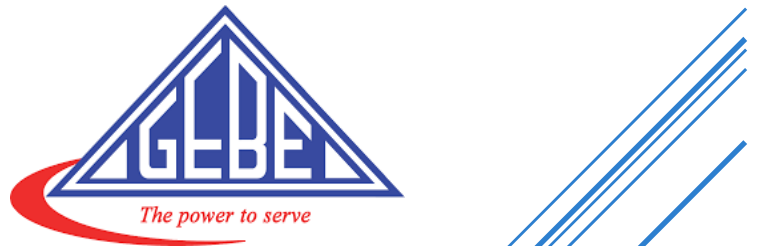


POLICY RULES & PROCEDURAL MANUAL

NV GEBE & The Ministry of VSA's Pilot Program – Relief
initiative



Ministry of Public Health , Social Development & Labor

Policy and Procedures Manual

Program Partners:

- N.V. Gemeenschappelijk Electriciteitsbedrijf Bovenwindse Eilanden (NV GEBE);
- The Government of Sint Maarten, represented by the Minister of Public Health, Social Development, and Labor; and
- The Division of Labor Affairs and Social Services

Effective Date: December 1, 2025

Program Duration: 12 months (1 year)

Document Version: 1.0

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1. PROGRAM OVERVIEW

1.1 Purpose

This pilot program provides utility bill relief to vulnerable applicants of the Sint Maarten community through a collaborative partnership between NV GEBE (hereinafter: “NV GEBE”) and the Government of Sint Maarten, represented by the Minister of Public Health, Social Development & Labor and executed therein by the Division of Labor Affairs & Social Services (hereinafter: “Social Services”).

1.2 Program Objectives

- Provide financial relief to vulnerable community applicants struggling with utility costs (financial aid recipients & vulnerable community applicants).
- Support national development by promoting well-being and service access to the vulnerable groups.
- Establish a coordinated support framework between NV GEBE and Social Services.
- Evaluate effectiveness of utility assistance for potential program expansion.

1.3 Program Budget

- **Total Monthly Allocation:** XCG 50,000.00
 - **Allocation to Existing Eligible Financial aid Recipients :** XCG 25,000.00 per month
 - **Allocation to New Eligible Applicants:** XCG 25,000.00 per month
 - **Maximum Per Eligible Applicant:** XCG 250.00 per month
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2. POLICY STATEMENTS

2.1 Core Principles

- Relief is provided exclusively to vulnerable community applicants and financial aid recipients as determined by Social Services.
- NV GEBE does not determine eligibility for the program.
- All relief is applied through a voucher system.
- The program operates within strict budgetary constraints.
- Regular reassessment ensures continued eligibility.

2.2 Non-Discrimination

The program shall be administered without discrimination based on race, religion, gender, age, disability, or any other protected characteristic, subject to eligibility criteria.

2.3 Transparency

All program operations shall maintain transparency while protecting confidential personal information of beneficiaries.

2.4 Accountability

Both Social Services and NV GEBE maintain accountability for their respective roles and responsibilities within the program framework.

3. ELIGIBILITY CRITERIA

3.1 Eligible Applicants

An individual qualifies for access to the program if they meet ALL of the criteria listed below.

Required Criteria:

- The applicant must be a private individual (not a legal entity or business).
- The applicant must be an existing NV GEBE client with utilities or bills registered in their name.
- The applicant must be listed by Social Services as a Financial Aid recipient, or have been assessed as a vulnerable member of the community through the application process for the Pilot Program.
- A valid Contract Account Number and Meter Number with NV GEBE must be registered in the applicant's name.
- The applicant must be a legal resident of Sint Maarten, possess a valid residence permit if applicable, and be registered at the Civil Registry.
- The applicant must demonstrate the need for financial relief with appropriate supporting documentation.
- The application has been assessed and approval by Social Services.

3.2 Disqualification

NOT eligible to the program are applicants that:

- Are recognized as a legal entity or business, such includes vendors, tradesmen and sole proprietors.
- Whose names do not appear on the utility bills.
- Who Social Services have not approved as a vulnerable member of society.

3.3 Eligibility Determination

- **Sole Authority:** Social Services has sole authority to determine eligibility.
 - **NV GEBE Role:** NV GEBE does not participate in eligibility decisions.
 - **Reassessment:** Once an applicant is deemed eligible and has been admitted to the program, their eligibility shall be reassessed every two (2) months. The designated authority is required to request all documentation required to ascertain continuation of eligibility. Home visits are permitted, ONLY with the individual's consent.
-

4. VOUCHER SYSTEM

4.1 Voucher Specifications

Standard Voucher Value: XCG 50.00 per voucher

Required Information on Each Voucher:

- Name of Eligible Applicant
- Date of voucher issuance
- Validity period (3 months from date of issue)
- Contract Account Number
- Meter Number(s)
- Amount (XCG 50.00)
- Authentic QR Code for verification (if applicable)
- Date of issue
- Signature and stamp of NV GEBE Transition Manager
- Signature and stamp of Division Head Labor Affairs & Social Services

4.2 Voucher Limits

- **Maximum per Applicant per Month:** 5 vouchers (XCG 250.00)
- **Validity Period:** 3 months from date of issue
- **Non-Transferable:** Vouchers cannot be transferred to another person
- **Non-Exchangeable:** Vouchers cannot be exchanged for cash
- **Account-Specific:** Linked exclusively to the Applicant's Contract Account and Meter Number
- **Voucher values determined per the following :**

Income Level (% of Minimum wage)	Household size 1-2	Household Size 3- 4	Household Size 5+
0 – 50%	Up to XCG 150 per month	Up to XCG 200 per month	Up to XCG 250 per month
51 – 100%	Up to XCG 100 per month	Up to XCG 150 per month	Up to XCG 200 per month
101- 150%	Up to XCG 100 per month	Up to XCG 150 per month	Up to XCG 200 per month
151 – 185%	Up to XCG 100 per month	Up to XCG 100 per month	Up to XCG 100 per month

4.3 Voucher Security

- Each voucher contains a unique QR code for authenticity verification
- All vouchers must be signed and stamped by both NV GEBE and Social Services
- Expired vouchers will not be accepted
- Counterfeit vouchers will be reported to authorities

4.4 Lost or Damaged Voucher Procedures

Purpose:

To ensure consistent and fair handling of situations where vouchers are lost, stolen, damaged, or otherwise unusable, while maintaining program integrity and preventing fraud.

A. LOST VOUCHER PROTOCOL

Eligibility for Replacement:

Lost vouchers may be replaced under the following conditions:

- The voucher was validly issued to the individual
- The voucher has not been redeemed
- The voucher has not expired (still within 3-month validity period)
- The individual reports the loss within a reasonable timeframe

Reporting Process:

1. Initial Report:

- Individual must report lost voucher(s) to Social Services in person or by phone
- Report should be made as soon as loss is discovered
- Individual must provide:
 - Full name and identification
 - Contract Account Number and Meter Number
 - Approximate date vouchers were issued
 - Number of vouchers lost
 - Brief explanation of circumstances (if known)

2. Documentation:

- Social Services completes a "Lost Voucher Report Form" (Appendix A)
- Individual signs declaration that voucher(s) were lost and not redeemed
- Social Services immediately notifies NV GEBE of lost voucher numbers

3. Verification Period (48 hours):

- NV GEBE checks system to confirm vouchers have not been redeemed

- If vouchers were already redeemed, applicant is notified and no replacement issued
- Social Services verifies voucher issuance in records

Replacement Issuance:

If verification confirms vouchers are unredeemed:

1. NV GEBE flags original voucher numbers as "VOID - LOST" in system
2. NV GEBE issues replacement voucher(s) with new unique QR codes
3. Replacement vouchers clearly marked "REPLACEMENT" with reference to original voucher number
4. Replacement vouchers have same value and validity period as originals (calculated from original issue date)
5. Standard voucher processing and distribution procedures apply

Limitations:

- Maximum of **two (2) lost voucher replacement requests** per Individual during the program year
 - After two occurrences, additional requests require approval from Division Head of Social Services
 - Excessive lost voucher claims may trigger eligibility review
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B. DEFECTIVE VOUCHER PROTOCOL

Definition:

Vouchers issued with printing errors, incorrect information, or other defects caused during production.

Examples of Defects:

- Wrong name or account number printed
- Incorrect amount
- Missing required signatures/stamps
- Duplicate voucher numbers

Immediate Replacement:

- Defective vouchers caused by production errors are replaced immediately
 - No waiting period or limitation applies
 - Applicant returns defective voucher to Social Services or NV GEBE
 - Replacement issued within 2 business days
 - Does not count toward lost/damaged voucher limits
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C. EXPIRED VOUCHER HANDLING

Non-Replacement Policy:

Expired vouchers (beyond 3-month validity) are **NOT replaced or extended**.

Exceptions:

Expired vouchers may be considered for replacement **ONLY** if:

1. Applicant was hospitalized or otherwise incapacitated during validity period (medical documentation required)
2. Program administrative error prevented timely redemption
3. Force majeure events (natural disasters, government shutdowns) prevented access to NV GEBE offices

Exception Approval:

- Requires written request to Social Services with supporting documentation

- Division Head of Social Services reviews and approves/denies
- If approved, replacement voucher issued with new 3-month validity period from new issue date

D. FRAUD PREVENTION MEASURES

Red Flags:

- Frequent lost voucher reports from same Individual
- Claims of loss immediately before expiration
- Inability to provide reasonable explanation for loss
- Multiple Individuals from same address reporting losses
- Lost vouchers later presented by someone else

Response to Suspicious Activity:

- Document all details
- Notify program liaisons immediately
- May require in-person verification for future voucher distribution
- May trigger eligibility review
- Confirmed fraud results in program termination

5. OPERATIONAL PROCEDURES

5.1 Monthly Voucher Issuance Process

Step 1: Social Services Data Submission (By the 25th of each month)

1. Social Services reviews registry of vulnerable individuals.
2. Social Services determines number of vouchers for each Eligible individual.
3. Social Services prepares list including:
 - Full name of each Individual
 - Contract Account Number
 - Meter Number(s)
 - Number of vouchers allocated (maximum 5 per Individual)
4. Social Services submits list of approved individuals to NV GEBE by the 25th of the month.

Step 2: NV GEBE Voucher Preparation

1. NV GEBE receives Social Services monthly list.
2. NV GEBE prepares vouchers with approved Individual's information.
3. NV GEBE adds unique QR code to each voucher.
4. Transition Manager signs and stamps all vouchers.
5. NV GEBE returns completed vouchers to Social Services.

Step 3: Social Services Verification and Distribution

1. Social Services verifies all voucher information.
2. Social Services (Division Head) signs and stamps each voucher.
3. Social Services inserts date of issue on each voucher.
4. Social Services distributes vouchers to Approved Individuals.
5. Social Services informs Approved Individuals of:
 - 3-month validity period
 - Non-transferability
 - Requirement to present with payment
 - Need to pay any remaining balance

Step 4: Redemption by Approved Individuals at NV GEBE

1. Individual visits NV GEBE office to make payment.
2. Individual presents voucher(s) with identification.
3. NV GEBE verifies:
 - Voucher authenticity via QR code (if applicable)
 - Voucher validity (not expired)
 - Individual's identity matches voucher
4. Individual pays any remaining balance after voucher deduction.
5. NV GEBE applies voucher value to Individual's account.
6. NV GEBE provides receipt showing applied vouchers.

5.2 Application Process for Individuals Not Registered in the Social Services Database (New Applicants)

Step 1: Initial Contact

1. Individual contacts Social Services to request consideration for the program.
2. Social Services provides application requirements and forms.

Step 2: Documentation Submission

1. Applicant submits required documentation substantiating need
 - Valid Government-issued Photo ID (Driver's License, Passport, or National ID Card)
 - Immigration / residence permit
 - Registration form (detailed)
 - Proof of Address (recent utility bill, lease agreement, or official mail)
 - Recent NV GEBE Utility Bill(s) - Last 3 months in their name
 - Proof of Income:
 - If employed: Recent pay slips (last 3 months) OR employment letter
 - If self-employed: Business registration and recent financial records
 - If unemployed: Termination letter OR proof of job loss

- If receiving benefits: Award letter or benefit statement

Proof of Other Household Income (if applicable)

Medical documentation (if claiming medical hardship)

Any other supporting documentation relevant to your application:

Note: Applications without required documentation will not be processed.

Step 3: Social Services' Assessment

1. Social Services reviews application and supporting documentation.
2. Social Services conducts assessment according to vulnerability criteria, as established in the National Ordinance governing Financial Aid.

Step 4: Approval and Registry Update

1. If approved, Social Services adds Applicant to registry (database).
2. Social Services notifies approved Applicant of acceptance.
3. Approved Individual becomes eligible for vouchers in next monthly cycle.

Step 5: Denial Process

1. If denied, Social Services notifies Applicant with reason.
2. Applicant may reapply if circumstances change.

5.3 Bimonthly Eligibility Review Process

Every Two Months:

1. Social Services reviews continued eligibility of all persons admitted to the program.
2. Social Services verifies continued vulnerability status.
3. Social Services confirms whether Applicants still meet all eligibility criteria.
4. Social Services updates registry (database) accordingly.

If Individual No Longer Eligible:

1. Social Services removes Individual from registry by deactivation.
2. Social Services notifies NV GEBE immediately.
3. Individual's relief ends effective immediately.

4. Individual receives written notification from Social Services.

5.4 Payment and Voucher Redemption Guidelines

For persons admitted to the program:

- Present voucher(s) when making payment at NV GEBE office.
- Provide valid identification matching voucher name.
- Pay remaining balance after voucher deduction or agree to a payment plan (installations) for the remaining balance
- Failure to pay remaining balance or enter into a payment plan with NV GEBE , results in voucher non-acceptance

For NV GEBE Staff:

- Verify voucher authenticity using QR code scanner (if applicable)
 - Check expiration date (3-month validity)
 - Confirm Individual identity with government-issued ID
 - Reject expired or invalid vouchers
 - Apply valid vouchers to Individual's account
 - Issue receipt clearly showing voucher deductions
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6. ROLES AND RESPONSIBILITIES

6.1 Social Services Responsibilities

Eligibility Management:

- Select all Eligible Applicants
- Maintain accurate registry of approved vulnerable applicants
- Conduct bimonthly reassessments (every 2 months)
- Immediately notify NV GEBE of eligibility changes

Data Management:

- Provide NV GEBE with verified Applicant data by the 25th of each month

- Ensure data includes: names, contract numbers, meter numbers
- Submit monthly lists within budgetary limits (XCG 50,000 total)
- Maintain confidentiality of all Applicant information

Communication:

- Communicate program details directly with beneficiaries
- Inform applicants about voucher system, validity, and limitations
- Explain non-transferability and non-cash exchange policy
- Clarify one-year pilot program duration
- Coordinate with designated NV GEBE personnel

Voucher Administration:

- Sign and stamp all vouchers after NV GEBE processing
- Insert date of issue on vouchers
- Distribute vouchers to approved Individuals
- Track voucher distribution

Liaison:

- Appoint and maintain a key liaison person for the program

6.2 NV GEBE Responsibilities

Financial Management:

- Allocate XCG 50,000 monthly budget for pilot program
- Communicate budget status to Social Services
- Track monthly expenditures against budget

Billing System:

- Adapt internal billing processes for voucher deductions
- Ensure accurate application of vouchers to Individual's accounts
- Maintain separate tracking for pilot program transactions

Voucher Management:

- Develop and produce secure vouchers with QR codes
- Sign and stamp all vouchers (Transition Manager)
- Verify voucher authenticity at redemption
- Track issued, used, and expired vouchers
- Provide Social Services with monthly voucher status reports

Documentation:

- Develop and implement all necessary forms and procedural documents
- Maintain accurate records of all voucher transactions
- Generate monthly reports for program monitoring

Customer Service:

- Process voucher redemptions at office locations
- Verify Individual's identity and voucher validity
- Provide receipts showing applied deductions
- Assist Individuals with questions about voucher use

Liaison:

- Appoint and maintain a key liaison person for the program

Boundaries:

- Do NOT determine an applicant's eligibility to the program
- Do NOT decide number of vouchers per Individual
- Refer all eligibility questions to Social Services

6.3 Government (Minister's) Responsibilities

Oversight:

- Provide overall program oversight and governance
- Ensure alignment with strategic vision of VSA
- Support coordination between Social Services and NV GEBE

Evaluation:

- Review program effectiveness during and at end of pilot year
 - Make decisions regarding program extension or modifications
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7. MONITORING AND REVIEW

7.1 Monthly Reporting

NV GEBE Monthly Report to Social Services:

- Number of vouchers issued during month
- Number of vouchers redeemed during month
- Number of vouchers expired during month
- Total monetary value applied
- Remaining budget allocation
- Any issues or concerns

Social Services Monthly Report (Internal):

- Number of database-served persons
- Number of New Applicants approved
- Number of applicants removed from program
- Voucher distribution statistics
- Applicant feedback or complaints

7.2 Bimonthly Eligibility Review

- Conducted every two (2) months by Social Service
- Reviews eligibility of all program participants
- Updates registry based on current vulnerability status

- Notifies NV GEBE of any changes

7.3 Quarterly Program Review

- Joint meeting between Social Services and NV GEBE representatives
- Review program statistics and performance
- Discuss operational challenges and solutions
- Assess budget utilization
- Evaluate Applicant satisfaction

7.4 Annual Program Evaluation

- Comprehensive evaluation at end of one-year pilot
- Assessment of program impact on vulnerable applicants
- Cost-benefit analysis
- Recommendations for continuation, modification, or termination
- Decision on potential extension

7.5 Key Performance Indicators (KPIs)

Program Reach:

- Number of applicants served
- Percentage of budget utilized
- Geographic distribution of beneficiaries

Operational Efficiency:

- Average processing time for voucher issuance
- Voucher redemption rate (used vs. expired)
- Accuracy of eligibility assessments

Impact Metrics:

- Reduction in utility disconnections among participants

- Applicant testimonials and feedback
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8. COMPLIANCE AND CONFIDENTIALITY

8.1 Legal Compliance

All parties shall comply with:

- All applicable laws of Sint Maarten
- Data protection and privacy regulations
- Anti-money laundering requirements
- Anti-corruption laws
- Consumer protection regulations

8.2 Compliance with Sint Maarten Data Protection Laws

Legal Framework:

All parties involved in this program shall comply with the **National Ordinance on Personal Data Protection** (Landsverordening bescherming persoonsgegevens, National Gazette 2010, GT No. 2), hereinafter referred to as "the Data Protection Ordinance," and any amendments or regulations issued thereunder.

Definitions (Per Data Protection Ordinance):

For purposes of this program:

- **Personal Data:** All data concerning an identified or identifiable natural person (program applicants and participants)
- **Processing:** Every action or set of actions concerning personal data, including gathering, recording, organizing, saving, updating, altering, retrieving, consulting, use, provision through transmission, circulation, compiling, relating, protection, deletion, or destruction of data
- **Responsible Party:** NV GEBE and the Division of Labor Affairs & Social Services, each as responsible parties for their respective processing activities
- **Data Subject:** Any program applicant or participant whose personal data is processed

Data Processing Principles:

All personal data collected and processed under this program shall adhere to the following principles as required by the Data Protection Ordinance:

1. Lawfulness and Fairness:

- Data shall be processed fairly and lawfully
- Processing is necessary for the performance of this program in the public interest
- Data subjects shall be informed of the processing purposes

2. Purpose Limitation:

- Personal data shall be gathered for specified, explicit, and legitimate purposes only (i.e., determining eligibility and administering utility relief)
- Data shall not be further processed in a manner incompatible with program purposes
- Exception: Statistical or historical analysis for program evaluation may be conducted if properly anonymized

3. Data Minimization:

- Only personal data that is adequate, relevant, and not excessive for program purposes shall be collected
- Parties shall not request information beyond what is necessary for eligibility determination and voucher administration

4. Accuracy:

- Personal data shall be accurate and, where necessary, kept up to date
- Reasonable steps shall be taken to rectify or delete inaccurate or incomplete data
- Bimonthly eligibility reviews serve as mechanism to maintain data accuracy

5. Storage Limitation:

- Personal data shall not be kept in identifiable form longer than necessary for program purposes

- Upon program termination or participant exit, data shall be retained only as required by law
- **Retention Period:** Program data shall be retained for two (2) years following program conclusion for audit and evaluation purposes, then securely destroyed

6. Integrity and Confidentiality:

- Appropriate technical and organizational measures shall be implemented to protect personal data against unauthorized or unlawful processing and accidental loss, destruction, or damage

Rights of Data Subjects:

Pursuant to the Data Protection Ordinance, program applicants and participants have the following rights:

1. Right to Information (Transparency):

- Data subjects shall be informed at the time of data collection:
 - Identity of the responsible party (Social Services and/or NV GEBE)
 - Purpose of data processing
 - Categories of data being collected
 - Rights available to them under the Data Protection Ordinance

2. Right of Access:

- Data subjects may request access to their personal data held by Social Services or NV GEBE
- Request must be made in writing
- Response shall be provided within **four (4) weeks** of receipt
- Access shall be provided free of charge for the first request in any 12-month period

3. Right to Rectification:

- Data subjects may request correction of inaccurate or incomplete personal data

- Corrections shall be made within **four (4) weeks** and communicated to the data subject
- Both parties (Social Services and NV GEBE) shall be notified of corrections affecting shared data

4. Right to Object:

- Data subjects may object to processing based on their particular situation
- Objections shall be reviewed and responded to within **four (4) weeks**
- Processing may continue only if legitimate grounds override the data subject's interests

5. Right to Erasure:

- Upon program exit or termination, data subjects may request deletion of their personal data
- Data may be retained only if required by law (e.g., financial records, audit requirements)

Data Security Measures:

Both Social Services and NV GEBE shall implement appropriate technical and organizational security measures, including:

Physical Security:

- Personal data in physical form (applications, vouchers, supporting documents) shall be stored in locked, secure locations with restricted access
- Access shall be limited to authorized personnel with legitimate need-to-know
- Visitor logs shall be maintained for secure storage areas

Digital Security:

- Personal data in electronic form shall be stored on secure, password-protected systems

- Access controls and user authentication shall be implemented
- Regular backups shall be maintained
- Systems shall be protected against unauthorized access, malware, and cyber threats

Disposal Security:

- Physical documents containing personal data shall be shredded or destroyed using secure methods
- Digital data shall be permanently deleted using secure erasure methods
- Records of data destruction shall be maintained

Data Sharing and Transfers:

1. Between Program Partners:

- Personal data may be shared between Social Services and NV GEBE solely for program administration purposes
- Data sharing shall be limited to information necessary for voucher issuance, verification, and redemption
- Data transfer protocols shall ensure security during transmission

2. Third-Party Disclosure:

- Personal data shall NOT be disclosed to third parties except:
 - With written consent of the data subject
 - As required by law or court order
 - To authorized auditors or oversight bodies (under confidentiality obligations)
- Any required disclosure shall be documented and limited to minimum necessary information

3. Cross-Border Transfers:

- No personal data shall be transferred outside of Sint Maarten without appropriate safeguards and data subject consent

- Exception: Technical support or cloud services with adequate data protection guarantees

Data Breach Response Protocol:

In the event of a suspected or confirmed data breach:

1. Immediate Actions (Within 24 hours):

- Contain the breach and prevent further unauthorized access
- Notify program liaison and senior management
- Begin internal investigation

2. Assessment (Within 72 hours):

- Determine scope and severity of breach
- Identify affected data subjects
- Assess risks to data subjects' rights and freedoms

3. Notification (Based on risk assessment):

- If breach poses significant risk to data subjects:
 - Notify affected individuals within **seventy-two (72) hours**
 - Provide information on nature of breach, likely consequences, and mitigation measures
- Notify supervisory authorities if required by law
- Document all breach response actions

4. Remediation:

- Implement corrective measures to prevent recurrence
- Review and update security protocols as needed
- Provide training to staff on breach prevention

Staff Training and Awareness:

- All staff involved in program administration shall receive training on:
 - Data Protection Ordinance requirements
 - Confidentiality obligations
 - Data security procedures
 - Recognition and reporting of potential breaches
- Training shall be provided upon hire and annually thereafter
- Training completion shall be documented

Accountability and Oversight:

1. Data Protection Officer (Optional but Recommended):

- Consider appointing a Data Protection Officer or designating a privacy compliance coordinator
- Responsible for monitoring compliance with Data Protection Ordinance
- Serves as point of contact for data subject inquiries

2. Regular Audits:

- Internal data protection compliance audits shall be conducted annually
- Audit findings and corrective actions shall be documented
- Ministry oversight personnel may conduct additional audits as needed

3. Documentation:

- Maintain records of processing activities, including:
 - Categories of personal data processed
 - Purposes of processing
 - Data retention periods
 - Security measures implemented
 - Data sharing arrangements

Legal Recourse:

- Data subjects who believe their rights under the Data Protection Ordinance have been violated may:

1. File a complaint with the responsible party (Social Services or NV GEBE)
2. Escalate to the Minister of Public Health, Social Development & Labor
3. Petition the Court of First Instance of Sint Maarten as provided under the Data Protection Ordinance
4. Seek damages for harm suffered due to unlawful processing

Program-Specific Privacy Notices:

Both Social Services and NV GEBE shall provide clear privacy notices to all applicants and participants, including:

- Statement of commitment to data protection
- Explanation of why data is collected and how it will be used
- Information on data subject rights
- Contact information for privacy inquiries
- Reference to this policy manual for detailed procedures

Penalties for Non-Compliance:

- Staff who violate data protection requirements may face disciplinary action
- Willful or negligent breaches may result in legal liability
- Both organizations commit to full compliance and cooperation with supervisory authorities

8.4 Fraud Prevention

Warning Signs of Potential Fraud:

- Falsified identification documents
- Counterfeit vouchers
- Multiple attempts to redeem same voucher
- Vouchers presented by someone other than named Applicant

Reporting Procedures:

- Any suspected fraud must be immediately reported to program liaison
- NV GEBE will not accept suspicious vouchers
- Investigation will be conducted by appropriate authorities
- Confirmed fraud may result in program termination for individual

8.5 Complaint and Grievance Process**For Applicants and Persons Admitted to the Program:**

1. Submit complaint in writing to Social Services.
2. Social Services reviews and investigates within 15 business days.
3. Social Services provides written response to Individual.
4. If unresolved, Applicant may escalate to Minister of VSA.

For Operational Issues:

1. Contact program liaison at respective organization.
 2. Liaison coordinates resolution with counterpart.
 3. Escalate to senior management if necessary.
 4. Document resolution and any process improvements.
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9. PROGRAM TERMINATION PROVISIONS**9.1 Termination of Program Admission**

When an individual Applicant is no longer eligible (due to death, voluntary removal, change in economic position):

- Social Services removes Individual from registry (deactivate in CRM/SS37) immediately
- Social Services notifies Individual in writing with reason

- Social Services notifies NV GEBE immediately
- Outstanding vouchers for that Applicant become invalid
- Applicant's relief ends effective date of notification
- This does NOT terminate the entire program

9.2 Program Termination Scenarios

At End of One-Year Pilot:

- Program automatically ends unless extended in writing by mutual agreement
- Final vouchers must be redeemed within 3-month validity period
- All parties conduct final program evaluation
- Decision made on extension or permanent program

Termination for Convenience:

- Either party may terminate with 60 days' written notice
- Notice must be provided to all parties
- Transition plan developed for affected Individuals
- Outstanding vouchers honored through validity period

Termination for Breach:

- Material breach by any party must be notified in writing
- Breaching party has 30 days to cure breach
- If not cured, agreement may be terminated
- Affected Individuals receive assistance transitioning out

10. CONTACT INFORMATION

Program Liaisons

Social Services Contact:

- Email: reliefprogram@sintmaartengov.org

NV GEBE Contact:

- Email: [To be provided]
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11. DOCUMENT CONTROL

Version History: November 2025

Version Date	Author	Changes
1.0	October 2025 Program Committee	Initial document creation

Review Schedule:

- This document shall be reviewed quarterly by Social Services
- Updates require approval from all parties
- Major revisions require new version number

Distribution:

- All Social Services staff involved in program administration
- All NV GEBE staff involved in program administration
- Ministry oversight personnel

APPENDICES

Appendix A: Forms and Templates

- Application Form
- Monthly Applicant List Template
- Voucher Template
- Monthly Report Templates

Appendix B: Sample Documents

- Sample Voucher
- Sample Applicant Notification Letters
- Sample Monthly Reports

Appendix C: FAQ for Staff

- Common questions and answers about program operations
- Troubleshooting guide
- Escalation procedures

Appendix D: FAQ for Applicants

- Program eligibility questions
- Voucher usage instructions
- Common scenarios and solutions
- Contact information for assistance

Document Approval:

This Policy and Procedures Manual is approved by: **NV GEBE & SOCIAL SERVICES**