

KENYA GREEN AND RESILIENT EXPANSION OF ENERGY (GREEN) PROGRAM

P180465

**(SUSWA STATCOM, RABAI PROJECT, AND THE 400/220KV KIMUKA
SUBSTATION AND ASSOCIATED LOOP IN LOOP OUT)**

STAKEHOLDER ENGAGEMENT PLAN (SEP)



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LIST OF ABBREVIATIONS

AC	Alternating Current
CG	County Government
CLO	Community Liaison Officer
CRA	Commission of Revenue Allocation
EAP	Employee Assistance Programme
EEHP	Eastern Electricity Highway Project
EMCA	Environmental Management and Co-ordination Act
ESF	Environmental and Social Frameworks
ESIA	Environmental and Social Impact Assessment
ESS	Environmental & Social Standards
FPIC	Free, Prior, Informed Consent
GoK	Government of Kenya
GPS	Global Positioning System
GRM	Grievance Redress Mechanism
HVDC	High Voltage Direct Current
ICT	Information and Communication Technology
KFS	Kenya Forest Service
KPLC	Kenya Power and Lighting Company
KYDP	Kenya Youth Development Authority
LCPDP	Least Cost Power Development Plan
NEMA	National Environment Management Authority
NGAO	National Government Administrative Leaders
NMK	National Museums of Kenya
PAPs	Project Affected Persons
PIT	Project Implementation Team
RAP	Resettlement Action Plan
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender Based Violence
SLO	Social License to Operate
SS	Substation
STATCOMs	Static Synchronous Compensators
UN-REDD	United Nations collaborative initiative on Reducing Emissions from Deforestation and forest Degradation

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1 PROJECT DESCRIPTION

1.1 Introduction

Kenya Vision 2030 aims to transform Kenya into a newly industrializing, middle-income country providing a high quality of life to all its citizens by 2030 in a clean and secure environment. Efficient, accessible, and reliable infrastructure has been identified as an enabler for achieving sustained economic growth, development, and poverty reduction by lowering cost of doing business and improving the country's global competitiveness.

The electricity sub-sector has adopted a 20-year Least Cost Power Development Plan [LCPDP] that will align the sector with the Vision targets. The plan provides a road map to meet the estimated power demand. Power generation sequence, necessary network upgrades and expansions required to adequately evacuate the generated power and efficiently meet the demand is proposed.

Kenya Electricity Transmission Company ("KETRACO") is mandated by the Government of Kenya to develop the country's power transmission grid with the primary objective of meeting the country's power transmission needs efficiently, effectively, and reliably. By 2039, KETRACO is expected to have cumulatively established around 11, 246Km of transmission lines and 129 substations.

To stabilize the grid, KETRACO is proposing to install **Static Synchronous Compensator (STATCOM)**, as well as shunt reactors, within the Suswa High Voltage Direct Current (HVDC) Converter station, Rabai 220/132 kV substation and undertake the construction of a new 400/220kV Kimuka Substation with its associated Loop In Loop Out (LILO) lines. This Stakeholder Engagement Plan (SEP) describes the stakeholder engagement activities and process that KETRACO will apply throughout the project implementation period.

1.2 Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

The SEP is being prepared for two subprojects under the Green and Resilient Expansion of Energy, Phase 2, as briefly described in section 3 of this SEP.

1.3 Key Issues that should be communicated

The following is some of the information that will be communicated to the Stakeholders:

- Background of the Project.
- Project description.
- Project activities.
- The potential project benefits and impacts.
- The process that will be followed to engage with stakeholders.
- Feedback on issues raised by stakeholders.
- How and when stakeholders can participate in the project.
- The Abbreviated Resettlement Action Plan report.
- The Environmental and Social Impact Assessment (ESIA) report
- The Labour Management Plan (LMP)
- The Grievance Redress Mechanism (GRM)

1.4 When to communicate

Project communication will be structured and offered regularly but with the flexibility of responding to issues as they emerge. Broadly, stakeholder engagement for the proposed Project has been categorised into preparation and operation engagement activities.

1.5 Communication Methods

A variety of communication methods are used to engage with stakeholders reflecting their level of authority, socio-economic context, and cultural and intellectual factors such as level of education and literacy.

While English is the official language, Kiswahili is the national language in Kenya. Therefore, all stakeholder engagements will be done in Kiswahili. In key stakeholder meetings, community sensitization and project affected persons meetings, Kiswahili will be used. Where necessary, a translator will be used during meetings to pass information to the relevant community members. All project information will be published in English and translated to Kiswahili or Maasai or Giriama when necessary.

2 STAKEHOLDER IDENTIFICATION AND ANALYSIS

2.1 Methodology

To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

2.2 Affected parties and other interested parties

Identification and analysis of the various stakeholders was carried out during the ESIA for the two STATCOM projects from 24th July to 4th August 2023 and during the initial ESIA for the Kimuka substation undertaken from 8th to 13th February 2021, and later during the ESIA update and RAP for the Kimuka substation undertaken from 16th to 19th October 2023. After the public consultation and participation process the following were identified as stakeholders for this project. For purposes of effective and tailored engagement, the identified project stakeholders have been divided into the following categories:

i) Affected Parties:

- a. These include the **local communities** neighbouring the proposed project site.

These are the Giriama around Rabai substation, and the Maasai and other communities around Suswa and Kimuka substations. Suswa and Kimuka are cosmopolitan areas comprising a mixture of communities around the project area, with the Maasai VMGs being the overwhelming majority.

b. *Project Affected / Persons / Households*

The line-in line-out (LILO) to Kimuka substation will lead to the acquisition of a 60 meter wayleave corridor along a 1.5 Km stretch, affecting 38 landowners. These landowners are the Project Affected Persons (PAPs) in relation to the Kimuka substation subproject.

ii) Interested Parties

Other Interested Parties (OIPs) are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect or influence the project outcomes and the process of its implementation in some way. These are: World Bank, Ministry of Energy & Petroleum, the County Government of Mombasa and the County Government of Kajiado, National Administration offices, National Land Commission, and the Media

a. **National Government Agencies** – these are the machinery of government that is responsible for the oversight and administration of specific functions, such as an administration. They work to ensure the effective delivery of services, the enforcement of laws, and the implementation of government policies to enhance the well-being and development of the country and its citizens. County Government - refer to government bodies and organizations established at the county level with specific mandates and functions. These agencies play various roles in implementing county-level policies and programs to serve the interests and needs of the residents within their respective counties.

b. **Local Administration** - local administration refers to the system of government officials who serve at the sub-national or local level to oversee and coordinate administrative and governance functions within specific areas, such as sub-locations, locations, and sub-counties. They help to mobilize communities for development activities and government programmes, solve disputes and conflicts at the local level and promote government programs and policies to the community.

c. **International Partners** – The World Bank will be the financier for this project and will carry duties such as monitoring project progress in relation to preparation, implementation, stakeholder engagements, joint control and management efforts, grievances received and how they are being handled and resolved etc.

2.3 Disadvantaged/vulnerable individuals or groups

Vulnerable groups are persons who may be disproportionately impacted or further disadvantaged by the Project (s) compared with any other groups due to their minority status, culture or language, and who may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes associated with the project. Vulnerable groups and individuals include women; youth; cross-border communities; and people with disabilities (PWDs).

3 STAKEHOLDER ENGAGEMENT PROCESS

3.1 Summary of stakeholder engagement done during project preparation

During project preparation, consultation meetings were held, questionnaires were administered, and key informant interviews were conducted in all the three project sites. Feedback received during consultation meetings from each project location is provided below.

3.1.1 Suswa Substation

i) **Use of questionnaires**- A total of **36** questionnaires (**13 key informants, 23 community questionnaires**) were administered and analysed during the field visit. Among the stakeholders who were consulted included, relevant government ministries, local administration officers, and local community members neighbouring the proposed project.

ii) Baraza's / meetings targeting local communities-1 (one) public meeting was carried out in Suswa Town on 27th July 2023 from 11am -1pm. A total of **33** community members were engaged during the meeting.

iii) Key informant interviews- The key informant interviews sought views from the following institutions within the project area:

- a. Ministry of Interior and Coordination, Chief- Suswa Location
- b. Ministry of Interior and Coordination, Chief- Ewaso Location
- c. Ministry of Interior and Coordination, Chief- Mai Mahiu Location
- d. Ministry of Interior and Coordination, Assistant County Commissioner- Kajiado North Subcounty
- e. Ministry of Interior and Coordination, Assistant County Commissioner- Kajiado West Subcounty
- f. Ministry of Interior and Coordination, Assistant County Commissioner- Mai Mahiu Location
- g. Kenya Forest Service- Ngong station
- h. Kenya Wildlife Service- Kajiado West
- i. Kenya Ports Authority- Dry Port in Suswa
- j. Kedong Ranch Ltd
- k. Institutions around the project area including: Suswa Girls' High school, Soila Maasai Girls Centre, Suswa Dispensary and Mayian School.

Key issues discussed include the environmental and socio-economic benefits including job creation, growth and emergence of other businesses and shopping centers in the area, a stable power supply and sourcing construction materials in the local area will improve the livelihood of the locals.

Potential negative environmental and socio-economic factors were also discussed including destruction of vegetation, dust emission, air pollution. soil erosion during the undertaking of the civil works. noise pollution from construction activities, creation of waste from the project among other effects. Mitigation measures to combat these effects were also disclosed.

3.1.2 Rabai substation

- a. **Use of questionnaires** - A total of twenty-two (**22**) community questionnaires- **13-** Males, **9-**females) were administered during the consultative public participation exercise.
- b. **Baraza's / meetings targeting local communities-** One (1) public community meeting was held at Mwele/Kisurutini social hall, Kisurutini ward, Rabai sub-county, Kilifi County. 41 males and 10 females totaling to 51 people.
- c. **Key informant interviews:** The key informant interviews sought views from the following institutions within the project area:
 - Directorate of Occupational Safety and Health Service
 - Ministry of Interior and Coordination of National Government
 - Ministry of Labour and Social protection, Department of Children services
 - Ministry of Interior and Coordination of National Government
 - Rabai sub-county, Education office
 - Rabai sub county, Agriculture office
 - National Museums of Kenya, Dr. Krapf memorial museum.
 - Administration police, Critical installation protection Unit, Rabai

The key issues raised in the meeting include the potential positive and negative effects of the project on the community. This includes creation of business and employment opportunities, and reliability of electricity supply. The negative effects include air pollution, social ills, fear of increased cases of insecurity and gender-based violence, fear of excessive vibration during construction to the neighbouring settlements as experienced during previous projects causing cracks in houses, etc. Mitigation measures were also disclosed for the negative effects.

3.1.3 Kimuka substation and LILO

The initial exercise of stakeholder mapping, identification and consultation took between 8th to 13th February 2021. The second one will be held as in 16th to 19th October 2023. Data collection was through public meetings, informative interviews, and administration of questionnaires to capture the concerns, comments and issues that the stakeholders, neighbours and businesspeople around the project site have regarding the construction of the proposed substation. The completion of such questionnaires allowed for the synthesis and analysis of issues that arose. The key informants consulted in the initial exercise were participants who were interviewed:

Key issues discussed include environmental and social benefits, negative impacts and mitigation measures including noise and air pollution. Delay in compensation was also highlighted by the PAPs as a major concern and PAPs were assured of prompt pay following submission of relevant documents. Environmental conservation was marked as a factor that should be accorded priority.

Table 11: Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Stakeholder group	Stakeholder	Key characteristics	Language needs	Preferred communication method(s)	Specific needs
Affected Parties	Local communities	Local communities neighbouring the proposed project site. These include Giriama around Rabai substation and the Maasai (considered VMGs since they are pastoralists) and other communities around Suswa and Kimuka substations. Suswa and Kimuka are cosmopolitan comprising a mixture of tribes around the project area.	English, Swahili, Respective local languages	Formal public meetings Structured agendas	Disclosure of project information including benefits, negative effects and mitigation measures, employment opportunities
	Project Affected Persons (PAPs)	The LILO to Kimuka Substation will lead to the acquisition of a 60meter wayleave corridor affecting 38 landowners.	English, Swahili, Respective local languages	Formal public meetings Structured agendas Email communication Telephone Letters	Disclosure of the RAP and ESIA Reports Disclosure of entitlements GRM Regular formal and informal meetings
Interested Parties	National Government Agencies	These are the machinery of government that is responsible for the oversight and administration of specific functions, such as an administration. They work to ensure the effective delivery of services, the enforcement of laws, and the implementation of government policies to enhance the well-being and development of the country and its citizens.	English, Swahili	Formal technical virtual and physical meetings Structured agendas	Project roles and responsibilities, planned stakeholder engagements, Sensitization on project and its outcomes & how they can support or collaborate.
	County Government	Refer to government bodies and organizations established at the county level with specific mandates and functions. These agencies play various roles in implementing county-level policies and programs to serve the interests and needs	English, Swahili	Formal technical virtual and physical meetings Structured agendas Email Structured agendas	Project roles and responsibilities, planned stakeholder engagements, Sensitization on project and its outcomes &

Stakeholder group	Stakeholder	Key characteristics	Language needs	Preferred communication method(s)	Specific needs
		of the residents within their respective counties.		Email	how they can support or collaborate.
	Local Administration	Refers to the system of government officials who serve at the sub-national or local level to oversee and coordinate administrative and governance functions within specific areas, such as sub-locations, locations, and sub-counties. They help to mobilize communities for development activities and government programmes, solve disputes and conflicts at the local level and promote government programs and policies to the community.	English, Swahili	Formal technical virtual and physical meetings Structured agendas Email Structured agendas Email	Project roles and responsibilities, planned stakeholder engagements, Sensitization on project and its outcomes & how they can support or collaborate.
International partners	World Bank	Financiers of the project. Possess knowledge of E&S management	English	Email, telephone calls, meetings (in person or virtual)	Project progress in relation to preparation, implementation, stakeholder engagements, joint control and management efforts, experience sharing, grievances received and how they are being handled and resolved, Regular formal and informal meetings

Stakeholder engagement plan

3.2 Purpose and timing of the stakeholder engagement program

The overall goal of this SEP is to ensure a systematic, consistent, comprehensive, and coordinated approach to stakeholder participation and communication throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and feedback mechanism to be utilized.

The plan will guide timely engagement with key stakeholders as well as dissemination and increased access to relevant project information. The project will innovate ways for consultations to be effective and meaningful to project and stakeholder needs.

In addition to this SEP, KETRACO has developed an Environmental and Social Commitment Plan (ESCP) and Labor Management Procedures (LMP) which will be disseminated on the KETRACO and World Bank websites to ensure access to information about the environmental and social risks and respective mitigation measures. The KETRACO environmental and social safeguard specialists will be trained on the comprehensive ESF and requirements of ESS2 and ESS10 immediately after project effectiveness, to ensure understanding and effective implementation of this SEP. KETRACO will further prepare and submit to the Bank regular monitoring reports on the status of SEP implementation. The first report will be submitted three months after project effectiveness followed by quarterly reports throughout the project implementation period.

3.3 Proposed strategy for information disclosure

Electronic copies of the disclosure materials will be placed on the KETRACO and World Bank websites to allow easy access for all stakeholders. The disclosure materials will also be shared with the targeted stakeholders through email, during project related meetings and as appropriate, hard copies will be made available at strategically accessible location, especially for the Kimuka LILO community level stakeholder. The following information will be disclosed to the relevant stakeholders:

- a) Project objectives, positive and negative project impacts, risks, and mitigation measures,
- b) The project grievance mechanism, its steps, and processes, how to access it and resolution timeframes,
- c) Project Implementation schedule and roles and responsibilities of various parties as per the Project's institutional arrangement,
- d) The project ESCP,
- e) The project SEP,
- f) The project LMP,
- g) The RAP report for the Kimuka LILO,
- h) The project ESIA and ESMP.
- i) Project progress,

In addition to emails, public and formal meetings, the above information will be printed, and copies distributed to the relevant stakeholders.

3.4 Proposed strategy for consultation

KETRACO will conduct consultations with all identified stakeholders with the aim of creating awareness, improving access to information and receiving/giving feedback on project implementation. The communication channels highlighted above will play a key role in ensuring information flow between KETRACO and its stakeholders. The SEP for the GREEN Energy project phase 2 is presented in table 1 below.

Table 2: Stakeholder engagement plan by project

	Target for Engagement	Purpose of Engagement	Engagement Tasks / Methods	Schedule / Frequency	Responsibility	Project Phase
1.	National Government, County Government, local administrators	Establish and maintain a good working relationship with the various authorities to promote the Project's interests, facilitate compliance and cooperate on issues of material interest to all parties	<ul style="list-style-type: none"> - Planned communications and liaison with various levels of Ministry / directorates and County / Division authorities - Host regulatory visits and full cooperation during inspections and audits 	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc., then as required during Project life cycle)	KETRACO	Pre-construction / Construction / Operation / Closure
2.	Local communities and Project Affected Persons	Sensitization and awareness-raising in relation to Project schedule, activities, impacts and compensation for the Kimuka LILO	<ul style="list-style-type: none"> - Undertake community meetings and public barazas to advise on Project progress, brief them on any specific issues (such as heavy construction equipment, electrical safety, increased road traffic, security, potential influx and employment) and explain the grievance procedures 	Before compensation (for the LILO) and as need arises	KETRACO/CLO	Pre-construction/C onstruction
3.	Local communities	Sexual exploitation and abuse prevention and mitigation measures, HIV/ AIDS and STD sensitization	<ul style="list-style-type: none"> - Provide community awareness training ahead of the mobilization of contractor workforces - Collaboration with health authorities / NGOs to support health promotion (other communicable disease, lifestyles, etc.) as well 	- in advance of contractor arrival	KETRACO/ CLO	Construction

	Target for Engagement	Purpose of Engagement	Engagement Tasks / Methods	Schedule / Frequency	Responsibility	Project Phase
			as to respond to SEA cases			
4.	Maasai VMGs and other vulnerable groups and individuals	Ensure adequate participation in Project activities and access to project benefits (e.g. unskilled and semi-skilled labor) by vulnerable groups and individuals	- culturally appropriate meetings with vulnerable groups / individuals, as required to provide subproject information especially on how to access subproject benefits (employment opportunities) and how to ensure equity among the VMG clans	- Minimum 6-monthly during construction / annually in operations phase	Community Liaison office	Construction / Operations
5.	All affected and interested parties including World Bank	Provide stakeholders with information on Project progress and performance on matters of material concern including resolution of complaints	-Public meetings -Prepare and disclose brochure on the Project's local stakeholder engagement programme	Separate engagement brochures to be prepared for construction and operations phases	ESHS Manager / CLO	Construction-Operations transition / Operations

3.5 Reporting back to stakeholders

There will be continuous information disclosure to all stakeholders regarding the project implementation progress, project environmental and social performance, implementation of the stakeholder engagement plan and Grievance Redress Mechanism

3.6 Resources and Responsibilities for implementing stakeholder engagement activities.

3.6.1 Resources

KETRACO will be in charge of stakeholder engagement activities. The budget for the SEP implementation is KES. 11,338,635 as tabulated in the table 3 below.

Table 3: SEP Budget

Budget Category	Quantity	Unit Costs	Times	Total Costs	Remarks
2. Community Sensitization					
2a. organization of public meetings	6	3,000.00	3	27,000	Meeting Venue: tents, seats, & refreshments.
2b. Facilitation fees for local leadership	6	2,000.00	3	45,000	Facilitation fee for local administration / village elders etc.
3. Communication					
3a. Communication operational costs	4	2,000.00	9	72,000	Airtime, internet access, Public Address, projector etc.
4. Trainings					
4a. Training on social/environmental issues for PIT and contractor staff	3	1,000,000.00	1	3,000,000	Training cost
4b. Training on gender-based violence (GBV) for PIT and contractor staff	3	1,000,000.00	1	3,000,000	Training cost
5. Beneficiary surveys					
5a. [E.g., mid-project perception survey]	1	200,000	1	200,000	Field costs
5b. [E.g., end-of-project perception survey]	1	200,000	1	200,000	Field costs
6. Grievance Mechanism					

6a. training of CRCs committees	3	1,000,000.00	1	3,000,000	Training costs
Subtotal				9,819,000	
7. Contingency 5% of subtotal				490,850	
Total				10,307,850	
7a. 10% of total expenditure				1,030,785	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET				11,338,635	

3.6.2 Management functions and responsibilities

KETRACO will be responsible for carrying out stakeholder engagement activities throughout the project cycle through the Social Safeguards and resettlement officer and Community Liaison Officers (CLOs) as follows:

The project's Social Safeguards officer will be responsible for ensuring that the stakeholder engagement strategy is communicated internally and that the staff, resources, and systems are in place to enable this SEP to be implemented. In addition, assist with liaison and communication with key national, county, and local government authorities and agencies, plan and attend key consultations with stakeholders as required, and assist in management of grievances. They will also monitor the complaints – handling performance at lower levels. Providing inputs into the monitoring and evaluation process, such as quarterly reports on grievances handled among other issues.

The CLOs will act as the link through communication (in the local language) between KETRACO and the Community. They will be responsible for assisting communities to file a complaint to address grievances as 1st point of contact, adjudicate, and develop redress options for the raised grievances, escalate grievances to KETRACO if they are unable to resolve them among other duties.

The stakeholder engagement activities will be documented through minutes of meetings and field visit reports and shared with national and other interested stakeholders including the financier.

4 GRIEVANCE REDRESS MECHANISM (GRM)

4.1 Introduction

It is highly unlikely that a project can be implemented without conflicts and complaints arising. Therefore, availability of an elaborate Grievances Redress Mechanism to resolve and address complaints is necessary.

4.2 GRM Objectives

The GRM is intended to:

- i) To receive, log, analyze and address complaints and grievances and enhance conflict resolution arising during project implementation, while keeping complainants informed of the progress being made to resolve the grievances.
- ii) Ensure transparency and accountability throughout the implementation of the project amongst the relevant stakeholders including project beneficiaries.
- iii) Resolve any emerging ESHS grievances in the project.
- iv) To promote relations between the project implementers, executors and beneficiaries.

- v) Provide avenue for vulnerable groups and survivors of SEA/SH to have equal access to grievance redress, while ensuring that SEA/SH grievance response mechanisms are survivor centred.

6.2 Levels of Grievance Redress

The essence of GRM is to offer affected people avenues for registering a complaint or handling any dispute that may arise during the implementation of the project; guarantee that appropriate and mutually agreed redress actions are identified and implemented to the satisfaction of complainants; and prevent recourse to violent and forcible actions and/or judicial proceedings as well as providing a transparent and accountable implementation process. Nevertheless, people who feel their grievances or complaints have not been satisfactorily addressed will be free to have recourse to the judicial processes and other grievance redress avenues, including the World Bank’s Grievance Redress Service (GRS). There will be two levels of grievance redress which are:

- a) Community level GRM
- b) KETRACO level GRM

The first level will be the Community Level GRM which will be developed during RAP preparation (for the Kimuka substation) and Grievance Redress Committees (GRCs) will be formed at the same time. It is expected that the GRCs will receive grievances from the community and resolve them in a culturally acceptable manner. In case the GRC is unable to resolve the grievances, they will escalate the same to KETRACO, therefore moving the grievances to the second level.

The second level is the KETRACO level GRM which is presented below.

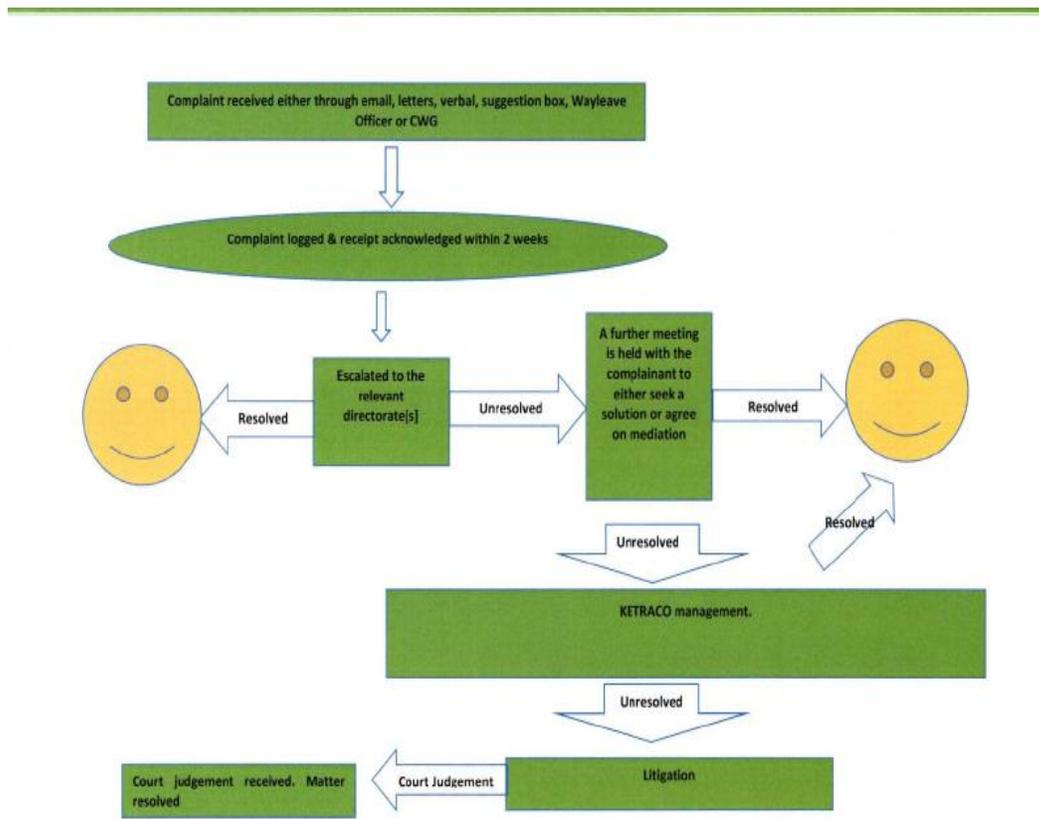


Figure 1: KETRACO's GRM procedure

In the second level grievance redress grievances will be received by KETRACO through email, letters, verbal, suggestion box, anonymously or through the CLO. Once grievances are received, they will be logged into the grievance log in the office. Some grievances may be resolved immediately, if not, they will be escalated to KETRACO’s PIT. KETRACO will acknowledge receipt of complaints within two weeks and will strive to resolve each complaint within two months.

The PIT will convene a meeting with the aggrieved party and seek to resolve the grievance. However, if the PIT is unable to resolve it, depending on the nature of the grievance, the PIT will escalate the grievance to The NLC through the General Manager Project Development services (GMPDS) or the Company Secretary for arbitration. NLC will resolve it but if unable to, the aggrieved party will have an option to go to court in which case the court judgement will be final.

Feedback will be given to the aggrieved parties at every stage of the GRM to enable them to know the next steps.

KETRACO will also monitor the GRM implementation process and provide recommendations for future improvements.

The main objective of a GRM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

4.3 Awareness

GRM will be widely publicized among stakeholder groups such as the affected parties including the PAPs, County Governments, Government administrative offices etc.

4.4 Implementing Steps

- i) The process of implementing the GRM involves the following steps:
- ii) The complaint submitted to PIT or designated GRC via email, cellphone, letter, Face-to-face or anonymously.
- iii) The Project Implementation Team (PIT) will register the complaint and acknowledge receipt.
- iv) An anonymous complaint should be investigated and handled in a confidential manner.
- v) The PIT will review the complaints and decide whether they will be processed.
- vi) The complainant will be notified of the case status.
- vii) The PIT will request additional information if required.
- viii) The complaint(s) will be assessed, and a response will be formulated.
- ix) The proposed solution will be communicated to the complainant within 15 working days from the receipt of the complaint.
- x) If the solution is acceptable to the complainant, then PIT will implement the solution(s) and settle the issue(s).
- xi) If the solution is not acceptable to the complainant, then the PIT will escalate raised the issue to management within KETRACO.

4.5 Description of GRM

The KETRACO GREEN Energy project will adopt the GRM arrangements described in the table below.

Table 4: GRM arrangements

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	Grievance redress mechanism at the Community level grievance redress	Throughout the project period as need arises	GRC

Step	Description of Process	Time Frame	Responsibility
	KETRACO level grievance redress	Throughout the project period as need arises	KETRACO
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> • [e.g., Toll-free telephone hotline/Short Message Service (SMS) line • E-mail • Letter to Grievance focal points at local facilities • Complaint form to be lodged via any of the above channels and complainants may choose to identify themselves or to remain anonymous. • Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box] 	Throughout the project period as need arises	KETRACO & GRC
Sorting, processing	<p>Any complaint received is forwarded to the relevant department Logged into the grievance log and categorized according to the following complaint types:</p> <ul style="list-style-type: none"> -Delayed payments -Land ownership issues -Lack of compensation documents [X/Y/Z] 	Upon receipt of complaint	Local grievance focal points and KETRACO
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by KETRACO or the GRC	Within 2 days of receipt	Local grievance focal points or KETRACO
Verification, investigation, action	Investigation of the complaint is led by the GRC or KETRACO A proposed resolution is formulated by the GRC or KETRACO and communicated to the complainant by the GRC or KETRACO	Within 10 working days to 2 months, depending on the complexity of the complaint	GRC and KETRACO
Monitoring and evaluation	Data on complaints are collected in from site and reported to KETRACO every once every week	Weekly	CRC
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by the CRCs [insert]	Weekly	CRC
Training	Training needs for staff/consultants I will be established through a capacity needs assessment prior to project implementation	Once	World Bank

A labour grievance Mechanism has been developed in the Labour Management Plan of this project, all project workers and labourers will be sensitized about it and encouraged to use when need arises.

4.6 Evaluation System

The PIT will assess the overall effectiveness and the impact of the mechanism annually and the results will contribute to improving the performance of the GRM and provide valuable feedback to project management. The following questions can be addressed in such evaluations:

- 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 problems?
- v. How many aggrieved parties have used the grievance redress procedure?
- vi. What were the outcomes?

5 MONITORING AND REPORTING

5.1 Introduction

The implementation of the SEP will be monitored on a regular basis. The effectiveness of engagement activities will be evaluated against the goals and objectives set out in the Plan. This evaluation will examine the extent to which activities were implemented in accordance with the Plan and the extent to which they achieved the aims defined here.

Goal: Enhance stakeholder consultation, engagement, disclosure and collaboration for the project.

Objective: To gather input, address concerns, and keep stakeholders informed throughout the project life cycle.

5.2 Summary of how SEP implementation will be monitored and reported.

Monitoring the stakeholder engagement activities is important to ensure that consultation, disclosure, and grievance management efforts are effective and that stakeholders have been meaningfully consulted throughout the process. Monitoring also allows the Project to improve its strategies by using information acquired from the monitoring activities. The Project will monitor the stakeholder engagement activities, and in particular:

- The implementation of the SEP.
- The effectiveness of the engagement process in managing impacts and expectations by tracking responses received from engagement activities.
- Consultations and disclosure activities conducted with stakeholders; and
- All grievances received and resolved whether anonymous or non-anonymous.

Performance will be evaluated bi-annually by tracking:

- Place and time of formal engagement events and level of participation by specific stakeholder categories and groups with due consideration for gender disaggregated (e.g., participation in engagement events).
- Numbers and type of grievance and the nature and timing of their resolution.
- Materials disseminated, i.e., type, frequency, and location.
- Number of comments by issue/ topic and type of stakeholders, and details of feedback provided; and

- Community attitudes and perceptions towards the Project based on media reports and stakeholder feedback.

A summary of the SEP monitoring arrangements for the project is presented in table 4 below.

Table 5: SEP monitoring arrangements

S/N	Activities	Monitoring Indicators	Verifier	Responsibility	Frequency of monitoring
1.	Stakeholder mapping, consultation, sensitization, and engagement, grievance received and redressed	No. of meetings held	Minutes of meetings, Attendance lists	PIT	Continuous during all project phases
1.	Stakeholder engagement for RAP and ESIA updates	No. of meetings held	ESIA Report	PIT	Once during pre-construction phased
3.	Stakeholders' engagement for LMP and SEP	No. of meetings held	Report on Key stakeholders engaged	PIT	Once during preconstruction and continuous during the project phases
4.	RAP & ESIA Disclosure	No. of disclosure meetings held	Minutes of meetings, Attendance lists	PIT	Once during preconstruction phase
5.	Disclosure of entitlements	No. of disclosure meetings held	Minutes of meetings, Attendance lists	PIT	Once during preconstruction phase
7.	Monitoring of RAP implementation	No. of M&E Reports	RAP M & E Reports	PIT	Quarterly during construction phase
8.	Monitoring pf GRM implementation	No. Of GRM monitoring reports	GRM M& E report	PIT	Monthly during construction
9.	Monitoring of ESMP implementation	No. of ESMPs and improvement orders	ESMP Reports	PIT	Quarterly during construction phase
10.	Environmental Audit	No. of Reports	Environmental Audit Report	PIT	Annually during the Operation Phase

5.3 Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary during project implementation. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The [quarterly or other] summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways including:

- Information distribution of disclosure materials.
- Public announcements and engagement of media; and
- Disclosure and consultation meetings; and collection and incorporation of comments and feedback.

6 ANNEXES

Annex 1: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)

Annex 2: Complaints form

1. Complainant's Details: (Optional)

Name (Dr/Mr/Mrs/Ms) _____

ID Number _____

Postal _____ address

Mobile _____

Email _____

County _____

Age _____ (in _____ years):

2. Are you requesting for confidentiality for the information?

Yes No

3. Is there any fear/ risk of retaliation or attack or victimization?

Yes No

4. Which institution or officer/person are you complaining about?

5. Have you reported this matter to any other public institution/ public official?

Yes No

6. If yes, which one?

7. Has this matter been the subject of court proceedings?

Yes No

8. Please give a summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

7.. What action would you want to be taken?

Signature _____

Date _____

6.1 Annex 3: SEA/SH Intake and Referral Form

Name of complainant: _____ Nationality: _____

Address/Contact Details: _____

Position (if applicable): _____ Age: _____ Sex: _____

Name of victim/survivor (if different from complainant): _____

Address/Contact _____ Details: _____

Age: _____ Sex: _____ Nationality: _____

Name (s) & address of parents/legal guardian, if under 18: _____

Has survivor given consent for completion of this form? YES: NO:

Is the victim/survivor a beneficiary/receiving any type of humanitarian assistance? (Name the organization/agency providing assistance): _____

Location of alleged incident (s): _____

Date: _____ Time: _____

Physical and emotional state of the victim/survivor (Describe any cuts, bruises, lacerations, behaviour and mood, etc.): _____

Witness' Name & Contact Information: _____

Description of incident (Please use separate sheet of paper if necessary):

Briefly describe service provided to survivor:

Briefly describe if there will be need for medium and long-term victim assistance:

Any other pertinent information provided during interview? (Including contact made with other organisations if any):

Signature/thumbprint signaling that the complainant been informed about organisations procedures for dealing with complaints:

Name of Accused Person (s): _____ Job title:

Organisation Accused Person (s) Works for:

Address of Accused Person:

Age: _____ Sex: _____

Physical Description of Accused Person:

Is the perpetrator a continuing threat to the safety of the survivor, complainant, staff or any beneficiary? Please explain any safety concerns:

Has any disciplinary action been taken by the responsible agency? (Describe):

Report Completed by: _____ Date/Time: _____

Position/Organisation:

Location:

Date Report forwarded to relevant management structure:

Date received relevant management structure (Name/Position/Signature):

6.2 Annex 4: Grievance Monitoring and Tracking Log (for non-SEA/SH Complaints)

Case no.	Date Claim Received	Name of Person Receiving Complaint	Where /how the complaint was received	Name & contact details of complainant (if known)	Type of Claim Add content of the claim (include all grievances, suggestions, inquiries)	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication & by whom)	Expected Decision Date	Decision Outcome (include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when, by whom and via what method of communication	Was the complainant satisfied with the decision? Y/N State the decision. If no, explain why and if known, will pursue appeals procedure.	Any follow up action (and by whom, by what date)?

