

**REPUBLIC OF KENYA**



**GOVERNMENT OF KIRINYAGA**



**DEPARTMENT OF ENVIRONMENT, ENERGY,  
CLIMATE CHANGE AND NATURAL  
RESOURCES**

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CLIMATE CHANGE AND NATURAL RESOURCES**

**KIRINYAGA COUNTY GOVERNMENT  
-FLLoCA**

## LIST OF ABBREVIATION

GRM – Grievance Redress Mechanism

FLLoCA – Financing Locally Led Climate Action

CCU – climate Change unit

WCCPC – Ward Climate Change Planning Committee

CECM – Count Executive Committee Member

POE – Panel of Experts

POM – Program Operations Manual

CGA – County Government Act

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# **CHAPTER ONE**

## **1.0 Introduction**

A Grievance Redress Mechanism is a tool primarily used to handle disputes. Critical steps within the mechanism include receipt of the complaints and processing of the complaints from specific individuals or groups of people. A grievance in project management is qualified by the fact that it adversely affects the execution of a project or use of a facility upon completion.

The County Government of Kirinyaga is one among the beneficiary counties of the FLLoCA program. In its nature of being a locally led intervention to climate change mainstreaming action, it is necessary and sufficient to ensure that a clear procedure of offering resolution to grievances emanating from projects being implemented is instituted. The County, through the department of Environment, seeks to implement climate change adaptation projects whose primary objective is to enhance adaptive and resilience capacity to climate change for the local communities across under priority areas such as:

- Food and nutrition security
- Water and blue economy
- Health, sanitation and human settlements
- Energy and transport
- Forestry, wildlife and tourism
- Disaster risk management

The GRM will assist the deliberating the processes in capturing, assessing, and responding to the concerns that are raised by the project beneficiaries, the general public, and those executing individual projects.

## 1.2 Objectives of the GRM

Here are specific objectives associated with the establishment of the GRM:

- i. Promoting transparency and accountability all through the implementation of the projects among the key stakeholders and beneficiaries
- ii. Promoting affirmative relations between the project executers, beneficiaries and members of the public
- iii. Addressing the grievances and enhancement of the conflict resolution emanating from the FLLOCA program affiliated projects
- iv. Offering resolution on social and environmental grievances during project implementation in a bid to facilitate project risk management.
- v. Guide the process of undertaking public participation, community feedback and access to information during service delivery.

## 1.3 Scope of the GRM

The Grievance Redress Mechanism (GRM) functions as a means of resolving disputes during program implementation. It is important to note that while the GRM serves to complement existing legal channels such as courts, tribunals, and other recourse mechanisms for addressing grievances, it does not replace them.

The primary purpose of the GRM is to enhance project outcomes by fostering public awareness about the FLLoCA investments/project and the objectives. Additionally, it aims to discourage fraud and corruption, mitigate socio-economic and environmental risks, and offer the FLLoCA specialists and technical departments with practical suggestions and feedback during the implementation of the program. Target audiences for the GRM include the funding body, the target County Departments and the implementing committees, as well as, the communities.

#### 1.4 Principles of the GRM

<b>PRINCIPLE</b>	<b>CONTEXT</b>
<b><i>Accessibility:</i></b>	The GRM must be accessible to everyone at all times, considering potential barriers such as language, literacy, awareness, cost, or fear of reprisal. Efforts should be made to address and overcome these barriers.
<b><i>Predictability:</i></b>	The GRM should be time-bound at each stage, with specified time frames for responses to ensure a predictable and timely process.
<b><i>Fairness:</i></b>	All procedures within the GRM should be perceived as unbiased in terms of access to information and meaningful public participation, promoting a sense of fairness.
<b><i>Rights Compatibility:</i></b>	The outcomes of the mechanism should align with international and national standards. It should not restrict access to other available redress mechanisms.

<p><b>Transparency and Accountability:</b></p>	<p>The entire GRM process should be conducted in the public interest, ensuring transparency and accountability throughout.</p>
<p><b>Capability:</b></p>	<p>For an effective GRM, the system must be equipped with the necessary resources, including technical, financial, and human resources.</p>
<p><b>Feedback:</b></p>	<p>The GRM should provide a channel for citizen feedback in a bid to enhance project outcomes for the benefit of the people.</p>



## **CHAPTER TWO**

### **2.1 Kirinyaga FLLoCA Grievance Redress Mechanism Framework**

A mechanism is designed and scales in absolute cognisance of the project risk and impact especially when the specific and critical processes are at play. There is need to have a basic and feasible to implement grievance handling approach with actionable handling steps. It is critical to also reflect on the resource envelop and the adequacy therein to execute this mandate. An environment to establishing a “learning premise’ within the structure hence adding capacity to establish grievance types and the impact as per assessment.

### **2.2 Levels of Redress**

#### **2.2.1 First Level of Redress**

This level focuses primarily on engaging communities and benefiting project stakeholders. Within each community unit, three community leaders will be designated and trained to manage complaints. These leaders will operate under the supervision of the area chief/assistant chief. All project beneficiaries will be informed about the designated individuals responsible for handling complaints. The community leaders will allocate specific days when they are available to receive and address complaints. Upon receipt of a complaint, their responsibilities include registering it, conducting an investigation, and recommending an appropriate course of action. Complaints will be documented using a standardized form (FLLoCCA Kirinyaga - GRM/001, as outlined in Appendix 1). In cases where the complainant is dissatisfied with the initial recommendation, they will be directed to escalate

the issue to the second level of redress. The community leaders are required to submit a quarterly report, utilizing the standardized FLLoCA Kirinyaga - GRM/005 format provided in Appendix 5. This report should detail the registered complaints and is to be forwarded to the County Implementation Committee for subsequent transmission to the county government FLLoCA offices.

#### *2.2.1.1 Points of receipt of complaints at community level*

At the community level, the complaints register shall be placed in the following points:

- i) Three (3) appointees from the Ward Climate Change planning committee who represent the community
- ii) The Ward Administrators from the respective wards
- iii) The Project Officer on site

#### *2.2.1.2 Mode of Receipt and Recording of Complaints*

The acceptable channels for submitting complaints include verbal communication, written submissions, emails, or phone calls. The officer responsible for receiving complaints should make an effort to gather relevant basic information related to the grievance. It is expected that, at this stage, a majority of complaints will be communicated verbally, via phone, through SMS and through the county website grievance tab. The designated points for receiving complaints will be equipped with a standardized complaint receiving form, which must be completed for each complaint.

Upon receiving a complaint, an acknowledgment form (FLLoCA KIRINYAGA-GRM/002, as outlined in the Appendix) will be issued promptly. After the

complaint is registered, the Grievance Handling Team, under the guidance of the Grievance Redress Mechanism officer, the chief officer, or CECM, will schedule an investigation on a designated date. Following the investigation, the team will provide a recommendation. If necessary, meetings may be convened between the complainants and the concerned officers to collaboratively find a solution to the problem and make arrangements for grievance redress. The proceedings and decisions of these meetings will be documented in a standardized format (FLLoCA - GRM/003).

### 2.3. Second level of redress

The primary targets at this level of the redress include the executors, the implementers, and the community and the project beneficiaries. The grievance handling team shall work under the guidance of the Grievance Redress Mechanism officer, the Count Director Climate Change, the Chief Officer in office and department CECM in office where the FLLoCA program is anchored. It will be routine that the grievances are sampled and reviewed by the Climate Change Unit after which specific deliberations on the technical department liable to address the grievances will be identified. The proposals will be shared with the Chief Officer and the CECM for their action.

#### 2.3.1 Points of receipts of complaints at county level

At this level, the aggrieved parties will be advised to make their complaints or register them at these specific points:

- i) Climate Change unit – the GRM Officer
- ii) The Chief Officer – Environment and Climate Change
- iii) Officer of the County Secretary ( Sub-County Administration)

iv) Project Officer

*2.3.1.1 Mode of receiving Complaints*

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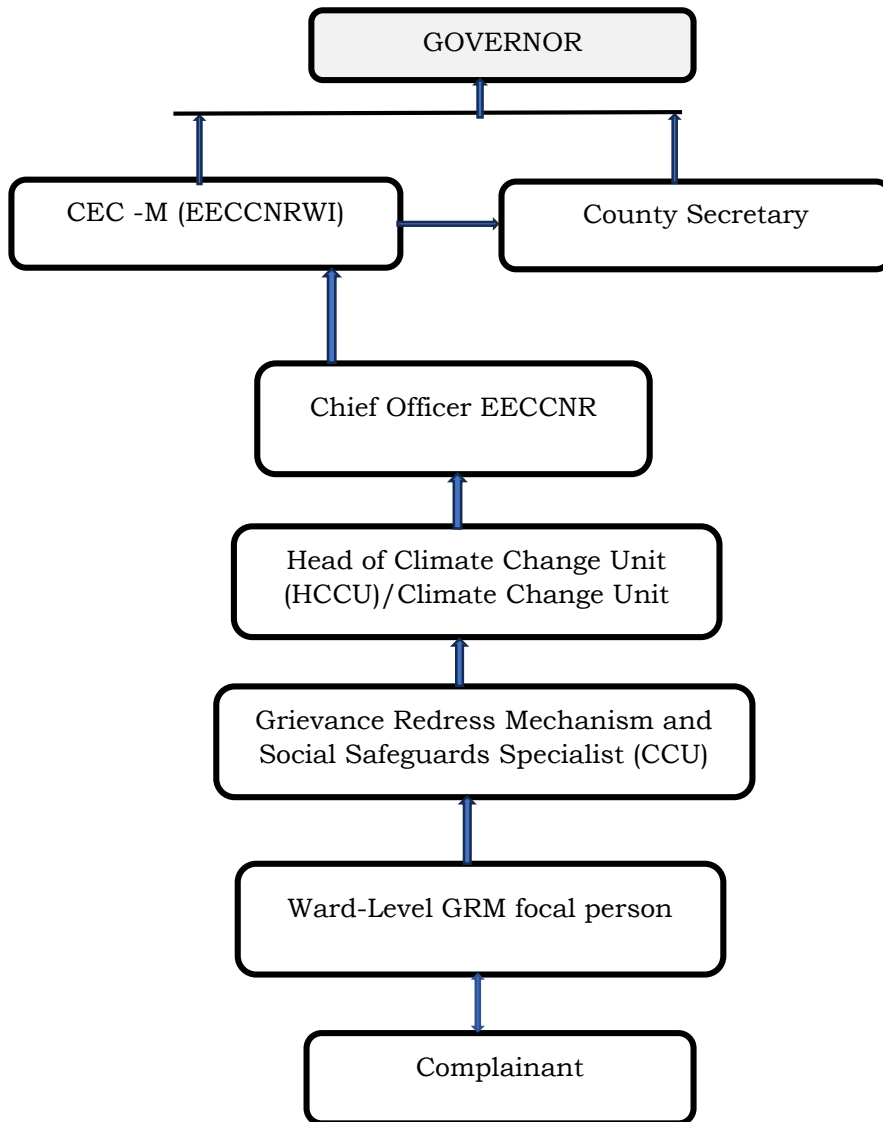
**2.4 Technical GRM composition**

The County Departments that are critical in the interventions being undertaken by the program will nominate technical officers to serve in the technical committees for the GRM. They are also designate to double up in

the overall public participation mainstreaming, and support the function of social risk management. The dedicated staff will provide a network and an array of ideas for conflict resolution which tend to link the communities to the specific departments and the central GRM office.

The CECM and the chief officers will maintain a policy level committee. The GRM service officer has a dedicated staff with the necessary skills and knowledge in ICT, Public participation and county affairs to handle the grievance affairs across the county. The expectation and requirement is that all the nominees, as well as, standing members of committees will be individuals or persons of high integrity and commitment. They are expected to manifest the right will, skills, and attitude to handle this socially and economically sensitive function.

## 2.5 GRM Structure



## 2.6 Key Committees and Responsibilities

The section reflects on the various committees and their respective responsibilities.

### □ Project level Project Management Committee

The committee is in charge of the day-to-day supervision and management of the projects implementation. The secretary of this committee is supposed to liaise with the GRM desk in the context of grievance handling. They are

supposed to collect grievances sited at the project level. It is important to note that they GRM log is a key tool in the committee to support the tracking of movements of the complaints for closure.

□ Ward Based GRM committee

This is a technical committee that constitutes representatives from the WCCPC, technical departments, the ward administrator for the ward and a community development officer availed to the ward team.

□ Departmental GRM desks and working teams

These are officers designated to the GRM technical teams on the call to constitute the POE that will establish the suitable complaint resolutions from a technical perspective. The GRM specialist and the members of the CCU are key to this team's execution.





□ County GRM Steering committees

With the support of the GRM officer, and the CCU, this is a team that comprises the Chief Officers and is determined to offer and make GRM decisions based on policy, budgets and technical input by the technical committees.


## 2.7 General Procedure for Handling Grievances, Petitions, Memorandums and Complements

Below are procedures provided for the project management committee in the reporting and handling of the conflicts that emerge from the projects.

<b>*Process</b>	<b>Description</b>	<b>Time</b>
-----------------	--------------------	-------------

<p style="text-align: center;"><b>Receiving and Logging Grievances</b></p> 	<ul style="list-style-type: none"> <li>- Phone, letter or email</li> <li>- Recorded grievance through the grievance form/log</li> <li>- Completion and submission of a grievance form/letter</li> <li>- Face-to-face meeting with the aggrieved stakeholder</li> </ul>	<p>24 hours – 48 hours (urgency may apply when profiled as such)</p>
<p style="text-align: center;"><b>Acknowledgement of Grievance</b></p> 	<ul style="list-style-type: none"> <li>- Receipt of complaint through proper communication medium for recording</li> </ul>	<p>24 hours (urgency may apply when profiled as such)</p>
<p style="text-align: center;"><b>Assesses, Profiling and Investigation</b></p> 	<ul style="list-style-type: none"> <li>- Assess and profile complaint</li> <li>- Consult with critical parties</li> <li>- Visit on need basis/discuss with stakeholder</li> </ul>	<p>36 - 72 hours after receipt of grievance (urgency may apply when profiled as such)</p>
<p style="text-align: center;"><b>Grievance Resolution</b></p> 	<ul style="list-style-type: none"> <li>- Identification of further action</li> </ul>	<p>14 days after receipt of grievances (urgency may apply when profiled as such)</p>



	- Response to complaint considering resources required	
<b>Sign-off</b> 	- Confirmation with complainant that issue is closed, establish the follow-up and a sign-off established	21 days after receipt of grievance (urgency may apply when profiled as such)
<b>Grievance Monitoring</b>		3 months depending on the level of significance
<b>Generation of Grievance Redress Quarterly Reports</b>		

The internal process flow for channelling complaints is developed pursuant to the guideline provided in the FLLoCA POM. Below are the explicit steps that are supposed to be undertaken in the channelling of complaints.

- a) Receipt of complaint
- b) Recording assessment and classification of complaints
- c) Refer to concerned department for inquiry or evaluation or investigation depending on individual cases
- d) Administrative action
- e) Response to the complaint on action taken
- f) Review of the status of complaint by a committee
- g) Submission of quarterly reports on complaints to the program coordinator

It is important to note that the grievances redress process will have a series of outputs that are consumed by the county management team, as well as, the relevant program coordinator.

## 2.8 Financial resources

The GRM function requires an explicit line budget to foster sufficiency in the execution of the mandate therein. It also requires proper enhancement of the capacities of the staff, as well as, the community that are supposed to handle the complains hence promoting the 'learning premise' within the structure. These will be incorporated in the work plan and budgets.

## **CHAPTER THREE**

### **3.0 Legal and Judicial Frameworks for Grievance Redress Mechanism (Refer to CGA), other county frameworks**

The GRM practice is anchored in Law. There are a few regulations that guide the handling of grievances. Below is a concise break down of these pieces of legislature:

- a) Section 88 of County Government Act, 2012 (1) gives the citizens a right to petition the county government on any matter that is under the responsibility of the County Government
- b) Section 15 of the County Government Act, 2012 provides that any person has a right to petition a county Assembly to consider any matter within its authority which includes enacting, amending, and repealing any of the legislation.
- c) Section 88 (2) Citizen Petitions shall be made in writing to the county government
- d) County legislation shall give further effect to section 88 (1)
- e) Section 89 of the County Government Act provides that there is a Duty to respond to the citizens petitions and challenges by the County Government authorities, agencies and agents. They have a duty to respond in an expeditious manner to these petitions and challenges raised by citizens
- f) Section 90 of the County Government Act, 2012 provides that matters that are subject to local referenda (1) A county government may conduct a local referendum on among other local issues – (a) county laws and

petitions; or (b) planning and investment decisions affecting the county for which a petition has been raised and duly signed by at least twenty five percent of the registered voters where the referendum is to take place.

## **CHAPTER FOUR**

### **4.0 Grievance Redress Mechanism Communication Plan**

The communication plan aims to establish clear procedures for the FLLoCA/CCU to effectively communicate and collaborate with relevant stakeholders regarding the grievance Redress Mechanism (GRM). The plan will facilitate cohesive communication and coordination between the CCU, PIU, World Bank, project beneficiaries, and the general public regarding the standard procedures of the GRM. It will ensure that all parties are well-informed on the GRM before and during the implementation of the program.

#### **4.1 Communication plan objectives**

The primary goal of the GRM communication plan is to establish a framework for effectively communicating and managing GRM-related activities during the implementation of FLLoCA. This includes outlining strategies and methodologies for GRM communications, information distribution, feedback, and stakeholder engagement. Additionally, there are other objectives of the plan, such as:

1. Sharing information on GRM procedures with relevant stakeholders before and during the implementation of the program.
2. Developing a comprehensive communication methodology for disseminating GRM information to the target audience.

3. Promoting collaboration among project executors, beneficiaries, and the general public to ensure successful grievance handling throughout the FLLoCA implementation.
4. Allocating responsibilities for the CCU, GRM committee, GRM specialist, and Ward focal person with regards to GRM procedures and structure.

#### 4.2 Target Audiences for the communication plan

The target audiences for this plan are namely;

1. Project beneficiaries: ward communities and the local institutions
2. Office of the County Secretary (Public Administration) where the ward administrators are anchored
3. The CCU
4. The County Climate Change Planning Committee
5. The CECM-Environment, Climate change, Water and natural resources as the implementing office
6. County Assembly Committee on Environment, water and climate change
7. County Environmental committee

#### 4.3 Grievance redress mechanism communication structure and channel

The GRM structure consist of a three-tier structure that outlines how information will pass from implementers down to the targeted audience.

#### 4.3.1 First Tier GRM communication structure

The first tier of the GRM communication structure aims to communicate with project beneficiaries, local institutions, and the general public. The following information will be provided to this audience:

- Goals, objectives, and procedures of the GRM
- Planned activities and deliverables of the GRM, including their respective start and end dates
- Criteria for selecting community representatives who will receive complaints
- Information on GRM committee officials and the CCU members involved in the GRM procedures
- Contact details for individuals seeking redress in case they are affected by programme activities
- Recognition of community members' right to provide feedback on the implementation of the Programme and raise grievances
- A clear explanation of how and when complaints will be addressed.

#### 4.3.2 Second Tier GRM communication structure

The second tier of the GRM communication structure targets project implementers, consultant management firms, selected parastatals, associations, and their related institutions. These stakeholders will be provided with the following information:

- All information from the first tier, including goals, objectives, procedures, planned activities, and deliverables of the GRM
- Criteria for appointing members to technical GRM committees
- Ways in which individuals can participate in the GRM procedures
- Specific County points of receipt for grievances
- Process for receiving and recording grievances
- Details regarding when and how complaints will be addressed
- Alternative redress mechanisms available to the public if their grievances are not resolved.

#### 4.3.3 Third Tier GRM communication Structure

- i. All First and Second tier information
- ii. Progress of the Grievance Handling performance in relation to its goals and activities
- iii. How input from GRM progress reports has contributed to decisions
- iv. Key staff, GRM committee roles and responsibilities in relation to GRM procedures

#### 4.4 GRM communication channels

For the targeted audience to get all information regarding the grievance redress mechanism, FLLoCA will need to establish platforms and use already existing avenue to reach to their stakeholders at different tiers. The communication channels will vary for each target audience due to group dynamics and accessibility of such platforms especially to the project beneficiaries.



The Kirinyaga FLLoCA CCU will use the communication channels listed depending on its target audience:

1. Print media; e.g. posters, flyers, booklets, notices
2. Social media; that is Kirinyaga Facebook page, WhatsApp
3. Use of ICT
4. In addition, the following communication activities and methods will be conducted to promote a two-way communication between FLLoCA and all its relevant stakeholders, that is, a) Information sessions and workshops on GRM b) Bulletins d) GRM awareness literature e) Public forums f) Training on GRM procedures and structure at the project beneficiaries level

#### 4.5 GRM communication Matrices

The following pages are matrices for the CCU, GRM committee, ward committees and Management committees to assemble target audiences, messages, and delivery channels in line with the GRM communication plan.

AUDIENCE	INTEREST	MESSAGE	CHANNEL	WHO	WHEN
<i>Name the stakeholders here</i>	<i>Identify the kind of information needs to relayed in regard to the GRM</i>	<i>Identify the primary message for this group. All future messages</i>	<i>Describe the communication tools to be used to reach the targeted audience</i>	<i>List the official (s) who will craft and deliver the message</i>	<i>Describe the time frame or frequency of the communication</i>

		<i>developed for this group should tie to this one overall theme</i>			

ANNEX

COMPLAINTS FORM

**Date:**

**(Date complaint is received)**

**Personal Details:**

**Name, Contact details, if necessary)**

**Nature of Complaint:**

**Detail of Complaint:**

**Who dealt with the complaint?**

**How it was dealt with:**

**Outcome: (Outline of what has happened as a result of the complaint)**

**Follow up required:**

**ACKNOWLEDGEMENT RECEIPT**

Acknowledgement Receipt (FLLoCA KIRINYAGA-GRM/002)

Complaint no.: .....

Date of issuing complaint: ..... (dd/mm/yyyy)

Place of issuing complaint:

Village/Town/City/Area: .....

County: .....

Details of the Complainant:

Name: ..... Age: .....

Address: ..... Gender: .....

Email address: ..... Phone no.: .....

Supporting documents submitted:

i. ....

ii. ....

iii. ....

iv. ....

v. ....

Summary of complaint:

.....  
.....  
.....

Name of Officer receiving Complaint: \_\_\_\_\_

Signature of Officer receiving Complaint: \_\_\_\_\_

**Meeting Record Structure (Grievance Redress Committee & related**

**Meetings)**

(FLLoCA kirinyaga -GRM/003)

Date of Meeting: ..... Complaint no.: .....Venue  
of Meeting: .....

List of participants:

Complainant Side NIE/EE/Grievance Redress Committee

Members

- 1)
- 2)
- 1)
- 2)
- 3)

Summary of Grievance:

.....  
.....

Key discussions:

- 1)
- 2)
- 3)

Decisions Made/Recommendations by the Grievance Redress Committee:

- 1)
- 2)
- 3)

Status of Grievance (tick where applicable):

Solved Unsolved

Chair person's name: \_\_\_\_\_

Chair person's signature: \_\_\_\_\_

Date (dd/mm/yyyy): \_\_\_\_\_

(dd/mm/yyyy): \_\_\_\_\_

## Grievance Log

<b>Complaint No.</b>	<b>Date received</b>	<b>Location or project (village/cluster/sub water)</b>	<b>Complaint Received from</b>	<b>Nature of complaint</b>	<b>Action taken</b>	<b>Date of resolution</b>
1.						
2.						