GOVERNMENT OF KENYA

MINISTRY OF CO-OPERATIVES AND MSMES (MCMSME)

AND THE MINISTRY OF INVESTMENTS, TRADE, AND INDUSTRY (MITI)

STATE DEPARTMENT OF MSMES

MICRO AND SMALL ENTERPRISE AUTHORITY (MSEA)

STATE DEPARTMENT FOR INVESTMENT PROMOTION (SDIP)

KENYA JOBS AND ECONOMIC TRANSFORMATION (KJET) PROJECT

P179381

Grievance Redress Mechanism Manual

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DEFINITIONS OF TERMS

Complaint: Is a general expression of dissatisfaction or annoyance with project-related actions and it is not necessarily formal and can be resolved informally.

Grievance: Is a formal complaint against a project made by stakeholders and is based on real or perceived feeling of discontent or dissatisfaction, arising out of anything connected with the project.

Complainant: A person who reports a complaint to the project grievance mechanism (GM) in accordance with established procedures.

Concern: Is a matter of interest or importance to a stakeholder.

Compliments: An action that expresses approval, admiration or respect.

Feedback: Is a response provided to a complainant regarding the status of resolution of reported grievance.

LIST OF ACRONYMS

APs	Affected Parties
CBO	Community Based Organization
CoK	Constitution of Kenya
CSOs	Civil Society Organizations
CIDCs	Constituency Industrial Development Centres
CYDO	County Youth Development Officer
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FPs	Focal Persons
FDI	Foreign Direct Investment
GBV	Gender Based Violence
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
GoK	Government of Kenya
GRS	Grievance Redress Service
GRC	Grievance Redress Committee
ICT	Information and Communication Technology
IP/SSAHUTLC	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
IPF	Investment Project Financing
KDC	Kenya Development Corporation
KenInvest	Kenya Investment Authority
KIEP	Kenya Industry and Entrepreneurship Project
KJET	Kenya Jobs and Economic Transformation
KYEOP	Kenya Youth Employment and Opportunities Project
M&E	Monitoring and Evaluation
MC	Master Craftsmen
MIS	Management Information Systems
MITI	Ministry of Industry, Trade and Investment
MSEA	Micro and Small Enterprises Authority
MYAAS	Ministry of Youth Affairs, The Arts, and Sports
NGEC	National Gender and Equality Commission
NGO	Non-Governmental Organization
NITA	National Industrial Training Authority
NPIU	National Project Implementation Unit
NSSF	National Social Security Fund
NYOTA	National Youth Opportunities Towards Advancement Project
PAPs	Project Affected Persons
PSC	Project Steering Committee
SCYDO	Sub County Youth Development Officer
SDIP	State Department for Investment Promotion
SDS	Social Development Specialist
SDSP	State Department of Social Protection
SDYAA	State Department for Youth Affairs and the Arts

SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
ToR	Terms of Reference
VMGs	Vulnerable and Marginalized Groups
WB	World Bank
YDO	Youth Development Officer

1. **Project Background**

The Project: Kenya Jobs and Economic Transformation (KJET) Project is being implemented by the Government of Kenya through the Ministry of Co-operatives and MSMES (MSMSME) and The Ministry of Investments, Trade, and Industry (MITI). The Project aims to address government and market failures that prevent high-quality job creation and adoption of green practices by Micro, Small and Medium Enterprises (MSMEs). These includes burdensome regulatory frameworks; inadequate Foreign Direct Investment (FDI) promotion; coordination failures between buyers and suppliers; information asymmetries with respect to capabilities and market requirements; and externalities related to climate change.

1. 1.   Project Development Objective:

To increase private sector investments, access to markets and sustainable finance to create and improve jobs

1.2 Project Structure: The project is structured in four components:

> ***Component 1: Strengthening Business and Investment Enabling Reforms ($10 million)***
> This component will target government failures around the business regulatory and FDI environment (e.g., registration, entry, and licensing barriers faced by MSMEs, fragmented framework towards FDI policy and promotion). Project support will be anchored within the State Department of Investments (SDI) and KenInvest within MITI. It will cover diagnostics related to risk-based regulatory approaches and FDI policy and promotion at the National, County, and value chain levels, followed by support for implementation of the key resulting recommendations. Depending on the outcomes of diagnostics, implementation support could cover, *inter alia*, design and rollout of systems to streamline and automate regulatory processes; targeted changes to laws, regulations, and strategies; deployment of dedicated toolkits for investors targeting; and/or capacity-building for key implementation agencies to address gaps (e.g., on investment promotion).

> ***Component 2: Enhancing MSME Cluster Competitiveness ($85 million)***
> This component aims to strengthen the competitiveness and market access of the MSMEs. Across all interventions, this component will leverage, align, and expand existing MCMSME, MSEA, and MITI initiatives for MSME support, such as Constituency Industrial Development Centers (CIDCs). It will also build downstream linkages with other ongoing large-scale GOK interventions including from WB and IFC portfolio as relevant. The main implementer of this component will be MSEA.

> ***Subcomponent 2.1: TA on Competitive Cluster Development Initiatives***
> This sub-component will provide technical assistance to build MSEA's capacity to identify actionable policy reforms and/or common infrastructure or services investments to remove existing government and market failures for a given cluster. As a first step, technical assistance will map five (5) priority value chains to provide a detailed analysis of the distribution and concentration of economic opportunities and value addition across Kenya. Technical assistance will then cover, *inter alia*, analytical frameworks for analyzing cluster competitiveness and binding constraints, and

prioritizing interventions. Special consideration will be given to the potential for digital platforms and technologies to address market failures (e.g., e-commerce platforms, tokenization). These capabilities will enhance MSEA's overall abilities to strategically plan investments (including operationalization of national cluster strategies); provide inputs into prioritization and selection processes for MSME cluster support under Subcomponent 2.2 (see below); and work with other ministries and agencies to undertake reforms. Beyond the project, findings regarding horizontal constraints related to, *inter alia*, FDI and competition will inform subsequent analytical and operational work which will focus on competition, trade, investment, and services.

Subcomponent 2.2: Building Capacities of MSME Clusters

This subcomponent aims to address identified market failures related to MSME capabilities, market access, and agglomeration. The subcomponent will achieve this via an integrated package of business development services (BDS) and targeted co-investment support for productive assets. This will be delivered through clusters (defined here as organized agglomerations of firms in each value chain and geographic area) in priority value chains. BDS will cover, *inter alia*, market research, strategy and business plan development, marketing and product development, financial management, practices for climate change mitigation and adaptation (e.g., energy-efficient manufacturing processes, use of drought-tolerant seeds); and adoption of digital technologies (e.g., e-commerce platforms, remote sensing supply chain technology), and product quality requirements. Co-investment will require beneficiaries to match project investments upfront and be on a term share basis.

Beneficiaries will be required to pay back project investments (original value plus additional amount scaled to the beneficiary's ROI) within a given period. BDS and co-investment support will be provided mainly through clusters (i.e., cooperatives or geography/value chain-specific MSME associations). However, individual MSMEs will be considered on a case-by-case basis based on the extent of their backward linkages, potential for jobs impact at scale, potential for women's economic empowerment, and export orientation. To the extent possible, support will be targeted around business plans targeting specific downstream off-takers, like the Productive Alliance model used in prior agribusiness projects in Latin America and Africa (e.g., Zambia Agribusiness and Trade Project) but adapted to expand beyond purely the agricultural context. Clusters will apply for support with their business plans and be selected using market-based criteria around viability/growth orientation, jobs potential, and alignment with government priority value chains. Implementation will begin with pilots targeting the edible oil, textiles, and construction/building materials value chains to generate rapid learnings and impact. These value chains were selected based on a framework balancing desirability and feasibility, and further value chains will be screened during early implementation in line with Sub-component 2.1. The subcomponent will incorporate special considerations for women-owned and -led businesses with respect to beneficiary outreach/targeting and BDS intervention design.

Component 3: Scaling-up Green Financing and Strengthening Climatic Resilience for SMEs (US$45 million)

This component is meant to mobilize green private capital to support SME's adoption of green, clean and eco-friendly technologies through setting up an agile, patient financing structure that can crowd in private capital, especially for medium businesses. The component will also pilot an innovative instrument to support SMEs in managing compound shocks including climatic risks and Russia's invasion of Ukraine. This component will be implemented by the Ministry of Investments, Trade, and Industries (MITI) through the Kenya Development Corporation (KDC). This component is complementary to other components and World Bank operations. It will synergize its efforts with the existing SAFER as well as the KIEP. MITI is keen to crowd in capital from DFI's and other interested SWF's and investors as founding shareholders of the fund. The key objective of establishing the fund is to support high growth potential enterprises to adopt greener production technologies and engage in production of green goods and services to reach a level of financial viability that makes them more attractive to commercial investors including IFC.

Sub-component 3.1: Scaling Up Green SME Financing

This sub-component will provide initial risk-adjusted, long-term and patient capital, including equity and/or mezzanine financing, through a dedicated newly established Green Investment Fund (GIF) to finance green enterprises, greening of existing SMEs, and adoption of circular economy processes and practices. It is expected that medium enterprises will form most of the target pipeline, but the feasibility of targeting SMEs more broadly will be explored during appraisal. Investee enterprises of GIF may include but will not be limited to beneficiary SME clusters supported under Component 2 (and/or their off takers) and other women- and youth-led enterprises that are viable for green equity financing. This will be based on a well-developed and targeted investment criteria based on business viability and acceptability of ESF risks. GIF will be managed by an independent, competitively selected Fund Manager (FM). Options for the fund's governance framework (including board independence, licensing and oversight) and business model will be assessed during appraisal with support from Kenya's JCAP ASA and closely coordinated with IFC. Moreover, the selection of the FM will be subject to technical review of the ToRs by the World Bank, including a 'no objection' to the short-list of candidate FMs and the final selection.

Sub-component 3.2: Strengthening MSMEs Climatic Resilience

This sub-component will enhance the climate resilience of MSMEs by using blended financing to boost MSMEs' liquidity and minimize their default risk following external climate-related shocks. KDC will make concessional loans readily available for MSMEs, including beneficiaries of Subcomponent 3.1, to cover liquidity and credit risks in the event of expected shocks. MSMEs will apply to access concessional finance after pre-defined objective shock triggers are breached. Such interventions will reduce risks associated with climatic shocks and allow firms to acquire funding during exposure and normal operations, thus manage their cash flow, preserve jobs and customers, continue with capital investments, and innovate. This sub-component targets firms that were previously viable before exposure. The intervention will particularly benefit MSMEs whose operations have already been impacted by Covid-19, the Russia-Ukraine war and prolonged drought conditions or may face additional compounded climate shocks. After

evaluating their suitability to the MSMEs, climate risk insurance and other targeted financial instruments will also be considered. Sub-component 3.2 will address adaptation measures to Climate Change while 3.1 will focus on mitigation measures to support MSMEs adopting low-carbon pathways, enhancing their comparative advantage in export markets.

Component 4: Project Management and Monitoring and Evaluation ($10 million)
This component will provide financial and material support for the successful implementation of the project. The proposed project would be governed by a Project Steering Committee that would provide the PCUs with the strategic orientation of the project and the approval of Annual Work Programs, among other responsibilities. For purposes of project preparation, the PCUs would be created under MITI and MSEA. PCUs would be responsible for the technical preparation of the project; overseeing the preparation of the fiduciary and safeguards documents; programmatic and operational management of the project; coordination of different institutions and actors involved in the project; management of project implementation agencies responsible for the implementation of different activities of the project; as well as the execution of the PPA. The management of the Project will be conducted by a team of technical and fiduciary specialists in areas including project coordination, technical, procurement, environmental and social, financial, and M&E specialists in line with the organizational structure.

Project Beneficiaries

Overall, the project is expected to support Kenyan businesses (particularly MSMEs), foreign investors, and their underlying workers. Component 1 is expected to benefit all firms subject to the regulatory procedures addressed by the sub-national pilots through streamlined regulatory procedures. It will also benefit all foreign investors working with KenInvest via improved service delivery from KenInvest (e.g., completion of One Stop Center implementation). Component 2 will benefit the MSME clusters to participate in the project by providing BDS and co-investments to, *inter alia*, improve business and financial management capacity, establish market linkages, increase productive capacity, and adopt climate smart practices, in turn generating higher sales and profits for firms and higher wages and employment for workers. Component 2 is expected to benefit 1200 clusters with 600 clusters covered in co-investment. Component 3 is expected to firms accessing financing through the Green Investment Fund and KDC concessional loans. Finally, a number of government agencies or institutions are expected to benefit from KJET technical assistance or financial support.

2. Rationale for Grievance Redress Mechanism

The rationale behind the Grievance Redress Mechanism (GRM) within the Kenya Jobs and Economic Transformation (KJET) Project is rooted in ensuring accountability, transparency, and effective management of potential risks, negative impacts and concerns arising from the project's implementation. GRM is a critical component for responsible project governance, aiming to create an inclusive and transparent environment where all stakeholders can participate, voice concerns, and contribute to the project's success. The GRM will support the following:

i. **Addressing Project affected Parties' Concerns**: Any large-scale development project such as KJET may have unintended consequences or concerns for individuals, communities, or businesses. The GRM will provide a structured and accessible channel for the project-affected parties to raise issues, questions, concerns, or grievances.

ii. **Promoting Trust and Positive Relationships**: By offering a fair, legitimate, reliable, and cost-effective redress procedure, the GRM fosters trust between the implementing agencies and the project beneficiaries and wider community. This will help to build positive relationships and prevent minor issues from escalating into major conflicts.

iii. **Ensuring Accountability and Compliance**: The GRM will align national legal requirements with the international environmental and social standards such the World Bank's ESSs. Its implementation demonstrates a commitment to responsible project execution and provides a mechanism to track and address deviations from agreed-upon standards.

iv. **Mitigating Risks and Preventing Escalation**: A well-functioning GRM will allow for the early detection and prevention of grievances. By addressing concerns promptly and efficiently, the GRM will help mitigate potential risks to project operations, reputation, and overall success. This proactive approach prevents grievances from escalating into more serious disputes or legal challenges.

v. **Facilitating Continuous Improvement**: The GRM will be a valuable tool for learning. By systematically documenting and analyzing grievances, the project will identify emerging issues, trends, and areas for improvement in its design and implementation. This feedback loop will contribute to continuous improvement in project performance.

vi. **Enhancing Project Outcome**s: The GRM will ensure that the achievement of the KJET project's development objectives without leaving any stakeholders feeling unheard or negatively impacted.

The Kenya Jobs and Economic Transformation (KJET) project, while designed to foster economic growth and job creation, operates within a complex socio-economic and political landscape. The following are some of the factors that could potentially lead to conflicts during the project implementation and lead to grievances:

i. Inadequate engagement of stakeholders/meaningful consultations in project decision-making processes;

ii. Implementation of project interventions in areas with Vulnerable and Marginalized Groups (VMGs) presence but without obtaining broad community support;

iii. Inequitable distribution of project benefits and opportunities among target beneficiaries;

iv. Broken promises and unmet expectations of benefits;

v. Failing to generate opportunities for employment, training, supply, or community development among target beneficiaries.
vi. Disruption of community dynamics.
vii. Lack of access to information
viii. Exclusion of the vulnerable and marginalized groups including the PWDs.
ix. Selection criteria for MSMEs
x. E and S non-compliance including environmental pollution, occupational health and safety risks.

Other contextual factors that have particular significance for VMGs and their relations with project include lack of respect (perceived or actual) for indigenous customary rights or culture, history, and spirituality, is likely to trigger a strong reaction. Similarly, issues around access to and control of resource such as productive factors e.g., credit, training, internship and apprenticeship opportunities and the recognition of sovereignty are very important for many VMGs and can lead to disenchantment if they are not handled sensitively and with due respect for the rights of affected groups. Table XX below shows detailed analysis on potential grievances

Table 1 GRM Analysis of Potential grievances per component

Component	Activities with potential to trigger grievances	Potential grievances
Component 1: Strengthening Business and Investment Enabling Reforms		
	Regulatory Diagnostics and Reforms	- Risk of deregulation leading to weakened environmental oversight - Overlooked environmental safeguards in streamlined procedures - Exclusion of vulnerable groups from consultations - Reforms may favor large investors over MSMEs
	Digitalization of Business Services (e.g., OSS platform)	- Increased e-waste from outdated ICT infrastructure - Energy consumption from data centers - Digital divide excluding rural or low-literacy users - Data privacy concerns
	Investment Promotion and FDI Facilitation	Promotion of projects with high environmental footprints - Weak environmental due diligence in fast-tracked investments- Land use conflicts from promoted investments - Displacement or marginalization of local communities
	Capacity Building for Regulatory Agencies	- Inadequate training on environmental risk management -Gender imbalance in training access - Lack of local language materials
	County-Level Business Environment Reforms	- Inconsistent enforcement of environmental standards across counties

		- Unequal access to reforms across regions - Political interference or elite capture
	Monitoring & Evaluation	- Neglect of Environmental Metrics: M&E may focus heavily on regulatory or economic reforms, sidelining environmental indicators such as emissions, energy use, or e-waste from digitalization -Lack of Environmental Risk Screening: Fast-tracked regulatory reforms or investment promotion may overlook environmental due diligence, leading to grievances from watchdogs or affected communities -Lack of Environmental Transparency: ESG findings may not be disclosed publicly or may be too technical for stakeholders to understand, eroding trust. - Exclusion from M&E Design: If MSMEs, women, youth, or persons with disabilities are not involved in defining indicators or reviewing findings, they may feel marginalized. - Digital Divide in Data Collection: Overreliance on online platforms may exclude rural or low-literacy populations, skewing results and triggering complaints. - Tokenistic Engagement: Stakeholder consultations may be superficial, with little influence on actual M&E frameworks or reforms. -Data Privacy Concerns: Improper handling of personal or enterprise data during M&E can lead to mistrust or legal challenges. - Conflict of Interest: If M&E is conducted by the same agencies implementing reforms, stakeholders may question the objectivity of findings. - Inaccessible Reporting: Reports may not be translated, summarized, or shared in formats accessible to the public. - Weak Feedback Loops: If M&E findings are not used to adjust policies or address grievances, communities may disengage or escalate complaints.
Component 2: Enhancing MSME Cluster Competitiveness		
Subcomponent 2.1: TA on Competitive Cluster Development Initiatives	Cluster Selection and targeting	Perceived favoritism or bias in selecting MSMEs, cooperatives, or individuals to benefit from cluster interventions.
	Eligibility Criteria for MSMEs	Exclusion of vulnerable groups (e.g., women, youth, PWDs, informal enterprises) due to stringent or inappropriate criteria.

	Baseline Assessments & Cluster Diagnostics	Community fatigue, misinformation, or lack of understanding during data collection and stakeholder assessments
	Resource Allocation (Equipment, Services)	Inequitable distribution or mismanagement of funds, equipment, or support services
	Development of Cluster Action Plans	Exclusion of grassroots voices or non-participatory planning processes
	Infrastructure Upgrades & Shared Facilities	Land disputes, noise, pollution, or displacement associated with development of shared cluster infrastructure.
	Equipment installation and operation	-Improper disposal of packaging and obsolete equipment - Energy consumption from non-efficient machinery - Chemical/oil leakage from machinery - E-waste accumulation if electronics are included
	Monitoring, Evaluation, and Reporting	Perception that feedback is ignored or grievances are not acted upon
	Formation of MSMEs Clusters / Associations	Conflicts over leadership, membership criteria, or decision-making in new associations/clusters
Subcomponent 2.2: Building Capacities of MSME Clusters	Selection of Beneficiaries for Training and Capacity Building	Perceived or actual exclusion, favoritism, nepotism, or bias in participant selection
	Training curriculum Design and Delivery	Inappropriate content, non-contextualized training, language barriers, or inaccessible formats
	Trainer Recruitment and Facilitation	Low-quality facilitation or unqualified trainers
	Location and Timing of Capacity-Building Activities	Exclusion due to remote venues, inconvenient scheduling, or safety concerns
	Disbursement of Stipends or Allowances for Trainees	Delays, underpayment, or non-payment of promised training stipends or facilitation allowances
	Follow-up Support (e.g. Coaching, Mentorship)	Lack of continued engagement, or inconsistent post-training support
	Monitoring, Evaluation, and Feedback Loops	Feeling that feedback is ignored or that evaluations are biased
	Technology Transfer or Equipment Training	-Inadequate training on how to use distributed tools, or unequal access to equipment -Lack of PPE leading to occupational health risks - Risk of small-scale pollution due to improper handling
Component 3: Scaling Up Green Financing and Strengthening Climatic Resilience for SMEs		

Subcomponent 3.1: Scaling Up Green SME Financing	Establishment of the Green Investment Fund (GIF	Risk of financing projects with unverified green credentials - Inadequate environmental due diligence - Lack of transparency in fund governance - Exclusion of marginalized groups from access
	Financing of Green and Greening MSMEs	- Pollution from poorly managed operations - Overuse of natural resources (e.g., water, energy) - Unfair labor practices in funded SMEs - Gender or youth exclusion in financing access
	Development of Green Screening Criteria	Criteria may overlook local ecological sensitivities - Risk of greenwashing - Criteria may unintentionally exclude informal or rural enterprises
	Capacity Building for SMEs on ESG Compliance	Poor implementation of environmental safeguards due to limited SME capacity - Training may not reach vulnerable or remote groups - Language or literacy barriers in training delivery
	Monitoring and Evaluation of ESG Performance	- Inadequate monitoring may allow harmful practices to the environment to persist - Lack of community involvement in monitoring - Weak grievance redress mechanisms
Subcomponent 3.2: Strengthening MSMEs Climatic Resilience	Climate Risk Assessments for MSMEs	-Inaccurate or incomplete assessments may lead to maladaptation - Overlooking local ecological sensitivities - Exclusion of vulnerable groups from consultations - Lack of transparency in risk communication
	Development of Climate Adaptation Plans	- Plans may promote unsustainable practices (e.g., over-irrigation, use of water intensive plants in drought prone areas) - Neglect of cumulative environmental impacts in planning - Lack of participation- Plans may not reflect community priorities - Risk of elite capture in plan development - Cultural insensitivity leading to ignorance of local knowledge, traditions, or sacred sites in the planning process

	Capacity Building and Training on Climate Resilience	- Poorly designed training may promote ineffective practices -Training may not be accessible to women, youth, or persons with disabilities - Language or literacy barriers
	Operationalization of Climate-Resilient Technologies	- Technologies may have unintended environmental impacts (e.g., e-waste, water overuse) - Unequal access to new technologies - Displacement of traditional practices or livelihoods
	Support for Climate-Resilient Value Chains	- Expansion of value chains may lead to habitat disruption or pollution - Labor exploitation or unsafe working conditions - Exclusion of informal sector actors
	ESG monitoring and evaluation	-Inaccurate or incomplete data- communities may dispute ESG reports that understate environmental harm or overstate benefits - Indicators may ignore local ecological dynamics leading to misleading conclusions - Greenwashing concerns – feeling that ESG reports are used to mask unsustainable practices - Exclusion in the M & E process - Lack of feedback loops may make stakeholders feel that their input is ignored - Improper handling of personal or community data can trigger trust issues - Conflict of interest – if evaluators are linked to implementing agencies, stakeholders may question the objectivity of ESG assessments - Weak accountability- absence of clear mechanism to act on ESG findings can bring frustrations and disengagement
Component 4: Project management, and monitoring and evaluation	Data Collection and Privacy Concerns	Misuse of personal data, lack of informed consent, or failure to protect respondent confidentiality
	Exclusion of Marginalized Groups in Feedback and Reporting Processes	Youth, women, PWDs, or other VMGs feeling ignored in M&E or learning activities
	Ineffective Grievance Tracking and Reporting	Stakeholders feel their complaints are not recorded, tracked, or acted upon
	Failure to Act on Monitoring & Evaluation Findings	Communities report issues, but no changes or accountability follow

	Inadequate or Infrequent Monitoring and Oversight	Neglected feedback, overlooked challenges on the ground, or poor implementation quality	
	Inequitable Beneficiary Assessments	Inconsistent or unclear criteria used to identify project beneficiaries or to assess impact	
	Infrequent or Poor-Quality Monitoring Visits	Irregular field monitoring or failure to follow up on key issues raised by communities or implementing partners	
	Failure to Disseminate Learnings and Adjust Activities	Lack of adaptive management or visible changes in response to M&E findings	
	Perceived Bias in Reporting Success	Overemphasis on success stories while downplaying or omitting project challenges	
	Technical preparation of the project	- Inadequate integration of environmental and social concerns during early planning - Risk of selecting technologies or approaches with high carbon or ecological footprint - Lack of baseline environmental data to inform impact minimisation - Omission of environmental criteria in feasibility assessments	
	Programmatic and operational management of the project	- Overlooking compliance monitoring for environmental and social safeguards - Inadequate resource allocation for environmental and social mitigation actions - Fragmented environmental and social aspects reporting, especially across multiple sub-components -Uncoordinated project phasing may lead to overlapping environmental stress (e.g., simultaneous construction in clusters)	
	Coordination of different institutions and actors involved in the project	-Inconsistent application of environmental standards across institutions - Gaps in environmental information flow and enforcement - Conflicting institutional mandates may lead to poor environmental oversight - Duplication or contradiction in mitigation measures from different implementing actors	
	Management of project implementation agencies responsible for different activities	- Weak environmental capacity of agencies leading to non-compliance - Failure to supervise contractors on mitigation measures - Lack of coordination between social and environmental safeguards implementation - Agencies prioritising speed or budget over environmental quality	

This Manual describes the Grievance Redress Mechanism (GRM) that will be used to address complaints and grievances associated with the KJET project interventions. It outlines, the procedures for receiving, recording, handling, and reporting of grievances.

The GRM is informed by lessons gathered from implementing the KYEOP GRM and best practices from other GRM used by completed and continuing World Bank financed projects.

3. Purposes of the KJET GRM

Grievance mechanisms are structured procedures designed for receiving, recording, and addressing complaints as well as resolving disputes. These mechanisms have been used to identify and respond to unintended impacts on individuals/communities, to ensure that the rights of affected parties are respected, and to increase the likelihood that project implementation will proceed without undue delays, complications and subsequent cost overruns during project implementation.

Grievance redress mechanisms have proven to be an effective tool for early identification, assessment, and addressing of complaints that may arise throughout the project cycle. Organizations must inculcate deeper understanding of the steps involved in grievance redress to enable improvement of project outcomes and support both project teams and beneficiaries to improve results. From a global practice, there is evidence that lack of a functional GRM has occasioned the stalling of many development projects around the world due to misunderstandings and disputes. This has made the business case for a functional GRM even stronger as the costs of ignoring such disputes or responding too late have proven to be too high for organizations to recover from. An effective GRM has the ability to identify minor incidents affecting project beneficiaries before they escalate into major conflicts. The KJET's stance on grievances is to promptly resolve grievances from the point of generation and only escalate when it is practically not possible to resolve.

3.1. Objectives of KJET GRM

i. To ensure that grievances, complaints, and concerns are addressed and resolved in a fair, transparent, and easily accessible manner to achieve the goals of restoring positive relationships with affected persons/communities.
ii. To manage all categories of grievances at the appropriate project operational level.
iii. To be responsive to the needs of beneficiaries and to address and resolve their grievances.
iv. To serve as a conduit for soliciting inquiries, inviting suggestions, and increasing stakeholders/beneficiaries' participation.
v. To collect information that can be used to improve operational performance.
vi. To promote transparency and accountability.
vii. To deter fraud, corruption, and mitigate project risks.
viii. To facilitate timely feedback from stakeholders/beneficiaries in order to support the project's commitment to continuous improvement.
ix. Monitoring and evaluating the grievance redress process.

4. Legal Framework

Recognizing the importance of accountability and the need to ensure that concerns and complaints of project-affected people are addressed in a manner that is fair and objective,

the World Bank under its Environmental and Social Framework (ESF) sets the requirement for all projects financed under Investment Project Financing (IPF) to establish a GRM. The GRM is specifically designed to receive and facilitate the resolution of concerns and grievances of project-affected parties arising from project activities (Para 60, ESF).

Under the ESF, the GRM requirements are explicitly stated under the following Environmental and Social Standards that are applicable to the KJET project:

- ESS10: The Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of concerns and grievances of project-affected parties.
- ESS2: A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns.
- ESS7: The Borrower will ensure that a GRM is established for the project, as described in ESS10, which is culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities/VMGs (IPSSAHUTLC).

IPFs are also required to have a GRM that applies to all aspects of the project including handling GBV/SEA/SH related complaints. The GRM should be scaled to risks and adverse impacts of the project and should address concerns promptly. The GRM should be simple and easy to understand, transparent and culturally appropriate. It should also be readily accessible to all segments of the affected communities, at no cost to communities and without retribution. The mechanism should not impede access to judicial and administrative recourse. KJET will inform the affected communities about the GRM in the course of its community engagement process.

Project-affected parties may submit complaints regarding a Bank-financed project to the project grievance mechanism, appropriate local grievance mechanism, or the World Bank's corporate Grievance Redress Service (GRS). After bringing their concerns directly to the World Bank's attention and giving Bank Management a reasonable opportunity to respond, Project Affected Parties (PAPs) may submit their complaint to the World Bank's independent Inspection Panel to request an inspection to determine whether harm has occurred as a direct result of World Bank non-compliance with its policies and procedures. (Para 61, ESF).

Similarly, Kenya has various legal frameworks at both National and County level that seek to proactively reduce the occurrence of grievances and also provide mechanism for resolving conflict. These include:

i. Chapter IV of the Constitution of Kenya (CoK) 2010, provides for the Bill of Rights as the framework for social, economic, and cultural policies. It considers the rights and fundamental freedoms to preserve the dignity of individuals and communities and promote social justice and the realization of the potential of all human beings.

ii. The CoK, 2010, also provides for economic and social rights including, (a) access to the highest attainable standard of health, which includes the right to health care services, including reproductive health care; (b) to accessible and adequate housing, and to reasonable standards of sanitation; (c) to be free from hunger, and to have adequate

food of acceptable quality; (d) to clean and safe water in adequate quantities; (e) to social security; and (f) to education.

iii. The Country and County systems clearly articulate the minimum requirements for equitable access and benefits for the persons with disability, women, and youth in its Programs to promote social inclusion and recognizes the vulnerable groups.

iv. The country and County systems have clearly articulated the minimum requirements for equitable access and benefits for the disabled, women and the youth in its programs

v. The government systems have embedded in the constitution the citizen engagement through Consultation and Public Participation requirements on all County programs as part of the devolution process

vi. The national ombudsman and the national security systems at the county level provide an avenue for resolving disputes.

vii. The County Government Act of 2012 mandates public participation and engagement in project identification and implementation that essentially has potential to reduce grievances arising from exclusion.

viii. Public Participation Policy 2023. Kenya has demonstrated commitment to public participation through policy and legal frameworks, including the Participation Guidelines by the State Department for Public Service Commission and County Public Participation Guidelines by the Ministry of Devolution and Arid and Semi-Arid Lands (ASALs) in collaboration with the Council of Governors, the Public Participation Policy and national curriculum for civic education. The Constitution and the PFM Act strengthen the requirement for public consultations. Further, the Judiciary has integrated public participation by establishing Court Users' Committees and the National Council on the Administration of Justice.

There are GRMs within Counties with varied levels of functionality that were established through other World Bank financed Operations such as Kenya Urban Support Program (KUSP) I & II, Kenya Devolution Support Program (KDSP I), Financing Locally Led Climate Action (FLLoCA), Kenya Informal Settlements Improvement Project (KISIP 1&2). These have been applied to varying degrees of effectiveness in management of complaints and grievances at the county level.

5. Guiding Principles for GM

The KJET GRM will ensure adherence to the following core principles:

i. **Fairness.** Grievances will be treated confidentially, assessed impartially, and handled transparently. The **KJET** GRM will ensure fairness, especially in terms of access to information, and provide for opportunities for meaningful participation in the final decision making on project interventions.

ii. **Objectiveness, legitimacy, and independence**. The GRM will operate independent of all interested parties in order to guarantee fair, objective, and impartial treatment to each

case. GRM officials will be adequately resourced and granted the mandate to investigate grievances (e.g., interview witnesses, access records).

iii. **Simplicity and accessibility**. Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them. Project beneficiaries have a range of contact options including, at a minimum, a telephone number (preferably toll-free), an e-mail address, and a postal address. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GRM will provide sufficient assistance to those who face barriers such as language, literacy, awareness and will not use complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).

iv. **Responsiveness and efficiency.** The GRM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances shall be trained to take effective action upon, and respond quickly to, grievances and suggestions.

v. **Speed, proportionality, and predictability.** All grievances, simple or complex, shall be addressed and resolved as quickly as possible. The GRM will define a clear procedure for grievance management with time frames for each tier and also provide clarity on the types of results it can (and cannot) deliver.

vi. **Participation and social inclusion.** A wide range of project-affected people including community members, members of vulnerable groups, project implementers, civil society, and the media - shall be encouraged to log grievances and complaints to the attention of project teams at both county and national level. Special attention will be made to ensure that vulnerable individuals and groups, including those with special needs, are able to access the GRM.It will be ensured that grievances are handled at first tiers, as much as possible minimize escalation.

vii. **Capability:** The GRM will be adequately resourced with the necessary technical, human and financial resources to deal with the grievances logged in.

viii. **Anonymity/confidentiality/sensitivity**: The GRM will allow for anonymous reporting of complains and will ensure confidentiality of all information in a complaint that may lead to the identification of a specific incident or those affected by the allegation. Confidentiality is key to protecting survivor's and witnesses' safety. This is specifically critical for SEA/SH survivors and witnesses, but also the identity of the alleged perpetrator. Confidentiality requires that information gathered about the allegation not to be shared with persons or entities unless there is explicit permission granted by the complainant. Even in such cases, information-sharing should take place on a strict need-to-know basis and limited to essential information. In such circumstances, reports of grievances to the Bank and PSC shall only include an anonymized summary of allegations based on pre-established information sharing protocols.

6. Characteristics of a Good Complaint-Handling Mechanism

To make the KJET Project more effective, the GRC will ensure that the project GRM adopts and meets the following parameters:
   o   Is known to the public and PAPs, including information about its contact details.

- o Provides for multiple access channels including local language, online platforms and in-person access points.
- o Has a systematic way of recording and monitoring the progress or resolution of issues.
- o Is accessible to all PAPs irrespective of their economic status, literacy level, ethnicity, caste, religion, gender, disabilities and geographical location.
- o Includes participation, representation, and consultation of PAPs in its design, planning, and operational processes
- o Provides security (both physical and psychological) for PAPs to participate without fear of intimidation or retribution.
- o Has respect for the dignity and self-esteem of PAPs and an empathetic relationship toward PAPs.
- o Provides equitable access for PAPs to information, advice, and expertise.
- o Has several tiers to allow for appeals and escalations.
- o Has a reasonable timeframe that prevents grievances from dragging on unresolved.
- o Evidences social and cultural appropriateness of the systems, approaches, and methods adopted.
- o Possesses values, attitudes, and commitment to fairness and justice.
- o Shows transparency, accountability, and objectivity in conducting grievance redress processes and realizing their outcomes.
- o Is independent and has a clear governance structure with no external interference with the conduct of grievance redress processes and reaching agreements.
- o Shows clarity in procedures, processes, and time frames adopted.
- o Has flexibility in decision-making processes, considering the unique and diverse character of grievances.
- o Follows existing systems without undermining them.
- o Is ran by professionally and technically competent GRM implementers who have been able to win trust and recognition from the communities.
- o Shows respect for the freedom of PAPs to opt for alternative GRMs if they so decide.
- o Clearly define lines of accountability for the mechanisms and ensure that those responsible for resolving grievances are held accountable for their actions.

7. Assessing the KYEOP Grievance Mechanism

The KYEOP used MSEA Management Information System (MIS) to receive, process, resolve and report on project grievances. Within the MIS platform, the project had a specific tab/section that was designed for grievance management and as such, it was possible to have an overview of the status of grievance management in the project. While this approach worked to a certain extent, it also had its own fair of challenges. The KJET Project targets to adopt and strengthen the GRM developed and implemented for the KYEOP.

The KJET GRM improves upon the KYEOP GRM, incorporating recommendations which emanated from consultations with the NYOTA project team and stakeholders including YDOs, NPIU, Technical Team and the WB. The team assessed the performance of the KYEOP GM and recommended material measures for strengthening it. The stakeholders were engaged through a virtual workshop held on November 21, 2023 where a total of 71 participants constituting 47 males and 24 females took part. The participants were drawn from 28 out of the 47 counties. Table 1 presents the key take away points on the performance of the KYEOP GM and recommended actions for its strengthening that have been considered in the

development of the KJET GRM.

7.1 Assessment of the Performance of the KYEOP Grievance Mechanism by NYOTA project Team

7.1.1. General Assessment of the Performance KYEOP GM

Table 2 Findings on the Assessment of the Performance KYEOP GM

No	Aspect assessed	Guiding questions	Feedback and Recommendation
1	**Organizational Commitment**	● Do the project's management and staff recognize and value the GRM process as a means of improving project management and enhancing accountability and transparency? ● Is grievance redress integrated into the project's core activities? ● Is grievance redress integrated into staff job descriptions and responsibilities? ● Is it appropriately resourced and monitored?	The project's management and staff recognize and value the GRM process as a means of improving project management and enhancing accountability and transparency as evidenced by: ● Assignment of staff at national level responsible for grievance management. ● Development and implementation of grievance handling procedure ● Recording of received and processed grievances at sub county, county and national levels. ● Establishment and implementation of a grievance handling platform within the project MIS. **Challenges encountered** ● The MIS system that provided a platform for grievance management was hardly updated making it difficult to have a clear picture on the status of grievances within the project. ● Resolution of grievances took unnecessarily too long as all complaints were escalated to the national level. **Recommendation** ● It is good to have a dedicated team responsible for recording, processing and resolving grievances within the project. ● The project should allow grievances to be resolved at the county level and only escalate those that are difficult to resolve.

N o	Aspect assessed	Guiding questions	Feedback and Recommendation
2	**Accessibility**	- Is the GRM accessible to all stakeholders, irrespective of their remoteness, language, education or income level? - Are procedures to file grievances and seek action easily understood by project beneficiaries? - Can grievances be filed anonymously? - Are there a range of contact options? - Is the GRM appropriately advertised and communicated to project-affected people? - Do multiple uptake channels exist? - Is there a system to categorize, assign priority, and route grievances to the appropriate entity? - Does it restrict access to other redress mechanism	- Available to affected persons and other stakeholders at no cost, considered literacy, mobility, disability challenges. - The project GRM was understood by project beneficiaries and provided for various uptake channels and did not restrict access to other grievance redress mechanism. - The GRM was accessible to stakeholders with access to smart phones or other social media platforms and could easily connect to the project Management Information System (MIS) to either submit or track the process of resolution. However, for VMGs especially those in Kwale county, did not access the project GRM as they lacked either smart phones or access to social media platform. As such, due to the delay in resolving some of their complaints a number of the VMG beneficiaries, dropped out of the program. - While the toll-free line was to provide a pathway for ease of access to the GRM, it was not active and offline most of the time thus many of the target beneficiaries could not register their complaints. - Resolution of grievances was also delayed by the continued referral of complaints to different KYEOP implementing institutions for resolution as it was not very clear who was the ultimate responsible staff to handle grievances. - Some grievances launched on the online platform were never addressed especially for trainers hence forcing them to incur cost of physically going to the head office to seek answers. **Recommendations** - A multi-institutional committee responsible for GRM to be put in place to handle grievances requiring input from the various institutions implementing KJET.

N o	Aspect assessed	Guiding questions	Feedback and Recommendation
			● Build the capacity of the staff at the County level on grievance redress so they can assist to resolve cases at their level. ● There is need to improve the speed at which grievances are resolved. ● The requirement to refer all grievances to the national level is not necessary as some of the grievances can easily be resolved at the county level. ● Ensure that the project toll free line is always active, working and online. ● The GRM should be made accessible to SMEs having basic devices. ● Flagging out and clustering grievances into categories would ensure each category of grievance is assigned to the specific officer handling that category, thereby enhancing accessibility to redress. ● It is important to consider access to GRM by SMEs living with disability especially those with sight impairment as well as VMGs who cannot access the project GRM. ● Project processes need to be more efficient. ● KJET Project should set up a Toll-Free Line and a Call Center where the clients can get real time responses to their concerns.
3	Predictability	● Is the GRM responsive to the needs of all complainants? ● Does the GRM offer a clear procedure with time frames for each stage and clarity on the types of results it can (and cannot) deliver	● The GRM is responsive to the needs of the stakeholders, however, the delay in responding to reported grievances reduced the predictability of the GRM. ● GRM offers a clear procedure with time frames for each stage however there was non-compliance with the set timelines leading to delay in resolving grievances. ● At times, follow up on complaints by YDOs was personalized by the national project team and thus reducing the staff moral in ensuring that all reported grievances are resolved.

N o	Aspect assessed	Guiding questions	Feedback and Recommendation
			• The field staff had minimal interaction with the MIS based GRM. In most cases staff would log in the complaint directly to the responsible officer but there was never feedback on whether the complaint was resolved or not. At times the field officers would use WhatsApp group to lodge complaints or even complain about the delays in providing response from the NPIU GM team. **Recommendations** • Designate specific staff with responsibility of managing project grievances who will be given the mandate to ensure close follow up of all the reported grievances. • Reduce the turnaround time for escalated grievances to allow prompt feedback to the complainant.
4	Capability	• Do GRM officials have the necessary technical, human and financial resources, means and powers to investigate grievances? • Are there dedicated and trained staff available to handle the GRM? • Are they given learning opportunities and do they receive any systematic reviews of their performance	• There were staff responsible for grievance management at NPIU level. However, at the county and sub county level, the staff's role was mainly to refer the complaints to NPIU. • The staff were trained on GRM, however further capacity training is necessary especially on reporting and on handling SEA/SH related grievances. **Recommendations** • Designate specific staff with responsibility of managing project grievances. • Strengthen the staff capacity in management of grievances and especially those related to SEA/SH. • There is need to evaluate the volume of work on GRM that needs to be handled against the available officers at the national level. From this analysis, it will be observed that there is a need to decentralize a good number of grievances to the field to enhance efficiency and save on time taken to resolve complaints.

No	Aspect assessed	Guiding questions	Feedback and Recommendation
			● Handling of grievance needs to be decentralized. Not only on the Grievance address but also on some of the other tasks. Some grievances would not even have arisen if we had a decentralized system e.g. placements, payroll etc. The GRM is effective for the most sensitive issues e.g. Sexual harassment, which are more private and confidential
5	Acknowledgement and follow-up	● Are complaints acknowledged in writing? ● Does the acknowledgement outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance? ● Are there clear timetables that are publicly available?	● Complaints are acknowledged in writing however, timelines for providing feedback are hardly provided ● There were clear timelines for processing and resolving grievances, however these were hardly adhered to. **Recommendations** ● The KJET GRM should have clear timelines for resolving and or escalating grievances within the various tiers. ● The NPIU should mandate adherence to the set timelines
6	Monitoring and Evaluation	● Is there a process to track grievances and assess progress being made to resolve grievances? ● Are there indicators to measure grievance monitoring and resolution? ● If there is data being collected, is this data used to make project process changes to minimize similar grievances in the future?	● Weekly monitoring of grievances is done at the county level. However, reporting of grievances received and resolved at the county and sub county level has been weak.
7	Feedback	Does a user survey exist to get feedback on the credibility of the process? Is such feedback publicly available?	● Though delayed in many instances, feedback has been provided to complainants

N o	Aspect assessed	Guiding questions	Feedback and Recommendation
		Is there right to appeal? If yes, are GRM users informed about this right?	● The feedback is not made public but rather only provided to the complainant. ● There were however incidences where feedback on a SEA/SH related grievance was shared without adherence to the confidentiality requirement which resulted in further harassment of the victim by the suspected perpetrators. **Recommendations** ● The KJET project GRM needs to be designed in a way that provides for confidential reporting, recording and referral of GBV SEAH related grievances. ● It is important that GRMs include multiple entry points and have clear protocols for recording SEA/SH complaints and providing referrals to existing quality GBV services. ● The GRM staff need to be well trained on receiving SEA/SH complaints: to frame questions in a non-accusatory manner; to treat complainants with respect including making the victim aware of the obligations under national law to report certain incidents, consistent with the principle of consent; and referring all SEA/SH complaints to GBV service providers. ● Projects needs to engage GBV service providers who apply a survivor-centered approach, in which the survivor is treated with dignity and respect, confidentiality and survivor's safety is ensured. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes.
8	Analysis	Is there a process to analyze the effectiveness of the GM? Is there a timeframe?	● No, this has not been effectively done under KYEOP **Recommendation**

N o	Aspect assessed	Guiding questions	Feedback and Recommendation
			● KJET to develop monitoring and evaluation framework for the GRM

7.1.2. Consultations with Refugee and Host Communities in Kakuma and Kalobeyei and urban refugees in Nairobi.

Examples of how GRM would work under KJET in dealing with marginalized groups are presented in Table 3 and 4 below. The NYOTA Team also engaged 71 youths to review the performance of the KYEOP GM and the results are presented in Table 2. The youths were drawn from refugee and host communities in Kakuma and Kalobeyei in Turkana and Urban refugees in Nairobi.

Table 3 Findings on the Assessment of the Performance KYEOP GM by representatives of youths from Refugee and Host Communities in Kakuma and Kalobeyei and urban refugees in Nairobi

Theme: Youth Engagement and Grievance Management	
Guiding Question	**Response**
1. What mechanisms are available to identify, map, consult, and engage youths, and that their views, concerns, and suggestions are systematically considered?	● Use of platforms such as Turkana College and University Students Association for college going youth. ● Use of local and national radio and TVs. ● Use of public meetings and Chief's barazas. ● Use of Film Aid – Kakuma platform. ● Through public participation. ● Through seminars and training. ● Through registered groups. ● Through social media, e.g., WhatsApp groups. ● Through youth leaders engagement. ● Through local leaders.

2. Is there an accessible and functional GRM with established procedures for submitting grievances (including several uptake channels, established routines, and standards, grievance logs,etc.	● YES
3. Is the GRM responsive to sensitive issues, e.g., GBV cases? If yes, what measures are in place to promote confidential reporting and handling GBV complaints?	YES. ● Through available toll numbers ● Through government officers deployed to handle GBV cases. ● Through reporting to the police stations then seeking treatment at the health facilities. ● Through interventions by Non State Organizations such as ADRA – K, UNHCR, World Vision officers. ● Through Chiefs and local administrators. ● Through Welfare organizations such as Kenya Red Cross. ● Calling office telephone numbers. ● Through controlled WhatsApp groups.

7.1.3. Consultations with Youths from VMGs Communities

The NYOTA NPIU engaged 8 youths to review the performance of the KYEOP GM and the results are presented in Table 3. The youths represented various VMG communities including Samburu, Ogiek, Ndorobo, El Kunono, Sengwer and representatives of Indigenous Peoples Organization (the YAAKU indigenous Moms).

Table 4 Findings on the Assessment of the Performance KYEOP GM by representatives of VMGs

Theme: Youth Engagement and Grievance Management	
Guiding Question	Response
1. What mechanisms are available to identify, map, consult and engage youths, and their views, concern and suggestions are systematically considered	● Youths taking responsibility on their own grievance

2.	Is there an accessible and functional GRM with established procedure for submitting grievances (including several uptake channel, established routine, and standards, grievance logs, etc	- No functional GRM established -Youths not aware of channels to air their grievances or the protocols to take up their problems
3.	Is the GRM responsive to sensitive issues, eg, GBV cases? if yes, what measures are in place to promote confidential reporting and handling GBV complaints	- GRM is not responsive to sensitive issues - There should be separate desk to handle sensitive and emergency issues - Anonymous identification, complainant should not identify him or herself. - Forming online chancellors to talk to youths through stressful issues - Training councilor to be deployed to the ground to leave the lifetime of the project.

7.2 KJET Grievance Coordination and Management Structure

The KJET Grievance Redress Mechanism will be managed at several levels; National, Regional, county, and Sub-County level as illustrated below:

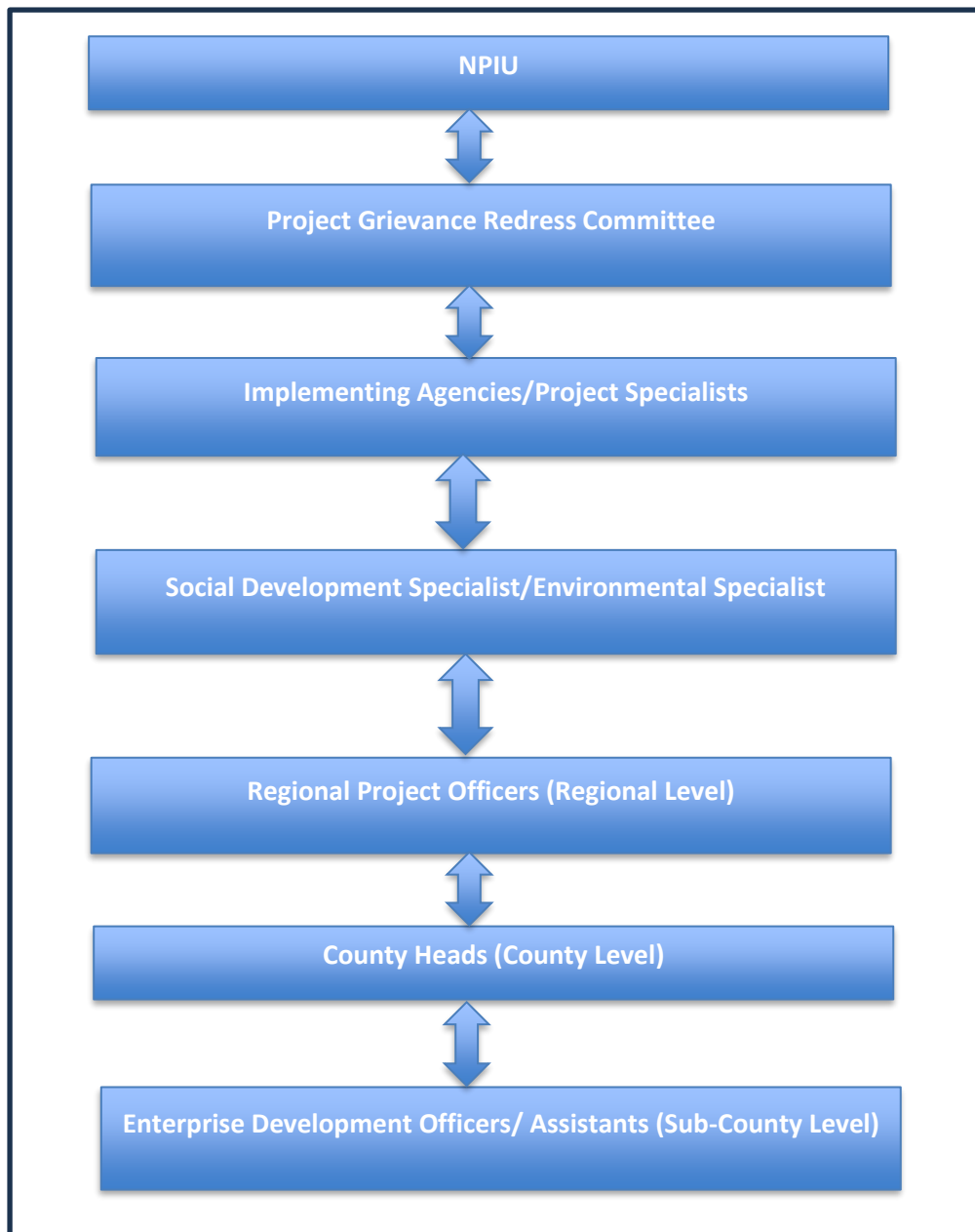**Figure 1 KJET GRM mechanism**

7.2.1 Role of Grievance Redress Committee (GRC) under KJET

The KJET project will have grievances redress Focal Persons (FPs) appointed or nominated by the implementing agencies to the Project GRC to manage grievances escalated from the counties. The FPs will be responsible for overseeing the management of the GM at the national level. Their specific roles will include:

i. Submit monthly reports to the World Bank and the PSC, highlighting grievance trends and challenges in resolution.
ii. Participate in GRM review meetings at the national level to discuss grievances, emerging issues, and improvement strategies.
iii. Conduct GRM awareness sessions for project beneficiaries, workers, and community members to ensure they know how to report grievances related to the project.
iv. Ensure that their agency's grievance handling aligns with the World Bank Environment and Social Framework (ESF), and national legal frameworks.
v. Monitor and evaluate the effectiveness of the GRM system within their agency and provide recommendations for improvement in close collaboration with the M&E Specialist SDMSME.
vi. Ensure that feedback mechanisms are in place to keep complainants informed of the status of their grievance resolution.
vii. Ensure gender sensitive and inclusive grievance redress approaches are applied, so that vulnerable groups including women, youth, persons with disabilities, and marginalized communities can safely and effectively access the mechanism.
viii. Maintain a secure and confidential grievance records system, ensuring proper documentation, analysis, and reporting of complaints in line with data protection and privacy principles.

7.2.2: Role of Social Development Specialist (SDS) and the Environmental Specialist (ES)

The Social Development Specialist (SDS) and the Environmental Specialist (ES) from SDMSME will be designated as the FPs in charge of grievance redress for the project. The SDS and ES will be charged with the following responsibilities:

i. Coordinate formation of Project the Grievance Redress Committee (GRC) at the national and county level before the commencement of project implementation phase.
ii. Serve as the overall project FPs for Grievance Management
iii. Create awareness of the GRM amongst all the stakeholders through public awareness campaigns.
iv. Refer cases/grievances to the responsible implementing agencies.
v. Maintain a database of grievances raised and addressed. Project GRM log detailing grievances, received, resolved, and closed out.
vi. Monitor the activities on grievance redress at the project level.
vii. Compile and share the consolidated quarterly grievance logs, showing clearly the status of resolution and submit to the WB through the SDMSME Project Coordinator.
viii. Liaise with the Project Coordinator to ensure adequate resources are allocated for grievance management.
ix. Ensure timely and appropriate liaison with regional and county GRM FPs.
x. Participate in all GRC meetings at the national level of the GRM structure.
xi. Facilitate GRM trainings for KJET staff and stakeholders as well as information dissemination to beneficiaries in liaison with project sub-county/county teams.
xii. Monitor the performance of the GRM by taking quarterly audits of all GRM activities within counties in collaboration with M&E Specialist.

xiii. Liaise with relevant GRM FPs at the regions to ascertain if the GRM is functioning appropriately.

xiv. Coordinate issues of grievance management with all implementing agencies

xv. Recommend appropriate actions for strengthening the GRM to the PSC.

7.2.3: Role of Regional, County and Sub-County Project/MSEA Officers

To ensure effective implementation at the regional level, the GRM will be coordinated by regional project officers in collaboration with MSEA County Officers. The staff at the county level will be responsible for grievance management with the following responsibilities:

i. Maintain a GRM database to document grievance details. The data base will include information such as; summary of grievances, case number, uptake location, office of uptake (county/sub-county level, name of complainant (if not anonymous and if no request for confidentiality is made), channel used, complaint issue, resolved cases, mutually agreed follow-up action, redress approach applied, referral cases and institution.

ii. Serve as the FPs for grievance redress at County level;

iii. Create awareness of the GRM amongst all the stakeholders at County level;

iv. Assist in redress of all grievances by coordinating with the concerned parties;

v. Registration and categorization of grievances;

vi. Monitoring and evaluation of the Grievance process;

vii. Briefing of registered complaints to the relevant GRC for further instructions;

viii. Providing feedback to complainants;

ix. Implementation of decisions taken by GRC;

x. Follow up of pending issues with GRC;

xi. Identify gaps and recommend actions for improvement of the GRM to the GRC

xii. Prepare monthly/quarterly reports on all grievances received, processed and submit to the FPs;

xiii. Building the capacity of the project staff at county level on grievance management;

xiv. Monitor performance of the project GRM by taking periodic audits of all GRM activities within the county;

xv. Maintain all GRM logs detailing grievances, received, resolved and closed out;

xvi. Escalate grievances that are difficult to solve to the regional project officers;

xvii. Receiving of grievances, feedback to complainants, and suggestions.

7.3 KJET Grievance Handling Structures

The Kenya Jobs and Economic Transformation (KJET) Project will implement a three-tier structured, Grievance Redress Mechanism (GRM) to address project-related complaints from individuals, communities, or institutions in a fair, accessible, and timely manner. The mechanism ensures that grievances are logged, resolved, and tracked transparently and efficiently.

7.3.1. Grievance Intake Channels

Grievances can be submitted through multiple channels to improve accessibility and encourage early reporting. These include:

- Physical walk-ins at project offices or participating agencies (e.g. SDMSME, SDIP, MSEA, KenInvest, KDC)
- Filled grievance submission forms (available at designated centers (participating agencies/MSEA offices at county, sub-county and regional level) and during stakeholder forums)
- Toll-free telephone line (number to be publicized)
- Online submissions through the project's grievance portal: http://kjetgrievance.msea.go.ke Email address for all the implementing agencies: sikika.kjet@msea.go.ke
- Direct contact with field-level officers, particularly MSEA Enterprise Development Officers (EDOs)
- Community outreach events or during field missions

Regardless of the channel used, the project staff who first receives the grievance whether at the agency level, field office, or through digital platforms must immediately record it in the official online grievance management system. This enables tracking, analysis, and accountability through the project's GRM Monitoring and Evaluation system.

TIER 3

NATIONAL PROJECT IMPLEMENTATION

TIER 2

PROJECT GRIEVANCE REDRESS COMMITTEE

IMPLEMENTING AGENCIES

ENVIRONMENT/SOCIAL DEVELOPMENT

TIER 1

REGIONAL PROJECT OFFICERS

COUNTY HEADS
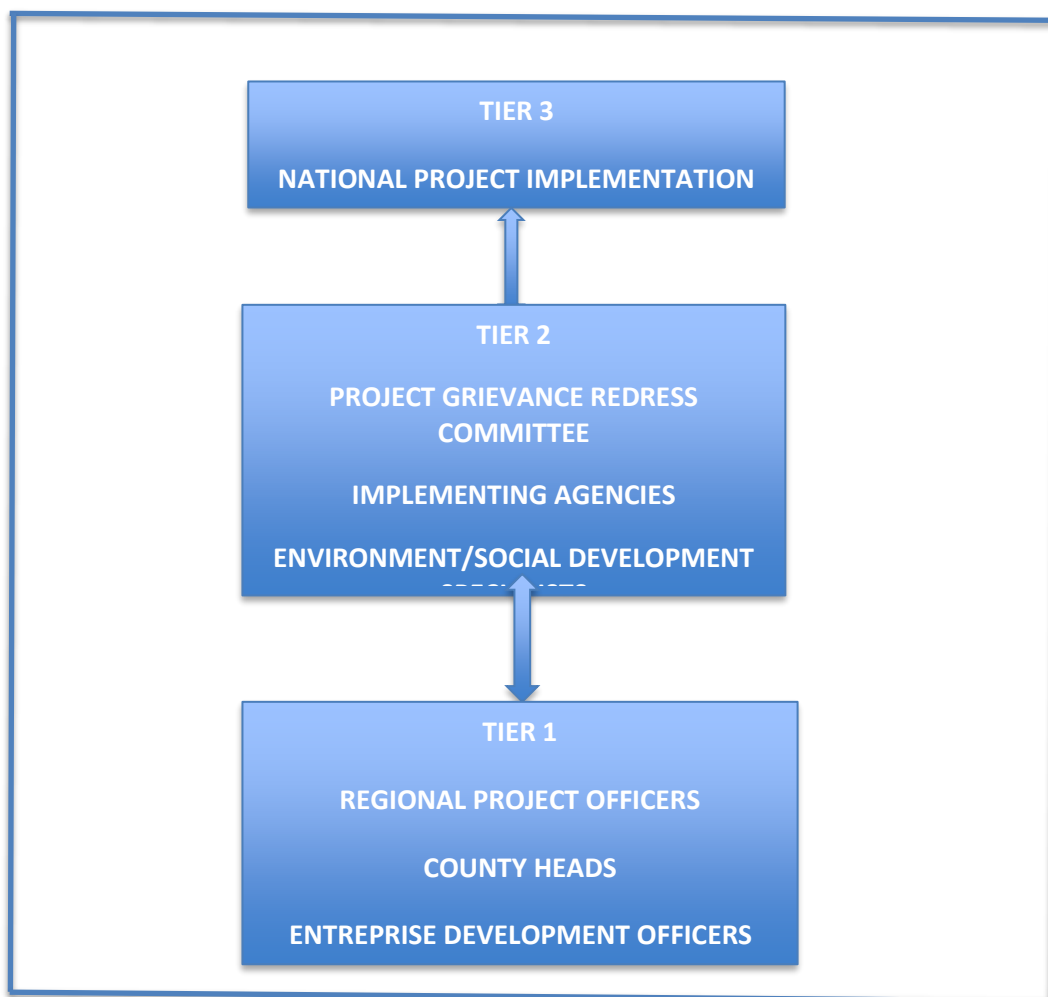
ENTREPRISE DEVELOPMENT OFFICERS

Figure 2 GRM Structure

7.3.2.   First Tier: Local-Level Grievance Uptake and Referral

At the first level, grievances will be received directly at the sub-county or county level. Officers from the Micro and Small Enterprises Authority (MSEA), specifically the Enterprise Development Officers (EDOs), will serve as the initial focal points for receiving grievances especially at sub- Counties and Counties. These officers will help complainants record their grievances and enter the details into the project's online grievance management system. The EDOs will resolve grievances and refer unsolved grievances to the County Heads (Senior Enterprise Development Officers). The County heads will resolve referred grievances and in-turn refer unresolved cases to the Regional Committee which comprises of Regional Project Officer and the Senior Enterprise Development Officers.

This tier is expected to resolve grievances within 5 calendar days from the date of referral. If the matter is resolved at this level and the complainant is satisfied, the case is closed in the system. Unresolved grievances at the regional level will be escalated to Tier 2 of the GRM.

7.3.3.   Second Tier: Project Grievance Redress Committee (GRC)

If a grievance remains unresolved or the complainant is dissatisfied with the response at the first level, it is escalated to the SDS and ES who are the Project GRM focal persons. The SDS and ES will assess the nature of each grievance and refer it to the relevant implementing agency (SDIP, MSEA, KDC, KenInvest). Reports of resolved and unsolved grievances at the respective agency level will be channeled back to the SDS and ES who will convene a meeting of the GRC. The GRC committee is housed at the State Department of MSMEs and is composed of:

1. The Social Specialist from SD-MSME (Chairperson)

2. The Environment Specialist from SD-MSME (Secretary)

3. Environment, Social, Communication, and Legal Specialists from the Project Implementation Units (PIUs)

4. PIT representatives from KenInvest, MSEA, and the Kenya Development Corporation (KDC)

5. Monitoring and Evaluation Specialists (SDMSME & SDIP)

The SDS will convene GRC meetings as needed. The committee will review the grievances logged in detail and, where necessary, engage directly with the complainant to better understand their concerns. Their goal is to reach a resolution that is acceptable to all parties. The discussions and outcomes of these meetings will be documented using a standard format. If a resolution is reached, it will be formally communicated to the complainant. The complainant's acceptance will be documented through a signed grievance resolution form, and the case will be closed in the online system. The minutes of the GRC meeting will be recorded and filed. Annex III provides a sample GRC Meeting Recording Format while Annex IV provides sample feedback on grievance resolution form.

This level of grievance resolution must be completed within 7 calendar days. If the issue remains unresolved or the complainant rejects the proposed resolution, it is referred to the third and final tier.

7.3.4. Third Tier: National Project Implementation Unit (NPIU) Grievance Redress Committee

The third level of the GRM is a national-level committee under the National Project Implementation Unit (NPIU). This level is reserved for cases where:

● The complainant rejects the decision from Tier Two

● There is an unreasonable delay (more than one month) in resolving the grievance at the second tier

The Environment and/or the Social Development Specialist (E&SDS) from SD-MSME serves as the secretary to this committee. They are responsible for coordinating its activities, including issuing circulars and scheduling meetings.

This committee consists of senior representatives as follows:

1. National Project Coordinator from SD-MSME (Chairperson)

2. Project Coordinator from SDIP

3. Environment and Social Development Specialist from SD-MSME (Secretary)

4. Chief Executive Officers from all key implementing agencies (KenInvest, KDC, and MSEA)

The NPIU-GRC reviews the grievance, engages stakeholders if necessary, and provides a final resolution from the project's side. Like the other tiers, the committee records and files meeting minutes. If the complainant accepts the outcome, they sign a resolution agreement, and the grievance is closed.

In situations where the complainant remains dissatisfied or the committee does not respond within 30 calendar days, the complainant has the right to seek redress through other legal or independent channels. These include mediation by local administration, traditional dispute resolution mechanisms, or pursuing a case in the formal judicial system, in accordance with Kenyan law. Should a complainant choose to seek legal action beyond the project's framework, they will bear the associated costs and may do so at any level they deem appropriate.

7.3 Schedule of meetings of the GRC

The GRC will meet on need basis to address grievances referred to level 2. The GRC will also be convened on quarterly basis to review progress made in grievance management. The quorum at the meeting shall be six members. Besides progress, the GRC will also review pending grievances and recommend appropriate measures for ensuring their timely resolution. The proceedings of the meeting shall be recorded and filed. Annex III provides a sample form for recording the GRC meeting minutes.

7.4 Mode of Receipt and Recording of Complaints

Complaints can be made verbally, in writing, over the phone, by emails, over the internet or through walk in to sub county, county and National offices or through the project MIS and social media platforms. Stakeholders will be sensitized on various grievance uptake channels during the grievance sensitization workshops and brochures with this information shared out. As soon as an officer receives a complaint, he /she should issue a grievance logging and acknowledgement form (Annex I) to the complainant including the details of the person reporting the grievance. The officer receiving the complaints should try to obtain and document all the relevant basic information regarding the grievance. To enhance access to the GRM by VMG communities, physical forms that have been translated to the local dialect will be provided. The VMGs will be engaged periodically throughout the project implementation period to ensure that any issues of concern are addressed.

7.5 Grievance Redress Process Steps

7.5.1. Step 1: Uptake; Reporting and Receiving Grievances

KJET Implementing Agencies with the support of the project officers will undertake workshops to sensitize all stakeholders on the project GRM including where and how to submit grievances. The KJET project will provide various uptake channels as shown in Table 5.

Table 5 KJET Grievance Uptake Channels

No	Mode	Contact
1.	GRM Tool	http://kjetgrievance.msea.go.ke
2.	Email	The official email for receiving the grievances is sikika.kjet@msea.go.ke
3.	Walk-ins	Grievances can be recorded from walk-ins in the Implementing Agencies offices MSEA, KenInvest, KDC and SDIP offices at the National level and at both MSEA county and Regional Offices.
4.	Toll Free line	To be provided
5.	Implementing Agencies Official Telephone Numbers	SDMSME- +254202731531-0 SDIP-+254207840031 MSEA- +254770666000 KDC- +2547275344572 KenInvest- +253730104200
6.	Official websites of implementing agencies	https://www.msme.go.ke/, https://kdc.go.ke/ , https://www.investmentpromotion.go.ke/ https://msea.go.ke,
7.	Project MIS	To be provided once operational

7.5.2. Step 2: Recording, sorting and processing of grievances

It is important to record all complaints and grievances, including informal or spoken ones. Keeping records helps identify patterns and trends on issues over time. While transparency is key (e.g., sharing regular updates on problems raised and how many are resolved), it's also

important to keep information confidential or allow complainants to remain anonymous when needed.

At national and county levels, all complaints must be entered into the MIS database and GRM logbook. All related documents (scanned or physical) should also be archived. (See Annex II for a sample log format.)

i. Step 1: The receiving officer reviews the complaint and tries to resolve it immediately.
ii. If unresolved, it goes to the Project Officer (PO) at the regional level.
iii. If the PO can't resolve it, the Focal Persons, i.e., the Social and Environmental Specialists, will refer the complaint to the technical experts in the Implementing Agencies.
iv. If unresolved, it is referred to the Grievance Redress Committee.
v. If still unresolved, the grievance is escalated to the National Project Implementing Unit (NPIU). The NPIU is the final step; if the complainant remains unsatisfied, they may pursue legal action at their own cost at any stage.

Each complaint must be reviewed, assigned to a person within specified timelines, tracked, and marked as resolved ("signed off"). Complainants should be consulted (where possible) and informed of the outcome. The MIS database will monitor the status of all complaints until resolution.

The Project officers will maintain a GRM log book in which complaints will be received by GRM FPs or other project staff, in written or any other form. The GRM log book /complaint register should capture the following information:
1. Complaint number,
2. Uptake channel used
3. Uptake location
4. Name and address of the complainant/s, unique identification number in the case of a sensitive issue.
5. Date of complaint
6. Summary of the complaint/grievance
7. Signature of the complainant/s
8. Category (example exclusion, procurement issue, GBV issues etc.)
9. Resolution process (Not commenced/In process/Completed)
10. Outcome/ feedback
11. Referred
12. Signature of the officer who closes out the complaint

In the KJET Project, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) cases will be addressed through well-structured and confidential escalation channels that align with national protocols and World Bank guidelines. At the community level, initial reports will be made through the Enterprise Development Officers (EDOs) - MSEA or through anonymous channels such as suggestion boxes, dedicated email, or input directly into the GRM online system. These will be escalated to the GRM focal persons in tier 2, who will ensure immediate survivor-centered responses, including referrals to health, psychosocial, and legal support services within 24–72 hours. The Project Implementation Unit (PIU), particularly the Social Development Specialist, will coordinate these efforts and ensure that each case is managed

discreetly and appropriately. At the national level, the National Project Implementation Unit (NPIU) will handle escalated cases, ensuring proper documentation and coordination without compromising survivor confidentiality. In cases involving project workers or contractors, the World Bank Task Team must be notified within 24 hours. Additionally, survivors will be referred to formal legal channels such as the Directorate of Criminal Investigations (DCI), county health services, and the National Gender and Equality Commission (NGEC), depending on their needs and consent. Throughout the process, strict principles of confidentiality, informed consent, non-retaliation, and the "Do No Harm" approach are upheld to safeguard the dignity and safety of the survivor.

7.5.3. Step 3: Reviewing and Investigating Grievances

All grievances will undergo review and investigation, depending on the nature of the   issue and clarity of circumstances.

7.5.4. Step 4: Developing resolution options and preparing a response

Once the grievance is well understood, resolution options will be developed, taking into consideration stakeholders' preferences, project policy, past experience, current issues, and potential outcomes. In the development of the grievance action plan, the following actions will be considered:
  i.   Determine the next steps and recommendations based on the findings;
  ii.   Refer to the appropriate department/personnel to handle the grievance, and
  iii. Undertake mutually agreed follow-up actions.

7.5.5. Step 5: Feedback mechanism

One of the most important steps of the KJET GRM is to provide clear feedback of outcome to the complainants. The GRM FPs at the County level, are responsible to give feedback to the complainants via email, message or call. The complainants must know that their complaints were recorded by the FPs and the process of resolving the issue will commence as soon as issue is recorded. In case of anonymous complain/grievance, acknowledgement will be generated by the system to the complainant through the use of their email address. The means through which the complainant has been acknowledged shall also be recorded in the database. In this regard, the complainants shall receive acknowledgement feedback within 7 working days after the issue is reported. The resolutions agreed upon must also be recorded in the MIS for purposes of tracking grievance management and reporting. The KJET GRM will use various approaches for **acknowledgment and communicating the grievance redress outcome and this includes:**

  i.   **Email/messaging**: Either an automatic or manual reply will be sent to the complainants confirming the receipt of their complaints and getting back to them after analyzing it. The complainant, who has sent his /her grievance through email, will receive the final feedback through email.

  ii.   **Grievance feedback form**: A printed or soft copy grievance feedback form will be used. The form is provided in Annex IV.

iii.   **Phone call:** The complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by relevant GRM FP.

One of the most important steps in the KJET GRM is to provide clear feedback of outcomes to the complainants. The GRM FPs at the County level, are responsible for giving feedback to the complainants in cases where the grievance was logged manually or the complainant has no access to the GRM system. The complainants must know that their complaints were recorded by the GRC and that they are investigating the issue. Anonymous grievances will need to be logged and acknowledged promptly, just like any other grievances. The complainants shall receive acknowledgement feedback immediately after the issue is reported. The resolutions agreed upon must also be recorded in the MIS for purposes of tracking grievance management and reporting. The KJET GRM will use various approaches for acknowledgment and communicating the grievance redress outcome. This includes:

i.   **Email/messaging**: Either an automatic or manual reply will be sent to a complainant confirming the receipt of their complaints and getting back to them after resolution.

ii.   **Grievance feedback form**: A printed or soft copy grievance feedback form will be used. The form is provided in Annex IV.

iii.   **Phone call:** A complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by relevant GRM FP.

iv.   **Social media**: A complainant who shared his/her grievance through social media will also receive feedback through the same platform.

7.5.6.   Step 6: Monitoring and Reporting of Grievance Mechanism

Monitoring and reporting is a useful tool for measuring the effectiveness of the GRM and for determining broad trends and recurring problems so that they can be resolved proactively before they become points of contention. Monitoring and reporting create a base level of information that can be used to report to stakeholders. To ensure smooth operation of GRM, GRC will conduct frequent supervisions and monitoring missions on GRM to ensure that it is functioning as anticipated and aspects are included in regular reporting mechanism. The status of grievances received and resolved or escalated will be reported by county level GRM FPs on a monthly basis. The GRM reports will be submitted to the Environment and Social Development Specialist SDMSME (who serves as the main GRM FP) for compilation and submission to the PSC and WB.

8.   Use of Alternative Dispute Resolution Mechanisms

In some communities in Kenya including those of VMGs, traditional dispute resolution structures exists and these will be used as the first step in resolving grievances. Those with complaints seeking redress would do so by notifying their traditional or village leader or the appropriate authority. If the complainant does not agree with the resolution provided at this level, the complainant will be offered the option of reaching out to the three-tier project GRM.

All the complainants dissatisfied with resolution provided through the project GRM, will be referred to the other statutory referral institutions such as the National Government

Administration Offices located at both the county and national level, CAJ Ombudsman, NGEC, KNCHR, NEMA and the Kenyan Courts of Law as the last resort.

9. World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by KJET project may submit complaints to the Country Director, World Bank Kenya office through the following address: Country Director, World Bank Kenya Office, Delta Center Menengai Road, Upper Hill P.O. Box 30577-00100 Nairobi, Kenya. Tel: +254-20-3226000. Fax: 254-20-3226382. *Kenyaalert@worldbank.org.*

If no response is received from the WB Kenya office, the complainant can also report directly to the WB Grievance Redress Service (GRS) on email address: *grievances@worldbank.org*. The GRS ensures that complaints received are promptly addressed by engaging both the WB project task team and the complainant. Project-affected communities and individuals may also submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, because of non-compliance with WB policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit *https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service*. For information on how to submit complaints to the World Bank Inspection Panel, please visit *www.inspectionpanel.org*. These contact email addresses will also be shared with the project stakeholders during the GRM disclosure workshops.

10. Publicizing the KJET's Grievance Mechanism

To enhance utilization of the GRM, the KJET NPIU in close collaboration with the county teams will create awareness key stakeholders on the existence of GRM. The key stakeholders include beneficiary communities, Government agencies, and civil society organizations. Inadequate disclosure of the GRM, may potentially lead to its under-utilization and eventually the GRM loses its relevance and validity of the purpose for which it was established. Stakeholders will be informed about other GRM options such as the WB, GRS and IP and national judicial system where complainants can be referred to if they feel that their grievance has not been adequately addressed. An effective awareness campaign will include among others the following aspects:

- o Scope of the project, target beneficiaries, components and key interventions;
- o The project GRM including other alternative GRM (WB and other national systems for GRM);
- o How the different GRMs can be accessed and how their information will be shared and used
- o Key people with GRM user rights and channels of submitting complaints, e.g., phone and facsimile numbers, postal and e-mail addresses, and websites of the GRMs as well as information that should be included in a complaint;
- o Procedures and time frames for initiating and concluding the grievance redress process; boundaries and limits of GRMs in handling grievances; and
- o Roles of different agencies such as project implementers and funding agencies.

o   Allow anonymous submission of grievances and assure utmost confidentiality.

To create awareness on the GRMs to the relevant stakeholders, NPIU will adopt a variety of methods including the following: display of posters and brochures on GRM in public places such as in chief's offices, project offices, community centers and outside religious places; village elders barazas to hold small-group discussions with target beneficiaries; through sessions organized by CBOs/NGOs; print and electronic media; and radio. In addition, this GRM manual will be published and shared with all stakeholders.

11. Evaluating the Grievance Mechanism

An evaluation system should assess the overall effectiveness and the impact of the GRMs. Such evaluations can take place quarterly and make recommendation on improving the performance of the GRM and provide valuable feedback to project management. The evaluation should answer the following questions can be used:

i.   How many complaints have been raised?
ii.   What types of complaints have been raised?
iii.   What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)?
iv.   How long did it take to solve the problem?
v.   How many complainants have used the grievance redress procedure?
vi.   Were the outcomes consistent with applicable national and international standards?
vii.   Are the GRMs effective in realizing the stated goals, objectives, and principles?
viii.   Are the GRMs capable of responding to the range of grievances being reported?
ix.   What are the cross-cutting grievances across all sub-counties, counties and regions?
x.   Are the grievances treated confidentially, assessed impartially and handled transparently?
xi.   Does the project have necessary technical and financial resources, means and powers to investigate grievances?
xii.   Is the GRM accessible to all stakeholders, irrespective of their remoteness, language education and income level

At mid-term stage of the project, an in-depth evaluation of the performance of the GRM will be done using the tool presented in Annex V. The information obtained will be used to enhance the effectiveness of the GRM and also improve project management processes for purposes of proactively reducing the number of reported grievances.

12. Grievance Mechanisms and Referrals for SEA/SH Survivors

The KJET project GRM will be adopted to receive, record, and refer all SEA/SH complaints to qualified GBV service providers. In adapting the GRM for receiving SEA/SH complaints the following considerations will be made:

a)   The GRM will adopt a survivor centered approach in which the safety and well-being of the SEA/SH survivor is the first priority and, in relation to adult GBV survivors, any action is only taken with the survivor's consent.
b)   In order to act in the best interests of children and persons with intellectual disabilities, GRMs will develop specific protocols for children who are survivors of SEA/SH. GRM operators will be trained on how to respond to cases involving children and persons with

intellectual disabilities, regardless of whether the child or a third-party lodge the complaint.

c) There GRM will provide multiple channels through which complaints can be registered in a safe and confidential manner, including through anonymous complaint reporting mechanisms.

d) The GRM will ensure that information on how to report complaints is disseminated among project beneficiaries and communities.

e) The GRM will advise SEA/SH survivor/witness/alleged perpetrator of mandatory reporting requirements and limits of confidentiality as required under Kenyan law.

f) The GRM will ensure that personal information of a survivor is protected. No identifiable information on the survivor will be stored in the GRM and all information must be kept confidential. The GRM will not require disclosure of, or record, information on aspects of the SEA/SH incident other than (a) the nature of the complaint (what the complainant says in her/his own words without direct questioning); (b) if, to the best of the complainant's knowledge, the alleged perpetrator was associated with the project; and (c) if possible, the age and sex of the survivor. Where mandatory reporting requirements apply, information disclosure should be made in accordance with legal requirements, and information should only be released to the appropriate authority or agency.

g) The GRM will serve primarily to refer complainants to GBV service providers (whether related to the project or not) immediately after receiving a complaint. Where the complainant consents, the GRM should initiate procedures to determine whether disciplinary measures should be implemented. The GRM should also monitor follow-up actions and record resolution of the complaint in line with survivor-centered principles.

h) The GRM will operate without prejudice to any other complaint mechanisms or legal recourse to which an individual or community may otherwise have access under national, regional, or international law, or under the rules and regulations of other institutions, agencies or commissions.

All the project GRM staff will be trained on how to receive SEA/SH complaints, to frame questions in a non-accusatory manner, and to treat complainants with respect. In addition, staff will be trained to follow specific protocols when receiving complaints related to SEA/SH against children. The GRM may also verify whether the allegation is linked to the project and will have an ongoing role in monitoring progress and conclusion of the complaint, including actions taken. Follow-up support to the survivor is provided by the GBV service providers, while the GM will monitor effective access to holistic care based on each survivor's needs and wishes.

For project GRMs to be able to respond appropriately to incidents of SEA/SH, the NPIU will identify in advance competent GBV service provider (s) to refer survivors for support. GBV service providers will play an essential role in supporting survivors and mitigating the harm of SEA/SH including through health services; psychosocial care; and security, legal, and financial support.

Annexes

Annex I: Grievance Log and Acknowledgement Form

County: ………………………… Institution: ……………………………………………..

Name of Complainant:

Gender: …………………

Age: …………….

Contacts: Phone…………………………..
Email address …………………

Date of Complaint: ……………………………. (Dd-mm-yyyy)

Documents comprising the complaint: (petition, supporting documents etc.)
1)
2)

Summary of Complaint:

Name of the Complainant: ……………………………………………………

Signature of the Complainant:……………………………………………..

Name of officer receiving the complaint:…………………………………………

Signature of officer receiving the complaint:………………………………..

Annex II: Grievance Redress Log

GRIEVANCE LOG		PROJECT:		Person Completing:		Tel No.			Date Updated:		
GEOGRAPHICAL LOCATION:											
	IDENTIFIERS										
S No	Name /or Ref	Contact	Date received	Channel	Description of complaint	Referred to (Name & Pos)	Tel no	Date	Action taken/agreed resolution	Outcome	Feedback Given Y/N	Date resolved
1											
2											
3											

Annex III: GRC Meeting Recording Format

Date of the Meeting: _____; Complaint Registration No in. Register. _____

Venue of meeting: _____

Details of Participants:

Complainant(s) if present	GRC Members
1) 2)	1) 2) 3)

Summary of Grievance:

Summary of key discussions:

Decisions taken in the meeting / Recommendations of GRC:

Issue solved / Unsolved _____

Signature of Chairperson of the meeting: _____

Name of Chairperson: _____

Date: dd-mm-yyyy

Annex IV: Feedback on Grievance Resolution Form

County: Sub County:

1.   Name of Complainant……………………………….…………….

2.   Date of Complaint……………………………………………………….

Summary of the Complaint:

3.   Summary of Resolution

4.   Date of Redress of the Grievance: (dd-mm-yyyy)

Signature of the grievance committee chairperson

Name: _____

Date: dd-mm-yyyy

Signature of the Complainant in acceptance of the resolution to his /her grievance
_____

Name: _____

Annex V: Guiding Questions for Evaluating the Performance of the KJET Project GRM

No	Aspect to be assessed	Guiding questions
1	Organizational Commitment	Do the project's management and staff recognize and value the GRM process as a means of improving project management and enhancing accountability and transparency?
		Is grievance redress integrated into the project's core activities?
		Is grievance redress integrated into staff job descriptions and responsibilities?
		Is it appropriately resourced and monitored?
2	Accessibility	Is the GRM accessible to all stakeholders, irrespective of their remoteness, language, education or income level, VMGs?
		Are procedures to file grievances and seek action easily understood by project beneficiaries?
		Can grievances be filed anonymously?
		Are there a range of contact options?
		Is the GRM appropriately advertised and communicated to project-affected people?
		Do multiple uptake channels exist?
		Is there a system to categorize, assign priority, and route grievances to the appropriate entity?
		Does it restrict access to other redress mechanism
3	Predictability	Is the GRM responsive to the needs of all complainants?
		Does the GRM offer a clear procedure with time frames for each stage and clarity on the types of results it can (and cannot) deliver
4	Capability	Do GRM officials have the necessary technical, human and financial resources, means and powers to investigate grievances?
		Are there dedicated and trained staff available to handle the GRM?
		Are they given learning opportunities and do they receive any systematic reviews of their performance
5	Acknowledgement and follow-up	Are complaints acknowledged in writing?
		Does the acknowledgement outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance?
		Are there clear timetables that are publicly available?
6	Monitoring and Evaluation	Is there a process to track grievances and assess progress being made to resolve grievances?
		Are there indicators to measure grievance monitoring and resolution?
		If there is data being collected, is this data used to make project process changes to minimize similar grievances in the future?
7	Feedback	Does a user survey exist to get feedback on the credibility of the process?
		Is such feedback publicly available?

		Is there right to appeal? If yes, are GRM users informed about this right?
8	Analysis	Is there a process to analyze the effectiveness of the GRM?
		Is there a timeframe?

Annex VI: List of Participants for the Virtual Meeting Held to Assess Performance of KYEOP GM

#	Name	Location
1	Peter Muthini	PCU
2	Alex Otieno	Migori Priced
3	Ali Juma Were	Kwale
4	Alice Marambii	Bungoma
5	Amende Okola	Hom-bay
6	Beatrice Magendi	Nyamira
7	Carry	Meru
8	Christine Wanjiru	PCU
9	Erier Odongo	Kisumu
10	Ernest Mungai	Machakos
11	Jane Ngoli	Mombasa
12	Janet Buchaberi	Mumi
13	John Mwangi	Narobi
14	Johmarx Musoki	Siaya
15	Kaweti Joshua	Kisumu
16	Komu Mwangi	Samburu
17	Kent Simiyu	Kwale
18	Lucy Ndemo	PCU
19	Mary Machero	Mumi
20	Rosemary Akhasaya	Siaya
21	Anthony Okeyo	Kisumu
22	Denis M Chemunges	Turkana
23	Dominic D Thicholoo	Siana E & W
24	Faith Wavaso	Mombasa
25	Farida Abdulahi Hassan	
26	Festus Maine	Kilifi
27	Francis Mwangi	Siaia
28	Gladys Wambui	Narobi
29	Jonxson Kleeasa	Bungoma
30	James Karwagi	Kiambu
31	James Oguaji	Siaya
32	Jeff	
33	John Dordo	Siaya
34	Maberya Marie	TiuasNecial
35	Mere Mukwam	Thanewzoia
36	Martin Ndeitu	Nyeri
37	Mary Adhiambo	Kilifi
38	Matleu Muteo	Isiolo
39	Meonice Mwithi	Nairobi
40	Meline Andiwa	
41	Michael Nyaech	Kisumu
42	Ngugi Ngoize	Nyamira
43	Janet Otieng	Kirinaga
44	Peter	
45	Philip Wasike	Bungoma
46	Phinsian J Tot	Mararu
47	Rachael Kolgi	Nagrolai
48	Rhoda Kisumza	Mombasa
49	Richard	Mombasa
50	Richard Nyangwa	Kilii
51	Ruth Njoroge	Nyanga
52	Sarah Engiga	
53	Stanley Njugi	Mac-way
54	Theresia Warin	Mesan
55	William Mbithuis	Machakos
56	Taumier / Jan cluster	SDYMCF
57	Bungoma County Director	Namukwota
58	Catharine Kasioti	Machakos
59	Ishmael Joshua	Mombasa
60	Gladys Wambui	Nairobi

61. S.M. John Mbugyi - Kiambu(?)

62. Lech Ndg'ang'a - Nakuru(?)

63. Ruth Chimonah(?) - Mombasa.

64. Stephen Kenuer(?) - Laikipia

65. Solomon Kosom(?) - Kwale(?)

66. Charles Juma Wambose - Peu

67. Muna Juma - Kilifi(?)

68. Nelson Bossik(?) - Kai(?)

69. Zachariah Kamau - Siaya(?)

70. Judy Njenga - Peu

71. Nicholas Musila - Peu

Annex VII: Report on the Virtual Meeting Held to Assess Performance of KYEOP GM

1. TRANSPARENCY

The following suggestions were made:
- Making prompt feedback
- All grievances should be escalated both vertically and horizontally through the project hierarchy. All grievances should automatically be received by the top project officials to prevent project officers assigned with the duty of GR from sitting on the grievances lodged or simply trivializing the grievances.
- Widespread publicity about its existence and use
- Make its use as simple, effective and accessible as possible
- Devolve the following undertakings to the county to be in line with bottom-up approach transformation agenda and also payment to youth and trainers as this will ensure prompt payment without much delay.
- To ensure that MCs and youths are able to direct their grievances to the GRM officers without being pestered.
- For a short and simple messaging method to be employed.
- Improve MIS team technical capacity through training and acquisition of top-notch ICT infrastructure.
- Improve on follow ups to ensure all concerns are addressed (proper grievance tracking)
- Consistent and accurate communication flow from PCU to the field and back should be entrenched in future programs and projects.

2. CONFIDENTIALITY.

The following suggestions were made:
- Officers or beneficiaries who escalate grievances must be protected from intimidation and vilification as notorious complainers.
- Confidentiality was not key. Key issues were skills training, use of the acquired skills in personal development and skills can be used in order to enterprise

3. EFFECTIVENESS AND EFFICIENCY.

The following recommendations were made for improvement.

- There should be flow of timely information from one level to the other.
- Responses were not assured.
- The feedback on grievances should be prompt and timely.
- Some officers assigned with grievance redress saw them as a nuisance and sat on them or kept on tossing them around. This made most beneficiaries to drop out leading to high attrition.
- Information from the field to CPU wasn't effective as expected, at times it took a lot of time to be acted upon. Some expectations were not met especially in terms of payment of stipends to the youths.

- Took long for some issues to be resolved. To date some matters are still pending. Those not tech savvy avoided using it while those with disabilities especially visual found it difficult to interact with it. No communication to the aggrieved parties on how far the resolution of a grievance had reached
- Payment of stipend and fees to transfers took a long time which discouraged so many youths and trainers in continuing with the training. Monitoring and evaluation of grants given to youth was not well managed. There was no engagement of youth officers in this process hence not much was achieved.
- GRM unit be enhanced in manpower and equipped with resources to address the project grievances along with various outcome areas.
- Strict adherence to GRM timelines.

4. ACCESSIBILITY.

The following recommendations were made.

- When an issue was raised in the system, there was no feedback and subsequently no way to know if the issue had been resolved or not.
- The call center should be enhanced for easier access to youths having basic devices and have an active line that addresses concerns from the ground.
- Flagging out and clustering grievances into categories would ensure each category of grievance is assigned to a PCU officer and thereby enhancing accessibility to redress.
- Proper mapping of youth preferences and planning to avail opportunities towards achievement.
- Some MCs could not manage digital issues and therefore a need for them to be trained on the same.

5. GBV RESPONSIVE.

The following recommendations were put forward.

- Training/capacity building Project Officers and other implementing partners in matters pertaining to SGBV.
- Peer to peer education have a strategic/team mandated for confidential follow ups on GBV and also have professional and confidential reporting channels.
- Can only be effective if action is taken and the response time is too short otherwise it will be an exercise in futility if the above is not taken care of
- Can only be achieved if action is taken immediately once reported otherwise people will lose faith in it if action. Is delayed
- Making the redress mechanism friendly and timely while also collaborating with key stakeholders on GBV.
- A very clear disciplinary policy should be developed to punish project officers or beneficiaries who commit sexual abuse and harassment. During KYEOP, most youth went through harassment but were silenced and threatened when they reported. This happened during NITA exams. Qualified counsellor (officers or otherwise) should be engaged to give counselling support to victims of GBV.

- Not to share with third parties.
- proper networking between the victims and the society. Proper communication channels between the victims and the authority. GBV cases confidentiality and anonymity of issues should be maintained. Norms and culture of the community must be considered. A clear transparent activity should be adopted and activities must be accessible to targeted youths
- Address the issue of boy child who suffers silently on GBV. Make use of peer educators who the youth are free to open up to friendly counselling services that does not seem judgmental
- Refer the youth facing sexual abuse for counseling services, or have them report to relevant offices for follow up to ensure their future is safe. Connect the youth to medical facilities in case they need medical support.
- Put a toll-free number to report GBV cases. A desk to address GBV cases to be set up and also youths should be sensitized on what comprises GBV

6. **INCLUSIVITY.**

The following recommendations were put forward.

- There needs to be survey to establish whether indeed VMGs exist in Kiambu County.
- An integrated approach to EAT where the educated can do virtual while the less educated can do physical.
- Prior onboarding of adequate trainers in trades preferred by the youth.
- Relaxing of trainers onboarding process and protocols (informed by client preference)
- The MC capacity limit be determined by more than one parameter.
- Payment of MCs who trained beyond the limit of 6 trainees.

Annex VIII: Report on the Kobo Responses on the Performance of the KYEOP GM

1. **TRANSPARENCY.**

21 respondents agreed that the module was transparent. This represents 84% of the total respondents. 4 respondents representing 16% felt that the module was not transparent and recommended the following for improvement:

- Making prompt feedback
- All grievances should be escalated both vertically and horizontally through the project hierarchy. All grievances should automatically be received by the top project officials to prevent project officers assigned with the duty of GR from sitting on the grievances lodged or simply trivializing the grievances
- Widespread publicity about its existence and use
- Make its use as simple, effective and accessible as possible
- Devolve the following undertakings to the county to be in line with bottom-up approach transformation agenda
- Payment to youth and trainers as this will ensure prompt payment without much delay.

2. **CONFIDENTIALITY.**

23 respondents representing 92% of the total respondents reported that the module was confidential. 2 respondents representing 8% felt that the module was not confidential and recommended the following for improvement:

- Officers or beneficiaries who escalate grievances must be protected from intimidation and vilification as notorious complainers.
- Confidentiality was not key as the key issues were skills training, use of the acquired skills in personal development and skills can be used in order to enterprise.

3. **EFFECTIVENESS AND EFFICIENCY.**

18 respondents representing 72% were confident that the module was effective and efficient while 7 respondents representing 28% felt that the module was not effective and efficient. The following recommendations were given for improvement:

- The flow of timely information from one level to the other
- Response not assured
- The feedback on grievances should be prompt and timely
- Some officers assigned with grievance redress saw them as a nuisance and sat on them or kept on tossing them around. This made most beneficiaries to drop out leading to high attrition.
- Information from the field to CPU wasn't effective as expected, at times it took a lot of time to be acted upon. Some expectations were not met especially in terms of payment of stipends to the youths.
- Took long for some issues to be resolved, to date some matters are still pending.
- Those not tech savvy avoided using it

- Those with disabilities especially visual found it difficult to interact with it
- No communication to the aggrieved parties on how far the resolution of a grievance had reached
- Payment of stipend and fees to transfers took a long time which discouraged so many youths and trainers in continuing with the training. Monitoring and evaluation of grants given to youth was not well managed. There was no engagement of youth officers in this process hence not much was achieved

4. IF THE MODULE FOCUSED ON THE VULNERABLE YOUTH.

23 respondents representing 92% of the respondents felt that the module focused on the vulnerable youth while 2 respondents representing 8% of the respondents reported otherwise and recommended the following for improvement.

- Some officers assigned with grievance redress saw them as a nuisance and sat on them or kept on tossing them around. This made most beneficiaries to drop out leading to high attrition.
- It was based on wrong assumption that all youth were literate, had phones and were tech savvy yet in a number of times we've tried to reach these youth through phone numbers they provided, they were unreasonable
- Feedback was rarely given about a grievance raised.
- In most of the instances, it took too long to solve a grievance this breeding hopelessness and impatience among youth
- Centralization in making decisions and resolving grievances made youth lose trust in their youth officers

5. KYEOP MIS-GRM MODULE REPONSIVENESS RATING.

7 respondents representing 28% of the total respondents felt that the module was highly responsive. 12 respondents representing 48% felt that the module was responsive. 3 respondents representing 12% felt that the module was moderately responsive.

6. SUGGESTIONS ON HOW KJET CAN HAVE USER-FRIENDLY SERVICE FOR SEXUAL ABUSE AND GBV CASES.

- Peer to peer education.
- Strategic/team mandated for confidential follow ups on GBV.
- Professional and confidential reporting channels.
- Can only be effective if action is taken immediately and the response time is too short otherwise it will be an exercise in futility if the above is not taken care of.
- Making the redress mechanism friendly, timely and collaborating with key stakeholders on GBV.
- A very clear disciplinary policy should be developed to punish project officers or beneficiaries who commit sexual abuse and harassment. During KYEOP, most youth went through harassment but were silenced and threatened when they reported. This happened during Nita exams.
- Qualified counsellor (officers or otherwise) should be engaged to give counselling support to beneficiaries of GBV.
- Do not share with third parties.

- For GBV report to youth development officer or children s officer, hospital and police -court for determination. Report goes to the GBV committee for documentation and escalation to the county level.
- proper networking between the victims and the society and proper communication channels between the victims and the authority.
- GBV cases confidentiality and anonymity of issues should be maintained.
- Norms and culture of the community must be considered.
- Clear and transparent activities should be adopted.
- Involve the GBV office/officers to handle matters concerning the same.
- Create a GBV desk at every training center.
- Use of coded messages for reporting.
- Delegate decision making function to the lower levels as much as possible. This will free headquarters to hand serious matters
- Develop a guideline on how these matters would be handled when they arose.
- Revise the guidelines as frequently as possible to capture emerging issues, trends and circumstances
- Let clients be constantly reminded about the guidelines
- A dedicated staff to handle such matters be designated purposely for that so as to ensure quick dispensation of grievances
- Cases reported on the tool should be resolved immediately in real time or escalated to the technical team and resolved within 24 HRS.
- A toll-free No. should be set to offer assistance to the above cases.
- Incorporate Kiswahili and English languages in the tool for inclusivity. A tool to assist the Persons with Disabilities need to be included especially for those with hearing impairment and visually impaired for inclusivity.
- Introduce a USSD for reporting sexual abuse and harassment and GBV
- Create GBV desk at the Head office to coordinate responses to such occurrences
- Engage youth development officers, police department, public health officers and children's officers in this process
- This can be done by supporting and establishing specialized units to offer counselling to the victims of Sexually abused and GBV visits. The counselors should also be trained on new technologies and services ways of handling the victims.
- Establishing a rescue center where the victims can get proper counseling and also can be economically empowered.
- Beneficiaries should be sensitized on what comprises GBV.
- Address the issue of boy child who suffers silently on GBV
- Involve/engage/include officers through meetings, brain storming forums and networking platforms to clarify roles and responsibilities as well as reporting structures and systems
- Having proper channels of communication/Information flow/share knowledge
- Managing expectations and individual orientations through provision of available interventions while asserting Project requirements and outcomes
- Understand and manage group dynamics and expectations
- Maintain acceptable attitude, decorum, mannerisms and discipline between trainees and officers. Beneficiaries perceive officers as parents/guide/counsellor/mentor, hence endeavor to provide guidance and mentorship as well as positivity/psychological support to the trainees

- Explore every channel of presenting and resolving grievances, from the complainant to the support system
- Manage genesis/ tell tales/ signs and symptoms or triggers of stress/ depression/ difficulty /problem early enough to avoid the issue degenerating into unmanageable conflict or confrontation.
- Promote and instill respect, discipline and self-control to demarcate interactions, including sexual, emotional and socioeconomic as well as interpersonal relationships
- Explore platforms for exposure, ventilation, sharing and other support structures and systems for trainees
- Explore ways of detecting, addressing and managing crisis that might degenerate into GRM or legal issues
- Promote wellness and mental health through interactive and responsive training modules and training methodologies/strategies
- Endeavour to provide stable, hospitable and conducive training environment and spaces where youth feel secure and can trust
- Form and utilize manageable groups of trainers in a class for ease of management of crisis, including letting them appoint their leaders and acceptable cells to address needs and difficulties they are undergoing as well as explore for solutions within the group
- Adopt trainer-centered approaches to service and training delivery such as devolve funds, trainings, Project M&E, assessments and feedback as well as reports and data management.
- Adopt effective and efficient digital platforms, such as Mpesa for stipend payments/payroll, on-line daily registers and on communication systems. However, the center of these digital platforms be PCU.
- Utilize available resources, such as YECs and Officers in the respective implementation planning and execution.
- Outline roles and responsibilities of YOs to avoid field officers appearing disoriented, out of touch or clueless while the activity or incident might be happening within their jurisdiction.
- Develop effective and watertight systems of ascertaining viability of MCs, consultants or lead officers to ensure workloads, tasks, commitments and responsibilities are equitably shared and to especially, skilled persons that merit.
- Document youth backgrounds and strive to address their plight to promote effort and transformation through the benefits gained by participating in the project.
- Regular sharing, learning and exchange programmes to appraise and familiarize with best practices and excellent models as well as achievements.
- Plan effectively and in advance activities, especially recruitment/mobilization, registration/orientation and training or monitoring as well as logistics and facilitation to avoid awkward situations or panic that can escalate conflicts and mistrust.
- Ensure implementation is youth centered and Officer friendly to build trust and synergies.
- Devolve most activities during implementation, especially ascertaining trainers or MCs, payment of stipend to MCs, trainees as well as service providers, like interpreters.

- Explore efficient system of transmission of funds, responsibilities or project activities to avoid PCU imposing unmanageable or insensitive instructions and demands.
- Define who is in charge at each level of implementation to avoid irrelevance or redundancy. If planning is done well, a lot of conflicts could be avoided/ forestalled if intake is given ample resources and time.
- Trade areas ought to be reevaluated to bring on board those in high demand with high levels of transformation/ achievement rates. Attention should be given to what is most promising while it presents quick outputs, such as employment or grasp of skills.
- Project design should be simplified and practical to ensure officers do due diligence, conduct feasibility studies and have a commanding grasp of implementation of aspects and expectations of the project.
- Engage experts, such as psychologists, psychiatrists or medical experts when dealing with in extreme cases of trainers, especially if they exhibit instability, disorientation or depression.
- Explore and ensure trainers are competent, with the ability to reach youth through local language/dialect, familiarity with the facility as well as positive attitude or disposition to assist.
- Explore having AIEs for respective activities and facilitation at HQs/PCU, Region, County or Sub County levels. In addition, reporting systems can adopt this system to and from top to bottom.
- Explore reward/award system for implementers and beneficiaries to be able to stimulate commitment inspire hope and trigger exemplary effort to actualize the project as well as reward humanity/humanitarian spirit at all levels of implementation.

Annex IX: Assessment of the KYEOP GRM against the 10 GM principles and recommendations on how best to adapt the KYEOP GRM to KJET.

Principles	Meaning of the Principles	Responses	Recommendations
Efficient	Resolved grievances satisfactorily in a timely manner.	● Not at all, grievances involving placement of trainees were delayed for too long leading most of the dropping out of the program. Some related to none payment have not been resolved to date ● Certificates/results for the trainees has been perhaps the weakest link in KYEOP. The process is very lengthy and knowing that one failed after so many cycles is not good. ● Rostering grievances especially for the formal category could not be addressed nor verified by YDOs in the field ● In terms of stipend, some youth complained for months to receive their stipends.	● Decentralize the placement to sub-county level, let the trainees pick their trainer, be allowed to change, if necessary, within a one-week window of placement ● Speed up responses. There were a lot of delays ● We recommend that the GRM unit be enhanced in manpower and equipped with resources to address the project grievances along the various outcome areas. ● We also recommend strict adherence to GRM timelines
Effective	Closed-out all grievances raised and met the expectations of the aggrieved.	● Some grievances are still active to date ● MIS downtime sometimes lasted from days to weeks	● More time/resources should be allocated for effective handling of grievances ● Increase ease of access to GRM channels through the MIS (Inter-operation ability of all GRM channels

		- The frontline GRM service providers (YDOs) were not adequately trained on GRM - Some MCs who had abdicated their roles and consequently kicked out of the system due to breach of contract kept on demanding their pay. - When YDOs collect information and sometimes physical registers, after relaying the same to KYEOP HQs after sometime they would ask the same - Meeting some expectations was below standards and sometimes no answer provided on issues raised. This contributed to attrition as some youths' genuine concerns were not addressed	would ensure no grievance is lost in the multiplicity of channels) - The handing over between Implementing Partners (As happened between NITA & MIIYA mid project cycle) should be improved for tracking purposes (Centrality of command & coordination is necessary) - Adequate and periodic review of officers' GRM capacities and Building competencies through purposeful training recommended - Effective and efficient data input, retrieval and analysis system should be procured - We recommend strict adherence to GRM timelines by all Implementing partners - Communication of GRM outcomes should be improved both to and from the PCU
Confidential	Kept all cases private, did not disclose any information without the consent of the aggrieved.	- Was achieved - MSEA was however too confidential with the numbers of beneficiaries of business support	- Be maintained - Timely Sharing of sex & geographically disaggregated data between implementing partners recommended
Accessible	Available to affected persons and other stakeholders at no cost, considered	- The toll-free number was inactive most of the time - Some grievances launched on the online platform were never addressed especially for trainers	- Have an active line that addresses concerns from the ground - Some MCs couldn't manage digital issues. - The call Centre should be enhanced for easier access to beneficiaries having basic devices

		hence forcing them to incur cost of physically going to the head office to seek answers.	• Flagging out and clustering grievances into categories would ensure each category of grievance is assigned to a PCU officer thereby enhancing accessibility to redress. • We recommend proper mapping of beneficiary preferences and planning to avail opportunities towards achievement.
	literacy, mobility, disability challenges.		
Inclusive	The GRM considered all segments of the community.	• Every sub county has Vulnerable and Marginalized Groups (VMGs). KYEOP was discriminatory in saying Kiambu has no VMGs • The virtual Entrepreneurship Aptitude Test under MSEA excluded unschooled youth • Some grievances especially on availability of preferred courses could not be met due to capping of trainees per MC at 6 even for those with few or no trainers (e.g. Plumbing, plant operator). • Some MCs have not been paid to date because they had more youths than the recommended 6. The students had no option because of limited MCs offering certain courses. The students wrote their exams and passed.	• Be maintained • It should be all rounded-respond to any matter raised • Widen the scope • We recommend an integrated approach to EAT where the educated can do virtual while the less educated can do physical • We also recommend prior onboarding of adequate trainers in trades preferred by the beneficiaries. • We also recommend relaxing of the trainer onboarding processes and protocols (informed by client preferences) • We also propose that MC capacity limit be determined by more than one parameter

Transparent	GRM was disclosed to affected persons and other stakeholders, processes for receiving, handling, and closing out were clear and communicated to and understood by the aggrieved	• The creation of multiple programs for same trainer with some details not matching created a challenge during back rostering and payments for both Beneficiaries and service providers (Trainers) • The data collection exercise on possible MCs to onboard then abandoning after they had submitted data cast the YDOs in bad light • At times we raised concerns, recommended changes that were never affected.	• A simple short message method be employed. • Many youths and MCs couldn't direct their grievances to the GRM people owing to limitations on information on it. Officers ended up being pestered so much by these two groups • Improve MIS team technical capacity through training and also acquisition of top-notch ICT infrastructure. • Improve on follow ups to ensure all concerns are addressed (proper grievance Tracking) • Consistent and accurate communication flow from PCU to the field and back should be entrenched in future programs and projects.
Anonymous	Provided a means for anonymous reporting.	• Anonymity was achieved	• Be maintained
Culturally appropriate	Sensitive to the norms, standards, cultures of e.g., VMGs and others. Considered local/traditional forms of managing grievances.	• Satisfactory	• Be made more inclusive due to varied social economic, cultural and religious consideration
GBV-Responsive	Could receive and handle sensitive issues such as GBV	• The frontline GRM officers were not adequately trained to effectively handle SGBV grievances	• Ensure GBV issues are handled professionally • More attention required

			● We recommend training/capacity building the project staff and other implementing partners in matters pertaining to SGBV