

EXPLANATORY MEMORANDUM

General

1. Introduction

Article 1 of the Constitution (*Grondwet*) prohibits discrimination. This article directs the legislature, the executive and the judiciary to treat people equally in equal circumstances and prohibits unjustifiable distinctions. The Constitution, including article 1, applies throughout the entire jurisdiction of the Netherlands, which includes the public bodies of the Netherlands. Article 1 of the Constitution has been elaborated in a number of equal treatment acts, which prohibit discrimination on the grounds specified in each act. Up to the present, these acts have applied only to the European part of the Netherlands and not in Bonaire, St Eustatius and Saba (hereinafter: the BES islands). When the constitutional status of the BES islands changed on 10 October 2010, for reasons of legislative restraint the decision was made not to declare this equal treatment legislation applicable to these islands right away.¹

The government has since abandoned this practice of legislative restraint and introduced the principle of 'comply or explain': legislation must be applied in the BES islands unless there are good reasons not to do so. The aim is to achieve an equivalent effect, on the basis of an equivalent standard of public services so far as the Caribbean context allows. This ties in with article 132a, paragraph 4 of the Constitution, which states that for the public bodies, rules may be laid down and other specific measures may be taken in view of special circumstances that fundamentally distinguish these public bodies from the European part of the Netherlands. These special circumstances include but are not limited to their insular character, small size and population, cultural differences, economic and social circumstances and capacity. The foregoing means that maximum harmonisation is the aim but that a tailored approach is possible.²

In this connection, an assessment was made of the scope for introducing the equal treatment legislation in the BES islands.³ The Netherlands Institute for Human Rights (*College voor de Rechten van de Mens*; hereinafter: 'the Institute') has repeatedly called for this to be done.⁴ Introducing this legislation has also been incorporated into the National Programme against Discrimination and Racism (*Nationaal Programma tegen Discriminatie en Racisme*), developed in consultation with the National Coordinator against Discrimination and Racism (*Nationaal Coördinator tegen Discriminatie en Racisme*).⁵ The island executives (*bestuurscolleges*) of the three public bodies have also expressed their desire to see this legislation introduced and implemented in the Caribbean part of the

¹ See, *inter alia*, Parliamentary Papers, House of Representatives 2009/10, 31 954, no. 7.

² See, *inter alia*, Parliamentary Papers, House of Representatives 2019/20, 35 300, no. 11.

³ See Parliamentary Papers, House of Representatives, session 2017/2018, 34 338, no. 3.

⁴ See, *inter alia*, the letter of 14 March 2022 to the State Secretary for Kingdom Relations and Digitalisation.

⁵ See the National Programme against Discrimination and Racism 2022, p. 88.

Netherlands as soon as possible. To this end, an external committee⁶ worked with the public bodies and the relevant ministries to assess what was needed to be able to introduce and apply this legislation in the BES islands. Institutional aspects were considered in the assessment. A desirability assessment was made with respect to establishing in the BES islands a local anti-discrimination service where discrimination can be reported and recorded and victims can access support and with respect to establishing a body that can make findings and issue decisions in response to individual complaints. Lastly, the burden that introducing and implementing the legislation would place on public administration, the public and companies was examined.

The assessment was presented to parliament by letter of 23 January 2023. It provides insight into discrimination on the BES islands and the residents' wishes. Discrimination on a range of grounds is very common on the islands.⁷ Opinions on the nature and scope of what often manifests as subtle, covert discrimination differ from island to island and depend in part on the conversation partners. Discrimination and exclusion are experienced by older people and people with disabilities, particularly with respect to physical and digital accessibility. In addition, although there is a certain degree of acceptance in practice, LGBTIQ+ people experience discrimination ('don't ask, don't tell' is the prevailing attitude). Poverty or having a certain social background, or certain ethnic characteristics can lead to preferential treatment, while other characteristics can lead to discrimination (*colourism*). Pregnancy discrimination also frequently occurs.

Currently, there is a lack of tools for tackling discrimination effectively. Whereas the prohibition on discrimination in article 1 of the Constitution applies throughout the Netherlands, the elaboration of that prohibition in the equal treatment acts applies only in the European part of the Netherlands. It should be made possible to invoke and implement these acts in the BES islands. Introducing the equal treatment acts and establishing related institutions on the islands will meet a need there.

The letter presenting the exploratory study states that the recommendations put forward in the study would be adopted. The recommendations concerned are as follows:

- fully implementing the equal treatment acts in the BES islands;

⁶ The members of the committee were G.A.E. Thodé (former Lieutenant Governor of Bonaire and chairman of the BES Personal Data Protection Supervisory Commission (*Commissie toezicht bescherming persoonsgegevens BES*, CBP-BES) and J.J. van Eck (former State Councillor of the Council of State and member of CBP-BES).

⁷ Interviews conducted on Bonaire, St Eustatius and Saba provided information about the various manifestations of discrimination on the islands (Exploratory study, section 2.1.1: Discrimination in practice on Bonaire, Saba and St Eustatius). Regarding discrimination grounds in general: Discrimination statistics for 2022, appendix to the letter to parliament of 25 April 2023 on registration by the police of discrimination incidents and reports to anti-discrimination services and other organisations in the Netherlands, and a publication on effective ways to reduce discrimination ('*Wat werkt bij het verminderen van discriminatie*'), Platform for Inclusion and Community (*Kennisplatform Inclusief Samenleven*), 21 March 2023 (www.kis.nl/publicatie).

- establishing on each island a service that provides advice and information, registers complaints (a reporting centre) and offers easily accessible assistance and support in relation to discrimination issues;
- assigning a task of making findings with respect to individual discrimination cases in the BES islands to the Netherlands Institute for Human Rights (*College voor de rechten van de mens*).

This Bill enshrines these recommendations in statute. The aim is to offer the residents of the BES islands better protection against discrimination. To achieve this, the BES islands need legislation and institutions like those that have been developed and organised in recent decades to provide protection against discrimination in the European part of the Netherlands.

2. Outline of the Bill

2.1 Substantive norms

Although, as stated in chapter 1, article 132a, paragraph 4 of the Constitution allows for differentiation, it was decided to declare all equal treatment legislation applicable to the BES islands. Consequently, this Bill takes 'comply' as its point of departure, on the basis of the principle that there are fundamental rights involved that require protection throughout the Netherlands as a whole. Under the Bill, the following legislation will become applicable in the BES islands:

- the Equal Treatment Act (*Algemene wet gelijke behandeling*, AWGB), concerning equal treatment on the grounds of religion, belief, political opinion, race, sex, nationality, heterosexual or homosexual orientation or civil status;
- the Equal Treatment (Disabled and Chronically Ill People) Act (*Wet gelijke behandeling op grond van handicap of chronische ziekte*, WGBH/CZ);
- the Equal Treatment (Men and Women) Act (*Wet gelijke behandeling mannen en vrouwen*, WGB M/V);
- the Equal Treatment in Employment (Age Discrimination) Act (*Wet gelijke behandeling op grond van leeftijd bij de arbeid*, WGBL);
- article V of the Act amending the Civil Code (*Burgerlijk Wetboek*) and the Central and Local Government Personnel Act (*Ambtenarenwet*) in connection with the prohibition on discrimination between employees on the grounds of their working hours (*Wijzigingswet Burgerlijk Wetboek en Ambtenarenwet in verband met het verbod tot maken van onderscheid tussen werknemers naar arbeidsduur*, hereinafter: 'Working Hours (Discrimination) Act');
- section III of the Act implementing Council Directive 1999/70/EC concerning the framework agreement on fixed-term work concluded by ETUC, UNICE and CEEP (hereinafter: 'WOBOT');
- a number of provisions of the Civil Code.⁸

⁸ Articles 7:646, paragraph 2, second sentence, 7:648, paragraph 3 and 7:649, paragraph 3 of the Civil Code. Unlike the rest of Book 7, Title 10, Section 4 of the Civil Code, these provisions were not implemented in the BES Civil Code (*Burgerlijk Wetboek BES*, BW BES).

All of the legislation follows a similar system. Both direct and indirect discrimination are, in principle, prohibited. There are a number of absolute prohibitions (for example, the prohibition on sexual harassment) and allowance is made for justifiable exceptions.

Where legislation refers to civil-law employment contracts and does not include civil servants (which is logical given that under the Public Servants (Standardisation of Legal Status) Act (*Wet normaliserende rechtspositie ambtenaren*), civil servants are 'ordinary' employees with an employment contract), it is insufficient to declare such legislation applicable to the BES islands. This is because civil servants in the BES islands are not employed under civil-law employment contracts, but instead fall under the BES Government Personnel Act (*Ambtenarenwet BES*). In order to provide them with equal treatment protection, additional provisions are included in the Bill.

For reasons relating to the system of the legislation the choice was made not to draft separate 'BES legislation', but instead to draft a Bill making the existing equal treatment acts applicable to the BES islands. This was also the express preference of the islands for reasons of clarity and uniformity, future-proofing and avoiding friction. This approach also aligns with the principle of 'comply or explain'.

Various members of the government are responsible for the equal treatment acts and for them being declared applicable to the BES islands, which is reflected in the fact that the Bill is signed by the Minister for Poverty Policy, Participation and Pensions, the Minister of Education, Culture and Science, the Minister for Legal Protection, the State Secretary for Kingdom Relations and Digitalisation and the State Secretary for Health, Welfare and Sport.

2.2 Institutional norms

The Bill furthermore makes the Institute's task with regard to making findings in individual cases applicable in the BES islands. To this end, the Netherlands Institute for Human Rights Act is being amended.

Lastly, the Bill lays down the basis for a service providing independent support on matters relating to discrimination in the BES islands. For reasons pertaining to the nature and scale of this service in the BES islands, it was decided to create a separate statutory basis for this service instead of declaring the Municipal Anti-Discrimination Services Act (*Wet gemeentelijke antidiscrimatievoorzieningen*) applicable. By contrast to the Netherlands in Europe, where municipalities are responsible for organising discrimination support services, the public bodies favour a service that is more independent. In addition, they prefer to combine the service with the easily accessible first-line legal aid and advice centre currently being developed by the Ministry of Justice and Security (hereinafter: BES Legal Aid and Advice Centre), which will be tasked with providing broad-based legal advice. The government considers this combination of services to be appropriate, efficient and practicable. Although the tasks at issue will be similar in many respects to the anti-discrimination services in the European part of the Netherlands, the structure and organisation of the services in the BES islands will have a distinct character. This is expressed in the Bill.

3. Relationship to higher law

The aim of the Bill is to declare a number of equal treatment acts implementing article 1 of the Constitution applicable in the BES islands. The acts concerned also implement a number of EU equal treatment directives.⁹ In addition, several international conventions on discrimination are relevant, for example the UN Convention on the Rights of Persons with Disabilities is elaborated in the Equal Treatment (Disabled and Chronically Ill People) Act.

4. Effects

The equal treatment acts have horizontal direct effect for the persons subject to the statutory obligations. That means that they apply in relations between individuals and organisations, for example between employers and employees with respect to the prohibitions on pregnancy discrimination and racial discrimination when filling vacancies. An individual can invoke the provisions in these acts in relation to another individual. In more concrete terms,

people are better protected against discrimination because the legislation can be invoked against goods and services providers, companies, organisations and employers (including the government as an employer). The legal assistance service and the Institute help people exercise their rights free of charge.

Companies and organisations, as employers and goods and services providers, are prohibited from discriminating and are required to take measures to ensure equal treatment. For instance, buildings must be made accessible to people with a disability. Meeting this requirement can entail costs and equalise organisations' competitive position. Appropriate and effective measures must be taken to ensure accessibility for people with a disability, unless such measures would impose a disproportionate burden on the company or organisation.

The government, too, in its capacity as an employer or goods and services provider (in the BES islands, this means the public bodies, for example) is prohibited from discriminating and must take measures to achieve equal treatment.

The legal assistance service and the expansion of the Institute's tasks are financed from the Ministry of the Interior and Kingdom Relations' budget.

5. Implementation

⁹ Primarily, Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation and Council Directive 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services.

The main aim of the exploratory study that preceded this Bill was to determine what was needed to be able to implement the equal treatment acts and make them applicable in the BES islands. Are these rules useful and practicable, and can they be applied in the BES islands? The large group of conversation partners¹⁰ responded in the affirmative, emphasising that these standards and the related institutions are necessary. In addition, people need to be able to invoke these rules. Quite apart from the civic argument and the argument on principle that the same fundamental rights must apply in both the European and Caribbean parts of the Netherlands and that introducing this legislation in the BES islands can be a catalyst for the acceptance of diversity and equal treatment, implementation will not be problematic. The legislation provides sufficient scope for taking account of local facts and circumstances, such as the islands' insular character, particularly as regards objective justification assessments. Consequently, a tailored approach can be taken to applying the legislation in practice. Obviously, this tailored approach must not lead to discrimination.

6. Effectuation and supervision

Legislation will help make discrimination visible and public and raise awareness of fundamental rights, but this will not happen automatically. In order for the inhabitants of the BES islands to be able to fully effectuate these new rights and obligations, when the equal treatment legislation is implemented related institutions must also be established and equipped, specifically an anti-discrimination service and a capacity for making findings in individual cases. In this regard, consideration was given to what is needed for these institutions to function properly in the BES islands, given their nature and size.

Firstly, it is important to establish on each island a permanent and easily accessible service providing independent support that fosters awareness, offers information, advice, assistance in the settlement of complaints and mediation, records complaints and includes a reporting centre. In this regard, local embedding and expertise are essential. The intention is to set up this service with a front office on each island and a back office that largely operates out of the European part of the Netherlands. The plan is to integrate the front office into a broad-based legal aid and advice centre, which is currently being developed for the BES islands. For that reason, the Minister for Legal Protection is one of the parties involved in the development of the support service for discrimination issues that will operate within the legal aid and advice centre.

Secondly, it is important to have an independent supervisory authority operating in the BES islands. As a national human rights institution accredited with 'A' status at UN level, the Institute is an appropriate body to take on this role.¹¹

The Institute has outstanding anti-discrimination expertise, is authoritative, accessible and already performs an investigative role in the BES islands. It would therefore be logical to assign the task of making findings in individual cases in

¹⁰ The committee spoke with representatives of, *inter alia*, the public bodies, NGOs, civic and consumer organisations, advisory bodies, the public and companies. For a complete overview of the conversation partners in the European and Caribbean parts of the Netherlands, see the exploratory study.

¹¹ The 'A' status accreditation is awarded by the Global Alliance of National Human Rights Institutions (GANHRI). Institutions with 'A' status are entitled to provide written and oral input at meetings of UN monitoring bodies.

the BES islands to the Institute, which performs the same role in the European part of the Netherlands. The Institute is ready and willing to take on this task, provided it is given adequate resources. To that end, structural funding for the new task will be provided and the individual character of the islands will be taken into account in the organisation and procedures, by *inter alia* setting up dedicated support and appointing at least one alternate member in the Caribbean part of the Netherlands tasked with handling requests for findings concerning the BES islands.

7. Advice and internet consultation

TBC: advisory opinions by CBP BES (cf. section 49, BES Personal Data Protection Act (*Wet bescherming persoonsgegevens*, WBP BES)), the Advisory Board on Regulatory Burden (*Adviescollege toetsing regeldruk*, ATR) and consultation responses, including those by the public bodies.

TBC: During the consultation phase, discussions with the public bodies and interest groups will be held to obtain more insight into what reasonable and effective modifications are needed to ensure accessibility in the context of the Treatment (Disabled and Chronically Ill People) Act (WGBH/CZ). This assessment will be used to determine the implications for the funding of the public bodies.

Individual articles

SECTION I Independent support service on matters relating to discrimination

Subsection 1

The first subsection enshrines in statute the Minister of the Interior and Kingdom Relations' responsibility for establishing a service that provides independent support on matters relating to discrimination in the BES islands. This will secure the operation and stability of this service. The service will be funded in a structural manner, be positioned outside the public body and have an appropriate legal form. See the explanatory notes on subsection 3.

Subsection 2

Subsection 2 lays down the tasks of the service: (a) supporting persons in the settlement of their complaints concerning discrimination as referred to in the equal treatment acts listed and (b) recording complaints. Strictly speaking, the tasks enumerated in (c) to (f) – advising, referrals, mediation (obviously, only with the agreement of the parties concerned) and information provision – are specific elements of support. It was decided to identify each element explicitly for the sake of clarity. For the purpose of collecting data on equal/unequal

treatment, it is important to record complaints and reports. There is current information about discrimination in the BES islands¹² but precise figures are lacking. Collecting data makes it easier to effectively pursue targeted discrimination policy.

Subsection 3

A protocol outlining the work processes and defining the tasks will be drafted within the service for the performance and organisation of the tasks. For example, the front office of the service will be incorporated into a broad-based BES Legal Aid and Advice Centre,¹³ which will foster collaboration among the professionals involved. This will facilitate an integrated approach to providing support (including legal assistance) in an easily accessible and efficient manner. Having the support and trust of island residents is essential. For that reason, efforts are under way to develop a physical support location on each island where people can talk to someone in their own language during set office hours. In organising and equipping the organisation, a balance will be struck between proximity (understanding of the local context) and professional distance. Where possible, use will be made of the expertise and experience of the association of anti-discrimination services, Discriminatie.nl.

Subsection 4

Access to the service will be free of charge. This means that there will be no income limit for accessing support on matters relating to discrimination.

Subsection 5

Personal data is processed in the service in so far as is necessary for the proper performance of its tasks. Given the nature of the subject matter and the size of the islands, it is essential for the service to be reliable and for complaints to be handled confidentially. This is all the more important when contact is sought with, for example, employers or goods and services providers that have acted in a discriminatory manner or when partners in the system are consulted in the course of assisting island residents. In addition, the fact that the service is embedded in and works with the BES Legal Aid and Advice Centre means that different parties will be working together and this will (necessarily) involve sharing personal data. The BES Personal Data Protection Act (WBP BES) applies to all data processing by the service. As the data controller, acting within the statutory parameters, the service determines the purposes and means of the processing of personal data and has formal and legal control over the processing. The protocol referred to in subsection 3 will specify the personal data that may be processed, to whom this personal data may be disclosed and how

¹² See the exploratory study that was carried out.

¹³ The Ministry of Justice and Security is currently considering whether the BES Legal Aid and Advice Centre, a foundation (*stichting*) / legal person with statutory tasks, will come under the Legal Aid Act (*Wet op de rechtsbijstand*) or other (BES) legislation.

long the data may be retained. This is particularly important given that the service collaborates with the Legal Aid and Advice Centre and with partners in the system.

The BES Personal Data Protection Supervisory Commission (CBP BES) was asked to advise on this provision. To be sure, the present Bill is not entirely or even largely concerned with the processing of personal data, which would necessitate an advisory opinion under section 49 WBP BES.

However, the provision does concern new functionality in the BES islands, and in this regard reliability, confidentiality and due care are of major importance. An advisory opinion is therefore desirable. The commission advised as follows. TBC

SECTION II The Equal Treatment Act

The Equal Treatment Act is made applicable to the BES islands with the addition of a provision to this effect in the space previously freed up in section 11. In addition, it is provided that civil servants in the BES islands must also be treated equally in employment. See chapter 2.1 of the general part of this memorandum. With regard to legal actions under private law and review and appeal proceedings under administrative law, explicit mention is made of the BES Civil Code and the Administrative Procedure (BES) Act (*Wet administratieve rechtspraak BES*, WAR BES).

SECTION III The BES Civil Code

Pursuant to the current article 1614aa, paragraph 1 of the BES Civil Code, articles 646 to 649 (M/F, working hours, fixed-term/open-ended contract), Book 7 of the Dutch Civil Code, with the exception of articles 646, paragraph 2, second sentence, 648, paragraph 3 and 649, paragraph 3, already apply *mutatis mutandis* to the BES islands. The exceptions pertain to equal treatment of men and women and the Institute's tasks. These exceptions must cease to have effect as a consequence of the current the Bill.

SECTION IV The Netherlands Institute for Human Rights Act

The proposed section 2 expands the Institute's tasks to include making findings in individual cases in the BES islands. See also chapter 6 of the general part of this memorandum. In addition, the opportunity is being taken to clarify and streamline sections 10 and 13 of the Netherlands Institute for Human Rights Act. For the sake of clarity and consistency, all of the equal treatment acts concerned are named in section 10. References to the Netherlands Institute for Human Rights Act are deleted from the acts themselves.

SECTION V The Equal Treatment (Men and Women) Act

The Equal Treatment (Men and Women) Act is made applicable in the BES islands. To this end and for the sake of clarity, a new section, 23a, is inserted. It is necessary to explicitly mention the Caribbean public bodies in subsection 2 because the Equal Treatment (Men and Women) Act would otherwise apply only to public bodies in the European part of the Netherlands. With regard to legal actions under private law concerning equal treatment, reference is made to the BES Civil Code.

SECTION VI The Equal Treatment (Disabled and Chronically Ill People) Act

The Equal Treatment (Disabled and Chronically Ill People) Act is made applicable in the BES islands. To this end and for the sake of clarity, a new section, 11a, is inserted. In addition, the rules on equal treatment of disabled people in employment are made applicable to civil servants in the BES islands. For that reason section 10, which makes provision for legal action under private law or administrative law in the event of discrimination, is also amended. Civil servants in the BES islands will now be able to effectuate legal protection. See chapter 2.1 of the general part of this memorandum.

Section 12 of the Equal Treatment (Disabled and Chronically Ill People) Act is repealed because the Institute's task is established by way of the amendment of sections 2 and 10 of the Netherlands Institute for Human Rights Act. See the explanatory notes on section IV.

SECTION VII The Equal Treatment in Employment (Age Discrimination) Act

The Equal Treatment in Employment (Age Discrimination) Act is made applicable in the BES islands. To this end and for the sake of clarity, a new section, 13a, is inserted. In addition, the rules on equal treatment in employment on the grounds of age are made applicable to civil servants in the BES islands. For that reason section 12, which makes provision for legal action under private law or administrative law in the event of discrimination, is also amended. Civil servants in the BES islands will now be able to effectuate legal protection. See chapter 2.1 of the general part of this memorandum. In this connection, it should be noted that the Equal Treatment in Employment (Age Discrimination) Act prohibits discrimination with regard to membership of or involvement in a employers' or employees' organisation or an occupational association (section 6), and that this is understood to include any organisation that represents the interests of civil servants, including civil servants in the BES islands.

Section 14 of the Equal Treatment in Employment (Age Discrimination) Act is repealed because the Institute's task is established by way of the amendment of sections 2 and 10 of the Netherlands Institute for Human Rights Act. See the explanatory notes on section IV.

SECTION VIII Working Hours (Discrimination) Act

Discriminating between employees on the grounds of their working hours is already prohibited in the BES islands, under article 1614aa of the BES Civil Code in conjunction with article 7:648 of the Civil Code. This does not apply to situations where work is done under the authority of a particular party; for this reason, section V must be made applicable in the BES islands. The new section Va provides for this; civil servants are also explicitly included.

Section III, subsection 3 is repealed in connection with the fact that the Institute's task is established by way of the amendment of sections 2 and 10 of the Netherlands Institute for Human Rights Act. See the explanatory notes on section IV.

SECTION IX Act implementing Council Directive 1999/70/EC (framework agreement on fixed-term work concluded by ETUC, UNICE and CEEP) / WOBOT

Discrimination between workers on the basis of whether they have a fixed-term or open-ended employment contract is already prohibited in the BES islands, namely under article 1614aa of the BES Civil Code in conjunction with article 7:649 of the Civil Code. Section II, subsection 1 confirms this. This Bill brings civil servants in the BES islands under the scope of the act. See chapter 2.1 of the general part of this memorandum. Section II, subsection 3 is repealed in connection with the fact that the Institute's task is established by way of the amendment of sections 2 and 10 of the Netherlands Institute for Human Rights Act. See the explanatory notes on section IV. The new subsection 3 is formulated in line with article 7:690 of the Civil Code. Temporary employment agency contracts are not as such regulated by statute in the BES islands; however, the provision of workers is. For that reason, the relevant BES act is referred to here.

Lastly, the provision in section III is made applicable to the BES islands, on the understanding that an employer in the BES islands is not required to give notice of a vacancy involving an open-ended employment contract to a worker provided as referred to in section 1 of the BES Staffing Services Act (in the European part of the Netherlands: a temporary agency worker as referred to in article 7:657, paragraph 2 of the Civil Code).

SECTION X Evaluation

The Act must be evaluated within five years of its entry into force. The report to parliament on the effectiveness and impacts of the Act must also address the provision of legal assistance on matters relating to discrimination and the Institute's task of making findings in individual cases in the BES islands.

Minister of the Interior and Kingdom Relations