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**Kenya National Highways Authority (KeNHA),
Kenya Revenue Authority (KRA), Information and Communication
Authority (ICTA), National Transport and Safety Authority (NTSA), State
Department of Transport (SDoT) and State Department of Roads (SDoR)**

**Horn of Africa Gateway Development Project-2
(P515510)**

STAKEHOLDER ENGAGEMENT PLAN

February 2026

ACRONYMS

Acronym	Full Form
ASAL	Arid and Semi-Arid Lands
CBO	Community-Based Organization
CSOs	Civil Society Organizations
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
FGD	Focus Group Discussion
GBV	Gender-Based Violence
GoK	Government of Kenya
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IA	Implementing Agency
KeNHA	Kenya National Highways Authority
M&E	Monitoring and Evaluation
NEMA	National Environment Management Authority
NGAO	National Government Administration Office
NGO	Non-Governmental Organization
NLC	National Land Commission
PAP	Project Affected Persons
PIU	Project Implementation Unit
PWD	Persons with Disabilities
PWD	Persons with Disabilities
RE	Resident Engineer
SDoR	State Department of Roads
SDoT	State Department of Transport
SEP	Stakeholder Engagement Plan
SOP	Standard Operation Procedure
WB	World Bank
WRA	Water Resources Authority

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1. INTRODUCTION AND PROJECT DESCRIPTION

1.1 Introduction

The Government of Kenya, through the Kenya National Highways Authority (KeNHA), is improving and upgrading the 740km Isiolo-Mandera corridor in Northern Kenya. KeNHA is implementing Kenya-Horn of Africa Gateway Project (HoAGDP, P161305) in this corridor and upgrading the 365km asphalt road. The HoAGDP forms part of broader national and regional efforts to enhance road connectivity, improve access to social and economic services, strengthen cross-border trade, and promote regional integration within the Horn of Africa. The proposed Kenya-Horn of Africa Gateway Development Project-2 (HoAGDP-2) targets the upgrading of the unfunded road sections, namely Modogashe to Samatar (67km) and Rhamu to Mandera (76km), trade facilitation measures, and institutional strengthening and human capital development. The project will complement the investment under the HoAGDP. The project will be implemented by five implementing agencies namely Kenya National Highways Authority (KeNHA), Kenya Revenue Authority (KRA), Information and Communication Authority (ICTA), National Transport and Safety Authority (NTSA), State Department of Transport (SDoT) and State Department of Roads (SDoR).

The proposed Project area lies within Garissa, Wajir and Mandera Counties, regions characterized by arid and semi-arid conditions, dispersed settlements, pastoral and agro-pastoral livelihoods, and historically limited infrastructure development. Poor road conditions along the Modogashe-Samatar and Rhamu-Mandera corridors have constrained mobility, access to markets, delivery of essential services, and emergency response, particularly during rainy seasons.

1.2 PROJECT DESCRIPTION

Project Development Objectives: The Project Development Objectives are to improve: (a) the movement of people and goods, and digital connectivity along the targeted sections of the Isiolo-Mandera Regional Road Corridor; and (b) the capacity of selected transport related institutions in Kenya.

Project Beneficiaries: The proposed project (HoAGDP-2) will complement investments under HoAGDP in by expanding basic access transport services to the population of Northeastern Kenya, an area affected by standing isolation and extreme poverty. The upgraded road under HoAGDP-2, complemented with the installation of fiber optic connections under HoAGDP, is expected to attract investment, create jobs, and enhance information sharing and access to internet-based opportunities. The main beneficiaries include the vulnerable and marginalized communities in Northeastern Kenya, a population of 3.2 million residents; the traveling public who will benefit from reduced travel times and transport costs; and the businesses and traders engaged in commercial activities, which are likely to grow with the improved road corridor. Women, vulnerable groups and children in the project area will particularly benefit from improved transport services through improved movement, delivery of food during scarcity periods, and facilitate government response in the event of any security incidents. In addition, capacity building activities will deepen the on-going policy and institutional reforms in the transport sector and contribute to

human capital development. The proposed project's focus on regional integration and trade facilitation will extend benefits to vulnerable and marginalized communities in southern Ethiopia and, once the border reopens, potentially in western Somalia.

Project Components: The proposed project will comprise the following components and sub-components.

Component A: Improving Movement of People and Goods, and Digital Connectivity

Sub-component A1: Improving Selected Road Sections Along the Isiolo-Mandera Road Corridor by KeNHA

The activities include:

- a. Upgrading to bituminous standard with enhanced, more climate -resilient design standards, and carrying out road safety improvement, of selected sections of Isiolo-Mandera Regional Road Corridor including: (i) Modogashe-Samatar (about 67km); and (ii) Rhamu-Mandera (about 76km).
- b. Undertaking review and update of feasibility and detailed engineering design studies for the (i) Modogashe-Samatar (about 67km); and (ii) Rhamu-Mandera (about 76km); and updating of related safeguards instruments.
- c. Carrying out supervision of upgrading of selected road sections along the (i) Modogashe-Samatar (about 67km); and (ii) Rhamu-Mandera (about 76km); and
- d. Provision of consultancy services for management of social risks associated with works contracts through engagement of the services of selected civil society organizations.
- e. Implementation of safeguards instruments

Sub-component A2: Improving Digital Connectivity and Institutional Strengthening

- a. Carrying out feasibility and detailed engineering design studies for and supervision of replacing of the existing fiber optic cable and upgrading the associated active equipment between Nairobi and Isiolo.
- b. Replacing of the existing fiber optic cable and upgrading the associated active equipment between Nairobi and Isiolo.
- c. Institutional strengthening of the ICTA through provision of advisory services and training.

Component B: Facilitation of Regional Trade under KRA

The activities include:

- a. Upgrading ICT system for the Customs Department to improve revenue collection including those systems related to the Isiolo-Mander regional road corridor
- b. Facilitating partnership between academic institutions and industry including designing and offering training on social risks and constructing and equipping the proposed Center for Land Acquisition and Resettlement Studies (CELARS) at University of Nairobi.
- c. Carrying out supervision of the construction and equipping of CELARS at University of Nairobi.

Component C: Institutional Strengthening of Selected Transport and Related Institutions

Subcomponent C1: Strengthen the Institutional Capacities of SDoR and Associated Institutions.

The activities include:

- a. Project monitoring and updating the baseline data on the key indicators that are not available at commencement of the Project to establish post-Project impact.
- b. Enhancing capacity of the State Department of Roads to monitor and oversee road sub-sector including: (i) strengthening its project management and monitoring capacity; (ii) coordination of Project implementation activities including audits; and (iii) provision of training.
- c. Developing and implementing an integrated ICT-based oversight occupational safety and health information management system (OSH-MIS) and digital information center for DOSHS.
- d. developing and implementing an ICT-based system for payment processing and accountability of Project Affected Persons for National Lands Commission; and
- e. Strengthening the training capacity of the Departments of Engineering and Built Environment at the University of Nairobi.

Subcomponent C2: Strengthen the Institutional Capacities of State Department of Transport (SDoT) and Associated Institutions

The activities include:

- a. Feasibility and design studies for the optimal alternative transport route connecting Nairobi to the Lamu Port; and
- b. Carrying out an assessment of the resilience of the entire transport network and systems associated to climate change and similar disruptions.

Component D: Improvement of Road Safety through Compliance and use of Technology (NTSA)

The activity is:

- a. Enhancement of Traffic enforcement initiatives

The total estimated project cost is US\$318.25 million, consisting of US\$260.00 million from IDA and US\$58.25 million from the Borrower. The project will be exempt from output VAT (estimated US\$41.60 million) as is the case for HoAGDP. Therefore, the Borrower’s contribution attributable to the project is approximately US\$16.65 million comprising: (i) the cost for resettlement compensation for project-affected persons (estimated at US\$6.00 million), feasibility and design studies for the optimal alternative transport route connecting Nairobi to the Lamu Port (US\$4.0 million); Carrying out an assessment of the resilience of the entire transport network and associated systems to climate change and similar disruptions (US\$4.0 million); and project operating cost (US\$2.65 million). The Government has requested the World Bank to consider financing these additional activities except for project operating costs. This would increase the IDA allocation to approximately US\$274.00 million.

1.3 Project Location

As noted above, the HoAGDP-2 will be upgrading Modogashe–Samatar section (67 km) and Rhamu–Mandera section (76 km) initially planned under GoK funding and by scaling-up selected activities. The Project sites are located in the North-Eastern part of Kenya, spanning Garissa, Isiolo, Wajir and Mandera Counties. The Project corridor covers two strategic sections: the Modogashe–Samatar Road, linking Garissa County to Mandera County, and the Rhamu–Mandera Road, connecting the town of Rhamu to Mandera town and surrounding settlements. The Project traverses predominantly arid and semi-arid lands (ASALs) characterized by sparse, dispersed settlements, pastoral and agro-pastoral livelihoods, and small trading centers along the road. The area is culturally diverse, with strong clan-based and traditional governance structures, and experiences low literacy levels, security sensitivities, and limited access to social and economic services.

Modogashe - Samatar Road Section: The Modogashe-Samatar Road section is 76.62km long. The road starts from Modogashe town, about 600m from the T-junction of the Garissa–Isiolo road. The project traverses Garissa, Isiolo and Wajir Counties. The main ethnic groups are dominantly Somali in Wajir and Garissa counties and the Borana in Isiolo County. The project road traverses several settlements and administrative units outlined in the Table below.

Table 1: Settlements and administrative units along the project road

1.	Modogashe	Lagdera/Garba Tula	Garissa/ Isiolo
2.	Skanska	GarbaTula	Isiolo
3.	Habaswein	Wajir South	Wajir
4.	Lagdima	Wajir South	Wajir
5.	Kanjara	Wajir South	Wajir
6.	Samatar	Wajir South	Wajir

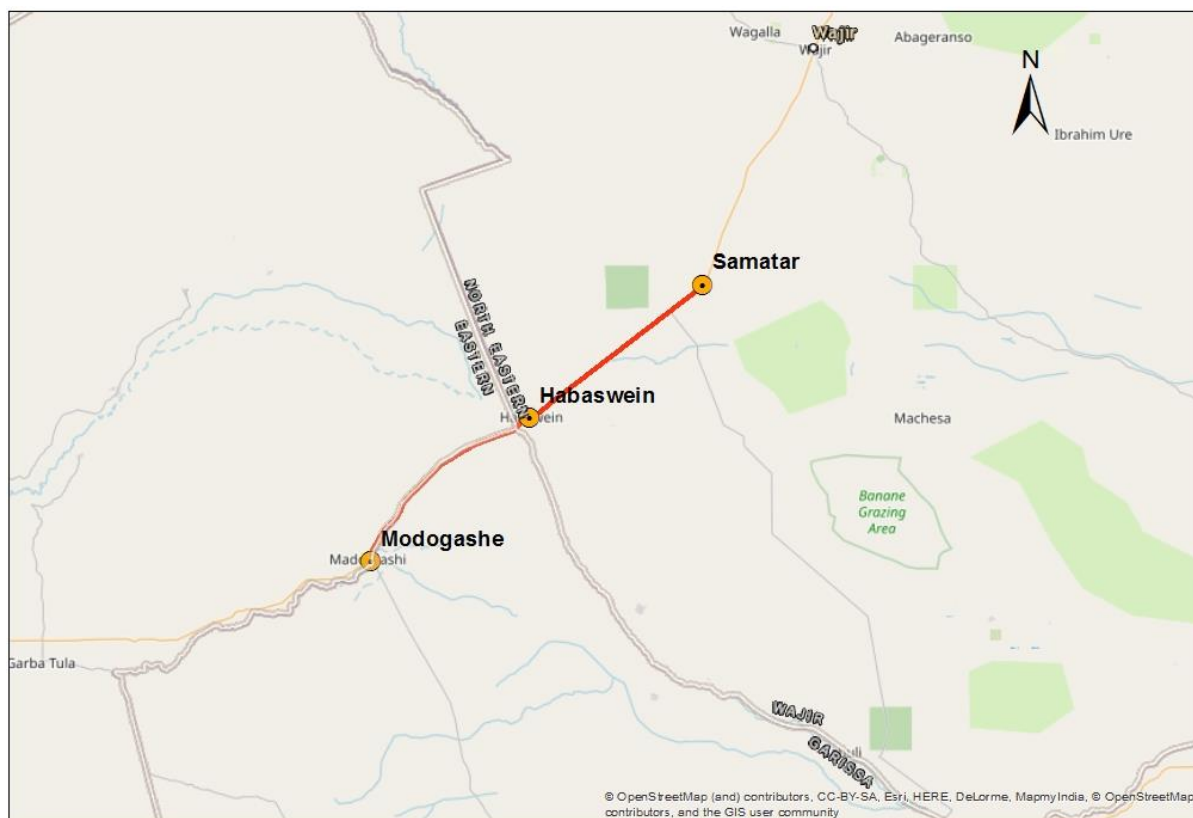


Figure 1: Modogashe - Samatar Project

Rhamu - Mandera Road Section: The Rhamu to Mandera (66.38 km km) (A13 Roads) route is located in Mandera County, running from the west (Kenyan Horn) to the east, parallel to the Kenya-Ethiopian border. The road traverses several settlements/towns as follows: Mandera, Garba Qoley, Karo, Farey, Saro Hindi, Qumbiso, Sala and Rhamu.

Table 2: Settlements and Administrative Units along Rhamu-Mandera Road Section

No.	Settlement Name	Sub county	Ward	County
1.	Rhamu	Mandera west	Rhamu	Mandera
2.	Sala	Mandera west	Rhamu	Mandera
3.	Qumbiso	Mandera west	Rhamu	Mandera
4.	Saro Hindi	Mandera west	Shimbir Fatuma	Mandera
5.	Farey	Mandera west	Shimbir Fatuma	Mandera
6.	Karo	Mandera west	Shimbir Fatuma	Mandera
7.	Garba Qoley	Mandera East	Neboi	Mandera
8.	Mandera Town	Mandera East	Mandera Township	Mandera

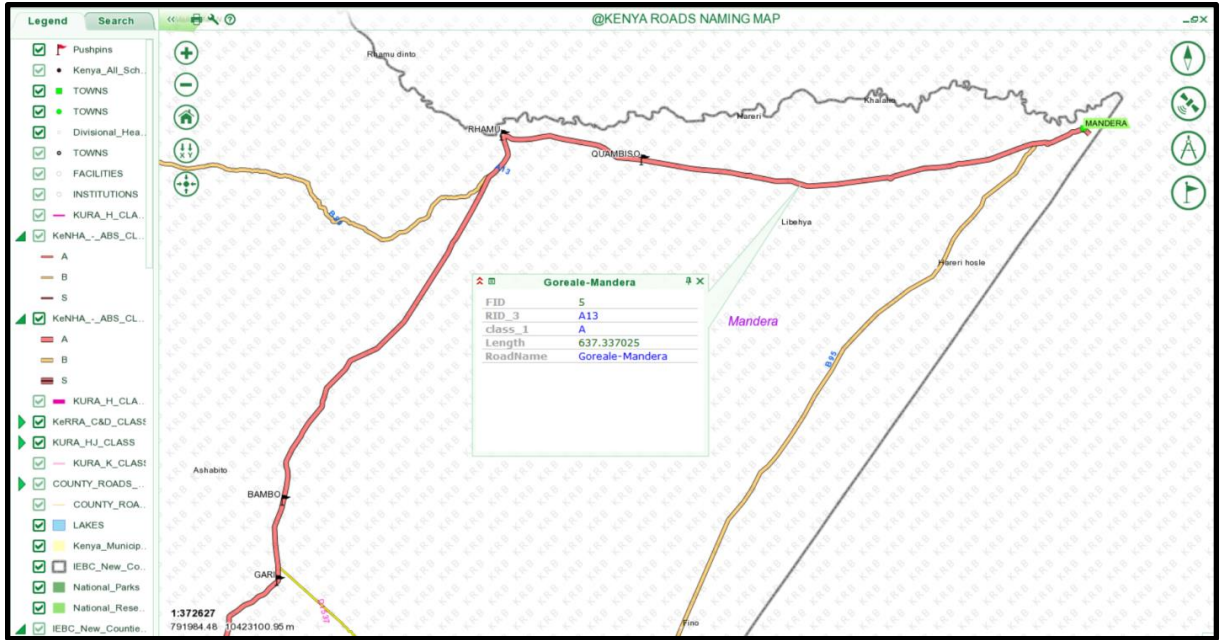


Figure 2: Rhamu-Mandera Road Section

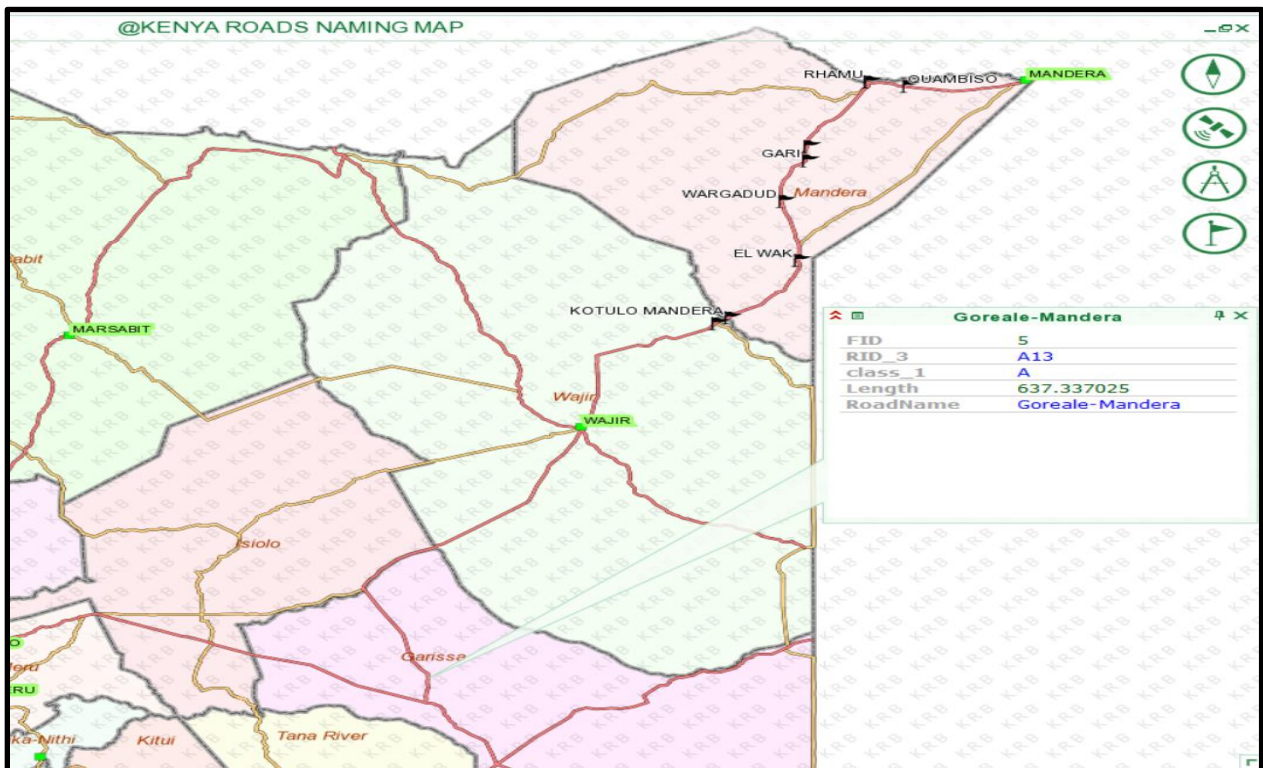


Figure 3: Location of the Rhamu-Mandera Road Section Along the A13 in Mandera County

The HoAGDP-2 is being prepared under the World Bank’s Environment and Social Framework (ESF), and this SEP is prepared to meet the requirements of the ESF.

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. This SEP outlines the ways in which the Kenya National Highways Authority (KeNHA) will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the HoAGDP-2 and any activities related to the HoAGDP-2. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

3: STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Methodology

The stakeholder engagement methodology for the HoAGDP-2 is designed to ensure inclusive, transparent, and culturally appropriate engagement throughout the HoAGDP-2 life cycle. The methodology will be guided by the following principles:

- **Inclusiveness and sensitivity:** All stakeholders, including project-affected persons. Vulnerable and marginalized groups, and other interested parties, will be identified and meaningfully engaged.
- **Transparency:** Relevant HoAGDP-2 information, including objectives, risks, impacts, and mitigation measures, will be disclosed in a timely and understandable manner.
- **Cultural Appropriateness:** Engagement approaches will respect local traditions, languages, and social norms.
- **Accessibility:** Information and engagement activities will be conducted in ways that are accessible to all stakeholders, including those with low literacy or disabilities.
- **Responsiveness:** Stakeholder feedback will be actively considered, and timely responses will be provided to address concerns and suggestions.
- **Accountability:** All engagement activities and decisions will be documented and reported to ensure transparency and compliance with ESS10.
- **Adaptive Approach:** Engagement strategies will be flexible and adjusted as necessary to respond to emerging risks, stakeholder feedback, or project changes, including public health or security considerations.

For the Modogashe–Samatar and Rhamu–Mandera Road Project, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

3.2. Affected parties

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the HoAGDP-2 activities. Specifically, the following individuals and groups fall within this category.

Table 3: List of possible affected parties categorized by project component.

Project Components	Affected Parties
<p>Component A: Improving Movement of People and Goods, and Digital Connectivity</p>	<p>Project-Affected Persons (PAPs): Individuals or households whose land, assets, livelihoods, or access to resources may be affected by land acquisition, resettlement, or construction activities. These will include largely Somali communities and few Borana communities, who are predominantly pastoralist communities considered Marginalized and meet ESS7 criteria.</p> <p>Communities along the road corridor include villages, settlements, and towns located along the Modogashe–Samatar and Rhamu–Mandera road alignment who will experience direct impacts from construction activities, including noise, dust, traffic disruption, and potential safety risks.</p> <p>Land and property owners: Individuals or entities owning land or structures within HoAGDP-2's right-of-way who may face land acquisition or restrictions on land use.</p> <p>Local businesses and traders: Shop owners, market vendors, and businesses operating along the road corridor whose operations may be temporarily or permanently affected by construction activities or changes in traffic patterns.</p> <p>Pastoralists: Community members whose grazing areas, or access to water sources may be affected by the project.</p> <p>Users of community facilities: Education, health, mosques, churches, and other community facilities located near the project area that may experience access disruptions or other impacts.</p>
<p>B: Facilitation of Regional Trade under KRA</p>	<p>-Staff of customs department who will be using improved ICT system for revenue collection.</p> <p>-People who will be served by the improved system.</p> <p>-Academic staff who will benefit from Center of Land Acquisition and Resettlement Studies (CELARS)</p> <p>-Students who will be trained at CELARS.</p>
<p>Component C: Institutional Strengthening of Selected Transport and Related Institutions</p>	<p>-Staff of Institutions whose capacity will be strengthened.</p> <p>-The institutions which will be strengthened.</p>
<p>Component D: Improvement of Road Safety through Compliance and use of Technology (NTSA)</p>	<p>-NTSA as an institution.</p> <p>-People who will be served by the improved road safety system.</p>

3.3. Other Interested Parties

The HoAGDP-2s' stakeholders also include parties other than the directly affected communities. They include organizations, institutions, or groups that have an interest in the project due to their mandates, expertise, or potential to influence project outcomes. This category includes:

a. **Government authorities and agencies:**

- National Government Ministries, Departments, and Agencies (Transport, Environment, ICT, Lands, Water, Internal security and Defense)
- Kenya National Highways Authority (KeNHA)
- National Environment Management Authority (NEMA)
- National Land Commission
- Department of Occupational Health and Safety
- National Transport and Safety Authority
- County Governments of Isiolo, Garissa, Wajir, and Mandera
- County departments (Transport, Environment, Lands, Trade, Health, Education, Water)
- State Directorate of Arid and Semiarid Lands (ASAL) which is also Coordinating North and Northeastern Development Initiative (NEDI) - an initiative of the Government of Kenya and World Bank to invest in transformative programs to address development deficit in selected ASAL region)

b. **Local administration:**

- County Commissioners
- Deputy County Commissioners
- Assistant County Commissioners
- Chiefs and assistant chiefs
- Village elders and community leaders
- Ward administrators
- Sub-county administrators

c. **Civil society organizations and NGOs:**

- Local and international organizations working on development, environmental conservation, human rights, gender equity, or community empowerment in the project area.
- Civil Society Organizations Consortium contracted by KeNHA to manage social risks and community engagement (including GRM and GBV/SEAH), (v). They include Kenya Red Cross-led consortium- including Wajir Peace and Development Agency (WPDA) and Agency for Peace and Inclusive Development (APID) for Wajir county, and the other consortium managing social risks in Mandera County, consisting of - Gender Violence Recovery Centre, Act Change and Transform (ACT), Mandera Women for Peace and Development

d. **Development partners and financial institutions:** World Bank and other financing institutions, including the African Development Bank, Consortium of Arab funds with oversight responsibilities for environmental and social safeguards and works.

- e. **Private sector contractors and consultants:** Construction companies, engineering firms, environmental consultants, and other service providers involved in project implementation.
- f. **Media:** Local, regional, and national media outlets that can facilitate information dissemination and public discourse about the project.
- g. **Academic and research institutions:** Universities and research organizations with interest in infrastructure development, environmental management, or social impact assessment.
- h. **Regional and cross-border stakeholders:** Ethiopian authorities and communities near the border, given the cross-border nature of trade and movement along the corridor.
- i. **Local institutions and structures, including clan elders, youth leaders/representatives, local women leaders/representatives, peace committees, and religious leaders,** who want to see successful implementation and be part of the project processes.

3.4. Disadvantaged/vulnerable individuals or groups

Within the HoAGDP-2, the vulnerable or disadvantaged individuals and groups may include, but are not limited to, the following: pastoral and agropastoral communities, women, youths, elderly, people with disabilities, ethnic minorities, Internally Displaced persons and Returnees etc. Table 4 below provides details on possible vulnerable groups for each project component and the barriers they may encounter in accessing information or other project benefits.

The project area is predominantly inhabited by ethnic minorities and vulnerable groups, with Isiolo County mainly home to the Borana community, a few immigrant groups such as Turkana and Samburu primarily around Modogashe town, while Garissa, Wajir, and Mandera counties are largely populated by the Somali ethnic group. The Somalis, Borana, Samburu, and Turkana are recognized by the Kenyan government as minorities and marginalized communities under Article 260 of the Kenyan Constitution and also meet the ESS7 criteria. Most of the people residing in the project location are from the Somali community, who are predominantly pastoralists and nomads, thereby fitting the requirements of ESS7 and being identified as marginalized communities.

Disadvantaged/Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. A description of the engagement methods to be undertaken by the project is provided in the following sections.

Table 4: Disadvantaged and vulnerable groups

Project Components	Disadvantaged and Vulnerable Individuals and groups and Possible Barriers in accessing information and project benefits
Component 1: Road and Rehabilitation	<ul style="list-style-type: none"> • Women and women-headed households: Women who may face gender-specific impacts, limited access to decision-making processes, or increased risks related to gender-based violence during construction. • Youth: Young people who may lack representation in traditional decision-making structures but have significant stakes in employment opportunities and long-term project benefits.

	<ul style="list-style-type: none"> • Elderly persons: Older community members who may have mobility limitations, health vulnerabilities, or difficulties accessing information and engagement activities. • Persons with disabilities: Individuals with physical, sensory, or cognitive disabilities who may face accessibility barriers to engagement activities and increased vulnerability to project impacts. • Pastoralist and nomadic communities: Mobile populations whose traditional grazing routes, water access points, and seasonal migration patterns may be affected by the project. • Minority clans and ethnic groups: Communities that may be underrepresented in local governance structures or face marginalization in consultation processes. • Poor and economically disadvantaged households: Families living below the poverty line who have limited resources to cope with temporary disruptions and may require targeted assistance. • Illiterate and low-literacy populations: Community members who cannot read written materials and require alternative communication methods such as verbal briefings, visual aids, or radio announcements. • Internally displaced persons (IDPs) or returnees: If present in the project area, these groups may have precarious land tenure and limited integration into local community structures.
<p>Component B: Facilitation of Regional Trade under KRA</p>	<ul style="list-style-type: none"> • Small Local business: <i>They may be left out of traders engagement as some may not be members of Chamber of Commerce at local level.</i>
<p>Component C: Institutional Strengthening of Selected Transport and Related Institutions</p>	<ul style="list-style-type: none"> • Junior Staff <i>who may not benefit from training due to their junior position.</i>
<p>Component D: Improvement of Road Safety through Compliance and use of Technology (NTSA)</p>	<ul style="list-style-type: none"> • Illiterate and low-literacy populations: Community members who cannot read written materials and require alternative communication methods such as verbal briefings, visual aids, or radio announcements to understand road safety signs and information.

4: STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Summary of stakeholder engagement done during HoAGDP-2 preparation

During project preparation, the following public consultation meetings were conducted and key issues discussed.

Stakeholder Consultations along Modogashe- Samatar Road Section

Consultations were done in the following locations: Samatar and Guticha, Kanjara, Habaswein, Skanska, Komor, Modogashe Town, Lagdima, and Ademasajida between 11th and 15th December 2025. The table below provides a summary of engagements:

Table 5: Summary of meetings held along Modogashe - Samatar Road section

Meeting Date	Venue	Stakeholder Participants	Male	Female	Total
11 th December 2025	Samatar & Guticha	NGAOs, Community Elders, Religious Leaders, Women Representatives, Youth, PAPs, Consortium team (i.e Civil Society Organization contracted by KeNHA to manage social risks, including GRM and GBV/SEAH in Wajir County led by Kenya Red Cross).	29	32	61
13 th December 2025	Kanjara Location	NGAOs, Community Elders, Religious Leaders, Women Groups, Youth Leaders, PAPs, Consortium Team.	46	17	63
14 th December 2025	Skanska Location	NGAOs, Community Leaders, Women Representatives, Youth, PAPs, Religious Leaders, Consortium Team	16	14	30
14 th December 2025	Komor Location	NGAOs, Chiefs, Community Elders, Women, Youth, PAPs, Religious Leaders	13	17	30
14 th December 2025	Modogashe Town	NGAOs, Chiefs, Community Elders, Women Leaders, Youth, PAPs	28	2	30
15 th December 2025	Habaswein Town	NGAOs, Sub-County Administration, Security Agencies, Community Elders, Women, Youth, PAPs, NGOs/CBOs	108	82	190

Meeting Date	Venue	Stakeholder Participants	Male	Female	Total
15 th December 2025	Ademasajida Location (Hadado West)	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	39	11	50
15 th December 2025	Lagdima Location	NGAOs, Community Elders, Women Groups, Youth Representatives, PAPs	8	52	60
Total			287	227	514

Key Issues and Feedback Raised by Stakeholders During the Consultations

Stakeholder engagement activities conducted along the Modogashe–Samatar Road corridor provided a structured platform for communities and key institutions to share their views, concerns, and expectations regarding the HoAGDP-2 activities. The engagements highlighted critical issues related to project financing, equitable access to benefits, employment opportunities, social risks, and grievance management. These concerns were acknowledged, and commitments were made to address them through sustained and continuous stakeholder engagement, strengthened coordination among project actors, and early activation of grievance redress structures to support smooth and inclusive project implementation.

Table 6: Summary of Key Concerns and Issues Raised for Modogashe -Samatar Road section

Key Concern / Issue Raised	Description of Concern Raised by Stakeholders	Stakeholder Groups Raising the Issue	Proposed / Agreed Response
Project financing and implementation timelines	Stakeholders expressed concern over previous delays caused by the annuity financing model and sought assurance that the project would proceed without further delays following the change in financing.	Community elders, NGAOs, community leaders	Consortium clarified that the project financing is shifting from annuity model and the government is seeking additional financing by the World Bank to fully finance the project; continuous updates to be provided prior to and during implementation.
Equitable distribution of project benefits	Communities living on both sides of the road corridor emphasized the need for fair and equitable access to employment opportunities,	Elders, youth leaders, PAPs, community representatives	Commitment to inclusive engagement, transparent communication, and equitable consideration of affected communities during implementation.

	transport services, and project-related benefits.		
Employment opportunities for local communities	Youth and community members raised concerns about prioritization of local labor during construction works to enhance livelihoods and ownership.	Youth groups, community members	Community sensitization on labor engagement processes and encouragement of local participation during construction will be done.
Need for continuous community engagement	Stakeholders emphasized that one-off meetings are insufficient and called for regular engagement forums throughout the project lifecycle.	Elders, religious leaders, community leaders	Consortium committed to sustained stakeholder engagement and periodic sensitization meetings before and during construction.
Clarity on socio-economic infrastructure	Stakeholders sought clear information on the type, timing, implementing agency, and beneficiaries of the proposed socio-economic infrastructure projects.	Community members, women groups, PAPs	Consortium clarified distinctions between road works, socio-economic infrastructure, in-kind projects, and Corporate Social Responsibility (CSR) initiatives and committed to continued information disclosure.
Peace, cohesion, and social risks	Communities raised concerns about potential tensions, competition for jobs, and conflicts arising from road construction activities.	Elders, peace committees, religious leaders	Emphasis on peacebuilding, coordination among neighboring communities, and proactive conflict prevention through continuous engagement.
Effectiveness of the Grievance Redress Mechanism (GRM)	Stakeholders stressed the need for an accessible, transparent, and trusted mechanism for raising and resolving grievances.	Community members, PAPs, women and youth groups	Sensitization on GRM conducted; inclusive GRCs validated and formed at settlement level to manage grievances.

Stakeholder Engagement for Rhamu–Mandera section: Stakeholder consultations for the Rhamu–Mandera section of the Horn of Africa Gateway Development Project (HOAGDP) were conducted from 10th December to 22nd December 2025. These engagements targeted key stakeholders, including National Government Administration Officers (NGAOs), County Government Officials, Civil Society Organizations (CSOs) and NGOs, Religious Leaders, Elders, and Political Leaders, and Community Members, including Project-Affected Persons (PAPs).

Community consultations were conducted at all major town centers along the project corridor, including Mandera, Garba Qoley, Karo, Farey, Sarohindi, Qumbiso, Sala, and Rhamu. The engagements aimed to provide project information, gather stakeholder feedback, address concerns, and promote inclusive participation in project planning and implementation. The information on consultation and stakeholder engagement meetings was sent through the local administrations, CSO consortium for Mandera and Wajir and stakeholder liaison officer. The information on who to invite, including VMG, was also shared. It was held in a culturally appropriate manner, with one joint meeting and breakout session for women officers help them voice their issues without fear or coercion. Stakeholder consultation minutes for all sites have been prepared and submitted to the Bank. It is instructive to note that these communities are beneficiaries of the parent projects (except for road construction activities), and they have been consulted during the original road design consultations and other project activities. The following stakeholder engagements have been undertaken as per the meeting schedule below.

Table 7: Summary of stakeholder engagements along Rhamu – Mandera road section

Meeting date	Venue	Stakeholder participants	Number of participants		
			Male	Female	Total
10.12.2025	County Commissioners Office Mandera	National Government Heads of Department	16	1	17
10.12.2025	Riverside Hotel Mandera	NGOs and CBOs	6	5	11
11.12.2025	County Commissioners Office Mandera	County Security and Intelligence Committee	8	1	9
20.12.2025	Bus Park Mandera	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	59	14	73
20.12.2025	QarbaQoley Location	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	18	7	25
20.11.2025	Karo Location	NGAOs, Area Chief, Community Elders, Women	3	27	30

Meeting date	Venue	Stakeholder participants	Number of participants		
			Male	Female	Total
		Representatives, Youth, PAPs			
21.12.2025	Farey Location	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	12	8	20
21.12.2025	Sarohindi Location	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	9	11	20
21.12.2025	Qumbiso Location	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	27	14	41
21.12.2025	Sala Location	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	34	7	41
21.12.2025	Baraza Rhamu Park	NGAOs, Area Chief, Community Elders, Women Representatives, Youth, PAPs	53	3	56

Summary of Key Concerns and Issues Raised

Throughout the stakeholder engagement process conducted from 10th to 22nd December 2025, a range of concerns and issues were raised by different stakeholders, reflecting their interests, expectations, and apprehensions regarding the Rhamu–Mandera section of the HOAGDP. The key issues are summarized below:

Table 8: Summary of issues raised along Rhamu - Mandera road section

Stakeholder Groups Raising the Issue	Key Concern / Issue Raised	Description of Concern Raised by Stakeholders	Response/ Proposed Action
National and County Government Officials	Security, Health and safety, RAP	<ul style="list-style-type: none"> National government concerns focused on security coordination, adherence to administrative protocols, effective community mobilization, timely information 	<ul style="list-style-type: none"> Stakeholder engagement activities to proceed as planned, subject to continuous coordination with security and

		<p>sharing, protection of vulnerable groups, and clear grievance management processes.</p> <ul style="list-style-type: none"> • County government concerns focused on environmental impacts, health and HIV/AIDS services, localized GBV response, protection of pastoral livelihoods, effects on roadside businesses, institutional capacity strengthening, and clear grievance redress mechanisms. 	<p>administrative structures.</p> <ul style="list-style-type: none"> • Engagement schedules to be shared in advance with the County Security and Intelligence Committee and local administration. • Security agencies to provide guidance and support during engagement activities as necessary. • Any security incidents or emerging risks to be reported promptly through established channels.
<p>Civil Society Organizations (CSOs) and NGOs</p>	<p>Inclusivity</p>	<ul style="list-style-type: none"> • Inclusion of vulnerable groups, such as women, youth, persons with disabilities, and marginalized populations, in engagement and decision-making processes. • Protection of community rights, livelihoods, and access to resources affected by project activities. • Transparency in project disclosure, monitoring of social and environmental impacts, and grievance redress mechanisms. • Need for continuous community awareness and sensitization to ensure informed participation. 	<ul style="list-style-type: none"> • NGOs and CBOs will collaborate with the project team to disseminate information about social safeguards, GBV pathways, child protection measures, and grievance reporting mechanisms. • Targeted sessions will be conducted to engage vulnerable groups and ensure inclusive participation. • Continuous coordination will be maintained between the project team and NGOs/CBOs for reporting, monitoring, and mitigation of social risks.
<p>Religious Leaders, Elders, and Political Leaders</p>	<p>RAP issues, Cultural dynamics, need for continuous engagements</p>	<ul style="list-style-type: none"> • Potential social conflicts arising from land acquisition, displacement, or resource use along the project corridor. • Ensuring that cultural norms and local customs are respected during project implementation. 	<ul style="list-style-type: none"> • NLC and KeNHA to undertake due process for affected persons. • Undertaking continuous engagements

		<ul style="list-style-type: none"> • Effective community mobilization and information dissemination to maintain public trust and minimize misunderstandings. 	
Community Members and Project-Affected Persons (PAPs)	Compensation, livelihood, GRM, Labor, Environmental concerns	<ul style="list-style-type: none"> • Concerns regarding land ownership, compensation, and tenure security for affected parcels. • Potential disruptions to livelihoods, access to services, and mobility along the road corridor. • Environmental impacts, including dust, noise, and potential degradation of natural resources. • Clarity on project timelines, scope of works, and responsibilities of the project team. • Awareness of grievance redress mechanisms and how to raise complaints effectively. • Consideration for labor 	<ul style="list-style-type: none"> • NLC and KeNHA to undertake due process for affected persons. • Prioritization of local Labor. • Mitigation on Environmental impacts to be undertaken. • Continuous engagements and establishment of GRC systems

Each meeting followed a structured agenda comprising introduction and opening remarks, disclosure of proposed project financing updates, presentation of validated socio-economic infrastructure, stakeholder mapping exercises, and validation or formation of Grievance Redress Committees (GRCs). The information on consultation and stakeholder engagement meetings was sent through the local administrations, CSO consortium for Mandera and Wajir and stakeholder liaison officer. The information on who to invite, including VMG, was also shared. It was held in a culturally appropriate manner, with one joint meeting and breakout session for women to allow them to voice their issues without fear or coercion. Stakeholder consultation minutes for all sites have been prepared and submitted to the Bank. It is instructive to note that these communities are beneficiaries of the parent projects (except for road construction activities), and they have been consulted during the original road design consultations and other project activities.

Disclosure of Project Information and Financing Updates

Across all engagement forums, the Consortium provided comprehensive updates on the transitioning from the annuity financing model¹ and consideration for World Bank financing

¹ The two road sections was originally planned to be funded by Government through Annuity. However, this took long to materialize and government requested WB to finance these section hence HOAGDP-2 project .

under the HoAGDP-2. Facilitators explained the implications of this transition, emphasizing adherence to World Bank standards, accountability requirements, and structured implementation procedures. Stakeholders were also sensitized on the project's scope, which includes both road construction and the installation of fiber-optic infrastructure along the road reserve to enhance internet connectivity. To support community preparedness and coordination, the team highlighted that the expected commencement timeline is 2026.

Community leaders and participants welcomed the update, noting and hoping that the transition from the annuity model will address previous project commencement delays. Stakeholders unanimously expressed support for the project and committed to maintaining peace, cooperation, and local support throughout implementation.

Presentation of the validated Socio-Economic Infrastructure Projects

The validated list of proposed socio-economic infrastructure sub-projects in project target areas and in various sectors (e.g health, water, education, markets, low seal roads, community facilities...) was presented during each engagement session to ensure transparency and informed participation. Communities were taken through nature, distribution, and anticipated benefits of the sub- projects, including improved access to water, health services, transport, and digital connectivity.

The consortium clarified the distinction between road works, socio-economic infrastructure, in-kind community projects, and Corporate Social Responsibility (CSR) initiatives by contractors. It was explained that socio-economic infrastructure sub-projects would be implemented by a separate contractor under KeNHA supervision.

Stakeholders appreciated the transparency and confirmed that the projects reflected earlier community prioritization exercises. The engagements enhanced accountability and strengthened community ownership of the development interventions.

Stakeholder Mapping Exercises

Participatory stakeholder mapping exercises were conducted in all locations to identify and validate key stakeholders critical to project success. The consortium team emphasized the importance of stakeholder mapping to promote coordination, reduce social risks, and ensure inclusive decision-making. This exercise was conducted to update the initial stakeholder mapping to ensure no one is left out in future community and stakeholder engagement.

Community members identified government institutions, community leadership structures, women and youth groups, service providers, and other influential actors as relevant stakeholders. This process reinforced the central role of communities as key stakeholders and emphasized the value of voluntary participation and collaboration.

1.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement.

The table below outlines envisaged engagement processes, methods, including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Table 9: SEP Summary Table

Project Stage	Target Stakeholders	Topic/Purpose	Methods	Responsibility	Frequency/Timeline
Project Preparation	Local communities, County Government, NGOs, traditional leaders	Project introduction, consultations, project information disclosure, SEP disclosure	Community meetings, FGDs, key informant interviews.	KeNHA PIU Social Specialists, Stakeholder Liaison officer, Civil Society Organization managing Social Risks and community Outreach activities.	Prior to appraisal (Dec 2025)
Project Preparation	Women, youth, PWDs, elderly, marginalized groups	Needs assessment, barriers to participation, design inputs	Separate FGDs, representative groups	PIU Social Specialist, Stakeholder Liaison officer, Civil Society Organization managing Social Risks and community Outreach activities	During preparation (Dec 2025)
Project Preparation	Government agencies, regulatory authorities	Project design, coordination, regulatory requirements	Formal meetings, workshops, official correspondence	PIU Director, County Coordinator	Throughout preparation
Inception & Design	All affected communities	Detailed design, site selection, component planning, E&S assessments	Community consultations, participatory workshops, surveys	PIU, supervision Consultants, Contractors, Stakeholder Liaison officer, Civil Society Organization	First 3 months of implementation

Project Stage	Target Stakeholders	Topic/Purpose	Methods	Responsibility	Frequency/Timeline
				managing Social Risks	
Inception & Design	Traditional leaders, peace committees	Conflict sensitivity, peace building, community mobilization	Meetings with elders, peace forums	PIU Social Specialist, County Peace Coordinator, Stakeholder Liaison officer, Civil Society Organization managing Social Risks	Monthly during inception
Implementation	General public, beneficiaries	Progress updates, activity schedules, benefit distribution, GRM	Radio, SMS, noticeboards, website	PIU Communications Officer, Community Liaison Officers, Stakeholder Liaison officer, Civil Society Organization managing Social Risks	Monthly radio, bi-weekly SMS/boards, continuous website
Implementation	Directly affected communities	Activity consultations, mitigation measures, benefit sharing, monitoring	Site meetings, community forums, household visits	Component Managers, Community Liaison Officers, stakeholder liaison officers	Before each activity, monthly for ongoing
Implementation	Women's groups	Livelihood opportunities, skills training, empowerment, GBV prevention	Women-only meetings, training sessions	Gender Officer, Community Liaison Officers	Quarterly meetings, training as per activities
Implementation	Youth	Employment, skills development, participation	Youth forums, social media, training workshops	Youth Officer, Community Liaison Officers	Quarterly forums, ongoing social media
Implementation	Persons with disabilities	Accessibility, inclusive participation, specific needs	Accessible meetings, disability	PIU Social Specialist, Community Liaison Officers	Quarterly consultations, ad hoc

Project Stage	Target Stakeholders	Topic/Purpose	Methods	Responsibility	Frequency/Timeline
			organizations, home visits		
Implementation	Pastoralist communities	Rangeland management, water access, conflict prevention	Mobile outreach, meetings at water points/markets	Rangeland Officer, Community Liaison Officers	Quarterly (more frequently in dry season)
Implementation	Contractors, workers	Code of conduct, labor standards, worker safety, SEA/SH prevention	Induction training, toolbox talks, meetings	PIU E&S Officers, Contractors	Induction before work, monthly meetings, daily toolbox talks
Implementation	NGOs, CBOs, development partners	Partnership opportunities, coordination, complementary activities	Coordination meetings, workshops, joint activities	PIU Director, County Coordinator, Stakeholder Liaison officer, Civil Society Organization managing Social Risks	Quarterly coordination meetings
Implementation	Media	Project visibility, public information, success stories	Press releases, media tours, interviews, press conferences	PIU Communications Officer	As needed, major milestones
M&E	Project beneficiaries, affected communities	Satisfaction surveys, impact assessment, feedback on services, SEP monitoring	Surveys, FGDs, community scorecards, participatory monitoring	PIU M&E Officer, Third-party M&E	Baseline (Y1), Mid-term (Y3), End-line (Y5)
M&E	Government oversight, World Bank	Project performance, compliance, E&S performance	Progress reports, supervision missions, joint monitoring	PIU Director, E&S,	Quarterly reports, bi-annual supervision
Completion	All stakeholders	Project outcomes, lessons learned,	Completion workshops, community meetings, final reports, media	PIU, County Government, Civil Society Organization	Final 6 months of project

Project Stage	Target Stakeholders	Topic/Purpose	Methods	Responsibility	Frequency/Timeline
		sustainability, handover		managing Social Risks	

4.3. Proposed strategy to incorporate the views of vulnerable groups

The HoAGDP-2 will seek the views of vulnerable groups including women, youth, PWD, the elderly, poor households, mobile pastoralists/Nomads, minority clans, and illiterate persons through the following methods. The following measures will be taken in order to remove obstacles to full and enabling participation/access to information.

Identification and Mapping:

The project will conduct systematic mapping of vulnerable groups in each location during the inception phase. This will include identifying women-headed households, persons with disabilities, minority clans, poor households, youth, pastoralists, elderly persons, internally displaced persons and returnees.

Differentiated Engagement Methods

Tailored approaches for each vulnerable group:

- ***Women:*** Gender-segregated consultations, female facilitators, safe spaces, and ensuring culturally appropriate engagement.
- ***Youth:*** Youth forums, technology/social media, peer engagement.
- ***PWDs:*** Accessible venues/formats, sign language, transportation support.
- ***Elderly:*** Respect for traditional structures, accessible venues, and home visits.
- ***Poor households:*** Flexible timing, integration with livelihood support.
- ***Minority clans:*** Separate consultations, if need be, trusted intermediaries.
- ***Illiterate persons:*** Oral communication, visual aids, vernacular radio
- ***Mobile pastoralists:*** Mobile outreach, water points/markets engagement, mobility pattern mapping to guide the engagement spaces and timelines.

Affirmative Inclusion

Ensure representation of vulnerable groups in project committees and decision-making bodies. Set quotas where appropriate. For instance, the project implementation committee and GRC, selection criteria will include at least 30% women's representation, representatives of youth (male and female), elders, and persons with disabilities.

Barrier Removal

Actively identify and address barriers such as transportation costs, childcare needs, scheduling conflicts, language barriers, stigma, and accessibility issues. Some of the measures include paying for transport, scheduling meetings considering availability, use of vernacular radios for communication and project disclosure, use of pictorials and visuals for communication materials to reach the low-literacy population, recruitment of community/stakeholder mobilisers and liaison from the local community to build trust and enhance outreach.

Capacity Building

Provide capacity-building to enable meaningful participation by vulnerable groups in all project activities and decision-making.

Monitoring and Adjustment

Monitor participation of vulnerable groups and adjust strategies as needed. Some of the actions include disaggregated data by gender, age, disability status, and other relevant characteristics. During project team meetings and project committee meetings, VMG participation and barriers to their participation will be discussed and appropriate strategies developed and implemented.

5: RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT

5.1. Implementation Arrangements and Resources

The Government of Kenya, through KeNHA, will be in-charge of stakeholder engagement activities. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) director. The entities responsible for carrying out stakeholder engagement activities are:

- Civil Society Organizations engaged in the project to manage social risks and undertake Community Outreach.
- Stakeholder Liaison officers
- Frontier Counties Development Council: Communications experts and third-party monitors
- Supervision Consultants
- Projects contractors.

The stakeholder engagement activities will be documented, and the PIU is responsible for documenting and reporting on all stakeholder engagement activities. Documentation will include stakeholder meeting minutes, attendance registers (disaggregated by gender and vulnerability), photographs, consultation summaries, issues raised and responses provided, and follow-up actions. Periodic stakeholder engagement reports will be prepared and submitted as part of the project's quarterly and annual progress reporting in accordance with World Bank ESS10 requirements. The following are summaries of SEP implementation and their roles.

5.1.1. Project Implementation Unit (PIU)

- Overall responsibility for implementation and oversight of the SEP.
- Approve SEP updates and ensure adequate financial and human resources are allocated.

- Provide strategic leadership and ensure coordination among PIU, Consultant managing Social Risk and Community Outreach, Stakeholder Liaison Officers, Communications officers, Supervision Consultants, Contractors, and other relevant actors.
- Ensure compliance with the World Bank Environmental and Social Framework (ESF), particularly ESS10.
- Oversee reporting on stakeholder engagement performance to the World Bank.

5.1.2. Social Safeguards Specialist

- Lead day-to-day planning and implementation of SEP activities.
- Coordinate stakeholder consultations, public meetings, and focus group discussions.
- Manage and oversee the Grievance Redress Mechanism (GRM).
- Ensure inclusive engagement, with particular attention to vulnerable and marginalized groups (women, elderly, persons with disabilities, minority clans).
- Document stakeholder feedback and ensure it informs project design and implementation.
- Prepare periodic stakeholder engagement and GRM reports.
- Train project staff and contractors on SEP requirements.

5.1.3. Communications Officer

- Develop and disseminate project communication materials, including brochures, leaflets, and notices.
- Manage media relations, including coordination of radio programs and public information.
- Maintain and update project communication platforms, including websites and social media channels.
- Support awareness campaigns and timely disclosure of project information along the Modogashe–Samatar and Rhamu–Mandera road projects.

5.1.4 Stakeholder liaison officers

These are consultants engaged by the KeNHA who are based at the county level. Existing consultants under the parent project will serve this project, unless the need arises for new ones to be recruited. Their main roles are:

- Act as the central stakeholder engagement and communication bridge between KeNHA and stakeholders, ensuring timely dissemination of project information and feedback flows.
- Ensure the GRM is implemented, including receipt, tracking, resolution, follow-up, and trend analysis of complaints and inquiries.
- Facilitate and strengthen stakeholder engagement processes, including community consultations, civil society coordination, and participatory forums.
- Maintain systematic documentation and reporting of stakeholder interactions, issues raised, response timelines, and social risk trends.

- Conduct internal audits of stakeholder engagement plans, GRM systems, identifying gaps and recommending corrective actions.
- Support awareness, training, and multi-stakeholder coordination, working with county authorities, civil society, project teams, and development partners to promote transparency, ownership, and social cohesion.

5.1.5. CSOs managing the Social Risks and Community Outreach activities

These CSOs include Consortium for Wajir led by Kenya Red Cross and including Wajir Peace and Development Agency, and Agency for Peace and Inclusive Development (APID), and Mandera CSO consortium consisting of Gender Based Violence Recovery Centre, ACT and Mandera Women for Peace and Development. The main role in the project is to manage social risks associated with undertaking civil works and carrying out community outreach activities including:

- To ensure that there is two-way communication between the local community, the project, and other project stakeholders.
- Identification and mapping of the different community groups and stakeholders, their interests and issues for Community engagement.
- Develop and implement a project-specific community engagement plan that describes proposed engagement strategies, tools, responsibilities, and schedule of engagement, etc.
- Manage Gender Based Violence (GBV), and Sexual Exploitation and Abuse and Harassment (SEA/H), GBV/SEAH including working with other government entities and CSOs on referral pathways.
- Manage Grievance mechanisms
- Receive, record, and forward grievances and community feedback to the Social Specialist.
- Support vulnerable and marginalized groups to participate meaningfully in project processes.
- Facilitate two-way communication between the project and affected communities.

5.1.6 Frontier Counties Development Council:

As a third-party monitor, FCDC has liaison officers in the counties and GBV expert and communication experts. Key roles are:

- Monitor Community and Stakeholder Engagement
- Coordinate, monitor, and report on the county government information flow and community sensitization activities by convening key county officials like Members of the County Assembly, Members of Parliament, and County Government Officials.
- Undertake all necessary communications activities under HoAGDP for the period of the assignment while coordinating the communications functions with the government counterparts located at County levels.
- Carry out targeted consultations with elders and customary institutions to support and complement stakeholder engagement, grievance redress mechanisms functions.

- Provide third-party monitoring functions in high-risk areas that the Bank Team will have no access including supporting community participatory monitoring and evaluation on the management of social risks and impacts.
- Advisory role to KeNHA existing community conflict, security instability, community grievance redress mechanism.

5.1.7 Supervision Consultants

- Ensure stakeholder engagement is undertaken for component-specific activities.
- Coordinate consultations with communities prior to commencement of work.
- Ensure mitigation measures related to environmental and social risks are implemented.
- Work closely with the Social Specialist and CLOs to address community concerns.

5.1.8 Monitoring and Evaluation (M&E) Officer

- Monitor SEP implementation and track stakeholder engagement indicators.
- Conduct surveys and participatory monitoring activities.
- Prepare monitoring and performance reports on SEP implementation.
- Support learning and adaptive management of stakeholder engagement activities.

5.1.9. Contractors

- Implement the Contractor Code of Conduct and manage worker behavior.
- Engage with affected communities in coordination with the supervision consultant and other actors.
- Report incidents, grievances, and community concerns for resolution promptly.
- Support traffic management, safety awareness, and community health and safety measures during construction.

5.1.10 Communication with the Security Personnel in the Project

During consultations both national and county governments concerns about security coordination, compliance with administrative protocols, timely sharing of information, and safeguarding project staff and property are raised. The parent Project developed a Security Management Plan (SMP) in January 2022, which will also guide the HoAGDP-2 communication in the project. In line with the SMP, KeNHA has hired a civil society organization (CSO) to facilitate community engagement and act as a liaison between security agencies and local communities. The CSO appointed Security Liaison Officer to support communication and all security-related information from the HOAGDP National Multi-Agency Security Committee to the communities. As a result, the following measures are recommended for project implementation related to security management and communication with the local communities and workers:

- KeNHA and Contractors must manage the deployment of security forces and cover all related costs.
- Community liaison officers hired by Contractors should collaborate closely with security liaison officers and the security forces.
- Communication with security personnel must comply with national laws and be directed by the national government, the multi-agency team, and local representatives of the national government.

- Stakeholder engagement activities require advance planning and coordination with the security commander.
- Ongoing cooperation between deployed security forces and administrative bodies is essential.
- All project workers, including contractors and subcontracted individuals, need to follow security Standard Operating Procedures (SOPs).
- Security SOP training should be provided to project teams as necessary.

5.2 Resources

The budget estimate for preparing and implementing SEP is USD **2,235,813.95**. See Annex 2 for the project budget breakdown.

Adequate resources will be allocated for effective SEP implementation. Each actor responsible for SEP implementation will be required to develop the plan and facilitate its implementation throughout the project period. The following will require consideration:

- Dedicated personnel
- Consultation activities
- Capacity building
- Communication Materials and Activities
- Surveys and Assessments
- Grievance Mechanism
- Logistics and Other Costs

The budget will be reviewed annually and adjusted based on implementation experience and emerging needs. The intention is to ensure that stakeholder engagement is well-resourced, inclusive, and effective throughout the project lifecycle.

Table 10: Estimated SEP budget

Budget categories	Total Cost (USD)
1. Estimated personnel costs and related expenses	400,000
2. Consultations/ Participatory Planning, Decision-Making Meetings	1,502,325.58
3. Communication campaigns	23,255.81
4. Trainings	34,108.53
5. Beneficiary surveys	15,503.88

6. Grievance Mechanism	34,108.53
7. Monitoring and Reporting	23,255.81
Contingency	203,255.81
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:	2,235,813.95

6. GRIEVANCE REDRESS MECHANISM

A functional GRM will be established for the HoAGDP-2. The GRM will be accessible and inclusive, ensuring that all project-affected persons, including vulnerable groups such as women, elderly persons, persons with disabilities, and marginalized communities, can safely raise concerns without fear of retaliation. Different reporting channels will be provided, including verbal complaints through community liaison officers, written submissions, telephone hotlines, suggestion boxes at strategic locations, and referrals through local leaders and other established institutions.

6.1 Description of Grievance Mechanism (GM)

The main objective of the Grievance Redress Mechanism (GRM) is to assist in resolving complaints and grievances in a timely, effective, and efficient manner. GRM provides a transparent and credible process for fair, effective, and lasting outcomes. The GRM will:

- Develop an easy-access, no-cost, and efficient complaint procedure for the community involved and/or impacted by the project. Establish a system of investigation, response, and quick complaint resolution.
- Ensure appropriate and mutually acceptable redress actions
- Ensure that grievances are handled in a fair and transparent manner, in line with the project's internal policies, international best practices, and lender expectations.
- Avoid the need to resort to judicial proceedings
- Allow for anonymous complaints
- Not preventing access to judicial or administrative remedies

Grievance Reporting Channels

The project will establish multiple channels for submitting grievances:

- Toll-free telephone hotline: [To be established] - Somali, Kiswahili, English
- SMS/WhatsApp: [Number to be established]
- Email: grievances@[project-email].
- In-person: At the CSO's satellite offices, the resident engineer's site office.
- Suggestion boxes for anonymous reporting of complaints to be located in strategic locations such as KeNHA offices, and Construction Camps.
- Written submissions.
- Through community representatives: Chiefs, village elders, community liaison officers
- KeNHA website: Online grievance form
- WB Kenya country office
- WB Grievance Redress Service

Principles Guiding the Project-Level GRM

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects. Key principles include:

- ***Accessibility and Availability:*** It should be accessible to everybody who would like to submit a complaint; aid those who face barriers such as language, literacy, awareness, cost, or fear of reprisal. Linked to overall community engagement strategy.
- ***Predictability:*** It should offer a clear procedure with time frames for each stage and clarity on the types of results it can and cannot deliver. Clear resolution procedures.
- ***Fairness:*** Its procedures should be widely perceived as fair, especially in terms of access to information and opportunities for meaningful participation in the final decision.
- ***Rights compatibility:*** Its outcomes should be consistent with applicable national and international standards and should not restrict access to other redress mechanisms.
- ***Transparency:*** Its procedures and outcomes should be transparent enough to the public interest concerns at stake. Clear structured process from complaint to resolution.
- ***Capability:*** It should have the necessary technical, human, and financial resources to deal with the issues at stake.
- ***Feedback:*** It should serve to channel citizen feedback to improve project outcomes for the people.
- ***Prevent escalation of grievances into communal conflict:*** by responding promptly and identifying issues that escalate grievances into community conflict. Experience from the main HOAGDP project indicates that local employment and labour issues often escalate to conflict and measures such as clan balance in recruitment, ample outreach on available vacancies mitigate conflict. Additionally, water sharing agreements with pastoralist communities have enhanced social cohesion and this will be adopted for the project.

6.2 GRM Structure and Process

Grievance Redress Committees (GRCs):

The Plan proposes a four-level Grievance Redress committee for the project-affected persons and the communities living along the project road. The system consists of the Settlement Level Grievance Redress committee, the Sub-County GRC, the County Level GRC, and lastly the Court of Law at relevant level, which depends on which court the complaints are filed. The supervision consultant, contractor and the consultant engaged to manage the social risks under the project will be required to sit on the committees. The project will also establish a workers' grievance redress mechanism to address labour issues.

Level 1: Settlement level Grievance Redress Committees (SGRCs). This is the first level that addresses grievances at the settlement levels. The committees will be established through the support of the Civil Society Organizations engaged in the project to manage the social risks associated with the projects. The committee is to be chaired by the Assistant County Commissioners and assisted by the location chiefs/ assistant chiefs. The GRCs are composed of representatives from the national government (Chief), community institutions (such as the

Mosques and churches), village leaders and other stakeholders who will be required to support the grievance resolution on a voluntary basis.

Level 2: Sub-County GRCs (Modogashe, Samatar, Rhamu)

This is the second level GRM structure that supports the resolution of grievances that are not managed at the settlement level and are escalated to this level. The membership at this level comprises members from multiple stakeholders and is to be chaired by the Deputy County Commissioner, with the Sub-County Administrator serving as the deputy. The committee comprises:

- Deputy County Commissioners (chair)
- Sub-County Administrator (Assistant)
- Agriculture officer/ livestock officer
- Water Resources Authority (WRA)
- NEMA
- Ministry of Health
- Peace officer at Subcounty
- Community representative (nominated by the community)
- Women's group representative
- Youth representative
- Elder/traditional leader (who brings on board traditional knowledge of grievance mechanisms for non GBV related Activities)

Level 3: County-level GRC

This is the third-level grievance redress system proposed for the project. The committee handles grievances that cannot be handled at other lower levels of the project. The county-level GRC is proposed to comprise the following:

- County commissioner representing the national government
- Representatives from the county government.
- National environmental management authority
- Social services and gender representatives
- Representative of the governor's office
- NLC County representative
- The Stakeholder Liaison Officer
- Community liaison officer – FCDC

Level 4: Court of law

This is the last level of the proposed GRM. If the aggrieved is not satisfied with the resolution made at the County Level Committee, the aggrieved is free to seek legal redress.

6.3 GRM Process Steps

Table 11: GRM Process Steps

Step	Description of process (e.g.)	Timeframe	Responsibility
Step 1: Grievance uptake	Grievances can be submitted via the following channels: Emails, letters, text messages, phone calls, verbal narrations, visits to the site office.	1-2 days	The focal point person receiving the grievances and providing feedback at the community level (Civil Society organization managing Social risks and community Outreach) will have a dedicated telephone with a toll free line where the aggrieved should channel their grievances. The stakeholder Liaison officer and FCDC will be in charge of collecting grievances as well as provide feedback to County Government officials, Senior government officials and political leadership.
Step 2: Sorting, processing	All grievances are logged into the GRM complaint form either in writing or verbally. The database included during registration should have: Unique reference number Date and time received Contact information (if provided) Nature of grievance Location Gender and age of complainant (if provided) Category (environmental, social, labor, SEA/SH, other)	Upon receipt of complaint	Local grievance focal points
Step 3: Acknowledgement and follow-up	Upon receipt of the grievance, the project acknowledges the grievance with the with reference number in writing. This is a participatory process where the	Within 2 days of receipt	Local grievance focal points or escalated to appropriate level.

Step	Description of process (e.g.)	Timeframe	Responsibility
	<p>aggrieved can spell out their wishes as part of the resolution process. An assessment is done to ascertain the type of grievance before relevant management is notified. Assessment of the grievance helps in the determination of the magnitude and intervention paths to be adopted and assigning responsibilities. A grievance log is updated to assist in monitoring the status of the recorded grievance. The assessment of the grievance is undertaken to:</p> <p>Assess urgency and severity Determine appropriate level for escalation for resolution (Settlement, Sub-County, or County level) Assign to appropriate staff/committee for investigation Flag sensitive cases (SEA/SH, violence, child protection) for immediate attention</p>		
<p>Step 4: Verification, investigation, action</p>	<p>Investigation of the complaint is led by [insert] A proposed resolution is formulated by [insert] and communicated to the complainant by [insert] Complaints that are straight forward should be addressed upon receipt. However, grievances that require investigation as well as gathering relevant information, documents review, engagement with stakeholders, interviews with the complainant, risk assessment, follow up meetings analysis of evidence will require time. The investigation should be carried out within 15 days. The investigation outcome includes an investigation report highlighting the steps, procedures and recommendations to be undertaken towards grievance resolution.</p>	<p>Within 10 – 15 working days</p>	<p>Complaint Committee at various levels</p>

Step	Description of process (e.g.)	Timeframe	Responsibility
<p>Step 5: Resolution and Response</p>	<p>Based on investigation findings, and severity of the complaint, the GRC develops a proposed resolution, which may include:</p> <ul style="list-style-type: none"> -Explanation or clarification -Corrective actions -Compensation or remediation (where applicable) -Changes to project activities or procedures -Referral to other services (e.g., health, legal, psychosocial) <p>Upon Completion of the investigation, a resolution to the grievance is decided. Written feedback and response are communicated within five days upon completion of the investigation and report done.</p> <p>Note: Grievances related to Gender Based violence, Sexual Exploitation and Sexual Abuse will be referred to an independent consultant managing the Social risks associated with the project. Care should be taken to ensure the security, safety and confidentiality of the survivor is upheld.</p>	<p>7-14 days after investigation</p>	<p>Complaint Committee at various levels</p>
<p>Step 6: Appeal (if complainant is dissatisfied)</p>	<p>If the complainant is not satisfied with the resolution, they are given an option to appeal or consider recourse. Before consideration for a recourse, the project team should review and ascertain whether additional reasonable actions are appropriate. The grievance mechanism is required to incorporate any appeals provision for complaints that cannot be solved through the project grievance mechanism. The process requires continuous communication to the aggrieved. Note: Complainants always retain right to pursue judicial or administrative remedies</p>	<p>When required</p>	<p>Complaint Committee at various levels</p>

Step	Description of process (e.g.)	Timeframe	Responsibility
Step 7: Implementation, Follow-up and closure	<p>Agreed actions are implemented with specific timelines. The safeguards team is required to monitor implementation and follow up with the complainant to confirm satisfaction. Upon implementation of all recommendations and satisfaction of the complainant, the grievance is considered closed. Additionally, Once the aggrieved party is satisfied with resolution a Grievance settlement form is signed to log in satisfaction/ resolution and the case is considered closed.</p>	<p>When required</p>	<p>Complaint Committee at various levels</p>
World Bank Grievance Redress Services	<p>World Bank Kenya Office: Communities and individuals who believe they are adversely affected by a WB-supported project may submit a complaint through the existing project-level grievance redress mechanisms or to the World Bank Kenya at kenyaalert@worldbank.org.</p>	<p>When required</p>	<p>World Bank Kenya Country Office</p>
World Bank Grievance Redress Service (GRS)	<p>If no response has been received from the WB Kenya Office, the complainant can report directly to the WB Grievance Redress Service (GRS) at grievances@worldbank.org. The GRS ensures that complaints received are promptly reviewed to address project related concerns. Project-affected communities and individuals may submit their complaints to the WB independent inspection panel, which determines whether harm occurred or could occur because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to WB’s attention and Bank management has given an opportunity to respond. For information on how to submit complaints to the WB’s corporate Grievance Redress Service (GRS), please</p>	<p>When required</p>	<p>World Bank Grievance Redress Service (GRS)</p> <p>And</p> <p>World Bank Independent Inspection Panel</p>

Step	Description of process (e.g.)	Timeframe	Responsibility
	visit: https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress and for information on how to submit complaints to the WB Inspection Panel, please visit: www.inspectionpanel.org		
Training	Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants may cover areas including Environmental and Social risks and impacts in Development Projects, Labor and Working conditions; GBV,/SEAH, Occupational Health and Safety, Social Inclusion, Grievance Mechanisms and stakeholder engagement. The GRC and SEA/SH watch groups will also be trained on their role. Stakeholders and communities will also be sensitized on the GRC and GBV/SEA structures and how and where to report issues and complaints.		
If relevant, payment of reparations following complaint resolution	Payment for reparation will be done by the employer/contractor and supervised/ monitored by the supervision consultant and KeNHA. Disbursements will be handled in accordance with established grievances redress mechanism and Kenya laws and documented in the financial records of the project.		

6.4 SEA/SH Grievances

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) cases require special handling to ensure survivor safety, security, confidentiality, and appropriate support. An independent consultant managing the social risks of the project will be engaged to provide dedicated services. These will be the same CSOs engaged under the parent project.

- a. **Dedicated SEA/SH Hotline:** A separate, confidential hotline will be established for SEA/SH complaints, operated by trained experts.
- b. **Survivor-Centered Approach:** All responses prioritize survivor dignity, safety, confidentiality, and informed choice.

- c. **Immediate Referral:** the service provider will be required to establish a referral system to support the survivor in the following:
 - ✓ Survivors are immediately referred to appropriate services:
 - ✓ Medical care (post-exposure prophylaxis, emergency contraception)
 - ✓ Psychosocial support and counseling
 - ✓ Legal assistance
 - ✓ Safety and security support
- d. **Trained Staff:** Designated staff at all levels of the GRM/SEAH structures will receive specialized training on handling SEA/SH cases with sensitivity and confidentiality.
- e. **Referral Pathways:** Established referral pathways connect survivors to service providers (health facilities, GBV recovery centers, legal aid providers, police gender desks).
- f. **Investigation:** If the survivor wishes, an investigation will be conducted with utmost confidentiality. Perpetrators will face disciplinary action or contract termination and referral to police for prosecution, as appropriate with consent of the survivor.
- g. **Confidentiality:** SEA/SH cases must be kept in separate, secure files with restricted access. No identifying information is shared without explicit survivor consent.
- h. **Dissemination of GBV/SEA/SH channels:** Community meetings will be held in all settlements along the road corridor to sensitize them on what constitutes GBV/SEA/SH, referral pathways, toll free numbers will be provided, community watch committees and school clubs will be formed and sensitized so that they report and receive survivors. Culturally sensitive GBV posters will be placed at strategic points, with clear contacts numbers for reporting and referral pathways. A GBV technical working groups comprising of the Consortium of CSOs contracted to lead on social risks and stakeholder engagement, county department of health, police gender desk, county gender and children office and Judiciary and other local CSOs working on GBV issues will be formed and engaged on GBV/SEA/SH issues.

6.5 Labour GRM

An effective Labour Grievance Redress Mechanism (GRM) is essential to ensuring that workers' complaints and concerns are addressed promptly, transparently, and fairly. This mechanism will address any labour and working conditions grievances, such as treatment by supervisors, pay, health and safety, or other employment-related matters. The workers have the right to join a trade union of their choice and form a workers' committee to assist in addressing workers' grievances. The Labour Management Plan of this project, prepared separately, provides details of the mechanisms, including actors, and the expected turnaround time for grievance handling.

Key Actors of the Workers' Grievance Redress Mechanism

The key actors and/or institutions in the Workers GRM will be as follows:

1. **Designated GRM Officer:** The Contractor's Sociologist will serve as the Contractor's designated internal Grievance Officer, with responsibility for overseeing the grievance process at the Contractor's level. The Sociologist will be supported by the Human Resource Officer. KeNHA will train the Sociologist, Human Resource Officer, and other key staff of the Contractor at the start of the Project on grievance handling in a Road Project, with an

objective of building capacity to manage labour grievances effectively and efficiently. This officer will also liaise with the Resident Engineer (RE) and the relevant authorities.

2. **Workers' Representative:** A workers' representative and/or union representative will be nominated to represent workers, ensuring their interests are promoted and safeguarded.
3. **Third-party Mediators:** If internal resolution is not possible, a third-party mediator will be brought in to facilitate resolution of the grievance.
4. The Plan proposes the establishment of the following levels:
 - a. Workers GRM Committee at the Contractor's Level: Grievance
 - b. Committee at the Resident Engineer Level
 - c. Labour Committee (membership includes the government labour office).
 - d. Workers' Disciplinary Committee.

Steps in the Labour GRM Process

The grievance redress process will be transparent, systematic, and involve clear timelines to ensure that issues are resolved quickly and fairly. The key steps are as follows:

- Step 1: Receiving and Registering the Grievance
- Step 2: Initial Review and Assessment
- Step 3: Investigation and Mediation
- Step 4: Resolution and Action
- Step 5: Monitoring and Closure

6.6 Publicizing the GRM

The project actors will be required to create awareness on existing GRM. This will be widely publicized through:

- Posters and brochures in Somali, Garre, Kiswahili, and English at project offices, settlement areas, and in other strategic places along the project roads.
- Radio announcements on local stations
- Community meetings and consultations
- KeNHA website and social media
- Through community representatives and leaders
- Signage at project sites
- Worker induction and contractor Code of Conduct

All materials will clearly state:

- Available channels for submitting grievances
- Contact information (phone numbers, addresses, email)
- Types of grievances that can be submitted
- Process and timeframes
- Confidentiality and non-retribution assurances
- That the service is free of charge

7. MONITORING AND REPORTING

7.1. Summary of how SEP will be monitored and reported upon (including indicators)

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators for stakeholder engagement and grievance performance. See detailed monitoring details in annex 3.

SEP reporting will include the following:

- i. Quarterly progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP) by KeNHA. The report is consolidated by the CSO consortium in collaboration with stakeholder liaison officers, social safeguards staff of Resident engineer offices and contractors and FCDC liaison officers.
- ii. Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing attendees' views can also be annexed to the monitoring reports.

7.2. Reporting back to stakeholder groups

The SEP will be revised and updated as necessary during project implementation.

Any major changes to project activities will be reflected in updated SEP versions. Stakeholders will receive regular reports on project progress through:

- Quarterly updates (print and digital) in English, Swahili, and in the local dialect: Somali.
- Radio programs (monthly) with project updates and Q&A sessions
- Community meetings (quarterly) to present progress and receive feedback
- Notice board updates (bi-weekly) at key locations
- Website updates (monthly/ quarterly)
- Social media posts (monthly) on activities and milestones
- SMS updates (as needed) on major developments
- Annual reports.

Reports will include:

- Summary of activities completed and progress toward objectives
- Summary of consultation activities and stakeholder feedback
- How stakeholder feedback was incorporated into decisions
- Environmental and social performance

- Information on involvement of the security personnel in the project
- Grievance statistics and resolution status
- Upcoming activities and schedules
- Success stories and lessons learned

7.3 Reporting to the World Bank

The Implementing Agency will submit regular reports to the World Bank on SEP implementation and stakeholder engagement activities as part of overall project reporting:

Bi-annual Progress Reports including:

- Summary of stakeholder engagement activities conducted
- Number and types of consultations held, disaggregated by stakeholder group
- Participation data (numbers, gender, vulnerability status)
- Key issues raised and how they were addressed
- Status of ESCP commitments related to stakeholder engagement
- GRM statistics (grievances received, resolved, pending) by category
- SEA/SH incidents and responses (aggregate data maintaining confidentiality)
- Challenges in stakeholder engagement and corrective measures
- Updates to SEP (if any)

Annual Reports providing comprehensive overview of:

- All engagement activities over the year
- Analysis of participation trends and vulnerable group inclusion
- Major themes from stakeholder feedback
- Environmental and social performance
- Effectiveness of engagement methods
- Lessons learned and recommendations

Ad-hoc Reports on:

- Significant incidents or issues requiring immediate attention and reporting on incident management system under ESIRIT.
- Major changes to project scope or design based on stakeholder input
- Serious grievances or SEA/SH cases
- Conflict or security issues affecting engagement

All reports will maintain the confidentiality of individual grievances and sensitive information, particularly SEA/SH cases.

ANNEX 2: SEP budget

Budget categories	Quantity	Unit costs (KSHS)	Unit costs (USD)	Times/ Years	Total costs (USD)	Remarks
1. Estimated officers costs and related expenses						
Community Engagement Officers	2	10,800,000.00	83,720.93	3	167,441.86	2 officers throughout
Engagement of consultant to undertake environmental and social safeguards assessment.	2	15,000,000.00	116,279.07	0.6	232,558.14	E&S consultants period of 6 months
2. Consultations/ Participatory Planning, Decision-Making Meetings						
Engagement with relevant stakeholders on environmental and social safeguards	45	200,000.00	1,550.39	9	69,767.44	Quarterly in each subcounty (5)
Engagement of stakeholders on public information disclosure and consultations throughout the project cycle	612	150,000.00	1,162.79	36	711,627.91	Monthly in all settlements
Validation workshop of the project ESS plan, Stakeholder Engagement Plan, Project risks and mitigation measures	4	300,000.00	2,325.58	2	9,302.33	Twice per project
Community meetings and focus group discussions: During all	612	150,000.00	1,162.79	36	711,627.91	Monthly

Budget categories	Quantity	Unit costs (KSHS)	Unit costs (USD)	Times/ Years	Total costs (USD)	Remarks
community visits, information about the project and responses to community questions will be given.						
3. Communication campaigns						
Publication of annual reports containing sections on stakeholder engagement	3	500,000.00	3,875.97	3	11,627.91	Annual
Conducting of media awareness and publicity on ESS and GRM stakeholder engagement forums	3	500,000.00	3,875.97	3	11,627.91	Annual
4. Trainings						
Training of project committees to sensitize them on stakeholder engagement and other ESS.	22	200,000.00	1,550.39	3	34,108.53	Annual
5. Beneficiary surveys						
Conduct surveys	2	1,000,000.00	7,751.94	2	15,503.88	Twice
6. Grievance Mechanism						
Grievance committee training, meetings, printing and distribution of	22	200,000.00	1,550.39	36	34,108.53	Monthly

Budget categories	Quantity	Unit costs (KSHS)	Unit costs (USD)	Times/ Years	Total costs (USD)	Remarks
GRM logs/registers.						
7. Monitoring and Reporting						
Monitoring consultations and production of reports	6	500,000.00	3,875.97	6	23,255.81	Bi annual and Annual
Contingency	LS	10%	203,255.81	1	203,255.81	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					2,235,813.95	

ANNEX 3: Monitoring and reporting

Key Evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>Grievance Management: To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Are project-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	<ul style="list-style-type: none"> • Records from the implementing agency and other relevant agencies • Interviews • Surveys • Grievance logs
<p>Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. 	<ul style="list-style-type: none"> • Stakeholder Consultation Attendance Sheets/Minutes • Evaluation forms • Structured surveys • Social media/traditional media entries on the project results

Key Evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
		<ul style="list-style-type: none"> • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<ul style="list-style-type: none"> • Communication Strategy (Consultation Schedule) • Periodic Focus Group Discussions • Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives. • Stakeholder surveys.