National Treasury

Kenya Mortgage Refinance Company

State Department for Lands and Physical Planning

Kenya Housing Finance, Land Administration & Sustainable Investments Project (KHFLASIP)

(P513352)

Stakeholder Engagement Strategy

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Abbreviations

AHP	Affordable Housing Program
ASALs	Arid and Semi-Arid Lands
E&S	Environmental and Social
FGD	Focus Group Discussion
GoK	Government of Kenya
IBRD	International Bank for Reconstruction and Development
ICT	Information and Communication Technology
IDA	International Development Association
IFMIS	Integrated Financial Management and Information Systems
IT	Information Technology
KSH.	Kenya Shillings
KII	Key Informant Interview
KMGT	Kenya Mortgage Guarantee Trust
KMRC	Kenya Mortgage Refinance Company
M&E	Monitoring and Evaluation
MSME	Micro Small and Medium Enterprises
PMLSs	Primary Mortgage Lenders
SACCOs	Savings And Credit Cooperative Organizations
SDLPP	State Department of Lands and Physical Planning
SES	Stakeholder Engagement Strategy
TA	Technical Assistance

1 INTRODUCTION

The Kenya Affordable Housing Finance Project (P165034) (closed on June 30, 2025) made significant strides in expanding access to affordable housing finance in Kenya, primarily through the support and operationalization of the Kenya Mortgage Refinance Company (KMRC). As of September 2025, KMRC had refinanced approximately KES 23 billion in mortgages, representing 4,915 loans. Repayment tenor lengthened from 8.3 (2021) to 14.4 years (2024) signaling enhanced affordability. Notably, nearly 48 percent of KMRC-refinanced mortgages were issued to women, highlighting significant progress in gender inclusion. KMRC's portfolio now accounts for about 5.0 percent of the banking sector's mortgage book by value and 12.8 percent by number of loans. Additionally, the share of refinancing through SACCOs within KMRC's portfolio grew from 7 percent in 2022 to 13 percent by August 2025, indicating a strengthened role for non-bank lenders in the affordable housing finance sector, and growing financial inclusion.

Building on the strong foundation and lessons learned from the first phase, a second phase of the Kenya Affordable Housing Finance 2 Project, **Kenya Housing Finance, Land Administration & Sustainable Investments Project (KHFLASIP)** is both timely and essential to address the persistent gaps in access to housing finance for low- and middle-income households. To truly expand financial inclusion and meet the GoK's ambitious goal of delivering 250,000 affordable housing units annually, Phase 2 must innovate beyond conventional mortgage financing. This means developing and scaling products that make homeownership more accessible, addresses affordability and improves property transactions, and can de-risk lending to lower-income and informal sector borrowers. Innovative housing finance solutions, while critical for expanding access and affordability, can only be effective if households can build or improve homes on land that is titled and legally secured and connected to basic services.

The overall Environmental and Social (E&S) risk of the project is assessed as Moderate for both dimensions. Project activities are anticipated to produce positive E&S outcomes. While no significant risks are expected, there remains a potential concern: key stakeholders such as civil society organizations and community groups that represent vulnerable and marginalized groups (VMGs) and other disadvantaged populations may not be sufficiently engaged during consultations. Should their involvement be inadequate, their perspectives and concerns might not be fully addressed, potentially reducing the inclusiveness and effectiveness of the interventions, particularly regarding land administration reforms.

The Stakeholder Engagement Strategy (SES) outlines the necessity of adopting a participatory and consultative approach, ensuring meaningful engagement with all stakeholders across the project. The SES aims to establish a systematic framework for stakeholder engagement, maintain constructive relationships, and incorporate stakeholder perspectives throughout the project cycle. It promotes effective and inclusive engagement by: (i) ensuring stakeholders receive timely, relevant, understandable, and accessible information; (ii)facilitating consultations in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination, or intimidation, and (iii)providing mechanisms for stakeholders to raise concerns, offer feedback, or submit complaints regarding project activities. The SES has been developed to guide the KHFLASIP project in fulfilling these objectives, thereby fostering transparency, accountability, and trust among all stakeholders.

Stakeholders for the KHFLASIP include beneficiaries of mortgages, individuals and groups affected benefitting from the line of credit/mortgages and the proposed land administration reforms, such as vulnerable and marginalized groups (VMGs) and other disadvantaged populations, as well as relevant

state departments, (TA) service providers, and civil society organizations (CSOs), among others. Initial identification and engagement of these stakeholders began during project preparation and will be maintained as a continuous process throughout the project cycle.

The SES has been developed to comply with both national legal requirements on public participation and information disclosure, as well as the World Bank's Environmental and Social Framework (ESF) regarding stakeholder engagement. Key national frameworks informing the SES include the Constitution of Kenya (2010), Kenya Vision 2030, the Public Participation Policy (2018), the National Gender and Equality Commission Act (2012), the Disability Act (2025), and the Access to Information Act (2016). Additionally, the SES aligns with the World Bank's Environmental and Social Standard 10 (ESS10) on "Stakeholder Engagement and Information Disclosure." Consistent with these requirements, KHFLASIP activities will be implemented in a participatory manner, ensuring stakeholders are fully informed about the project.

2 PROJECT DESCRIPTION

2.1 Project Development Objective

The main objective of the project is to expand access to affordable housing finance to underserved beneficiaries and support Kenya's commitments on nature and energy access, effectively contributing to job creation.

2.2 Project Structure

The project is organized into four (4) components with related activities as outlined in the table below.

Table 1: Project Components and Key Activities

Component	Key Activities
Component 1: Support to KMRC: Line of Credit for Mortgage Refinancing	This component will provide a line of credit to the KMRC and ensure continuity and enhanced uptake of the company's current product offering while innovating to serve unmet market needs. IBRD will provide a credit line to KMRC through NT to refinance affordable housing loans. As in the first phase of the project, KMRC will extend loans to banks and SACCOs (Primary Mortgage Lenders (PMLSs)) that meet strict eligibility criteria (as already documented in the earlier Project Operations Manual), and such loans will be secured against eligible mortgage/housing loans. To encourage market growth, PMLs will be able to pledge other collateral (government securities) for a limited time while they convert their portfolio into mortgage loans. The line of credit will be blended with KMRC's own funding raised through bond issuances on the capital markets, to ensure leverage of the IBRD resources and the overall sustainability of the mortgage market. Gender targets will also be actively pursued to ensure that efforts to promote gender equality are integrated into project implementation. The project aims to deliver additionality by consolidating existing gains while moving beyond conventional mortgage financing to pilot innovative products tailored to underserved market segments.
Component 2: Support to land administration reforms to accelerate affordable housing	This component would support the State Department of Lands and Physical Planning (SDLPP) in its reforms to make property registration faster, cheaper and more reliable, which is a precondition to develop the mortgage market. Building off the technical assistance completed under KAFHP1, the Project support will be structured into three sub-components: (i) Enabling the environment for property and mortgage registration through legal and regulatory reforms. (ii) Digitization of spatial and land records data, including geodetic improvements. (iii) Enhancing the *Ardhisasa* land administration management system by addressing systemic issues.
	2.2.1 Sub-Component 2.1: Legal and regulatory reforms While the current legal framework does not present any immediate impediments to the Component's proposed activities, there is scope for modernizing and harmonizing the legal framework for land. Based on the analysis already done during KAFHP1, this component would support the SDLPP to review, harmonize, and enact legislation to support end-to-end digital land transactions and promote consistency across land administration statutes, such as modernizing the Survey Act and improving the Sectional Properties Act (critical for housing development).

	2.2.2 Sub-Component 2.2: Digitization of spatial and alpha-numeric land records For Ardhisasa to function fully it is necessary to digitize existing property rights data (titles, deeds, transfer documents, etc.) and graphical spatial data (survey plans, etc.) so that it is fully available in the digital system. This has already been done for Nairobi County and parts of Mombasa, and the SDLPP has a solid system in place for the digitizing including records organization, bar-coding and management, indexing and data capture, quality control and assurance, and archiving of the paper records when digitized. The Project supported digitization activities will focus on land registries in the Nairobi metro area whose digitization would support affordable housing (Machakos, Ruiru, Thika, Kiambu, Kajiado Central, Ngong, Kisamis and Kajiado South) and potentially some secondary cities. These registries sit within the most active land market corridor in the country, with high transaction volumes, intense development pressure, and a large concentration of GoK's Affordable Housing Program projects. Additional pilot activities will be explored to consider how best to incorporate urban planning and development control data layers, and what is the scope of data improvement required
	2.2.3 Sub-Component 2.3: Enhancements to Ardhisasa land administration management system. While Ardhisasa provides a good platform for digital transactions with a unique property identifier linking alpha-numeric and spatial data, data security and audit functions for all changes to the data, and separation of front office and back-office functions, there is room for improvement. These include business process reengineering to simplify processes, automatic data checks, e-signature and other functionality. The work under this Sub-component will begin with an assessment of Ardhisasa from the security, technical and business perspectives and will propose additional functionality and other improvements to be implemented during the Project.
Component 3: Sustainability-Linked Financing Instrument	Subcomponent 3.1: Sovereign Sustainability-Linked Loan The project will support the GoK, via the National Treasury (NT), in launching a sovereign SLL vis the capitalization of a sinking fund. Blending World Bank financing and other concessional lending will be used to support a credit enhancement for SLL. The innovative instrument ties the cost of borrowing to national sustainability targets, aligning Kenya's financing needs with measurable environmental and development outcomes. The SLL is designed to diversify Kenya's financing sources, reduce borrowing costs and demonstrate how sovereign debt can be structured to drive development impact.
	Subcomponent 3.2: Sustainability-Linked Bond Issuance This component will support the issuance of a sustainability-linked finance instrument by KMRC. KMRC seeks to diversify its financing sources and raise private sector financing. The project can enable access to more affordable financing by credit enhancing a portion of the loan, thus reducing borrowing costs, leveraging financing sources, and enhancing KMRC sustainability ambitions.

Component 4: Technical Assistance	The TA will support Component 1 and overall project management. Activities will cover the development of new product offerings and assess market readiness. It will help define the program/product characteristics and support the development and implementation of roll out plans. The TA will also help operationalize KMGT, including capacity building (including for its staff, trustee, regulators and primary mortgage lenders) and procurement of relevant IT systems. Additionally, the TA will support preparations for future bond issuances (including the potential issuance of a sustainability-linked bond), through transaction advisory services and consultancy support. This component will also finance project management, including related capacity building.

2.3 Key Project Outputs

- Number of affordable mortgage/ housing loans refinanced by KMRC.
- Percentage of property sales transactions processed within the agreed service standard.
- People provided access to electricity through new connections in rural areas (Number).
- Level of Carbon Dioxide Abatement (Metric tons/year).
- Number of direct and indirect jobs created via the project.

2.4 Implementation Arrangements

The National Treasury (NT) will oversee the overall coordination, implementation, and supervision of E&S risk management for the project. E&S specialists within implementing agencies are tasked with executing the SES and updating it as needed throughout the project cycle. These specialists will collaborate closely with the Gender-Based Violence (GBV) specialist, communications officers, Monitoring and Evaluation (M&E) officers, and other key stakeholders, including those within PMLs.

NT, KMRC, and the SDLPP will organize and deliver all relevant training for effective implementation of SES (and the Grievance Mechanism), including for PMLs and other key project stakeholders. Specialized training will also address grievance management and GBV, specifically Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). Institutions engaged in project activities will be trained on operationalizing the GM, and service providers (including consultants) and primary suppliers will receive inductions on the SES and GM requirements.

2.5 Project Beneficiaries

Stakeholders	Benefits
Kenyans who are unable to access long-term housing finance.	This new operation targets underserved market segments by expanding access for low- and middle-income households that struggle to obtain long tenor finance due to limited collateral, irregular incomes, and high upfront construction costs. The project introduces refinancing products that focus on micro-housing loans and incremental construction finance to help these households build, improve, or purchase homes. It also develops a green mortgage segment designed to support climate resilient and energy efficient housing for lower income borrowers.
Primary Mortgage Lenders (PMLs) and SACCOs receiving refinancing from a strengthened KMRC.	KMRC will work with PMLs and SACCOs to diversify products and improve affordability. Technical assistance to the newly established KMGT will help lenders manage risk and lend responsibly to lower income and informal borrowers.

Users of land administration services.	Homebuyers, property owners, developers, lenders, surveyors, and conveyancers will gain from faster and more reliable property registration. The SDLPP will benefit directly through support for legal reforms, digitization of land records, and enhancements to the Ardhisasa system, improving the efficiency and integrity of property registration.
Private investors, capital market participants, and the National Treasury	They will benefit from the introduction of a sustainability-linked financing instrument. This will diversify funding sources, reduce borrowing costs, and align financing with measurable climate and development outcomes. They also strengthen market confidence and create fiscal space for priority housing investments.

3 STAKEHOLDER ENGAGEMENT

Stakeholder engagement is the continuing and iterative process by which the Borrower identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. The implementing agencies will ensure that stakeholder engagement begins as early as possible in project preparation to allow stakeholders' views and concerns to be considered in the project design, implementation, and operation. They will also consider the different information access and communication needs of various stakeholder groups and individuals, including consideration of literacy, mobility and disability challenges, especially with vulnerable individuals and groups.

This strategy will be implemented in a way that promotes monitoring of E&S risks while also setting mutual expectations, clarifying the extent of the government's commitments and resources, and obtaining feedback on activities. Thes strategy includes a grievance Mechanism (GM) to allow the government to act upon complaints and suggestions for improvements in a timely fashion.

Effective public participation strengthens and legitimizes state decisions, actions, and development intervention. It is an important element of good governance and the foundation for a true democracy. In line with good international practice, public participation is a requirement firmly anchored in the Constitution of Kenya (CoK, 2010) that provides new spaces for interaction, declared the citizen sovereign and demand that the public must be involved in every aspect of public governance.

This Strategy outlines ways in which the implementing partners will ensure meaningful stakeholder engagement, consultation and information disclosure throughout the project cycle. Specifically, the strategy outlines a systematic process for:

- Identifying and mapping project stakeholders at different levels.
- Planning engagement modalities through effective communication, consultations, and disclosure.
- Outlining platforms for stakeholders to influence decisions regarding the project.
- Defining roles and responsibilities for the implementation of the strategy.
- Defining reporting and monitoring measures to ensure the effectiveness of the strategy and periodic reviews of the strategy based on monitoring findings.
- Elaborating the project Grievance Mechanism (GM) that will facilitate prompt resolution of project related complaints.
- Outlining the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setting up of a project website.
- Documenting stakeholder consultations on proposed project design, environmental and social risks (E&S) and impacts, mitigation measures, the strategy, and draft E&S risk management instruments.

3.1 World Bank Requirements for Stakeholder Engagement

Consistent with the requirements stipulated under the World Bank's (WB) ESF and specifically the Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, the implementing agency is required to engage with stakeholders throughout the project life cycle. Such engagement is to commence as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design.

Consistent with ESS10, a Project with a Moderate E&S risk rating such as KAHF is required to include several points of engagement prior to approval by the WB and ideally more than one point of engagement during project implementation. In practical terms, the engagement should include:

- Stakeholder consultation to inform stakeholder analysis.
- ii) Dissemination of relevant project material, including explanations of intended project benefits and, where appropriate, the setting up of a project website.
- Stakeholder consultations on proposed project design, E&S risks and impacts, mitigation measures, the proposed strategy, and draft E&S risk management instruments.

Once the project is approved by the WB, project stakeholder engagement should include:

- Disclosure of information on how stakeholder feedback was incorporated into project design and E&S management instruments.
- ii) Consultations on implementation and supervision, on any new project characteristics or E&S risks, and on progress of E&S risk mitigation measures.
- iii) Regular efforts to keep stakeholders informed on project implementation and review the adequacy of stakeholder identification considering project implementation and related revisions to the strategy.

To comply with this requirement the implementing agencies are required to:

- Establish a systematic approach to stakeholder engagement that helps the entities to identify stakeholders and maintain a constructive relationship with them.
- Assess stakeholder interests and support for the project and enable stakeholders' views to be considered in project design.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle; and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

As a standard practice and as guided by ESS10, the disclosure of project E&S instruments including this strategy will be made by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. The disclosure process associated with the release of project E&S instruments will be implemented as follows:

- Disclosure of all E&S instruments in the public domain will take place after clearance by the World Bank. As per the World Bank Policy, the instruments will be disclosed on the external websites of KMRC, NT and SDLPP.

3.2 Stakeholder Identification and Analysis

The KHFLASIP is designed to engage a diverse range of stakeholders throughout its implementation. These stakeholders will include both state and non-state actors. According to the preliminary stakeholder analysis, the groups involved encompass project beneficiaries such as Vulnerable and Marginalized Groups (VMGs), women, youth, older persons, and persons with disabilities (PWDs). In addition, Civil Society Organizations (CSOs), organizations advocating for VMGs, and private sector entities will also be engaged. The implementing agencies are committed to ensuring that all relevant stakeholders are identified and actively involved during the entire project cycle.

a. Project-Affected Parties

According to ESS10, Project-Affected Parties (PAPs) include individuals or groups that are affected or likely to be affected by the project. PAPs are influenced (actual or potential) by the project and/or have been identified as most susceptible to change associated with the project. PAPs need to be closely engaged in identifying potential E&S risks and impacts including appropriate mitigation measures. Under KHFLASIP, PAPs include the individuals and groups identified under Table 2below.

b. Other Interested Parties

The projects' stakeholders also include parties other than the PAPs. They include key stakeholders within the implementing agencies, other relevant government agencies, who may have an interest in the project as listed under Table 2 below.

Table 2: Categories of Stakeholders

Category	Sub-category	Relationship to KAHFP
Project-Affected Parties	• Lower-income and middle-income borrowers/home buyers in underserved market segments. • Vulnerable and Marginalized Groups (VMGs). • Other vulnerable groups such as youths, women, PWDs, older persons, female-headed households, child-headed households and the urban poor.	• Beneficiaries of mortgage facilities under component 1. Households struggle to obtain long tenor finance due to limited collateral, irregular incomes, and high upfront construction costs. • Beneficiaries of the proposed land reforms, under component 2.
Other Interested Parties	• Kenya Mortgage Refinance Company. • National Treasury. • State Department of Land and Physical Planning. • Project workers (including TA providers).	• Implementing entities, and technical assistance providers.
	• Other state agencies, e.g. regulatory bodies.	• Regulatory Authorities
	Primary Mortgage Lenders (PMLs) in the Banking sector, Savings and Credit Cooperative Organizations and microfinance e.g. banks, saccos. • Imarisha SACCO. • Tower SACCO. • Safaricom SACCO. • Unaitas SACCO. • ABSA Bank of Kenya. • Stanbic Bank. • Cooperative Bank. Other private sector entities.	• Private sector financial institutions.
	• African Development Bank (AfDB). • The World Bank. • International Finance Cooperation.	Development partners.
	Civil society groups. • National Council for Persons with Disabilities. • Kenya National Hman Rights Commission. • The Institute for Social Accountability.	Organizations that represent the interests of vulnerable groups, including minority VMGs.

	• Ogiek Peoples' Development Program. • Sengwer Indigenous Community Trust. • Hunters and Gatherers Forum Kenya.	

3.3 Stakeholder Engagement Principles

Stakeholder analysis generates information on the perceptions, interests, needs, and influence of actors on the project. Identifying the appropriate consultation approach for each stakeholder throughout the project lifecycle is necessary. To meet the best practice, the project will apply the following principles (but not limited to) for stakeholder engagement.

a. **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation to closure. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
b. **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate and accessible format; conducted based on timely, relevant, understandable and accessible information related to the project; their rights and entitlements fully disclosed, and opportunities provided to raise concerns and ensure that stakeholder feedback is taken into consideration during decision making.
c. **Inclusivity and sensitivity:** stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive, and all stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods and ensuring that special attention is given to vulnerable groups.

3.4 Summary of Stakeholder Engagement Undertaken During Project Preparation

The implementing agencies (NT, SDLPP and KMRC) will undertake consultations with stakeholders before project effectiveness, update and disclose this strategy. A sample stakeholder consultation guide tool is provided under Annex 4.

3.5 Summary of Project Stakeholder Engagement Tools and Techniques

The implementing agencies will apply some of the most effective mechanisms to reach identified stakeholders including vulnerable and disadvantaged groups. To be effective, the implementing agencies will adopt various communication and participatory methods designed to inform, consult, involve, collaborate or empower. Such communication methods may include Focus Group Discussions (FGDs), public meetings, social media, print and other media, etc. Due to obstacles such as literacy, disability mobility, cost implication etc., impeding effective participation by the vulnerable individuals and groups, the project will work closely with organizations that advocate interests of such groups to ensure their concerns are addressed and their views taken into consideration. Further, the project is to ensure that engagement sessions are held at venues closer to communities.

Meaningful stakeholder engagement is based on the prior disclosure and dissemination of relevant, transparent, objective, and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format. The implementing agencies need to ensure that relevant project related information is available as early as possible and throughout the project life cycle in a manner, format, and language appropriate for each stakeholder group. This way, stakeholders will have an opportunity to influence the project in ways that do not present risks to those raising critical and sensitive issues regarding the project.

- The project team will utilize accessible and preferred methods for disseminating project -related information through public meetings, formal letters, emails, local mainstream media, information/service centers domiciled in counties and sub-counties, websites of implementing agencies and social media platforms, among others.
- Conduct periodic community feedback sessions and use of printed materials such as brochures and flyers containing relevant project information.
- Provide regular feedback mechanisms, such as surveys and grievance management platforms.
- Engage national, county and ward-level administrators, women's representatives, disability rights organizations, and organizations championing the interest of marginalized individuals and groups.
- Establish a clear and accessible grievance mechanism, as well as confidential reporting channels such as toll-free lines.

Table 3: Proposed Engagement Strategy

Method/Tool	Description and Use	Content	Dissemination Method	Target Group	Frequency of Stakeholder Engagement
For disclosure of project Information					
Print media such as leaflets, brochures, newsletters etc. and social media platforms.	Used to convey information on project activities and to provide regular updates on progress.	Printed materials present illustrative and written information on project activities. The contents presented are concise, clear, and easy to understand by a layperson reader. Graphics and pictorials are	Distribution of print media and disclosure of social media handles as part of consultation meetings, awareness campaigns, discussions, and meetings with stakeholders.	Affected parties including VMGs and other disadvantaged or vulnerable individuals and groups that can read and access social media platforms. Other interested parties.	At inception of project activities. Print media: quarterly basis to provide regular updates on project activities. Social media platforms; updated regularly

Method/Tool	Description and Use	Content	Dissemination Method	Target Group	Frequency of Stakeholder Engagement
		widely used to describe technical aspects and aid understanding. Social media platforms are widely used.			(daily/weekly basis).
Public forums with visual presentations.	Engage and present on the project.	Create awareness on the project's objectives, expected results, activities, target beneficiaries and project timelines. Raise awareness on potential E&S risks, impacts, opportunities, benefits, rights and entitlements and measures to mitigate risks and negative impacts, as well as the enhance positive impacts. Understand the perceptions of beneficiaries on the planned activities and how best to design the project to ensure inclusivity.	Public forums with visual presentations are used widely during consultation with the public and allow for oral interaction, especially when Q&A sessions are provided at the tail end of the presentation. If a large audience is expected to attend a necessary arrangement will be made to ensure audibility and visibility of the presentations. This includes provision of a microphone, proper lighting, projector, and places allocated for wheelchair users. Engage sign language interpreters, s appropriate and use language understandable to all.	All affected parties including VMGs and other disadvantaged or vulnerable individuals and groups. Applicable to those who cannot read or access project website/social media platforms due to limited network/phone connectivity. Other interested parties.	At inception of project activities. This can be applied on quarterly basis to affected parties or when need arises.
Use of mainstream media such as local TV/radio stations.			Engage diverse radio/TV stations including those in vernacular languages to ensure wide dissemination of project information.		
For provision of feedback to project Implementing Agencies					
Dedicated toll-free telephone line.	The Project will set up a dedicated toll-free telephone line for use by the public for	Information that is of interest or interest to the direct project beneficiaries and other stakeholders.	Telephone numbers are printed on published materials and distributed to project stakeholders during public	All affected parties including VMGs and other disadvantaged or vulnerable	A toll – free telephone line will be made available throughout the project cycle to allow for ease of

Method/Tool	Description and Use	Content	Dissemination Method	Target Group	Frequency of Stakeholder Engagement
	purposes of making inquiries, providing feedback or obtaining project information.	Receive feedback from beneficiaries about their concerns, issues and perceptions of the overall project implementation, as well as complaints.	meetings, provided on the social media platforms and project website.	individuals and groups. Other interested parties.	recording of complaints and grievances relating to the project.
Project website and social media platforms.	Use of implementing agencies' websites, social media platforms to engage the public on the project. Websites to have a built-in feature that allow viewers to leave comments or ask questions about project activities. Websites to be available in both English and Kiswahili	Information such as procedures/criteria for accessing mortgages, status on mortgage application process etc.,	A link to the project website, and social media handles should be specified on the printed materials distributed to stakeholders and shared during public forums.	All affected parties. including VMGs and other disadvantaged or vulnerable individuals and groups with internet/phone connectivity. Other interested parties.	The websites/social media platforms will be regularly updated with information on activities and stakeholders, especially those with access to internet can be able to access such information throughout the project cycle.
Information Centre or open office located within the Project Implementation Unit (PIU), Huduma 'service' centers existing within counties and sub-counties.	The centers are already in place and can be manned by designated project staff available to respond to queries or provide clarifications on project activities where needed.	Queries on the proposed land administration reforms, benefits, gaps etc.,	Information about the information centre with opening hours for the public, together with contact details, is provided on the project's printed materials distributed to stakeholders, websites, social media platforms, as well as shared during public meetings. Beneficiaries in far-flung areas, with limited internet and phone connectivity can walk into these centers and access project information.	All affected parties. including VMGs and other disadvantaged or vulnerable individuals and groups Other interested parties.	Stakeholders are free to always provide feedback or suggestions on project activities.

Method/Tool	Description and Use	Content	Dissemination Method	Target Group	Frequency of Stakeholder Engagement
Feedback & Suggestion Box.	A suggestion box can be used to encourage stakeholders to leave written feedback and comments about the project activities. Contents of the suggestion box should be checked by designated staff on a regular basis to ensure timely collection of input and provision of response/action, as necessary.	Any questions, queries, or concerns, especially from stakeholders who may find it difficult to express their views or concerns verbally during public meetings.	Appropriate location for the suggestion box should be selected in a safe public place to make it readily accessible to the stakeholders. Information about the availability of the suggestion box should be communicated as part of project Team's regular interaction with stakeholders on project activities.	All affected parties, including VMGs and other disadvantaged or vulnerable individuals and groups. Other interested parties.	Stakeholders are free to always provide feedback or suggestions on project activities. The project needs to ensure that the feedback/suggestion Box is checked on daily basis to provide timely response on issue raised within 7 days.

3.6 Strategies for the Inclusion of Vulnerable or Disadvantaged Individuals or Groups

Consistent with ESS10, vulnerable or disadvantaged groups within the project are the stakeholders who may be disproportionately impacted or further disadvantaged by the project as compared with other groups due to their vulnerable status. They are more likely to be excluded from or are unable to fully participate in the mainstream consultation process. It is therefore important to put in place targeted measures/interventions to ensure that they can effectively participate in project consultations processes free of coercion and duress. In the case of KHFLASIP and according to the preliminary assessment, such individuals or groups may include persons with disabilities, women, older persons, youth, orphans and VMGs, among others. As such, this strategy and the Environmental and Social Commitment Plan (ESCP) include measures, to ensure their meaningful consultation, inclusion of all beneficiaries in the engagement process and access to project benefits and opportunities that are culturally appropriate-in the case of VMGs.

Special sessions will be held with such groups to ensure their needs are captured and voices heard including where necessary conducting separate FGDs for women and youths amongst them. The project will endeavour to enhance women and youth participation by engaging their respective organizations and gather their insights on priorities and concerns.

Further the project will undertake the following to ensure effective participation of vulnerable or disadvantaged individuals or groups.

- Identify organizations championing the interest of these groups and their legitimate leaders, as appropriate. This will also require the implementing agencies to make reasonable efforts to verify that the respective legitimate leaders do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner.
- Ensure continued involvement and engagement of the identified organizations in all the project processes including targeting and engaging project beneficiaries.
- Seek input/feedback of the identified organizations and other stakeholders to avoid or minimize the potential E&S risks and impacts associated with the planned interventions on these groups.
- Address the barriers that are likely to impede their access to project benefits and opportunities.

Consultations with these groups shall be conducted prior to the commencement of project activities and throughout implementation, there will be continuous stakeholder engagement that will ensure the active involvement of vulnerable or disadvantaged individuals or groups. In this regard, the project teams will:

- Disclose all relevant project information including potential E&S risks and impacts, as well as their rights and entitlements in a timely and culturally appropriate manner ensuring meaningful consultations and provision of feedback. All project E&S plans will be disclosed and made publicly available on the websites of implementing agencies.
- Conduct meetings in a language(s) understood by these groups and where necessary language, translation will be provided.
- PWDs will be provided with information in accessible formats.
- Announce public meetings in a timely manner (a minimum of 7 days in advance).
- Facilitate their broad participation with adequate gender and intergenerational representation.
- Ensure adequate and ongoing consultation based on a pre-agreed consultation plan (and in line with this SES) with them in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation.
- The project team shall consider and respond to feedback promptly and, document and disclose all consultations held, clearly providing minutes and signed list of attendance. Further, the

project shall provide regular updates on project progress and organize feedback sessions and /or mechanisms to effectively provide input to the project as implementation continues.

- Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
- Document details of all consultation meetings on their perceptions towards the project activities and the associated impacts, especially adverse ones.
- Share any input/feedback offered by them; and provide an account of the conditions agreed with the people consulted.

To help ensure that the process does not marginalize vulnerable groups, the following issues will be addressed during the implementation stage of the project:

- Establish an effective mechanism for monitoring implementation of the project activities by the implementing agencies, including the E&S team.
- Ensure adequate representation of the vulnerable individuals and groups in all project governance structures if any.
- Design and publicly disclose the project grievance mechanism that is SEA/SH-responsive. The E&S Specialists will be instrumental in sensitizing vulnerable individuals and groups on the project GM including the grievance management structures, escalation tiers and uptake channels. Feedback on reported grievances will be provided to all the vulnerable individuals and groups in a timely manner as described in the project GM. The E&S teams will ensure that all concerns/conflicts are addressed promptly and effectively, in a transparent manner that is culturally appropriate. All received grievances including those reported anonymously shall be logged, dated; processed, resolved, and closed out.
- For effective engagement and participation of vulnerable individuals and groups, the implementing agencies E&S focal points will ensure that relevant project information disclosed is:
    - Accurate, up-to-date, and easily accessible.
    - Articulates the principle and rationale for the various strategies being used by the project at the different levels.
    - Includes an indicative timeline and phasing of the project activities in the respective project areas.
    - Includes explanation of measures that will be used in the selection of workers and how the effects on the public and communities will be minimized.
    - Includes information on where target communities and other stakeholders can go for more information, ask questions, channel their complaints and grievances, and provide feedback (and contact persons as appropriate) and acts on their feedback appropriately and confidentially.

Before project effectiveness, the project implementation teams will map and engage these groups to ensure their needs and concerns in terms of accessing information, services, project benefits and opportunities, and any other challenges experienced during project implementation are timely addressed. Further, organizations working with or representing the interests of these groups will also be consulted in the respective areas of operation on how best to ensure inclusiveness. This strategy will be updated and disclosed following this exercise.

4. GRIEVANCE REDRESS MECHANISM

KMRC has an existing Grievance Mechanism (GM) as part of the Environmental and Social Management System (ESMS) and which was utilized under the first phase of the project. In line with the ESS10 requirements, the other two implementing agencies (SDLPP and NT) will establish and operate a GM to ensure effective management of grievances that may arise during project implementation. The GM shall be readily accessible to all project-stakeholders, at no cost and without retribution. The GM is also expected to address project related concerns promptly and effectively, in a transparent and culturally appropriate manner. Further, the implementing agencies will ensure that the GM is well documented, and all its processes publicly disclosed to enhance its accessibility by all stakeholders including target communities.

TheE&S specialists at KMRC, NT and SDLPP in close cooperation with the Project Coordinator (PC) will assume the lead responsibility for resolution of all projects related grievances in accordance with the WB ESSs. A Grievance Committees (GC) will be established at the national level and chaired by the Project Coordinator (PC) while the SDLPP, NT and KMRC E&S specialists will serve as the key focal points in charge of grievance management for their respective entities. The main task of the committee is to review progress on complaints resolution and assess overall effectiveness of the GM. Membership to the GC will include staff responsible for procurement, finance, Monitoring and Evaluation (M&E), and communication, among others. In addition, staff from other government agencies will be invited as required.

For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the E&S specialists should immediately inform the World Bank within 48 hours as per the Environmental and Social Incident Response Toolkit (ESIRT).

The E&S specialists at KMRC, NT and SDLPP in close cooperation with the Project Coordinator will be charged with the following responsibilities.

- Serve as the main focal person for grievance management within their respective entity.
- Register, categorize, analyse, invite the others E&S specialists for resolution, and provide feedback to the aggrieved.
- Maintain the GM log in both soft and hard copies.
- Follow up on pending issues with the community, and national level grievance committees.
- Identify gaps and recommend actions for improving the GM.
- Prepare monthly/quarterly reports on all grievances received and processed and submit to WB, as one consolidated report.
- Build the capacity of the project staff on grievance management.
- Monitor performance of the project GM by taking periodic audits of all GM activities.

4.1 Grievance Redress Process Steps

Step 1: Reporting and Receiving Grievances

The implementing agencies E&S specialists and close cooperation with the will sensitize all project staff and stakeholders on the project GM including where and how to submit grievances. They will ensure that various grievance uptake channels are provided at all tiers of grievance resolution before commencement of project activities. Grievances can be submitted by email, publicized toll-free phone lines managed by the E&S specialists, letters, walk-ins to implementing agencies offices, verbally through project E&S specialists or use of anonymous/suggestion boxes. The project GM will not prevent access to judicial or administrative remedies. The project team will inform all stakeholders about the grievance process during its stakeholder engagement activities and will make publicly available a record documenting the responses to all grievances received. The project GM will also allow receipt and resolution of anonymous complaints and will incorporate existing traditional grievance mechanisms.

Step 2: Recording and processing of grievances
Documentation of complaints and grievances is important, including those that are communicated informally and orally. Records provide a way of understanding patterns and trends in complaints, disputes, and grievances over time. While transparency should be maintained for example, through regular reports on issues raised and rates of resolution, provision should also be made for confidentiality of information or anonymity of the complainant(s) especially where SEA/SH cases are involved. All submitted complaints and grievances will be entered into the grievance log/register and archived including all scanned documents received or related to the case along the process. Once logged, the grievance should be assessed, assigned to an individual for management, tracked and closed out or "signed off" when resolved, ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution.

The project will maintain a grievances log in which complaints received by the project, either in written or verbal form, are entered. A grievance log should capture the following information:

- Serial number,
- Reference number,
- Uptake channel used,
- Name and address of the complainant/their representatives/if anonymous,
- Date of complaint,
- Summary of the complaint/grievance,
- Signature of the complainant/s,
- Category,
- Resolution process (Not commenced/In process/Completed),
- Referred,
- Signature of the complainant/s.

Step 3: Reviewing and Investigating and Resolution of Grievances
All grievances will need to undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances. Once the grievance is well understood, resolution options can be developed taking into consideration stakeholders' preferences, project policy, past experiences, current issues, and potential outcomes.

Step 4: Feedback mechanism
One of the most important steps of the project GM is to provide clear feedback of outcome to the complainants. The E&S specialists are responsible to give feedback to the complainants via email, message, phone call or verbal. The complainants must know that their complaints were recorded by the GC's and that the issue is being investigated. In case of anonymous complaints, acknowledgement will not be possible. The complainants shall receive acknowledgement feedback within 7 working days after the issue is reported. The resolutions agreed upon must also be recorded in the grievance log for purposes of tracking grievance management and reporting.

The project GM will use various approaches for acknowledgment and communicating the grievance outcome and this includes:

a. **Email/messaging**: Either an automatic or manual reply will be sent to the complainants confirming the receipt of their complaints and getting back to them after analysing it. The complainant, who has sent his /her grievance through email, will receive the final feedback through email.
b. **Grievance resolution form**: A printed, or soft copy grievance resolution form will be used. The form and other GM related templates (grievance acknowledgement form, grievance log template, GC meeting format, and grievance resolution form) are annexed to this strategy.
c. **Phone call:** The complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by the E&S specialist or verbally.

Step 6: Monitoring and Reporting of Grievance Mechanism
Monitoring and reporting can be a useful tool for measuring the effectiveness of the GM and for determining broad trends and recurring problems so that they can be resolved proactively before they become points of contention. Monitoring and reporting create a base level of information that can be used to report to communities. To ensure smooth operation of GM, the E&S specialists at all levels will conduct frequent supervisions and monitoring missions on GM to ensure that it is functioning as anticipated, and GM aspects are included in regular reporting mechanism. The status of grievances received and resolved or escalated will be reported by the E&S specialists on a quarterly basis. The GM reports will be submitted to WB in consultation with the project coordinator.

4.2 Workers Grievance Mechanism

Typical workplace grievances include fair and equal opportunities for employment; discrimination, labour wages rates and delays in payment; disagreements over working conditions; and health and safety concerns in work environment. Therefore, in line with the ESS2 requirements, a separate GM will be provided for SDLPP and NT to cater to all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the GM at the time of recruitment and the measures put in place to protect them against any reprisal for its use.

4.3 Grievances related to Gender Based Violence (GBV)

The preliminary assessment of the project-related GBV SEA and SH risk is moderate. The GBV specialist will be responsible for ensuring GBV related complaints are addressed. Further, the project will provide various avenues for reporting GBV-SEA/SH cases, and the GBV Specialist will have a dedicated telephone line, SMS service and email address where such complaints can be raised.

In line with the survivor-centered approach, the grievance recipient to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, and compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor. Once a case has been taken in by a GM operator or via the identified focal points, informed consent of the survivor is obtained to proceed with the case, the case file/information will be submitted to the project E&S and GBV Specialists, who will ensure that the survivor has been provided with all necessary GBV referral services, and he/she is safe.

Complaints relating to GBV- SEA/SH will be addressed immediately by referring the SEA/SH survivors to support services as per the GBV Referral Pathways. A comprehensive GBV -SEA/SH Prevention and Response Action Plan shall be prepared and publicly disclosed. This plan shall contain a map of GBV referral pathways.

5. Monitoring and Reporting

The E&S specialists at KMRC, SDLPP and NT will monitor the implementation of this strategy in accordance with the requirements of the Legal Agreement and the Environmental and Social Commitment Plan (ESCP), including changes resulting from the implementation of any project activity. The extent and mode of stakeholder monitoring with respect to environmental and social performance of the project activities will be proportionate to the potential environmental and social performance risks and impacts of the project activities and their effect on the various stakeholder interests. The entities will allocate the necessary resources for successful implementation of this strategy and ensure that the objectives are met.

The implementing agencies will compile a report summarizing SES results on an ongoing basis throughout the project implementation period. The SES will be periodically reviewed and updated as necessary during project implementation to ensure that the information presented therein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of development. Any major changes to the project-related activities and to its schedule will be duly reflected in the updated SES.

The SEP reporting will include the following:

- Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP).
- 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, or SEA/SH Action Plan or LMP 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 the views of the attendees can also be annexed to the monitoring reports.

The table below summarizes the quantitative monitoring indicators.

Potential Indicators	**Means of Verification**
Number of project stakeholders accessing project information, benefits and opportunities.	Quarterly E&S reports.
Percentage of stakeholders who are aware of the GM mechanism report that they trust the mechanism to resolve complaints satisfactorily.	Stakeholder meetings type of stakeholder and gender.
Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential E&S risks and impacts including associated mitigation measures.	Quarterly E&S reports.
Number of government agencies, civil society organizations, private sector and other stakeholder groups that have been involved in consultations on the project implementation phase on a quarterly basis.	Minutes and reports of consultations disaggregated according to e.g., gender.
Number of engagements (e.g. meeting, workshops, consultations participants sex and age disaggregated) with stakeholders during the project implementation phase (on an annual basis).	Minutes reports and other documentation of consultations.
Percentage of SEP activities implemented, key barriers to participation identified with stakeholder representatives and number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness.	Quarterly reports.
Percentage of complaints that are satisfactorily resolved and not resolved within timelines disaggregated by e.g., gender (according to the complainants (during stakeholder surveys and evaluation).	Stakeholder meetings by type of stakeholder and gender.

6. Budget

The implementing agencies will ensure that adequate funds are allocated from the overall project cost, for implementation of this strategy. The budget will be used to cater for costs related to capacity building and awareness creation activities.

The strategy will also include resources for implementing the project GM and will be referenced when developing the detailed work plan. Table 8 below provides an itemized budget of USD 84,000.

Table 1: Estimated Budget for Implementing the SES for 5 Years

Item	Budget basis and Assumption	Total Cost USD
1. Capacity Building: (awareness creation, induction and trainings on E&S provisions)		
Undertake stakeholder consultations to inform the assessment of the Ardhisasa platforms functionality and areas of improvement to ensure an inclusive design.	One-off	50,000
Prepare information awareness materials for beneficiaries.	Once per year	5,000
Train project workers on E&S provisions.	Once per year	5,000
2. Monitoring on Implementation of E&S Provisions		
Monitoring compliance and extent of implementation of ESF instruments including the SES.	Quarterly	10,000
3. Grievance Management		
Develop and operationalise the project and worker GMs including a separate GM for handling SEAH related grievances.	0	5,000
Maintain a toll-free line.		5,000
	Total Estimated Budget	**80,000**
	Contingency (5%)	**4000**
	Grand Total (USD)	**84,000**

ANNEXES

Annex 1: Template to capture minutes/records of consultation meetings

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

Annex 2: List of Participants during Stakeholder Mapping and Consultations

The list of participants is not publicly disclosed to align with data protection provisions.

Annex 3: Grievance Management Related Templates

a. Grievance Documentation and Acknowledgement Form

State: …… Institution: ……..

Name of Complainant:

Contacts: Phone……..
Email address ……

Date of Complaint: ……. (dd-mm-yyyy)

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

Summary of Complaint:

Name and Signature of the Complainant:
……

Name and Signature of Officer receiving the complaint:

b. Grievance Redress Log

GRIEVANCE LOG		**Person Completing**	
Project		**Contact**	
Geographical Location			

Serial No	**Name/or Ref**	**Contact**	**Date received**	**Channel**	**Description of complaint**	**Referred to (Name& Position)**	**Tel no**	**Date**	**Action taken/greed resolution**	**Outcome**	**Feedback Given Y/N**	**Date resolved**
1												
2												
3												

c. Grievance Committee Meeting Recording Format

State:

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

Venue of meeting: _____

Details of Participants:

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

Summary of Grievance:

Summary of key discussions:

Decisions taken in the meeting / Recommendations of GRC:

Issue solved / Unsolved _____

Signature of Chairperson of the meeting: _____

Name of Chairperson: _____

Date: dd-mm-yyyy

d. Grievance Resolution Form

State:

1. Name of Complainant……..…….

2. Date of Complaint……..……..

3. Summary of the Complaint:

4. Summary of Resolution

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

Signature of the grievance committee chairperson

Name: _____

Date: dd-mm-yyyy

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

Name: _____

Annex 4: Stakeholder Consultations Guiding Questions

#	Thematic Areas	Objectives	Questions
1	Stakeholder consultation	How to make engagements meaningful and inclusive.	• What is your take about the project that we have explained to you? • How do you wish to be involved throughout the project cycle? • How often do you want to be engaged/communicated to? • What engagement method/tools do you propose the project utilize to convey information to you? • How can the project ensure that stakeholder engagement is meaningful and inclusive?
2	Grievance management	Ensuring functional mechanisms for effective and timely grievance resolution.	• What are some of the areas of the project that will raise complaints? • What is your view regarding the capacity of the project grievance mechanism to resolve grievances effectively and a timely manner? • What recommendations do you have for enhancing the project's grievance mechanism?
3	Targeting and inclusion	Enabling access to project benefits and opportunities especially for those considered vulnerable.	• What barriers are anticipated to affect the potential beneficiaries from accessing project benefits and opportunities? • Which groups of the population are likely to be at risk of being affected by the barriers mentioned? • What suggestions do you propose for overcoming the said barriers to ensure that vulnerable groups access project benefits and opportunities?
4	GBV-SEA/SH	Ensuring SEA/SH cases are prevented and responded to.	• What situations, locations, or project activities could expose women, children, or other vulnerable groups to risks of sexual exploitation, abuse, or harassment (SEA/SH)? • What preventive measures should be in place from the start? • What reporting and survivor-centered response mechanisms would project stakeholders trust to safely report SEA/SH incidents without fear of retaliation, stigma, or loss of benefits?