REPUBLIC OF KENYA

GOVERNMENT OF KIRINYAGA

KERUGOYA-KUTUS MUNICIPALITY

STAKEHOLDER ENGAGEMENT FRAMEWORK [SEF]

SEPTEMBER, 2024

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The Kerugoya-Kutus Stakeholder Engagement Framework has been prepared by the Kerugoya-Kutus Municipality with the help of the County Project Coordinating Team for KUSP II program. The framework primarily creates a roadmap for streamlining equal and equitable involvement of all key stakeholders in the Municipality social and development agenda towards promoting social-economic development that is inclusive. It also purposes to embrace the constitutional and legal act on purpose of public participation in mainstreaming development agenda.

The framework provided a detailed stakeholder map criterion, the grievance redress mechanism outlook and the communication approaches that ought to be used in the municipality towards ensuring that stakeholders are well incorporated in the development agenda of the municipality.

The framework is intended to act as a live document guiding the municipality management team on the engagement procedures and the expectations in the context of promoting Vision 2030, implementation of the Sustainable Development Goals, and ensuring sustainable development is realized. The stakeholder portfolio is guided and considered a legal institution in the constitution that should be included both at the planning and implementation stages of projects in the municipality.

I am delighted to state that the framework is coming at a time we are kicking off some of the most essential development milestones in the municipality. I also applaud the CPCT KUSP II team under the leadership of the County Social Risk Management Specialist in developing this framework.

Signed...Date...25/10/2024.....

CPA Paul M Muchira

Municipal Manager, Kerugoya Kutus Municipality.

Acknowledgement

Kerugoya-Kutus Municipality wishes to acknowledge H.E Ann Mumbi Waiguru EGH and the CECMs, as well as, the Kerugoya-Kutus Municipal Board Members for supporting the development of this framework. The collective efforts in the development of this framework cannot be underscored as it has pulled a series of consultations in the designing phase of the framework.

The Municipality also wishes to thank the technical working team led by the Municipal Manager CPA. Paul Muchira in conjunction with the KUSP II CPCT team led by the County Social Risk Management Specialist George Macharia, The municipal Social Development Officer Christine Nyawira, The Municipal Grievance Redress Mechanism Officer Brian Gitei, Municipal Head of Accounts, Naphtali Muikia, Municipal Accountant Sylvia Muli and the rest of the team for their unwavering support.

The Municipal also wishes to thank all members of the community who were involved in the ratification of this framework allowing its adoption into the municipality as a key document in the implementation of projects.

Signed...Date....25/10/2024

Rev. Samuel Kanjobe

CECM Land, Physical planning and Urban Development.

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Executive Summary

The stakeholder consultation process within the project serves the dual purpose of informing stakeholders about the project and actively seeking their contributions to shape its design. A crucial component of this process is the Stakeholder Engagement Plan (SEP), which lays out a comprehensive program for engaging stakeholders, ensuring public information disclosure, and facilitating ongoing consultation at every stage of the project.

The SEP delineates how the project team will communicate with stakeholders and provides a structured mechanism for stakeholders to express concerns, provide feedback, or raise complaints related to the project or its activities. The involvement of the local population is deemed essential for the project's success, fostering smooth collaboration between project staff and communities, and working to minimize and mitigate environmental and social risks associated with the proposed project activities. The plan underscores the significance of transparency, ongoing communication, and proactive engagement with stakeholders throughout the entire project life cycle.

The stakeholder engagement framework for this program observes key principles:

i) Identification and segmentation of stakeholders

ii) Objective Communication with stakeholders – the program implementing teams will engage and influence stakeholders'

interactions throughout the phases of the projects cycles. This includes engaging in critical assessment of the viability and reliability of stakeholders.

iii)   Timely and consistent consultations – given the high likelihood of limited knowledge regarding the project, it will necessary and sufficient to make timely and consistent clarifications regarding the purpose, the scope, risks and potential approaches associated with them.

Acronyms

SEP   Stakeholder Engagement Plan

KUSP   Kenya urban support program

ESF   Environment and Social Framework

ESS   Environmental and Social Safeguards

NPCT   National Program Coordination Team

CPCT   County Program Coordination Team

ESHS   Environment, Social, Health and Safety

CECM   Count Executive Committee Member

POE   Panel of Experts

POM   Program Operations Manual

CGA   County Government Act

UIG   Urban institutional Grants

SRM   Social Risk Management

GRM   Grievance Redress Mechanism

CUIDS   County Urban Institutional Development Strategy

KPI   Key Performance Indicators

M&E   Monitoring and Evaluation

GBV   Gender Based Violence

ESIA   Environmental and Social Impact Assessment

SECTION 1: INTRODUCTION TO FRAMEWORK

1.1 Introduction

This document is the Stakeholder Engagement Plan (SEP) which has been prepared by the CPCT under the guidance and support of the County Social Safeguards Specialist, the Municipal Social Safeguards Specialist and Grievance Redress Mechanism specialist for the Kenya Urban Support Program phase 2 (KUSP II) program in Kirinyaga County. It establishes the general framework for the effective participation of all the stakeholders, actors and parties. The SEP also presents the activities, schedule, responsible parties, and the mechanism for handling complaints and claims, monitoring and reporting activities.

The KUSP II Project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard (**ESS 10**) that calls for Stakeholder Engagement and Information Disclosure

Stakeholders Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

1.2 Program Description

The Government of Kenya is in consultation with the World Bank for consideration of the Kenya Urban Support Program (KUSP) Phase II to consolidate the gains made under KUSP I and enhance the benefits of the project to more people in the Urban set up. This Second Kenya urban support Project (KUSP II) will build on the successes and lessons learned from KUSP 1, but also introduce new interventions to deepen its overall impact. It will support the interventions that have been successful under

KUSP 1, tenure regularization, infrastructure upgrading, and institutional strengthening.

In addition, the project will include activities to link vulnerable people (elderly, orphans, disabled, and others) of informal settlements to government programs aimed at reducing poverty and vulnerability, and to link at-risk youth to programs focused on building skills and creating opportunities for employment and self- employment.

The proposed project objective is to enhance access to basic services and improve tenure security in urban set up in Kenya. This will be achieved by investing in infrastructure based on plans developed in consultation with the community, by supporting planning, surveying and issuance of land documents for residents of informal settlements, and by strengthening capacity of county administrations to deliver on their mandates.

Counties will apply for the Urban Institutional Grants (UIG) to address institutional and technical capacity needs of the county and urban institutions to perform their urban management and service delivery roles and responsibilities and contribute to achieving the Program outcomes.

Counties will use UIGs to develop basic capacities and systems related to urban governance and management including urban policy and legislation, urban planning and development control, urban finance, municipal finance and human resource management, resilient and inclusive urban infrastructure and municipal services delivery, Monitoring and Evaluation (M&E), asset management, environmental and social risk management, climate change, citizen and private sector engagement.

Led by the department responsible for urban development they will assess and identify the urban governance and development capacity development needs of the relevant departments, the county assembly, the county public service board and the urban institutions and prepare responsive capacity

development plans with budgets and monitoring and reporting frameworks as part of their County Urban Institutional Development Strategy (CUIDS)

1.3 Objective of the SEP

The stakeholder consultation process within the project serves the dual purpose of informing stakeholders about the project and actively seeking their contributions to shape its design. A crucial component of this process is the Stakeholder Engagement Plan (SEP), which lays out a comprehensive program for engaging stakeholders, ensuring public information disclosure, and facilitating ongoing consultation at every stage of the project.

The broad objectives of this SEP are to:

a) Describe the applicable regulatory and/or other requirements for disclosure, consultation and engagement with the Project's stakeholders

b) To enable identify elaborately different stakeholders including their roles and develop an approach for reaching each of the sub groups

c) Identify, analyze and prioritize key stakeholder groups, focusing on Project directly affected local communities

d) To provides an appropriate approach for consultations and disclosure of Project information throughout the project cycle

e) To plan for engagement modalities and provide effective communication tools for consultations and disclosure of Project information

f) Provide a transparent and inclusive strategy, action plan and timetable for disclosure of information, ensuring that engagement with each group is undertaken without any form of discrimination

g) Describe the processes for implementing stakeholder engagement and community liaison activities, including any special measures for

engaging with vulnerable groups and integration of this SEP into KUSP 's wider management systems

h) Establish an effective grievance mechanism, ensuring that stakeholders are properly informed of their rights and know how to communicate their concerns

i) Determine roles, responsibilities in project consultation communication and information disclosure

j) Define monitoring and reporting procedures

k) Ensure continuous improvement

The SEP delineates how the project team will communicate with stakeholders and provides a structured mechanism for stakeholders to express concerns, provide feedback, or raise complaints related to the project or its activities. The involvement of the local population is deemed essential for the project's success, fostering smooth collaboration between project staff and communities, and working to minimize and mitigate environmental and social risks associated with the proposed project activities. The plan underscores the significance of transparency, ongoing communication, and proactive engagement with stakeholders throughout the entire project life cycle.

SECTION 2: STAKEHOLDER IDENTIFICATION AND ANALYSIS

2.1 Introduction

In adherence to the World Bank's Environmental and Social Standard 9, which underscores the significance of open and transparent engagement between the executing entity and parties interested in a project's implementation. The involvement of concerned parties is viewed as an encompassing process spanning the entire project lifecycle. Project stakeholders are identified as individuals, groups, or entities that:

i.   Derive direct or indirect benefits from the project

ii.   Possess an interest in the project. This constitutes individuals or groups whose interests may be impacted by the project and who hold the capacity to influence project outcomes in various ways.

iii. Are responsible for fueling and facilitating the existence and running of the projects

This project places a specific emphasis on acknowledging individuals or groups with interests who may be in vulnerable situations. The aim is to prevent the exclusion of these less privileged entities from the opportunities presented by the project. Successful project development hinges on cooperation and negotiation with stakeholders, with a particular focus on identifying legitimate representatives within stakeholder groups.

Ward Administrators and GRM Focal persons are integral to this process, serving as valuable resources for gaining insights into the local context. They act as primary conduits for the dissemination of project-related information and play a vital role in establishing communication links between the project and its beneficiaries, as well as their networks. This approach ensures that the project's benefits reach a broad spectrum of stakeholders, including those in vulnerable situations, fostering inclusivity and equitable access to opportunities.

Verifying the legitimacy of stakeholder representatives is a vital task, ensuring that they genuinely advocate for the communities they represent. This verification process involves informal discussions with a random sample of representatives to understand their views on effective representation.

Collaboration with key government departments enhances the verification process and ensures alignment with broader government initiatives. Together, these efforts contribute to establishing a solid foundation for successful engagement and cooperation throughout the project development process.

2.2 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Open and Comprehensive Approach*: Public consultations for the project(s) will be organized throughout the entire life cycle, conducted openly, and safeguarded against external manipulation, interference, coercion, or intimidation.

- *Informed Engagement and Feedback*: Information will be disseminated to all stakeholders in a suitable format, and ample opportunities will be created for stakeholders to provide feedback. Rigorous analysis and addressing of comments and concerns will be undertaken.

- *Inclusivity and Sensitivity*: The identification of stakeholders is conducted to enhance communication and foster effective relationships. The participation process for projects is all-encompassing, encouraging the involvement of all stakeholders throughout the consultation process. Equal access to information is ensured for all stakeholders. The selection of engagement methods is guided by a principle of sensitivity to stakeholders' needs, with special attention given to vulnerable groups, including women, youth, the

elderly, and diverse ethnic communities with consideration for cultural sensitivities.

For the purposes of effective and tailored engagement, stakeholders of the proposed project (s) can be divided into the following core categories:

- **Benefiting Parties** – within the framework of the project, the beneficiary parties are considered to be the immediate community benefitting from the interventions.

- **Other Interested Parties** – individuals/groups/entities that may not be direct beneficiaries but who consider or perceive their interests in the project and the process of its implementation in some way. They constitute the national government agencies, and departments, County Government technical departments, Civil Societies, Water User associations within the county, business community etc.

- **Vulnerable Groups** – Individuals who may experience a disproportionate impact or heightened disadvantage from the project(s) in comparison to other groups due to their vulnerable status. These individuals necessitate special engagement efforts to guarantee their equitable representation in the consultation and decision-making processes linked to the project. In this specific project, the identified vulnerable groups include women, youth, Persons with Disabilities (PWDs), minority groups, and marginalized

2.3 Beneficiaries by the Project

These institutions meet the eligibility criteria and terms of conditions for participating in KUSP II Project. Beneficiary parties include;

- Residents

- Business Community

- Persons with disabilities (PWDs)

- The Elderly

- The women and Youths

- Participating financial institutions that include commercial banks and mobile network operators.

- Minority and Marginalized Groups

- Community Based Organizations (CBOs)

2.4 Other Interested Parties

Other actors who could potentially have an interest in the development of the project. Include:

- The County Assembly

- County Executive departments (trade, lands, transport and housing, education and public Service)

- Mobile network providers

- Digital platforms

- Commercial Banks

- Local administration

- Non-state actors (Civil society groups, NGOs)

- National Government departments and agencies (NEMA, WARA, Local Administration, KURA)

- Religious institutions

2.5 Women, Youth, PwDs Minorities and Marginalized Groups

These groups face greater constraints in accessing the project's benefits, such as MSMEs led by women, youth, Persons with Disabilities (PwDs), minorities, and marginalized groups. The project places particular emphasis on identifying and reaching out to these groups, creating awareness and making project participation accessible to them. These efforts aim to facilitate their engagement and connect them with the project.

The project design is structured to enhance credit access for the most vulnerable business groups in the market, primarily led by women, persons with disabilities, and the youth. The goal is to provide better opportunities for this demographic group.

The project design is also geared towards incorporating a gender perspective, targeting a segment of the population that is vulnerable and has been disproportionately affected by the pandemic.

Within the project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Marginalized communities
- Youth
- Women
- People Living with Disabilities
- Elderly
- Children

Vulnerable groups affected by the project will be further confirmed and consulted through dedicated means, as appropriate.

SECTION 3: STAKEHOLDER ENGAGEMENT MECHANISM

3.1 Introduction

The stakeholder engagement framework for this program observes key principles:

iv)   Identification and segmentation of stakeholders

v)   Objective Communication with stakeholders – the program implementing teams will engage and influence stakeholders' interactions throughout the phases of the projects cycles. This includes engaging in critical assessment of the viability and reliability of stakeholders.

vi)   Timely and consistent consultations – given the high likelihood of limited knowledge regarding the project, it will necessary and sufficient to make timely and consistent clarifications regarding the purpose, the scope, risks and potential approaches associated with them.

The CPCT with the technical guidance appointed social safeguards and GRM specialist with the primary goal to determine the objective interests and aligning them with the eligible investment options established within the program.

3.2 Project Stakeholder Needs and Methods, Tools and Techniques for Stakeholder Engagement

Stakeholders Needs

Dissemination of information on the KUSP II project will allow stakeholders to express their opinions, observation and suggestion which depending on their feasibility could be incorporated into the project.

The aim of this engagement is to:

i.   Establish a systematic approach regarding the participation of the stakeholders to help maintain a constructive relationship with them.

ii.   Identify the priorities of the interested parties and allow their opinion to be taken into account in the implementation and monitoring of the project;

iii.   Demonstrate both the benefits and the guarantee of environmental and social sustainability of the project.

The topics of interest to be communicated to the beneficiaries and interested parties.

Table 1: Topic of Interest for Beneficiaries and Interested Parties

Parties	Theme of Interest
Community (Residents, Business Community, PWDs, women, youth & CBOs	• Primary beneficiaries of the project • Key players in prioritization of the interventions • Form management committees to implement ward projects
County departments (Lands, environment/Water, Trade, Urban development & Transport)	• Technical support in the specialized areas • Offer platform for community to participate during sensitization • Monitoring and evaluation of the projects • Preparing the work plans and progress reports

Parties	Theme of Interest
Non-state actors(Civil society groups, NGOs & CBOs)	• Community empowerment and participation • Advocacy for social and environmental justice • Gender and social inclusivity in project implementation • Monitoring and evaluation of project impacts • Capacity building for sustainable development • Collaboration with government agencies and stakeholders
Development partners (World Bank)	• Provide financial resources • Monitoring and evaluation of the project
Local Administration- National/Ward administrator or village in charges	• Efficient delivery of services to the community • Promotion of national development and welfare • Improvement of infrastructure and facilities in the ward • Addressing social and cultural issues in the community • Enhancing community development and livelihoods

Parties	Theme of Interest
Leading Agencies (e.g. NEMA, WARMA, etc)	• Environmental protection and conservation • Compliance with environmental regulations • Sustainable use of natural resources • Environmental impact assessment and management Stakeholder engagement for sustainable development • Biodiversity conservation and ecosystem preservation
County Assembly	• Effective public service delivery • Compliance with legal and regulatory frameworks • Ensuring equitable distribution of resources • Participatory decision-making and public engagement • Promoting transparency and good governance • Monitoring and evaluation of project outcomes • Addressing local community needs and concerns • Accountability and oversight of project implementation

3.3 Proposed Strategy for Information acquisition and Disclosure

The stakeholder engagement process during the project preparation phase and promotion has been done through working meetings between program implementation units (team), Community based committees, technical stakeholders and other interested parties. It is necessary and legally bidding that the vulnerable and marginalized groups as outlined in the stakeholder map will be actively involved in the engagement proceedings or meetings. Critical functions such as social risk assessments environment risks assessment, project monitoring and evaluation will encompass interviews that will be elementary to gather information from the relevant stakeholders. This will be a basis for the development of a repository from which interested parties can access information

Formal calls and detailed records of participation will be meticulously maintained, encompassing comprehensive reports outlining the event log. These reports will include information such as the event's location, date, and time, as well as the topics covered. Additionally, records will capture details about the information transmitted, criteria received, the number of participants, and a thorough analysis of how the criteria are integrated or how various actors responded. This meticulous documentation ensures a comprehensive and transparent account of each event, facilitating effective analysis, evaluation, and informed decision-making throughout the project.

It is elementary to articulate that the information will be availed to the stakeholders based on the theme of interest.

The main means of dissemination will be:

1. ICT enabled platforms: virtual meetings will be held via Google meet, Teams, WebEx and Zoom for purposes of sharing progress, consulting on potential interventions or changes as deemed necessary.

2. Website: the County government, through its website, will have a designated link to the program-specific information regarding the

grievance redress system, information regarding the projects being implemented and the frameworks developed to guide the implementation of the program component as provided for in the KUSP II POM.

3. Email: Provide the stakeholders with information on the project design and component, and this will be done on a regular basis.

4. Social Media and Digital Gadgets: the program implementing team will provide information on the project and its components, as well as, receive feedback via the County Facebook page, Emails, phone calls, SMSs WhatsApp, and Print media among other viable and verifiable modes of communication. However, the official social media accounts and platforms will be used.

5. News channels and media: On need basis, there will be explicit broadcast in the media especially when coverage of progress of projects being implemented.

3.4 Proposed Feedback Strategy

Section 15 and 88 of the County Government Act provides that the citizens have the right to petition the county government on any matter that is under the responsibility of the county government. This stakeholder engagement plan puts into consideration any other legislation that shall guide feedback and feedback mechanisms within the county. Further the petitions should be done in writing to the county government The Kirinyaga project implementing unit (teams) is committed to receiving feedback and acting on it as provided for by Law. Feedback includes petitioning and giving insights on the alternative positions that the stakeholders may have regarding the approach used to implement project or execute other complementary responsibilities   in   the   program.

3.5 Stakeholder Engagement Plan

Project stage	Topic of consultation/message	Method used	Target stakeholders	Responsibilities
Projects identification & Prioritization	Reflection of the potential project interventions considering community needs	Participatory Assessments (Key community informant discussions)	Community representatives (Women and Youth, VMGS, CSOs) and other interested stakeholders	Kirinyaga County CPCT, Technical Departments Representatives (Trade, Transport , Housing, Environment)
Screening of Project Risks (Environment and Social Risks Screening)	Assessment of potential risks associated with the implementation of the projects	Participatory Screening using ESRM screening tools	Community Representatives, Resource Users, NEMA	ESRM experts (SRM and ERM specialists)

Project stage	Topic of consultation/message	Method used	Target stakeholders	Responsibilities
Project appraisal	1) Risk communication strategy 2) Review and clearance of the service level agreements prior to execution	Key informant discussions Forwarding of the agreement template to the program implementing unit for advisory and instructions	County Level Community Representatives, Technical Experts from County and National Government departments and agencies.	Kirinyaga County Program Implementation Team (CPCT)

Project stage	Topic of consultation/message	Method used	Target stakeholders	Responsibilities
Implementation	Implementation updates, Risks Management, Complaints about project execution.	Prudential supervision by Regulators, Risk management Specialists, Engineers, and Resource Users/Community	*Project implementing Agencies*	KUSP II project implementing agency/Contracted Service Provider
		Engagement with The Ministry of Industry, Trade and Enterprise Development		

Project stage	Topic of consultation/message	Method used	Target stakeholders	Responsibilities
Quarterly evaluation and feedback survey	Feedback of effectiveness of different channels of communication	Survey	Different stakeholders and VMG groups	GRM Specialists, Ward Administrator

3.6 Future of the Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.

3.7 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

3.7.1. Resources

Implementation of the SEP which is a sub-activity of component of the stakeholders' engagement mechanism, a sub-component of the environmental and social risk management components of the KUSP II. The function is supposed to have ample resources captured in the program budgets and work plans. The amounts are subject to review by CPCT which is the KUSP II Steering Committee and the municipal board. The project management team will be responsible for the stakeholder engagement activities.

3.7.2. Management Functions and Responsibilities

The project will be implemented by County Department of Lands and the Program Implementing Unit supporting the KUSP II activities. The project will be supervised by a program steering committee. It is expected that a CPCT shall be established and will be responsible for:

(i) Coordination of capacity development, and implementation of UIG

(ii) Oversight, monitoring and evaluation of KUSP II implementation and reporting to NPCT

(iii) Mobilization and coordination of relevant county departments toward Program implementation

(iv) Support financial management, procurement, supervision and technical backstopping of works

(v) Supporting the urban institutions to perform and prepare for APAs

The CPCT will report to the CECM Urban who will in turn report to the County Executive Committee at the county level.

SECTION 4: GRIEVANCE REDRESS MECHANISM

4.1 Background

The main objective of a Grievance Redress Mechanism (GRM) is to assist in resolving issues, concerns, complaints and grievances in a timely, effective and efficient manner that satisfies all parties involve during the implementation of the KUSP II Project.

Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides project beneficiaries and interested parties people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;

- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and

- Avoids the need to resort to judicial proceedings.

4.2 Description of the Existing Grievance Redress Systems

The National Treasury Citizens' service delivery charter provides for mechanisms for grievance redress. Any complaints are reported directly to the Cabinet Secretary and or the Commission Secretary, Commission on Administrative Justice through the physical address, email address and telephone numbers provided. The charter also states that the turnaround time for resolution of complaints is seven days. Concurrently, the county government has a well constituted GRM framework that guides the formulation of the formulation of the municipal GRM, considering that it sits within the county jurisdiction.

4.3 Responsibilities

The grievance handling team shall work under the guidance of the Municipal Grievance Redress Mechanism Framework and a team constituting the County GRM officer (CPCT), the Municipal Manager (Municipal Board relevant committee) or CECM- Lands where the KUSP II program is anchored.

It will be routine that the grievances are sampled and reviewed by the Municipal Grievance Redress Mechanism officer, the county GRM officer (CPCT) to address the grievances identified. The proposals will be shared with the Municipal Board and the CECM for their action.

The GRM focal person will be responsible for the grievance redress mechanism in liaison with the representatives from the community. They will be responsible for the day to day running of the GRM as well as follow up to ensure that timelines for grievance resolution are observed and maintained. The Ward Administrator will be the first level of escalation of grievances.

Issues, concerns, complaints and grievances from the general public can be raised through various channels email, telephone or letter. A call can also be made to the department of Lands or to the GRM representative at the desk who will communicate in Swahili, English and if possible other languages from those communities that may have limited Swahili and have experience of hard to reach counties. A protocol for handling complaints including staff complaints will be put in place and will be confidential. Once all possible redress has been proposed and the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The public hotlines which are already in existence will have a selection option for complaints including for workers and confidential complaints such as incidences of GBV. This will be guided by a complaints protocol which all the operators will be trained on. The project communication strategy will provide information on how to register grievances.

The GRM will include the following steps:

*Process	Description	Time
Receiving and Logging	- Phone, letter or email - Recorded grievance through the grievance form/log - Completion and submission of a grievance form/letter - Face-to-face meeting with the aggrieved stakeholder	24 hours – 48 hours (urgency may apply when profiled as such)
Acknowledgement of Grievance	- Receipt of complaint through proper communication medium for recording	24 hours (urgency may apply when profiled as such)
Assesses, Profiling and Investigation	- Assess and profile complaint - Consult with critical parties - Visit on need basis/discuss with stakeholder	36 - 72 hours after receipt of grievance (urgency may apply when profiled as such)
Grievance	- Identification of further action - Response to complaint	14 days after receipt of grievances (urgency may apply when profiled as

	considering resources required	such)
Sign-off ↓	- 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)
Grievance		3 months depending on the level of significance
Generation of Grievance Redress Quarterly Reports		

4.4 Monitoring and Evaluation

The Stakeholder Engagement Plan (SEP) will undergo periodic revision and updates throughout the project implementation to ensure the information remains current and aligned with the project context and specific development phases. Any significant alterations to project activities and schedules will be documented in the SEP. Responsible staff will compile quarterly summaries and internal reports on public grievances, inquiries, and related incidents, along with the implementation status of associated corrective/preventative actions. These reports will be submitted to the project's senior management.

The quarterly summaries serve as a mechanism for evaluating both the number and nature of complaints and requests for information, assessing the project's ability to address them in a timely and effective manner. Information on the project's public engagement activities throughout the year may be communicated to stakeholders through either the publication of a standalone annual report on the project's interactions or monitoring a set of Key Performance Indicators (KPIs) regularly.

4.5 Information Disclosure

The county government will disclose on their websites the projects ESIA and environmental and social instruments. The County Government will be expected to disclose project-related documents related;

(a) Application of the ESSs

(b) Environment and social monitoring reports.