-3308	familycourt.slu@gmail.com
Criminal Investigations Department	Case Management	Castries Vieux Fort	456-3770 456-3817 456-3926	
Vulnerable Persons Unit	Case Management Investigation of sexual offences against minors, women and men.	Vulnerable Persons Team South North	456-3908 456-4050 4051/4052	
St. Lucia Against Human Trafficking	Providing human trafficking victims and survivors with access to critical support and services to get help and stay safe.	Ministry of Home Affairs, Justice and National Security 1 st Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	police@antitraffickingslu.org
Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	gender.relations@govt.lc

Service Providers	Service Provided	Address	Telephone	Other
Abuse Hotline	Psychosocial Support		202	
St. Lucia Crisis Centre	Psychological Support Livelihood Support Assistance with basic needs such as food and shelter	107 Chausse Road, Castries	453-1521 712-7574	stluciacrisis@gmail.com
Women's Support Centre	Legal Aid Psychological Support Livelihood Support Assistance with basic needs such as food and shelter		458-4470	wsccenter2001@gmail.com
Raise your Voice St. Lucia Inc	Psychological Support Livelihood Support	Manoel Street, Castries	726-0473 487-2329	raiseyourvoiceslu@gmail.com https://ryvslu.org/
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	info@prosafe.org https://prosaf.org
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	unitedandstrongstlucia@yahoo.com www.facebook.com/Unitedandstrongstlucia/
St. Lucia Planned Parenthood Association	Sex education counselling, Sexual and reproductive health services	52 John Compton Highway	452-4335 Hotline: 459-7933 Whatsapp 722-1234	slppa758@gmail.com
OKEU Hospital	Medical Health Services	Castries	458-6500	

Service Providers	Service Provided	Address	Telephone	Other
St. Jude Hospital	Medical Health Services	Vieux Fort	454- 6041	
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
Vieux Fort Wellness Centre	Medical Health Services	Vieux Fort Town	454-6337	
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	