



**MINISTRY OF INDUSTRIALIZATION, TRADE AND  
ENTERPRISE DEVELOPMENT  
State Department for Industrialization**

**Kenya Industry and Entrepreneurship Project (KIEP)**

**Grievance Redress Mechanism (GRM)**

**(2018-2024)**

**February 2021**

<b>KIEP Grievance Resolution Mechanism</b>	
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## List of Acronyms

ESMF	Environmental and Social Management Framework
GDP	Gross Domestic Product
GoK	Government of Kenya
GRM	Grievance Redress Mechanism
IDA	International Development Association
ICT	Information and Communication Technology
KAM	Kenya Association of Manufacturers
KITP	Kenya Industrial Transformation Program
KIEP	Kenya Industry and Entrepreneurship Project
M&E	Monitoring and Evaluation
MoITED	Ministry of Industrialization, Trade and Enterprise Development
MTP III	Medium Term Plan III
PDO	Project Development Objective
PIU	Project Implementation Unit
PS	Principal Secretary
PSC	Project Steering Committee
PC	Project Coordinator
PM	Project Manager
TEI	Tertiary Education Institution

## Terminology

Terminologies used in this Procedure have the following meaning:

Term	Definition
<b>Ecosystem</b>	The enabling environment under which entrepreneurs grow and thrive, including a variety of actors such as startups, support organizations, financiers, government, academia, etc
<b>Ecosystem intermediaries</b>	Under this Project, they refer to incubators, accelerators, tech hubs, and technology bootcamp providers.
<b>Implementation action plan</b>	Generated by the ecosystem intermediaries (incubators, accelerators, hubs, bootcamp providers) based on recommendations from the diagnostic, and pitched as part of the selection process; they will include milestones.
<b>Incubator</b>	A company that helps startups to develop and grow by providing services such as management training or office space. Also referred to as hubs and innovation centers. Incubators support the creation and initial growth of new and early stage enterprises through access to resources such as capital, physical space, networking connections, and mentorship. Their support can last for a longer period than the support offered by accelerators. The time period can be at minimum 6 months up to 18 months; however, some incubators' support lasts even longer. They offer a pathway to the first investment for startups. Incubators can be run by the private sector, government, universities etc. <sup>1</sup>
<b>Innovation ecosystems</b>	This describes the interaction between the main innovation actors that contribute to enhancing competitiveness and generating growth and employment. In the context of the knowledge economy, beyond researchers, university faculty, and industries, public administration, entrepreneurs, developers, and investors are also considered important actors of the innovation ecosystem. Innovation ecosystems grow continuously with the increase of skilled people capable of creating innovative products and solutions.
<b>Complainant</b>	An individual, group or organization who submits a complaint to KIEP.

<sup>1</sup> Entrepreneur.com

<b>Complaint/ grievance</b>	A concern, grievance or an expression of dissatisfaction with the KIEP or Beneficiary Activities associated with KIEP, typically referring to a specific source of concern and/or seeking a specific solution. For the purposes of this Procedure, a question or request may also be treated as a complaint.
Complaints File	A file used to store all complaint investigation related documents
Complaint Register/ Log	A database for maintaining information about complaints received.
Contractor/ Consultant	An individual or firm that has entered into a contract to provide goods or services to KIEP. The term covers parties directly contracted by KIEP and those contracted by a Contractor company, also referred to as subcontractors.
Registration Form	A form used to capture information about an incoming complaint.
Stakeholder	KIEP Beneficiary or any other party interested directly or indirectly involved in or influenced by KIEP operations.
Appeals Committee	Will comprise the select committee of the Project Implementation Unit to review the complaint and make recommendations to Project Steering Committee.

## **1. Introduction**

### **1.1 Project Overview**

The Government of Kenya (GoK) received a credit of US\$50 million (Euro 41.4 million) from the International Development Association (IDA) to finance the implementation of the Kenya Industry and Entrepreneurship Project (KIEP) for a six-year period spanning from August 2018 to December 2024. Kenya's Vision 2030 and its Third Medium-Term Plan (2018-2022), together with the Big Four Agenda, set ambitious development targets that require significant growth in private sector employment, generation and productivity.

The Kenya Vision 2030 aims to transform Kenya into a newly industrialized, globally competitive, middle-income country. By strengthening the innovation and entrepreneurship ecosystem and increasing firm-level innovation and productivity, this loan will help deliver Kenya's Vision 2030, which recognizes the challenges of slow structural transformation and low productivity in sectors that employ the majority of Kenyans. This loan also aids the broader Medium-Term Plan III (MTP3), which envisages the transformation of the Kenyan economy, partially through a higher contribution of manufacturing industry, and exporting sectors to GDP, and accords priority to enhancing enablers including Science, Technology, and Innovation as well as ICT. MTP3 strives to raise productivity in all sectors of the economy, including the manufacturing and agriculture sectors, which require modernization and higher levels of technology absorption.

As part of the implementation of the Kenya Vision 2030, the Ministry of Industrialization, Trade and Enterprise Development developed a strategy, the Kenya Industrial Transformation Program (KITP). The KITP highlights the importance of technology and innovation to the development of industry and recognizes the centrality of firm-level support to Kenya's industrialization.

### **1.2 KIEP Project Objectives**

The Project Development Objective (PDO) is “to increase innovation and productivity in select private sector firms.”

### **1.3 Rationale for the GRM**

A Grievance Redress Mechanism (GRM) is an instrument through which dispute resolution is sought and provided. It involves the receipt and processing of complaints from individuals or groups negatively affected by activities of a particular project. The GRM will assist KIEP to ensure that deliberate processes and procedures are put in place to capture, assess and respond to concerns from project beneficiaries, project executors and the general public during the implementation of the project. This will ensure smooth implementation of the project, timely and effectively addressing of the problems that would be encountered during implementation.

### **1.4 Project Beneficiaries**

In order to help the GoK meet its growth and industrialization agenda, the Project's direct beneficiaries are formal private sector firms in Kenya, including incubators, accelerators and

technology bootcamp providers (referred to collectively as Intermediaries), innovators, start-ups, SMEs, corporates, select State Corporations and select Tertiary Education Institution (TEI) and technology bootcamp students. The Project seeks to work with high-growth firms and firms with a high potential to succeed, including strong Intermediaries, to enhance the Project’s success in terms of realizing its outcomes and ensuring significant catalytic and cascading effects.

KIEP seeks to build strong relationships with project stakeholders. In doing so, the project recognises that complaints about its operations in the innovation ecosystem may occur from time to time. The Grievance Redress Mechanism (GRM) Procedure allows stakeholders to raise questions or concerns with KIEP and have them addressed in a prompt, respectful and responsive manner. KIEP aims to address all Complaints received, regardless of whether they stem from real or perceived issues and whether the Complainant is named or anonymous.

Any stakeholder affected by KIEP activities will not only have free access to this procedure, but they will be party to a process that is predictable, transparent and credible. This has to be fair, effective and lasting. The statutory rights of the Complainant to undertake legal proceedings remain unaffected by participation in this process.

KIEP seeks to foster trust in the process and its outcomes. To this end, it will communicate this Procedure in an understandable manner to stakeholders. Confidentiality will be respected and KIEP will take all reasonable steps to protect parties to the process from retaliation.

#	Project Beneficiary Agencies. possible complaint owners	Possible Complaint Owners
1.	Principal Secretary for Industrialization	Ministry of Industrialization Trade & Enterprise Development (MOIED)
2.	Project Coordinator	Kenya Industry & Entrepreneurship Project (KIEP)
3.	NIRAS OY	Consultancy Services for Management of Support to SMEs Through Capacity Assessment and Performance Based Funding
4.	Growth Africa with Aspen Network of Development Entrepreneurs (ANDE) and Nairobi Garage	Consultancy Services for Design and Management of an International Acceleration Process-REF. NO. KE-SDII-71153-CS-QBS
5.	Maastricht School of Management (MSM) with LIWA (Linking Industry with Academia) Trust and INASP	Consultancy Services for Administration And Management of an Industry-Academia Platform
6.	TBD	Consultancy Services for Design and Management of an Industry-Start-up Linkage Program; M&E Firm; Communication firm.
7.	Spineberg & E4Impact Ltd	Consultancy Services for Administration and Management of Intermediaries

## **2. GRM Objectives**

The KIEP GRM objectives are to:

- i. Establish a prompt, consistent and respectful mechanism for receiving, investigating and responding to complaints and concerns raised in connection with KIEP's activities.
- ii. Describe the scope and procedural steps for the complaint handling process and specifies the roles and responsibilities of the parties involved.
- iii. Enable local communities, employees, SMEs, Innovators, and other affected stakeholders to raise grievances and seek redress when they perceive a negative impact arising from the project implementation activities and reduce the likeliness of escalation of disputes.
- iv. Ensure proper documentation of complaints and any corrective actions taken.
- v. Mitigate, manage, and resolve potential or realized negative impacts, as well as fulfil obligations under international human rights law and contribute to positive relations with communities and employees.
- vi. Enhance confidence among stakeholders on KIEP interest to address their concerns hence promote positive project image.
- vii. Contribute to continuous improvement in performance through the analysis of trends and lessons learnt.
- viii. Create awareness on GRM to stakeholders.

## **3. Scope of Grievance Redress Mechanism**

This GRM Procedure is open to all stakeholders who consider themselves affected by KIEP activities. Complaints may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named complaints to the extent that is reasonably possible.

There are no restrictions on the type of issue a stakeholder can raise under this procedure. However, when a complaint is received that is more appropriately handled under a separate Organizational process established for that purpose (such as employment or business integrity related issues), it will be redirected so as to prevent parallel processes being followed. All complaints received under this Procedure shall be tracked until completion regardless of the process under which they are handled.

KIEP, upon consultation with Chairman of the Project Steering Committee, reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified and therefore un-actionable dissatisfaction with KIEP, is otherwise malicious or vexatious in nature, or concerns a matter for which KIEP has no formal responsibility (for example, a matter that the government controls or stakeholders control internally). The GRM complements but does not replace the legal channels and other mechanisms for addressing grievances.



KIEP will create awareness of the GRM through various stakeholder's forums. In addition, a complaint reporting facility will also be availed as an online grievance redress system displayed on [kiep.go.ke](http://kiep.go.ke) website. The GRM will be revised and updated periodically based on experience and feedback from stakeholders.

#### **4. Principles of the GRM**

The effectiveness of this GRM will be guided by the following principles:

- i. **Accessibility:** The GRM should be accessible to everyone and at any time. It should take into consideration potential barriers such as language, literacy, awareness, cost or fear of reprisal and seek to address them.
- ii. **Predictability:** GRM should be time-bound at each stage, and have specified time frames for the responses.
- iii. **Fairness:** All the procedures therein should be widely perceived as unbiased in regards to access of information and meaningful public participation.
- iv. **Rights compatibility:** The outcomes of the mechanism should be consistent with the international and national standards. It should also not restrict access to other redress mechanisms.
- v. **Transparency and accountability:** The entire GRM process should be done out of public interest.
- vi. **Capability:** Effective GRM, system needs to be endowed the necessary resources, that is, technical, financial and human resources.
- vii. **Feedback:** It should serve as a means to channel citizen feedback to improve project outcomes for the people.

## **5. The GRM Structure**

The different levels of redress (Beneficiaries, stakeholders, Points of receipts of complaints), Establishment of the GRC's and criteria for membership in this committees)

A two level Redress mechanism is planned to address all complaints during KIP project implementation.

### **5.1 First Level of Redress: Management Firm/Beneficiaries Level**

The main targets at this level are the project beneficiaries. All the components management firms will be required to adopt the grievance Redress Mechanism and shall appoint GRM Focal person who will be trained to handle complaints. All project beneficiaries shall be informed of the appointed recipients of complaints. Once they receive a complaint they shall be mandated to register the complaint, investigate and recommend an action. The received complaint shall be recorded on a standardized KIE-GRM/002 form as shown in Appendix 2. If the complainant is not satisfied with the recommendation they shall be advised to report to the second level of redress. The focal persons shall be obligated to submit a quarterly report using the standardized KIEP-GRM/006 format as in Appendix 6.

#### **5.1.2 Mode of receipt and recording of Complaints**

The complaints can be made in writing, verbally, over the phone, by fax or emails. The officer receiving the complaints should try to obtain relevant basic information regarding the grievance. As soon as a complaint is received, an acknowledgement form, KIEP-GRM/003 as shown in Appendix 3 shall be issued.

After registering the complaint, the Grievance Handling Team shall set a date to investigate the matter, after which they shall provide a recommendation. If necessary, meetings have to be held between the complainants and the complainant to find a solution to the problem and make arrangements for grievance redress. The deliberations of the meetings and decisions taken are recorded in a standardized format as in KIEP-GRM/004 (see Appendix 4).

#### **5.1.3 Timeline**

The resolution at the first level will be done within 10 working days and notified to the concerned through a standardized disclosure form, KIEP-GRM/005 as shown in Appendix 5. Should the Grievance not be solved within this period it would be referred to the next level of Grievance Redress. However, if the complainant requests for an immediate transfer of the issue to the next level or is dissatisfied with the recommendation, the issue will be taken to the next level.

## **5.2 Second Level of Redress: Project Implementation Unit Level (KIEP, Parastatals/Associations)**

The main targets at this level are the KIEP project implementers, Project Implementation committee and their related institutions. A grievance handling committee shall be appointed and trained to handle complaints. This committee shall work under the supervision of the Project Coordinator. All stakeholders shall be informed of the existence of the grievance committee. This committee shall dedicate days when they are available to receive and resolve complaints. Once the committee receives a complaint it shall be mandated to register the complaint, investigate and recommend an action. If the complainant is not satisfied with the recommendation they shall be advised to report to the third level of redress. This committee shall be obligated to do a quarterly report following the KIEP-GRM/006 format.

### **5.2.2 Mode of receipt and recording of Complaints**

The complaints can be made in writing, verbally, over the phone, by fax or emails. The officer receiving the complaints should try to obtain relevant basic information regarding the grievance. The points of receiving complaints as illustrated above shall be in possession of a KIEP-GRM/002 form which must be filled in by every complaint. As soon as a complaint is received, an acknowledgement, KIEP-GRM/003 is issued.

After registering the complaint, the Grievance Handling Team under the guidance of the Project Coordinator shall set a date to investigate the matter, after which they shall provide a recommendation. If necessary, meetings have to be held between the complainants and the concerned officers to find a solution to the problem and make arrangements for grievance redress. The deliberations of the meetings and decisions taken are recorded on a KIEP-GRM/004 form.

### **5.2.3 Timeline**

At the second level, the resolution period will also take a maximum of 10 working days and the concerned shall be notified through a KIEP-GRM/003 form. Should the Grievance not be solved within this period, this would be referred to the next level of Grievance Redress. However, if the complainant requests for an immediate transfer of the issue to the next level or is dissatisfied with the recommendation, the issue will be taken to the next level.

### **5.3 GRM Membership Criteria**

The PIU members involved in the project management will take on grievance handling as a responsibility. The GRM members should be qualified, experienced, and competent personnel who can win the respect and confidence of the affected beneficiaries. It is also important to maintain a gender balance within the GRMs. Criteria for selecting members of GRMs include the following:

- ✓ Knowledge of the project, its objectives, and outcomes;
- ✓ Technical knowledge and expertise, e.g., innovations management, SMEs, business, legal; understanding of the social, economic, and cultural environments and the dynamics of the innovation ecosystem players;
- ✓ capacity to absorb the issues dealt with and to contribute actively to decision-making processes;
- ✓ social recognition and standing; and
- ✓ an equitable representation of males and females.

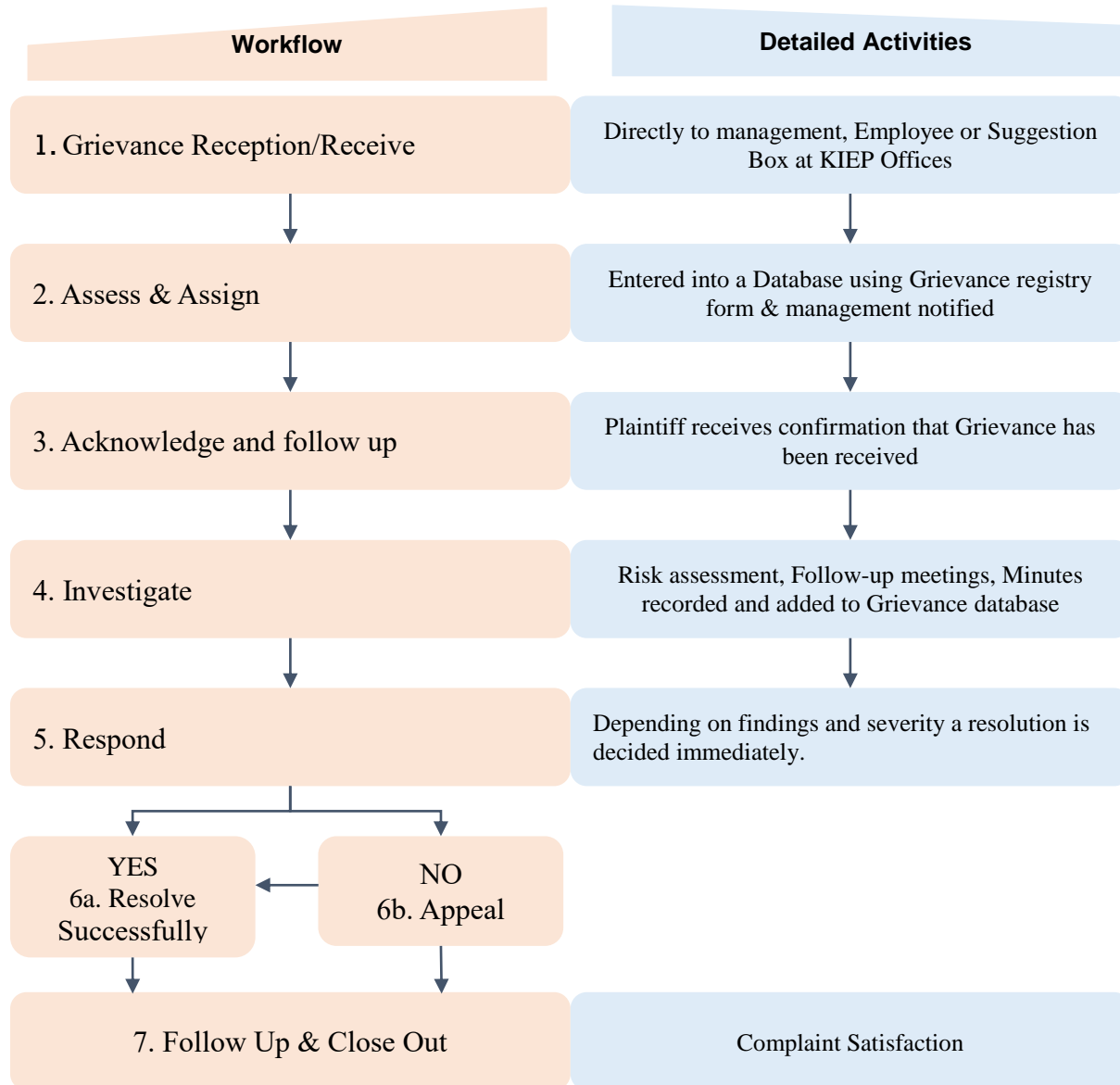
## 6. Roles and Responsibilities

Roles and responsibilities under this GRM Procedure are as follows:

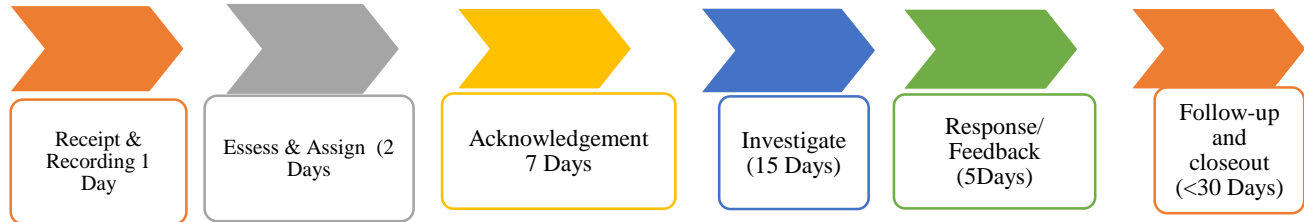
<b>Role</b>	<b>Responsibility</b>
Project Coordinator	<p>Responsible for the overall implementation of this procedure. This includes serving as custodian of the complaints process, monitoring the handling of complaints, and suggesting changes to policies or practices based on lessons learnt.</p> <p>The Project Coordinator also serves as the Complaint owner (but can delegate to an appropriate alternate) and also as the main point of contact with the Complainant</p>
Project Manager	Responsible for coordinating the response to a Complaint. This includes receiving and reporting Complaints, maintaining the Complaints Log, supporting the resolution of Complaints; and liaison with the Complainant.
Complaint Owner	Responsible for investigating and resolving a Complaint. This includes conducting investigations, proposing resolutions, implementing corrective actions and co-ordinating with the Complainant and other parties. This include the implementing agencies
Appeals Committee (Select PSC Members)	Responsible for reviewing escalated complaints and authorising additional actions to be taken. This includes reviewing overdue or escalated complaints, authorising additional actions, and approving the close out of complaints where it is not reasonably possible to reach an agreed resolution with the Complainant.

## 7. Grievance Redress Mechanism (GRM) Process

This section sets out the process to be followed for receiving, investigating and resolving Complaints. The timelines for key steps are as outlined in the process flow chart below



## Procedure for Resolving Complaints



### 7.1 Grievance Reception/Receive

The Procedure is initiated when a Complaint is received by a member of the PIU or contractor and referred to the Project Coordinator (PC)/Project Manager (PM). The complaints can be forwarded to KIEP through emails, telephone calls, letters and short text messages (SMS). However, if there is an issue of concern published in social media, print and electronic media such an issue should be directly taken up and treated as anonymous reporting.

KIEP will have a grievance log that record; i) the number of complaints received, ii) receipt/acknowledgement details, iii) describes the issues, iv) location of each complaint, v) number of complains resolved and v) the number of complains that have gone to mediation.

If the Complaint is readily resolvable and can be dealt with immediately, the PC takes action to address the issue directly and records the details in the Complaints Register. If the Complaint is not readily resolvable, creates a record of the Complaint in the Complaint Register. When of particularly high risk, a grievance can be fast tracked to ensure involvement of Grievance Committee at an early stage.

#### Contact Details

Telephone Number: +254 722825161

Email: [info@kiep.go.ke](mailto:info@kiep.go.ke)

#### Postal Address:

Ministry of Industrialization, Trade and Enterprise Development, State Department for Industrialization & Enterprise Development P.O. BOX 30418-00100, NSSF Building NAIROBI

## **7.2 Assess and Assign**

The PC and PM makes an initial assessment of severity and assigns the Complaint to a Complaint Owner. The PC/PM and the Complaint Owner agree the timelines for an investigation and any follow up actions. The PC provides access of all relevant documentation to the Complaint Owner. In the event that the complaint is against the PC/PM, it should be directed to the Chairman Project Steering Committee ([ps@industrialization.go.ke](mailto:ps@industrialization.go.ke) )

For Complaints regarding issues for which a more appropriate separate Organizational process already exists, the PC shall refer the matter to the appropriate process owner for further action. This will typically be the case for Complaints related to contractual or commercial issues; industrial relations and employee relations; business integrity or criminal matters; and issues subject to current or pending litigation. The PM updates the Grievance registry form /Complaint Record as appropriate.

## **7.3 Acknowledge and follow up**

Once a Complaint has been assessed and a Complaint Owner assigned, the PM sends a written acknowledgement to the Complainant. The acknowledgement can be in form of a letter or email depending on practicality and appropriateness. The letter should normally be sent within Seven (7) calendar days of receiving the Complaint. The PM documents the acknowledgement in the Complaints Register as well as details of follow-up steps and set time-lines for follow-up activities to seek verification or investigation if need be and communication of outcomes and next steps based on the outcomes.

## **7.4 Investigate**

Appropriate investigation is decided at the assessment stage. The Complaint Owner investigates the factual basis for the Complaint and proposes options to resolve the issue. If deemed necessary, the investigation will include a risk assessment. The investigation may include follow-up meetings between stakeholders and the project, where an impartial party is present. Minutes are recorded and added to the grievance database.

The Complaint Owner may involve third parties in the fact finding process as required. The identity of the Complainant should only be disclosed to the extent necessary to resolve the issue or as required by law. If the Complainant has specifically requested that his or her identity not be disclosed, their personal information may not be shared with third parties unless required by law.

KIEP generally seeks to resolve complaints within Thirty (30) days. The maximum resolution period should not normally exceed Ninety (90) days. The PM is responsible for providing regular progress reports to the Complainant, including a verbal update every fifteen (15) days and a written



update after thirty (30) days. If additional time is needed to complete an investigation, the Complaint Owner will notify the PC/PM, who will inform the Complainant of the reason for the delay.

When the investigation is complete, the Complaint Owner documents the findings and proposes options for resolving the Complaint as appropriate.

## **7.6. Response**

The Complaint Owner and PC agree on a response to the Complainant. The response should communicate the findings of the investigation, set out the proposed solution and timelines, and seek feedback from the Complainant.

The Complaint Owner and PC determine next steps based on feedback from the Complainant. If the Complainant accepts the resolution, KIEP will proceed to implement (Section 6.6). If the Complainant does not accept the resolution, the Complaint will be escalated to the Appeals Committee (Section 6.7). The Complainant's response will be documented in the Complaint Log.

## **7.7. Resolution**

If the Complainant accepts the proposed resolution, the mutually agreed actions are implemented.

The Complaint Owner is responsible for assigning action parties, actions and deadlines to implement the resolution. These are recorded in the Complaint Log with any supporting documentation. Monitoring arrangements may need to be put in place to verify implementation.

The Complaint Owner informs the PM once the resolution has been implemented. The PM then asks the Complainant to sign the Confirmation Form. If the Complainant agrees to sign, the Complaint is closed out as Resolved (Section 6.8). If the Complainant refuses to sign because of dissatisfaction, or has failed to sign within the timeframe allowed, the Complaint is referred to the Appeals Committee (Section 6.7).

## **7.8. Appeal**

KIEP will seek to reach a resolution with the Complainant that is satisfactory to both sides. If KIEP and the Complainant are unable to agree on a solution, the Complaint may be escalated to the Appeals Committee for review and final decision.

The Appeals Committee reviews the case and determines if further reasonable action is possible. If no reasonable action is possible, the Appeals Committee authorises the close out of the Complaint. A close out letter will be sent to the Complainant explaining KIEP's position.

Cases where the Complainant disputes or declines to acknowledge the implementation of a previously agreed resolution, may also be referred to the Appeals Committee for review.

## **7.9. Close Out**

A Complaint is closed out when no further action can be or needs to be taken. Closure status will be classified in the Complaints Register as follows:

- Resolved. Complaints where a resolution has been agreed and implemented and the Complainant has signed the Confirmation Form.
- Unresolved. Complaints where it has not been possible to reach an agreed resolution and the case has been authorised for close out by the Appeals Committee.
- Abandoned. Complaints where the Complainant is not contactable after one month following receipt of a Complaint and efforts to trace his or her whereabouts have been unsuccessful.

The PC/PM is responsible for updating the Complaints Register and the logistics associated with closing out the case.

At the end of a case, regardless of whether agreement was achieved, the PM will seek feedback from the Complainant on their level of satisfaction with the complaint handling process and its outcome.

If the complainant is not satisfied with the resolution made, they have a right to go to a court of law for further redress of their complaint.

## **8. Communication plan for the GRM**

This Communication plan describes the approach to be taken by the KIEP PIU in communicating and collaborating with its relevant stakeholders on the Grievance Redress Mechanism. This plan will facilitate effective and coordinated communication between the KIEP, World Bank, , project beneficiaries and the general public on standard procedures of the GRM before and during programme implementation.

### **8.1 Communication plan objectives**

The primary objective of the GRM communication plan is to: Outline the strategy and methodologies to be used for GRM communication, GRM information distribution, feedback and stakeholder engagement, and how these will be managed during KIEP implementation.

Other objectives include

- i) Share information on GRM procedures to the relevant stakeholders before and during project implementation.
- ii) Develop a detailed communication methodology of disseminating GRM information to the target audience
- iii) Foster collaboration with the project executors, project beneficiaries and the general public for successful grievance handling throughout the implementation of KIEP.

- iv) Assign responsibilities for the KIEP PIU, GRM committee, in regards to GRM procedures and structure

## **8.2 Target audiences**

The targeted audiences for this plan are namely:

- i. Project beneficiaries – incubators, accelerators and technology bootcamp providers (referred to collectively as Intermediaries), innovators, start-ups, SMEs, corporates, select State Corporations and select Tertiary Education Institution (TEI) and technology bootcamp students.
- ii. KIEP Project Implementation Unit (PIU)
- iii. Consultant Management firms
- iv. World Bank
- v. National Government of Kenya
- vi. County Government of Kenya

## **8.3 GRM Communication Structure and channels**

### **6.3.1 GRM communication structure**

This is a three-tier structure that outlines the types of information that the KIEP implementers will pass down to the targeted audience.

#### **8.3.1.1 First tier of the GRM communication structure**

The targeted audiences for this tier are the project beneficiaries, local institutions and the general public. This audience will be informed about:

- ✓ GRM goals, objectives and procedures
- ✓ GRM planned activities and deliverables, including start and end dates
- ✓ Criteria for selecting community representatives who will act as recipients of complaints
- ✓ Details about GRM committee officials, NIE's operational unit (NIE secretariat, Programme Coordinator) who are involved in the GRM procedures
- ✓ Contact details, including how people can seek for redress if aggrieved by programme activities
- ✓ Community members' right to provide feedback on the KIEP implementation and make grievances
- ✓ When and how complaints will be handled

#### **8.3.1.2 Second tier of the GRM communication structure**

The targeted audiences for this tier are the project implementers, Consultant management firms, Selected Parastatals and Associations and their related institutions. These stakeholders informed about:

- ✓ All first tier level information
- ✓ Criteria of appointing members to the GRM committee
- ✓ How people can participate in the GRM procedures
- ✓ Points of receipts of grievances at the national level
- ✓ Mode of receipt and recording of grievances

- ✓ When and how complaints will be handled
- ✓ Alternative redress mechanisms open to the public in case their grievances are not handled
- ✓

### 8.3.1.3 Third tier of the GRM communication structure

The targeted audiences for this tier are the funding agencies, project implementers, executing entities, general public, project beneficiaries and their related institutions are informed about:

- ✓ All First and Second tier information
- ✓ Progress of the Grievance Handling performance in relation to its goals and activities
- ✓ How input from GRM progress reports has contributed to decisions
- ✓ Key staff, GRM committee roles and responsibilities in relation to GRM procedures
- ✓

### 8.4 GRM communication channels

In order to communicate all information regarding the GRM to the targeted audience, KIEP will need to have platforms and utilize already existing avenue to reach their stakeholders at the different tiers. It is noteworthy that the communication channels will vary for each target audience due to group dynamics and accessibility of such platforms especially to the project beneficiaries.

KIEP PIU will use the communication channels listed depending on its target audience:

- a) Print media; e.g. posters, flyers, booklets, notices
- b) Social media; that is Facebook, Twitter, Whatsapp
- c) Use of ICT
- d) Radio stations
- e) Television stations
- f) In addition, the following communication activities and methods will be conducted to promote a two-way communication between KIEP and all its relevant stakeholders, that is,
  - a) Setting up Programme’s Intranet
  - b) Information sessions and workshops on GRM
  - c) Bulletins
  - d) GRM awareness literature
  - e) Public forums
  - f) Training on GRM procedures and structure at the project beneficiaries level

### 8.5 GRM Communication matrices

The following pages are matrices for the KIEPE Secretariat, GRM committee, Project officers and Management firms to assemble target audiences, messages, and delivery channels in line with the GRM communication plan.

AUDIENCE	INTEREST	MESSAGE	CHANNEL	WHO	WHEN
<i>Name the stakeholders here</i>	<i>Identify the kind of information needs to relayed in regard to the GRM</i>	<i>Identify the primary message for this group. All future messages developed for this group should tie to this one overall theme</i>	<i>Describe the communication tools to be used to reach the targeted audience</i>	<i>List the official (s) who will craft and deliver the message</i>	<i>Describe the time frame or frequency of the communication</i>
Add additional					

resources here.					

## 9. Confidentiality

### 9.1 Duty of Confidentiality

KIEP is committed to protecting the identity of the Complainant and to handling personal information in accordance with legal requirements. This duty extends to all employees or representatives of KIEP or its Contractors who participate in the complaint handling process.

Information about a Complaint will be shared within KIEP on a need-to-know basis and only to the extent necessary to complete a step under this Procedure. KIEP will not share personal information with third parties unless required by law or authorised by the Complainant.

### 9.2. Personal Data

Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the Complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period pursuant to GoK Data Privacy Policy.

## 10. Conflicts of Interest

A conflict of interest exists where there is a divergence between the interests of an employee or Contractor and his or her responsibilities under this Procedure, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her own interests.

This procedure seeks to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the complaint handling process and avoiding placing individuals in a position where conflicts could be perceived to arise. When a Complaint relates to a specific KIEP or Contractor employee, that person shall not play a role in the complaint handling process.

## 11. Protection from Retaliation

Retaliation is any adverse action taken against a Complainant, employee or Contractor whose purpose is to frustrate the operation of this Procedure. KIEP will not tolerate such conduct. When

concerns about retaliation or victimisation are raised, they will be fairly investigated under applicable legal procedures.

## **12. Online Grievance Mechanism System**

Given the nature of the Project and its stakeholders, most of whom use online and social media to communicate and engage with their audiences, the PIU will set up an online grievance redress system to be displayed on [kiep.go.ke](http://kiep.go.ke) website. The system, will work similar to the World Bank's Grievance Redress Service (GRS), to enable submission of grievances by the aggrieved stakeholders anywhere and anytime (24x7). The KIEP communication lead from the PIU will forward the grievances received to a GRM panel within the PIU to scrutinize and take action for speedy and favorable redress of these grievances. Tracking grievances will also be facilitated on the portal through the system generated unique registration number. This grievance administration system will enable effective monitoring and submission of online monthly status reports regarding the number of grievances received, resolved, and the ones pending.

## **13. Performance Monitoring and Reporting**

M&E Specialist is responsible for gathering and reporting performance monitoring data under this Procedure. Key performances indicators (KPIs) will be collected to enable KIEP analyse trends in complaints received and identify underlying systemic issues. PM is responsible for making recommendations for changes to KIEP policies or practices based upon on-going learning from Complaints.

Every half year, KIEP will evaluate the GRM by analysing grievance data to reveal trends and patterns through taking stock of all complaints that have been received, how they have been handled and determine what lessons emanate from such complaints. Furthermore, from the lessons learnt it will be determined what actions or decisions are necessary to forestall similar complaints in the future.

A grievance report will be submitted to the World Bank in every mission. This report will present; (i) the grievance log; (ii) an analysis of the grievance reported and closed for the time leading to the mission ie every six months.

KIEP will also provide feedback to GRM users and the public at large about why the GRM is important, enhance the visibility of the GRM among the project beneficiaries and increase users trust in the grievance redress mechanism under the project.

**Annex II: Complaint Register/Log (KIEP-GRM/001)**

No	Date Received/Recorded/Time		Complainant Name/ Anonymous	Nature of Complaint (Brief Description)	Registration Form Number	Complaint Owner	Investigation kick off date	Investigation Closure date	Resolution
	Date	Time							

**Annex II. Complaint Receiving Form(KIEP-GRM/002)**

Date: ..... (dd/mm/yyyy) Place of issuing complaint .....

Complaint no.: .....

**Mode of Receipt (please tick where applicable):**

Writing	<input type="checkbox"/>	Verbal	<input type="checkbox"/>	Phone	<input type="checkbox"/>	Fax	<input type="checkbox"/>	Email	<input type="checkbox"/>
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**Details of the Complainant:**

Name (optional): ..... Gender: .....  
 Address: ..... Email address: .....  
 Phone no.: .....

**Location of complaint/concern:**

Village/Town/City/Area: ..... County: .....

**Category of Complainant (please tick where applicable):**

- i. Project Beneficiaries
- ii. Project implementers
- iii. Funding agencies
- iv. Other interested party (Please specify) .....

**Category of Grievances (please tick where applicable):**

- i. Project implementation related
- ii. Social

iii. Environment

**Brief Description of the Grievance:**

.....  
.....  
.....  
.....  
.....  
.....

(Attach letter/petition/documents detailing grievance information as submitted)

**Attachments:** (1) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_

Received/prepared by: ..... Date: ..... (dd/mm/yyyy)

Signature: .....



**Annex III. Acknowledgement Receipt (KIEP-GRM/003)**

Complaint no.: .....

Date of issuing complaint..... (dd/mm/yyyy)

**Place of issuing complaint:**

Village/Town/City/Area: .....

County: .....

**Details of the Complainant:**

Name: .....

Age: .....

Address: .....

Gender: .....

Email address: .....

Phone no.: .....

**Supporting documents submitted:**

- i. ....
- ii. ....
- iii. ....
- iv. ....
- v. ....

**Summary of complaint:**

.....  
.....  
.....  
.....  
.....

Name of Officer receiving Complaint: \_\_\_\_\_

Signature of Officer receiving Complaint: \_\_\_\_\_

**Annex IV. Meeting Record Structure (Grievance Redress Committee & Other Meetings) (KIEP-GRM/004)**

Date of Meeting: ..... Complaint no.: ..... Venue of Meeting: .....

**List of participants:**

Complainant Side	KIEP/PIU/Grievance Redress Committee Members
1) 2)	1) 2) 3)

**Summary of Grievance:**

.....  
 .....  
 .....  
 .....

**Key discussions:**

- 1)
- 2)
- 3)

**Decisions Made/Recommendations by the Grievance Redress Committee:**

- 1)
- 2)
- 3)

**Status of Grievance (tick where applicable):**

<b>Solved</b>		<b>Unsolved</b>	
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Chair person's name \_\_\_\_\_

Chair person's signature: \_\_\_\_\_

Date (dd/mm/yyyy): \_\_\_\_\_

**Annex V. Disclosure Form (KIEP-GRM/005)**

Village/Town/City/Area .....

County .....

**Result of Grievance Redress**

- 1. Complaint no.
- 2. Name of Complainant:
- 3. Date of Complaint:

4. Summary of the Complaint:

.....  
.....  
.....  
.....

5. Summary of Resolution:

.....  
.....  
.....

6. Level of Redress (please tick where applicable)

<b>First/Community</b>	<input type="checkbox"/>	<b>Second/County</b>	<input type="checkbox"/>	<b>Third/National</b>	<input type="checkbox"/>
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7. Date of grievance redress (dd/mm/yyyy): \_\_\_\_\_

Name of complainant: \_\_\_\_\_

Signature of the Complainant, indicating acceptance of the solution to his/her grievance:

\_\_\_\_\_

Name of Grievance Handling Officer: \_\_\_\_\_

Signature of Grievance Handling Officer: \_\_\_\_\_

Date (dd/mm/yyyy): \_\_\_\_\_

*(Note: Copy to be sent to the complainant and the KIEP PIU)*

**Annex VI. Quarterly Report of Registered Complaints (KIEP-GRM/006)**

Location ..... Date (dd/mm/yyyy) ..... Period (Quarter ending) .....

**Details of Complaints Received:**

<b>Place of issuing complaint</b>	<b>Name &amp; Address of complainant</b>	<b>Location of complaint/concern</b>	<b>Date of Receipt</b>	<b>Complaint no.</b>

**Details of Grievance Redress Meetings:**

<b>Date of meeting</b>	<b>Venue of meeting</b>	<b>Names of participants</b>	<b>Decisions/Recommendations made</b>

**Details of Grievances addressed:**

<b>Date of issuing complaint</b>	<b>Category of complaint</b>	<b>Category of grievance</b>	<b>Brief description of grievance</b>	<b>Date of complete resolution</b>

*(Note: Copy to be submitted to the KIEP Secretariat)*