REPUBLIC OF KENYA

MINISTRY OF AGRICULTURE AND LIVESTOCK DEVELOPMENT

STATE DEPARTMENT FOR CR0PS DEVELOPMENT

National Agricultural Value Chain Development Project

(NAVCDP)

GRIEVANCE MECHANISM

PROCEDURES & GUIDELINES

Reviewed March 2023

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1.0 INTRODUCTION

1. NAVCDP is operating in 33 from 26 counties:Namely: Meru, Nyeri, Muranga, Kirinyaga, Kiambu, Embu, Machakos, Kitui, Makueni, Tharaka Nithi, Nandi, Uasin Gishu, Trans Nzoia, Nakuru, Narok, Kajiado, Nyandarua, Kericho, Bomet, Kakamega, Busia, Bungoma, Vihiga, Homa Bay, Migori, Kisii, Siaya, Nyamira, Kisumu, Taita Taveta, Kwale, Kilifi, and Tana River (**Error! Reference source not found.**).

   The added counties in the above list include: Tharaka Nithi, Bungoma, Kajiado, Vihiga, Siaya, Nyamira and Kisumu.
   a) Allow Saturation- in all wards of the project counties.
   b) Each county selects up to 5 value chains, however 4 must be from the 12 VC menu and one more an open county choice.
   c) FPOs are value chain sensitive and will be funded directly - (FPOs will benefit from three grants: inclusion; Enterprise Development; and Value Chain Upgrading Matching grants)
   d) No micro-project grants- instead CIGs will access funds as a revolving fund from ward based SACCOs.
   e) The CIGs will also be supported with inputs to demonstrate different technologies and innovations using the FFBS model. Within the wards, it was agreed that to start with, every farmer (including the georeferencing) will be registered and subsequently both the CDDCs (for wards) and CIGs mobilization will be undertaken based on the PICD process.
   f) Every ward will have a SACCO. A diagnostic will determine whether a new SACCO will be mobilized, or an existing SACCO will be leveraged upon.
   g) Farmer registration, SACCO membership, and accessing SACCO funds will be value chain neutral activities.
   h) No grants will be provided at the CIG level and all grants to be provided will be either at the CDDC level (for selective crop demonstrations) or at the SACCO level (for revolving fund).
   i) Counties to constitute new CDDCs in the new wards and restructure the old CDDCs in the existing wards.

2. Therefore, based on the above project changes, it became prudent to realign all NAVCDP ESS instruments to be in line with the project changes. This ESMF has been realigned to address the project design changes. Consequently, this ESMF will further be reviewed, approved, cleared, Consulted, and redisclosed in country and in the World Bank External Website. The other NAVCDP ESS instruments include Integrated Pest Management Plan (IPMP) an annex of the ESMF, Resettlement Policy Framework (RPF), Vulnerable and Marginalized Framework (VMGF), Labour Management Procedures (LMP), Security Management Plan (SMP), Gender Based Violence/Sexual Exploitation Abuse and Harassment Prevention Plan (GBV/SEAHPP), Grievance Mechanism Manual (GMM), Stakeholder Engagement Plan (SEP), and Environmental and Social Commitment Plan (ESCP). All these

instruments will be realigned, just as for ESMF reviewed, approved, consulted, cleared, and redisclosed, both in country and in the World Bank External website.

a. Project Development Objective
To increase market participation and value addition for target farmers in select value chains in project areas.

b. Project Components
3. NAVCDP have five thematic components and sub-components as described in Table 0-1.

Table 0-1: NAVCDP Components and Subcomponents

I	**Component 1: Building Producer Capacity for Climate Resilient Stronger Value Chains**
1.1	*Sub-component 1.1 Farmer Capacity Building and e-Voucher Support*
	- Participatory identification of capacity needs for CIGs/VMGs; CDDCs, FPOs, and SACCOs - Community mobilization and strengthening through CDDCs for demos on climate smart TIMPs for prioritized value chains. and value chain promotion mainly for VMGs -CIGs; and new CIGs and IPs-CIGs. - Mobilize farmers to access GoK funded NVSP input climate smart e-subsidy support (seeds, fertilizer, and agro-chemicals) - Small scale infrastructure investments for primary aggregation and value addition - Technical Assistance at National and County levels to support implementation
1.2	*Sub-component 1.2 FPO Level Climate Smart Value Chain Investments*
	- Participatory identification of capacity needs for FPOs and provision of inclusion grants for the mobilization and strengthening of FPOs - Development of climate informed business plans to enable access high quality climate resilient inputs, balanced fertilizers, aggregation and value addition - Technical assistance to support access to formal financing; enable linkages with agribusiness SMEs, e-commerce companies and large ag-tech startups; and build techno-managerial capacity for agribusiness operations
1.3	*Sub-component 1.3 Improve Creditworthiness of CIGs and FPOs*
	- Provide initial small grants to CIGs through Savings and Credit Cooperatives (SACCOs) that will be repaid to build a revolving fund - Enhance financial management of VMG-CIGs, IPs-CIGs, CIGs/SACCO/CDDCs - Technical assistance to FPOs to access finance and support development of FPO rating tool - Build county, regional and national level partnerships for FPOs to ensure credit linkages and long-term access to capital from commercial banks, SACCOs, micro-finance institutions and digital financial service providers.
2	**Component 2: Climate Smart Value Chain Ecosystem Investments**
2.1	*Sub-component 2.1 Farmer-led Irrigation Development*
	- Leverage on CIGs/FPOs to motivate farmers access irrigation and use water efficiently. - Leverage on CIGs/FPOs to develop irrigation centred FLID forums linking farmers with irrigation suppliers, financial institutions and other key stakeholders.

	• Deployment of technical resource persons to coordinate with County Irrigation Development Units (CIDU) for provision of technical support on water harvesting and accessing irrigation through aggregation and linkage of farmers to high-tech suppliers and financial institutions
2.2	*Sub-component 2.2 Market Access and Infrastructural Development*
	• Formulate value chain development plans and co-financing models to maximize finance and crowding of investments at County, regional and national levels. • Development and upgrading of physical markets, aggregation centres and cold chain infrastructure. • Develop linkages with anchor off-takers and create pipeline investable opportunities for development of market infrastructure with private sector players. • Strengthen Kenya Markets Information Systems (KAMIS) to bridge market information asymmetry. • Finance new and existing SMEs that provide essential services along the value chains
2.3	*Sub-component 2.3 Data and Digital Investments*
	• Scale up partnership with DAT service providers by mobilizing technical assistance, training/capacity building and digital equipment • Strengthen existing Big Data platform at KALRO to support wider farmer outreach • Develop women and youth agripreneurs as last mile extension service providers and human touch point for bundling services in partnership with DAT providers • Training and capacity building for county staff and farmers.
2.4	*Sub-component 2.4 Research Linkages, Technical Assistance and Institutional Capacity*
	• Develop an inventory of TIMPs for the three new value chains (cotton, pyrethrum, and cashew nuts) • Update inventories of TIMPs for other value chains developed under NARIGP/KCSAP and prioritize 3-5 TIMPs with highest potential for impact. • Support on-boarding of Technical Support Agencies across several functional areas • Support deployment of full-time dedicated human resource and required equipment to support their functioning at County level • Establish dedicated cell at County level to anchor investment coordination and reference database of ongoing county level investments for prospective new investors
3	**Component 3: Piloting Climate Smart Safer Urban Food Systems**
3.1	*Sub-component 3.1 Climate Smart Urban and Peri-urban Agriculture*
	• Mobilizing and organizing urban and peri-urban farmers into CIGs/VMGs and FPOs and provide micro-project investment support to promote appropriate TIMPs • Linkage with DAT service providers for efficient input use • Link urban/peri-urban zones to mid-stream value chain stakeholders such as processors, logistic providers, and quality control and assurance institutions i.e. KEBS • Train and link SMEs in urban/peri-urban production and marketing to financial service providers
3.2	*Sub-component 3.2 Urban Infrastructure*
	• Develop climate proof market infrastructure to serve market hubs for direct farmer-consumer linkages • Facilitate between CIGs/VMGs and FPOs and e-commerce platforms and digital aggregators • Support intensive consumer awareness and information campaign to catalyze higher demand and value for safer food produce.

3.3	Sub-component 3.3 Policy and Institutional Strengthening
	• Implementation of existing legal and regulatory frameworks such as the Nairobi City Council Food System Strategy • Strengthening the coordination and convergence of line ministries and departments and agencies involved in urban food systems at National and County levels • Training and capacity building for consumers, farmers and government line ministries and departments • Support policy analytics and technical assistance to line ministries and departments
4	**Component 4: Project Coordination and Management**
4.1	Sub-component 4.1 Project Coordination
	• Finance costs of NPCU that include salaries, operation and maintenance costs, project supervision and oversight • Support oversight and inter-governmental coordination provided by the Joint Agriculture Sector Steering Mechanism (JASSCOM), Council of Governors (CoG and Caucus of County Executive Committee Members (CECMs) • Support the Agriculture Transformation Office
4.2	Sub-component 4.2 Communication, Monitoring and Evaluation (M&E), Environmental and Social Safeguards, and Information Communication Technology
	• Finance activities related to communication with all stakeholders that are part of project implementation • Support engagement with farming communities to ensure participation and ownership at planning, preparation and implementation of community driven development operations • Finance routine M&E functions including baseline, mid-point and end of project evaluations • Support project investments to identify potential risks and impacts, capacity build stakeholders and beneficiaries, and devise suitable mitigation measures with a view to achieving project compliance. Facilitate networking across project components and support development of an ICT-based agricultural information platform for sharing information
5	**Component 5 Contingency Emergency Response Component**
	Finance immediate response activities following natural disasters impacting the agricultural sector triggered upon formal request from the National Treasury on behalf of GoK

c. Project Beneficiaries

4. The project will support over 500,000 small-scale farmers who will be transitioning from subsistence to commercial farming within 33 Counties spread across 6 geographical regions. Other beneficiaries will be value chain actors at various levels including extension workers, aggregators, logistics support providers and SMEs operating within selected value chains. The selection of value chains and participating counties for the project has been driven by a multi-dimensional criterion. The nine (9) value chains prioritized for support are: Dairy, Coffee, Chicken, Fruits (Avocado, Banana, Mango), Vegetables (Irish potatoes, Tomato), Apiculture, Pyrethrum, Cashew nut and Cotton. Further, the 33 counties that will participate in this project are: Kilifi, Kwale, Taita Taveta, Kiambu, Trans-Nzoia, Nandi, Uasin Gishu, Narok,

Nakuru, Tana River, Bomet, Migori, Homabay, Kisumu, Siaya, Nyamira' Machakos, Kitui, Nyeri, Kajiado, Nyandarua, Kisii, Kakamega, Busia, Bungoma, Vihiga, Embu, Makueni, Tharaka Nithi, Kirinyaga, Muranga, and Meru.

5. In addition, taking into consideration the VMGs as beneficiaries and bearing in mind the issues and characteristics as set out under ESS7, the following fourteen counties have been established to have VMGs: Kiambu (Ogiek), Nandi (Talai), Uasin Gishu, (Sengwer), Trans-Nzoia (Sengwer), Narok (Ogiek), Nakuru (Ogiek), Tana River (Watha), Kilifi (Watha), Kwale (Waata), Kericho (Talai and Ogiek), Kajiado (Masaai), Bomet (Ogiek), Kericho (Talai), and Bungoma (Ogiek).

DEFINITION OF TERMS

Grievance

6. A Grievance is an expression of dissatisfaction related directly to the delivery of services, actions or behavior of anyone involved in implementing National Agricultural Value Chain Development Project (NAVCDP), be it staff or any other stakeholder and also non-beneficiaries. It is a specific expression of dissatisfaction that expects a response.

Grievance Mechanism

7. A Grievance Mechanism (GM) is a set of simple and transparent procedures that provide its users with access to safe and confidential means of expressing complaints/concerns and give guidance to staff on how to handle grievance to the point of giving feedback to the complainant.

GUIDING PRINCIPLES FOR THE ESTABLISHMENT OF A GRIEVANCEMECHANISM

8. In order to make a GM effective and successful its establishment is guided by some basic principles;

   a) **Commitment to fairness, transparency and accountability** towards the communities that NAVCDP works with.
   b) **Participation –** The GM should promote engagement and dialogue among all stakeholders and also be locally adapted redress mechanism for each specific context: Articulation and handling of grievances is a very culturally sensitive and context-specific issue. It is therefore important to involve all stakeholders in the design and establishment of the mechanism.
   c) **Safe access -** to the GM for all potential users, especially the target communities.
   d) **Confidentiality - In** order to create an environment in which stakeholders feel safe to raise their grievances NAVCDP will ensure that information received from complainants is treated confidentially and only shared with designated staff to resolve the issue and give feedback.

e) **Clear information** – NAVCDP GM will be safe and confidential to raise grievances without fear of victimization.
f) **Simple and effective -** mechanism that is easy to implement for staff in charge especially at project level.
g) **Open to continuous learning -** Grievances give important information on areas where there is room for improvement thereby providing an opportunity to improve service delivery to the target communities and to increase the impact of NAVCDP interventions.

2.0 Background

9. Grievance mechanism, consultations, and transparency measures are mandatory for all Environment and Social Standards applicable to this project. These ESS include ESS: 1 on Environmental Assessment, the scope of Land donation with consent and livelihood restoration under ESS: 5, and respect for human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous People according to ESS: 7

10. All the above standards have been effectively to the National Agricultural Value Chain Development Project (NAVCDP). The applicability of the standards require affordable and accessible procedures for third-party settlement of disputes arising from project implementation. Such grievance mechanisms take into account the availability of judicial recourse and traditional dispute settlement mechanisms. It is the role of the borrower to ensure that Project Affected People (PAP) do not face barriers when they express grievances. This can be achieved through:-
   a) Establishing grievance uptake locations in areas where poor and marginalized people live.
   b) Engaging local intermediaries (community based or civil society organizations) to facilitate submission of grievances.
   c) Deploying community-specific communication strategies to allay fears about and increase comfort levels for submitting grievances.
   d) Ensuring that there is no formal or informal charge for making grievances.
   e) Treating grievances confidentially.

11. Effectively addressing grievances from people impacted by World Bank supported projects is a core component of managing operational risk. GM can be an effective tool for early identification, assessment, and resolution of complaints on projects. Understanding when and how a GM may improve project outcomes can help both project teams and beneficiaries improve results.

2.1 Justification for Grievance Mechanism Approach.

12. The justification for such an approach is strong, many major infrastructural projects around the world have stalled due to disputes over land, water, or labor issues. The costs of ignoring such disputes or responding too late are high. A core characteristic of an effective grievance mechanism is the ability to identify minor community incidents before they escalate into unmanageable disputes. This is especially important for development projects, where support from impacted communities is critical to success.

2.2 Purpose of these Procedures

13. NAVCDP is committed to ensuring community engagement in the implementation of project activities. In order to achieve greater accountability, it is important to establish a grievance mechanism that is predictable, accessible, and legitimate, promotes equity

and allows the target communities to give feedback, concerns and compliments regarding the performance of the project.

14. The NAVCDP is committed to enhancing opportunities for grievance management, collaborative problem solving, and alternative dispute resolution. Grievance mechanism is an effective tool for early identification, assessment, and resolution of complaints on projects.

2.3 The NAVCDP Approach to Grievance Mechanism (GM)

15. The approach presents three interlinked steps: (i) a risk-based assessment of potential grievances, disputes, or conflicts that may arise during project preparation and implementation; (ii) identification of the NAVCDP's existing capacity for Grievance Mechanism, and (iii) an action plan that identifies priority areas for strengthening Grievance Mechanism capacity, or if necessary, establishing new mechanisms at the project level.

16. NAVCDP welcomes grievances because it recognizes the right of communities to express their concerns and appreciates the value of grievances for continuous learning and improvement. It is also the responsibility of the project to establish clear mechanisms for the investigation and response to complaints.

17. The World Bank requires that grievance mechanisms be provided for projects that they support so as to effectively address the grievances raised by the project stakeholders. The concerns should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all stakeholders. Management and timely resolution to the grievances registered is integral in preventing or mitigating risks as well as meeting operational requirements of the World Bank.

1.3   Advantages of GM

18. GM will enable NAVCDP to;
- Be responsive to the needs of beneficiaries, address and resolve their grievances.
- Serve as a channel for receiving enquiries, suggestions, and increasing community participation.
- Collect information that can be used to improve operational performance.
- Enhance the project's legitimacy among stakeholders.
- Promote transparency and accountability.
- Deter fraud and corruption and mitigate project risks.

19. The World Bank has taken the lead in coordinating this strengthened corporate approach focusing on a preventive approach to identify, track and resolve grievances early; and offering lower-cost, rapid citizen involvement and providing redress at the project and county level through mediation, facilitation or other problem-solving processes where it is most needed. The Bank is not alone in this, across public and

private sectors, in developed and emerging economies, organizations have increasingly institutionalized complaints handling and dispute resolution processes to better manage feedback and mitigate operational risks. This guideline presents the World Bank's recommended approach to strengthening Grievance Mechanism capacity in Bank supported projects.

2.0   APPROACH TO GRIEVANCE MANAGEMENT

20. NAVCDP is in the process of setting up a web based grievance mechanism named "**TUSULUHISHE**," which will help improve on reporting, resolving of grievances and feedback. The process involves the following steps.

Step 1: Assessment of Risks and Potential Grievances and Disputes

The project team conducted a rapid review of contentious issues, stakeholders, and institutional capacity, strongly relying on existing information from project documents, Regional Pastoral Livelihoods Resilience Project (RPLRP), National Agricultural and Rural Inclusive Growth Project (NARIGP), civil societies and other non-state actors. The NAVCDP PAD, PIM, ESMF, RPF, VMGF and SEP provided the basis for much of this work.

The work started by understanding the issues that are likely to be at the heart of disputes related to the project, such as clarity over land rights, benefit distribution, existing ethnic tension, environment and non- inclusion.

Step 2: Capacity and suitability Assessment

NAVCDP plans to review the ability of the GM, availability, credibility and capabilities of community members, local staff and institutions to address the issues related to the project in a participatory decision-making process. Other factors to be considered are:

a) Legitimacy - is its governance structure widely perceived as sufficiently independent from the parties to a particular grievance?
b) Accessibility - does it provide sufficient assistance to those who face barriers such as language, literacy, confidentiality, awareness, cost, or fear of reprisal?
c) Predictability - does it offer a clear procedure with time frames for each stage and clarity on the types of results it can /cannot deliver?
d) Fairness - are its procedures widely perceived as fair, especially in terms of access to information and opportunities for meaningful participation in the final decision and feedback?
e) Rights compatibility - are its outcomes consistent with applicable National and international standards? Does it restrict access to other redress mechanisms?
f) Transparency - are its procedures and outcomes transparent enough to meet the public interest concerns?
g) Capability - does it have the necessary technical, human and financial resources to deal with the issues?
Issues and stakeholder reviews will be mostly desk-based and will initially and primarily rely on the information contained in the PAD and other project documents.

Step 3: Action Plan from lessons learnt

Action plans will be project specific, but will also focus on tangible steps to be taken during preparation and implementation to strengthen grievance capacity.

The NAVCDP GM will;

a) Be well publicized, readily available and accessible.
b) Have a roadmap for timeline and milestones.
c) Have a reliable Back-office (Access, Acknowledge, & Respond).
d) Clearly define who is responsible for what grievance and the response.
e) Resolve and follow-up.

3.0 GENERAL PRINCIPLES OF THE NAVCDP GM

21. Easily accessible, well publicized focal point or user-facing 'help desk' within NAVCDP implementing counties, in a location deemed to be credible and accessible. Uptake channels include some or all of the following: **phone, email, mail, SMS, webpage, and face-to-face**. These channels will continue to be publicized and presented by NAVCDP.

22. Staff members who receive verbal complaints will record them together with the complainant details (Phone number and ID) in a format prescribed for them to be considered. Recognizing that many complaints may be resolved 'on the spot' and informally by project staff, these informal resolutions should be logged in to encourage responsiveness and ensure that repeated or low-level grievances are being noted in the system.

23. The GM has the ability to handle anonymous complaints. The user will be provided with an acknowledgement of the feedback, an explanation of how the complaint process works and a reasonable time frame in which to expect feedback.

24. Grievance Log: It is important that all complaints are logged in writing and maintained in a database. Short text complaints received will be assigned a number that will help the complainant track progress via an online system or database. At a minimum, the database can track and report publicly on the following metrics:

a) Complaints received
b) Complaints accepted/ eligible
c) Complains resolved
d) Feedback communicated
e) Feedback accepted and case closed or feedback rejected and case escalated to another level of GM or referred for mediation.

25. Eligibility will be a procedural step to ensure that the issue being raised is relevant to the project.

26. Complaints that cannot be resolved on the spot shall be directed to a grievance committee that will have a set number of days to assess the issue and provide a written response to the complainant, acknowledging receipt and detailing the next step of action to be taken. (One week or less is recommended). The determination of whether the issue can be resolved on the spot or needs to be referred elsewhere requires some judgment on the part of the NAVCDP staff.

27. The risk-level of the complaint; low, medium, or high risk, will require the person handling the complaints to have some form of training to categorize the risks prior to having the GM in place.

4.0 THE WORLD BANK'S APPROACH TO GRIEVANCE MECHANISM IN PROJECTS

a) On the spot resolution is encouraged while ensuring all incidents are recorded in a central database.

- Grievances should be categorized according to the type of issue raised and the effect on the environment/claimant. Based on this categorization, the complaint can be prioritized based on risk and assigned to the correct personnel for appropriate action. If the is the complaint already being addressed elsewhere then the issue should be excluded from the Grievance Mechanism process.

28. NAVCDP staff, service providers and the Social Accountability and Integrity Committee (saic) will take the lead in resolving complaints. If possible, this responsibility should be writing on project management manuals and procedures. The staff will offer option(s) for resolution of their issue.

4.1 Resolve and Follow-Up

a) Where there is an agreement between the complainant and the NAVCDP or contractor on how the complaint will be resolved, a minute will be drafted and signed by both parties. After due implementation, a new minute will be signed stating that the complaint has been resolved. NAVCDP will provide prompt response to the complainant.

b) All supporting documents of meetings held to achieve resolution should be part of the annexes related to the complaint. This should include meetings that have been escalated to an appeals level or are handled by a third party.

4.2. Who Can Make a Grievance?

- Beneficiary of a project
- Representative of NAVCDP's partner organizations
- Individual staff of NAVCDP's partner organizations
- Contractors
- Suppliers
- Affected community members who are not beneficiaries of NAVCDP

- Other stakeholders affected by the implementation of the NAVCDP projects e.g. local leaders, county Government representatives, etc.

5.0   ROLE OF THE GRIEVANCE MANAGEMENT COMMITTEE
- Receive; transmit grievance and if within their mandate, to resolve the grievance at the common interest groups and community level.
- Receive the feedback from the County Project Coordinating Units and other county partners and relay to the community at large or the complainant.
- Acts as an intermediate between the county project coordinating unit and the target community
- Sensitizes the community on the existence and utilization of GM.
- Mediate and resolve conflict that may arise from project implementation.

5.1   Establishment of a Grievance Management Committee-
Should be established in line with NAVCDP guidelines customized to specific counties.

6.0   TYPES OF GRIEVANCES
Grievance can be grouped in two main categories;

a. Non-sensitive - Relate directly to the projects implemented by the NAVCDP or its partners,

b. Sensitive – Require more complex investigation and usually concern either of the following: Misuse of funds, corruption or fraud, , Sexual abuse and exploitation. The investigation of suspected cases is regulated in the government's policy and procedures, and World Bank's related implementation guidelines.

6.1   NAVCDP valid grievances
a. Related to NAVCDP activities

b. Originate and driven by a person or community who believes they have been adversely affected by NAVCDP.
c. Led by a bidder or potential bidder about the procurement process on a NAVCDP contract.

6.2   Requisite information
Complaints must:

a. Identify the project subject of the complaint

b. Clearly state the project's adverse impact(s)
c. Identify the individual(s) submitting the complaint and whether confidentiality is requested
d. Specify if a representative of the person(s) or community affected by NAVCDP submits the complaint.
e. If a representative submits the complaint, include the name, signature, contact details, and written proof of authority of the representative(s).

f. Supporting evidence is not necessary but may be helpful in reviewing and resolving the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved.

7.0 DESIGN AND IMPLEMENTATION OF A GRIEVANCE MECHANISM

28. For effective GM communities and other stakeholders must participate in its assessment of existing systems and design. The assessment should include an analysis of existing systems for community feedback and complaints and whether they are accessible by all. In some cultures, complaining may not be considered as culturally appropriate so it is important to find out in which way dissatisfaction and grievances are expressed in a specific context and which terminology is acceptable.

7.1 Target Groups of GM

29. A responsive GM should consider the beneficiary communities and any other target groups of the GM, e.g. representatives and staff of the partner organizations or other stakeholders of the project and affected community members who do not directly benefit from the projects.

7.2 NAVCDP options for the communication of grievances

30. There are many possible channels through which grievances can be received by the project team; i.e. **phone, email, mail, SMS, webpage, and face-to-face.** Each of them has advantages and disadvantages that vary depending on the local context. It is recommended to identify together with the communities or county staff at least two different channels for individuals to make a complaint so that people can choose the method they prefer. At least one of the chosen channels should offer the possibility to raise grievances confidentially.

8.0 SEXUAL EXPLOITATION AND ABUSE (SEAH)/ GENDER BASED VIOLENCE (GBV)

31. SEAHH/GBV is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

32. Sexual harassment includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature. NAVCDP GM for SEAH approach will;

a. Be Survivor-centered - that ensures the response to the incident is in line with the wishes of the survivor and ensures their safety, respect, confidentiality and non-discrimination.
b. Prevent SEAH and GBV of women and children through improved project risk assessment, active community engagement and the design and monitoring of systems to minimize risks.
c. Strengthen the speed and effectiveness of response (should such an incident occur) through well-functioning protocols and remedial actions to enable safe and ethical care of survivors.
d. Build the capacity of all actors, the Bank, government, contractors and communities, to take on their respective responsibilities for action, while also working together to protect women, children and other vulnerable groups.

33. NAVCDP GM integrates tools to track complaints related to SEAH/GBV, including a feedback system for regular and timely feedback on actions taken to respond to complaints. These mechanisms will protect confidentiality of individuals and preservation of evidence without compromising access to justice, while also enabling links to referral pathways and local organizations for support services. Grievance Mechanisms should include development of a protocol outlining reporting procedures and an appropriate timeline for response actions, depending on the severity of the allegation.

34. Preventing or mitigating against project-related risk of sexual exploitation and abuse requires interaction and collaboration between five key groups of actors;

  i. Women and children at risk, as well as other vulnerable populations, in communities where Bank-financed projects take place.
  ii. Communities as dynamic risk management actors who can play a role in expanding the circle of protection.
  iii. Contractors and consultants who are responsible for following contractually mandated social and labor practices that prevent abuse and violence.
  iv. Government partners at national and county levels who are critical to ensure that GBV/SEAH prevention and accountability mechanisms are in place.
  v. World Bank, which can put in place the policies and systems to prevent such incidents and play a convening role to facilitate partnerships that allow each of these actors, including the World Bank itself, to take on their respective roles and accountabilities to protect women and children from grievous harm.

9.0 GRIEVANCE CHANNELS

Below are the different options NAVCDP will use in receiving grievances in targeting all the user groups.

9.1 TOLL FREE SMS
- Suitable in areas with high coverage of mobile phones.
- Option for sensitive complaints that need high degree of confidentiality.
- Accessible also for people with mobility challenges.
- Option for use in insecure environments.
- Requires consistent availability of staff to answer the phone.
- Easily accepted because the sender of SMS does not incur any cost.
  The conditions below are used to define the standards, which a message should meet to qualify as a proper message to the GM system.

- Confirm the message is not repetitive as input i.e. two identical SMS in the space of 2 minutes.
- Confirm the length of the message is not below the allowed 20 chars and spaces.
- Confirm the length of the message is above the allowed 380 chars and spaces.
- Confirm message is not a hyperlink (does not contain a hyperlink).
- Check if the content of the message is inclusive of banned words.
- Confirm that the query format is alphanumeric and not numbers only.

- Check to see if the message is one word only but longer than usual e.g. more than 40 characters.

9.2 WEB -BASED GRIEVANCE MECHANISM
- Requires access to internet and high literacy in technology and internet use.
- Option for sensitive complaints that need high degree of confidentiality.
- Accessible also for people with mobility challenges e.g. saves on time and transport cost.
- Option for use in insecure environments.

10.0 CONSTITUTING GRIEVANCE COMMITTEES
For committees to be properly managed and constituted NAVCDP shall do the following;

- Build capacity and sensitize the members in order to improve capacities and confidence.
- Motivate members to stay devoted and committed over time being a voluntary job.
- Ensure marginalized groups are represented adequately.
- Integrate the GM with traditional redress mechanisms.

11.0 COMMUNITY PUBLIC FORUM FOR GRIEVANCE MECHANISM AND FEEDBACK
A community public forum shall;

- Provide an opportunity to build trust between the project implementation staff, agencies, and communities.
- Give a voice to vulnerable groups.
- Require appropriate and capable Grievance Mechanism committee.
- Give an opportunity to collect grievances from the community who may have challenges accessing other communication channels.
- Be combined with projects related meetings or any other community meetings.
- Be held in a location that allows for full participation.

12.0 GM PROCEDURES (RECEIVING, RECORDING AND RESOLVING GRIEVANCES)
NAVCDP will assign officers responsible for each of the key roles in the Grievance Mechanism value chain. The officers appointed should be

- Available in project area
- Must have knowledge of local language (at the community level)
- At least one female and male – so that complainants can choose who they prefer to address
- Trustworthy
- Confidential

The following are the steps in receiving and recording grievance

12.1 Receiving Grievance(s)

35. The staff member appointed by NAVCDP in charge of receiving the complaints is also responsible for recording and documentation. All grievances must be recorded in the complaints log using the adopted format. The complaints log register should contain information about the complainant, the details of the complaint, recipient of the complaint and the referred persons. It is the responsibility of the person in charge of the complaint log to ensure the follow up of each complaint.

Complaints received through verbal channels should be captured by filling the relevant sections of the 'Tusuluhishe' form.

12.2 Categorizing Grievance(s)

36. The grievance received will be analyzed based on the following criteria:

a) Is the complaint within the scope of the Project, i.e. is it attributable to NAVCDP project activities or staff?

If **yes** it will be referred to the relevant staff or partner in the project. The response should be given within a reasonable time frame. (Ideally within 7 working days)

If **no**, refer the complainant to the appropriate relevant authority or ombudsman to handle the matter.

b) Is it a sensitive Grievance?

- If Yes, follow procedures as per respective government policies
- If it is a non-sensitive complaint which is related to NAVCDP, follow the steps provided in the Project's GM.

c) In case the analysis of the complaint shows that it is of malicious intent or manifestly unfounded, the complaint will be rejected archived and the complainant informed thereof.

12.3 Confidentiality

37. The grievance forms and the complaint log register shall be kept in a safe place to which only the staff in charge of managing the GM have access.

The complaint records should be archived at the end of the project and be subjected to the government data disposal guidelines.

12.3.1 Analysis of complaints chart on NAVCDP:
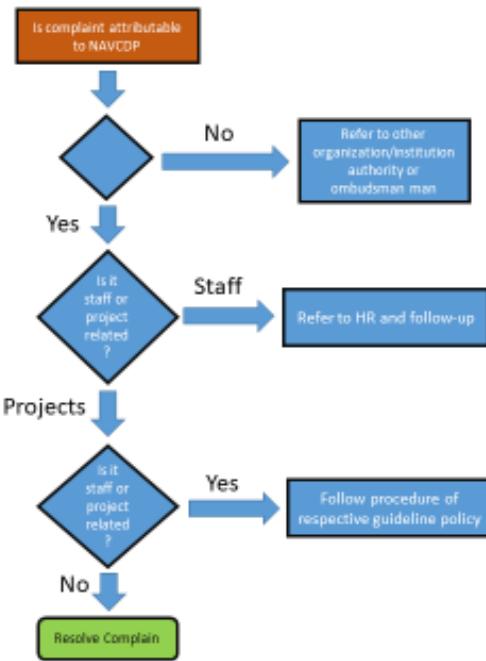
12.4   Resolving Complaints

38. Whenever possible, staff and project affected persons are encouraged to resolve complaints immediately if they can be dealt with easily. However, even if a complaint can be solved on the spot it should still be recorded for knowledge management and learning.

39. If a complaint cannot be resolved immediately the complainant should receive an immediate acknowledgement and a response within 7 working days. If the complaint is sensitive or complex in nature needing an investigation, then process should be completed within 1 month and if that is not possible the complainant should be informed of the progress.

12.5   Giving feedback

40. Once a grievance has been resolved NAVCDP will provide feedback to the complainant. The feedback should have clarity in conveying the decision reached to allow the complainant make a decision to appeal if not satisfied. The date and decision should be recorded in the grievance log register.

13.0   ANONYMOUS COMPLAINTS

41. If a complaint is received anonymously it still needs to be assessed whether it is substantial and whether there are any actions needed to mitigate or solve the complaint, even though it isn't possible to give an acknowledgement and response directly to the complainant. This should be considered as a warning signal to the project.

Anonymous complaints as well as malicious complaints can also be an indication of underlying discontent which needs to be taken seriously and into account for general risk analysis of the project.
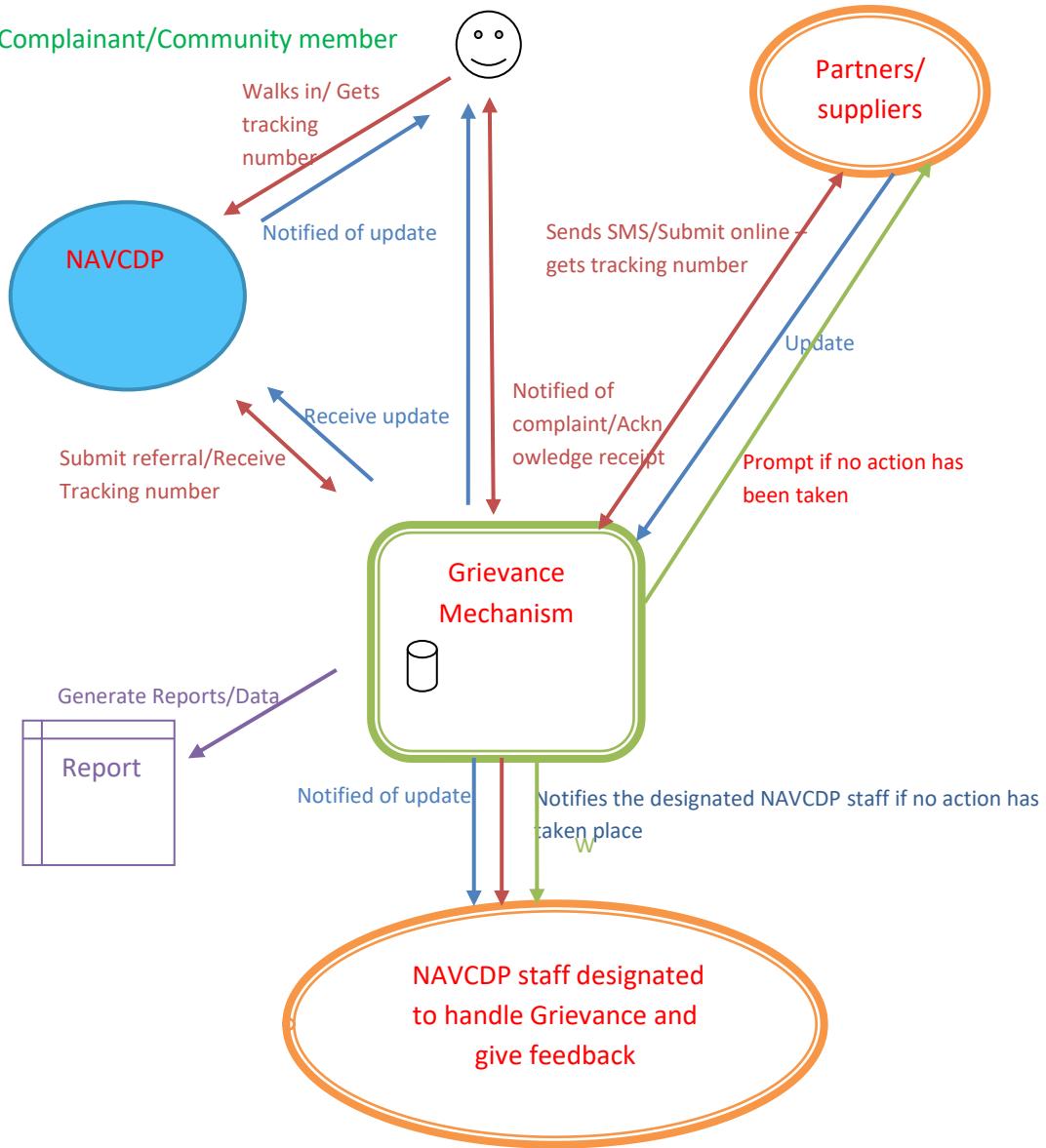
14.0 GRIEVANCE(S) REFFERAL

42. All the grievances related to NAVCDP are received and resolved at the common interest group/CDDC/SACCO/Contractors levels. If unable to resolve the grievance the secretary to the CIG will refer the same to the SAIC for further consideration. Any unresolved grievance at the SAIC level shall be escalated to the CPCU and is still unable to resolve the CPCU shall escalate it further to the NPCU

15.0 RIGHT TO APPEAL

43. If a complainant is not satisfied with the response received despite having had the opportunity to request further clarification or feedback, he/she has the right to make formal communication to NAVCDP. This should happen within one month of receipt of the response and the case reviewed by an appointed officer following all procedures laid down. The complainant shall be informed about the appeal process.

The response given to the appeal shall be final following the GM process however the complainant is at liberty to pursue the matter legally if s/he is still unsatisfied with the decision.

44. If the grievance is against a member of staff and the complainant is not satisfied with the response, the CPC at the county level should give the complainant an option of appealing and should as well notify the relevant component/section head at the national level.

16.0 SITUATIONS WHERE NAVCDP STOPS RESPONDING TO A GRIEVANCE

45. Any person who has a grievance with regard to NAVCDP activities or staff has the right to express it and be heard. However, it is expected that complaints are raised in a fair and appropriate manner. In case a complainant resorts to harassing or abusing staff in order to pursue his/her complaint, NAVCDP may stop the investigation and decide not to enter into further correspondence with the complainant. This decision and its justification will be communicated to the complainant by the Chair of the National Grievances Management Committee and documented in the complaint records register.

17.0 LEARN FROM COMPLAINTS

46. All complaints should be recorded and analyzed to allow for a review of project procedures and identify opportunities for improvement.

18.0 GRIEVANCES RECEIVED AT NATIONAL LEVEL

48. Complaints received shall be through; SMS short code, telephone, email, and letter, in person or through referral from the counties. These are handled according to a grievance management process, which has been established for NAVCDP. The process is documented and reported to World Bank alongside other resolved complaints at the county level.

19.0 CREATE AWARENESS ON THE GRIEVANCE MECHANISM

49. After the GM is designed and established, NAVCDP will create awareness on the existence of the GM and sensitize stakeholders on it. The stakeholders will include project implementers, communities, partners and other stakeholders.

Methods for publicizing the GM among NAVCDP's target groups will depend on the local context.

When sharing the information about the GM, NAVCDP shall provide assurance to the communities that the mechanism is confidential, safe, accessibleand that there won't be any retaliation or victimization for raising a grievance.

ANNEXES

1: Tusuluhishe form

By reporting to any office or staff implementing the National Agricultural Value Chain Development Project (NAVCDP), the National and County Project Coordinators will ensure your concern/complaint is acted upon and feedback is given as quickly as possible.

Complainant Profile:				
1. Name:				
2. Gender:	Male: ☐		Female ☐	
Age:	Below 18 ☐	18-35 ☐	36-60 ☐	Above 60 ☐
Phone No:		Email:		
County:	Sub-County:	Ward:	Zone:	
Complaint Submission Date:				
Complaint Category:				
☐ Non inclusion	☐ Corruption (Fraud, Embezzlement, Bribery)	☐ Non Compliance	☐ Political interference	☐ Conflict of interest
☐ Procurement	☐ Incompetence (Human resource capacity, service delivery)	☐ Staff / contractor behavior	☐ Environmental issues	☐ Access to resources
☐ Delayed provision of services.	☐ Misuse/Misallocation of project resources	☐ Poor workmanship	☐ Access to information	☐ Recruitment (skilled and unskilled)

☐ Others (Specify)	

Description of grievance/ Feedback	
Complainant's Signature:	

Feedback Unit

☐ Component 1 head	☐ Component 2 head	☐ Component 3 head	☐ Coordination and Administration	☐ M&E
☐ Procurement	☐ Finance	☐ Communication/ Information Flow	☐ Environmental & Social Safeguards	☐ ICT

Complaint Recipient

Name:		Phone No:		Date received:	
Level (CIG, SAIC,SACCO, FPO, CPCU, NPCU): (Choose one)		Signature:			
If Resolved			Date:		
If referred			Date:		

Complaint Referral:

Name:		Designation:		Date referred:	
Level (SAIC,CPCU, NPCU): (Choose one)					
Name:		Phone No:		Date received:	
Email:		Signature:			
Date Resolved					
Date resolution communicated to the complainant					

2. Grievance Log register

	PROJECT:			Person Complaining		Tel. No.				Date Updated		
Geographic Location												
	Identifiers											
	Name	Contact	Date Received	Channel	Description Of Complaint	Reffered To (Name & Position)	Tel No	Date	Action Taken/ Greed Resolution	Outcome	Feedback Given Y/N?	Date Resolved / Closed
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												