



**NATIONAL AGRICULTURAL VALUE  
CHAIN DEVELOPMENT PROJECT  
(NAVCDP)**



**NAVCDP - PI76758**

**GRIEVANCE MECHANISM**

**PROCEDURES & GUIDELINES**

Updated

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## DEFINITION OF TERMS

**Complainant** Any person, household, or community group that believes they have been adversely affected by project activities and submits a formal grievance.

**Grievance:** A complaint, expression of dissatisfaction, or concern raised by an individual or a group regarding a specific impact, act or omission caused by the project (NAVCDP). A grievance can range from a minor query to a serious allegation of harm or misconduct.

**Grievance Mechanism:** A formal, non-judicial and accessible process through which stakeholders can raise concerns and seek remedy for project-related issues. Under the World Bank ESS 10 (ESS10), the Grievance Mechanism must be culturally appropriate, transparent, and free of cost or retribution.

**Saturation Model:** The strategic approach adopted by NAVCDP to ensure that project interventions reach all eligible farmers and households within all administrative wards of the 34 participating counties, minimizing the risk of exclusion.

**Tusuluhishe:** The official NAVCDP digital grievance system. It serves as the centralized platform for logging, tracking, and managing the resolution of all project-related complaints across the 34 counties.

## **1.0 INTRODUCTION**

### **1.1 Project Overview**

1. The National Agricultural Value Chain Development Project (NAVCDP) is a Government of Kenya initiative implemented by the Ministry of Agriculture and Livestock Development (MoALD). The project is financed by the World Bank and counterpart funding from the participating Counties. Implementation is underway in 34 counties (Table 1, Figure 2).
2. The project is structured around five core components, designed to support the transition of smallholder farmers from subsistence-oriented production systems to market-oriented, climate-resilient, and inclusive agricultural value chains.
3. Component 1 - Building Producer Capacity for Climate-Resilient Stronger Value Chains, focuses on enhancing the productive capacity of smallholder farmers while promoting climate-resilient, nutrition-sensitive, and sustainable agricultural practices. It aims to increase farmers' participation in agricultural markets through improved access to inputs, extension services, finance, and organizational support.
  - a) Sub-component 1.1: Farmer Capacity Building and e-Voucher Support - Supports farmer mobilization through the Participatory Integrated Community Development (PICD) approach and provides climate-smart agricultural inputs, including seeds and fertilizers, through an electronic voucher (e-voucher) system. The sub-component also delivers training on Technologies, Innovations, and Management Practices (TIMPs) through on-farm and extension-based advisory services.
  - b) Sub-component 1.2: Farmer Producer Organization (FPO) Level Climate-Smart Value Chain Investments - Strengthens FPOs through business planning, aggregation strategies, governance support, and targeted inclusion grants aimed at improving collective marketing, value addition, and market linkages.
  - c) Sub-component 1.3: Improving Creditworthiness of Common Interest Groups and FPOs - Facilitates access to financial services by strengthening the creditworthiness of Common Interest Groups (CIGs) and FPOs, including support to ward-based Savings and Credit Cooperative Organizations (SACCOs) through revolving funds and financial literacy initiatives.
4. Component 2 - Climate Smart Value Chain Ecosystem Investments, addresses critical ecosystem investments and enabling infrastructure required to reduce post-harvest losses, improve market access, and strengthen linkages across priority agricultural value chains.
  - a) Sub-component 2.1: Farmer-Led Irrigation Development (FLID) - Supports individual and group-based small-scale irrigation systems, water harvesting and storage infrastructure, and capacity building on efficient, equitable, and sustainable water use. Sub-component 2.2: Market Access and Infrastructure Development (MAID) - Finances strategic market-related infrastructure, including aggregation

centers, cold storage facilities, and rural market upgrades, to improve produce handling, storage, and connectivity to markets.

- b) Sub-component 2.3: Data and Digital Investments - Supports the development and operationalization of digital platforms such as the Kenya Integrated Agriculture Management Information System (KIAMIS) and the Kenya Market Information System (KMIS) to enhance farmer registration, service delivery, traceability, and access to market information.
  - c) Sub-component 2.4: Research Linkages and Institutional Capacity - Strengthens research–extension–farmer linkages and institutional capacity through technical assistance, adaptive research, and dissemination of TIMPs in collaboration with the Kenya Agricultural and Livestock Research Organization (KALRO) and other relevant institutions.
5. Component 3 - Piloting Climate Smart Safer Urban Food Systems, pilots interventions that strengthen linkages between rural production systems and urban consumption markets, with an initial focus on Nairobi and Mombasa. It aims to improve food safety, nutrition, and climate resilience within urban and peri-urban food systems.
- a) Sub-component 3.1: Climate Smart Urban and Peri-Urban Agriculture - Supports climate-smart production in urban and peri-urban areas through mobilization of producers into CIGs, adoption of improved production technologies, and promotion of safe and sustainable practices.
  - b) Sub-component 3.2: Urban Market Infrastructure and Information Systems - Strengthens food safety, traceability, and market efficiency through investments in urban market hubs, logistics infrastructure, and food information systems.
  - c) Sub-component 3.3: Policy and Institutional Strengthening - Supports the development and implementation of urban food policies, regulatory frameworks, and food safety standards to enhance governance of urban food systems.
6. Component 4 - Project Coordination and Management, provides institutional support for effective project implementation, coordination, monitoring, and reporting at national and county levels.
- a) Sub-component 4.1: Project Coordination - Finances the operational costs of the National Project Coordination Unit (NPCU) and County Project Coordination Units (CPCUs), including fiduciary management, procurement, safeguards supervision, and technical coordination.
  - b) Sub-component 4.2: Monitoring, Evaluation, and Safeguards - Supports monitoring and evaluation systems, learning and adaptive management, and ensures compliance with the World Bank Environmental and Social Framework (ESF), including applicable Environmental and Social Standards (ESSs).
7. Component 5 - Contingent Emergency Response Component, is a zero-cost component that enables the rapid reallocation of project resources in response to an eligible national

crisis or emergency affecting the agricultural sector, in accordance with agreed CERC implementation arrangements.

## 1.2 Geographical Coverage

8. At inception, NAVCDP targeted 500,000 smallholder farmers across 26 counties and 520 wards, focusing on nine priority agricultural value chains. County and value chain selection was based on production potential, market access, and anticipated livelihood impacts. The project scope has since expanded to cover 34 counties (1075 wards), under the Saturation Model, with 16 priority agricultural value chains (see Table 1, Figure 1, and Table 2).

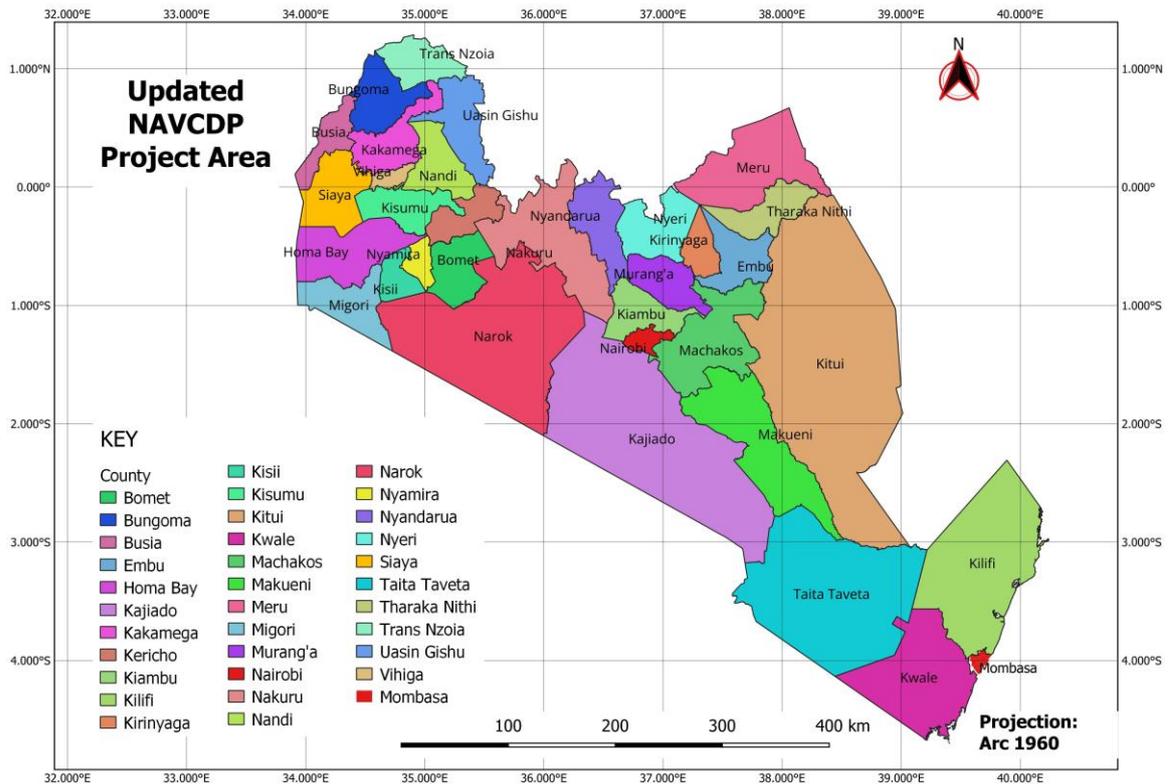


Figure 1: Map of NAVCDP Implementation Areas (34 Counties)

Table 1: Regional Distribution of NAVCDP Participating Counties

S/No.	Region	Counties
1	Mt kenya	Embu, Kiambu, Meru, Nyeri, Murang'a, Nyandarua
2	Lower Eastern	Kitui, Machakos, Makueni, Tharaka Nithi,
3	North Rift	Nandi, Trans Zoia, Uasin Gishu
4	Central / South Rift	Bomet, Kajiado, Kericho, Nakuru, Narok
5	Western	Bungoma, Busia, Kakamega, Vihiga
6	Nyanza	Homa Bay, Siaya, Kisii, Kisumu, Nyamira, Migori
7	Coast	Taita Taveta, Kwale, Kilifi, Mombasa

Table 2: Priority Value Chains

<b>No.</b>	<b>County</b>	<b>Priority Value Chains</b>
1	Bomet	dairy, chicken, potatoes, avocado and pyrethrum
2	Bungoma	dairy, chicken, coffee, banana and avocado
3	Busia	dairy, chicken, banana, rice and cotton
4	Embu	dairy, coffee, avocado, mangoes and apiculture
5	Homa Bay	dairy, banana, coffee, rice and cotton
6	Kajiado	dairy, chicken, tomatoes, apiculture and red meat (beef)
7	Kakamega	dairy, chicken, avocado, banana and apiculture
8	Kericho	dairy, chicken, coffee, avocado and pyrethrum
9	Kiambu	dairy, chicken, coffee, avocado and banana
10	Kilifi	dairy, chicken, apiculture, mangoes and cashew
11	Kirinyaga	dairy, chicken, coffee, tomatoes and avocado
12	Kisii	dairy, chicken, coffee, banana and avocado
13	Kisumu	dairy, chicken, rice, tomato and cotton
14	Kitui	dairy, chicken, apiculture, tomato and mangoes
15	Kwale	dairy, chicken, cashew, tomato and apiculture
16	Machakos	dairy, chicken, coffee, avocado and tomatoes
17	Makueni	dairy, chicken, tomatoes, mangoes and apiculture
18	Meru	dairy, chicken, coffee, avocado and potatoes
19	Migori	dairy, chicken, banana, tomatoes and apiculture
20	Murang'a	dairy, chicken, coffee, avocado and mangoes
21	Nakuru	dairy, chicken, apiculture, potatoes and pyrethrum
22	Nandi	dairy, chicken, coffee, avocado and potatoes
23	Narok	dairy, chicken, tomatoes, avocado and tomatoes
24	Nyamira	dairy, chicken, coffee, African leafy vegetables (ALVs) and avocado
25	Nyandarua	dairy, chicken, coffee, potatoes and garden peas
26	Nyeri	dairy, chicken, coffee, avocado and potatoes
27	Siaya	apiculture, chicken, rice, tomatoes and cotton
28	Taita Taveta	dairy, chicken, potatoes, bananas and green-grams
29	Tharaka Nithi	dairy, chicken, coffee, green grams and bananas

No.	County	Priority Value Chains
30	Trans Nzoia	dairy, chicken, avocado, tomatoes and banana
31	Uasin Gishu	dairy, chicken, coffee, avocado and potatoes
32	Vihiga	dairy, chicken, banana, avocado and ALV

9. Beyond primary farmer beneficiaries, NAVCDP supports extension service providers, aggregators, logistics and input suppliers, and Small and Medium-sized Enterprises (SMEs) in the selected value chains.
10. The expanded scale and diversity of beneficiaries and coverage influence stakeholder engagement, environmental and social risk management, and grievance mechanisms.

### 1.3 Vulnerable and Marginalized Groups

11. In line with the World Bank ESS 7 on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (SSAHUTLAC), NAVCDP recognizes groups with distinct social, cultural, and economic characteristics that may heighten their vulnerability to project-related exclusion or adverse impacts. Under the Constitution of Kenya (2010), these groups are recognized as Vulnerable and Marginalized Groups (VMGs) pursuant to Articles 56 and 260.
12. The June 2025 Social Assessment confirms presence of VMGs in 12 of 34 counties (see Table 3). The VMGs participate in selected value chains, including coffee, dairy, and apiculture.
13. The presence of VMGs across multiple counties has implications for stakeholder engagement, grievance accessibility, and culturally appropriate dispute resolution. NAVCDP ensures inclusive access, respects traditional governance structures, and responds to VMG-specific needs.

Table 3: NAVCDP Project Counties with VMGs/IPs

S/No	Counties	VMG/IPs
1	Nakuru	Ogiek
2	Bungoma	Ogiek
3	Nandi	Talai
4	Trans Nzoia	Ogiek, Sengwer
5	Kiambu	Ogiek
6	Kilifi	Waata
7	Kwale	Waata
8	Uasin Gishu	Sengwer
9	Narok	Ogiek
10	Bomet	Ogiek

<b>S/No</b>	<b>Counties</b>	<b>VMG/IPs</b>
11	Taita Taveta	Waata
12	Kericho	Talai

#### **1.4 NAVCDP Implementation Progress and Additional Financing**

14. By November 2025 Midterm Review (MTR), approximately 2.3 million farmers had been mobilized into 173,116 CIGs through the PICD. Over 1.3 million beneficiaries had received agricultural assets and services, contributing to a 43.23 percent increase in the proportion of participating farmers selling more than half of their produce in the market.
15. Building on these results, the Government of Kenya has requested Additional Financing (AF) of US\$250 million from the IDA to support NAVCDP through December 2027. The AF will consolidate gains achieved to date and will scale up interventions, including market infrastructure, FLID, SACCOs and FPOs strengthening, and modernization of digital platforms such as the KIAMIS and the Agripreneur Management Information System (APMIS).
16. The MTR informed adjustments to project implementation arrangements and provided a basis for strengthening key systems to support continued delivery of project objectives.

## **2.0 GRIEVANCE MECHANISM**

### **2.1 Legal and Policy Framework**

17. The NAVCDP Grievance Mechanism (GM) is established in accordance with the Constitution of Kenya (2010), including Article 10 on National Values and Principles of Governance, Article 35 on the right to access information, and Article 47 on fair administrative action. These provisions require public institutions to operate transparently, accountably, and responsively, and to provide fair, lawful, and predictable administrative processes. The GM also aligns with the Public Service (Values and Principles) Act, 2015, which promotes efficient, impartial, and equitable service delivery in public administration.
18. Consistent with the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, NAVCDP provides accessible, inclusive, and culturally appropriate mechanisms for receiving and resolving grievances from project-affected parties. The GM complements, and does not replace, judicial remedies and traditional dispute resolution systems.

### **2.2 Guiding Principles for The Establishment of NAVCDP GM**

19. The NAVCDP GM is guided by following core principles:

- a) **Accessibility and Public Awareness:** The GM is publicly communicated and easily accessible through multiple channels (digital, written, verbal, and in-person), ensuring all stakeholders are aware of how and where to lodge grievances
- b) **Fairness, Transparency, and Accountability:** Grievances are reviewed impartially and objectively, with clear accountability at each level of handling and consistent application of procedures.
- c) **Participation and Contextual Adaptation:** Resolution processes are culturally appropriate and responsive to local contexts, with communities engaged in grievance handling and feedback where appropriate.
- d) **Safe and Universal Access:** All stakeholders, including VMGs, women, youth, and PWDs, can raise grievances safely, without barriers related to distance, literacy, language, or fear of retaliation.
- e) **Confidentiality and Privacy:** All grievances are handled with strict confidentiality. Personal data is shared only with designated personnel directly involved in grievance assessment and resolution, in accordance with applicable data protection requirements.
- f) **Protection Against Retaliation:** Stakeholders may raise grievances without fear of victimization, intimidation, or loss of project benefits.
- g) **Simplicity and Operational Efficiency:** The GM is designed to be user-friendly for complainants and the project staff, with clear procedures, defined roles, and realistic timelines for response and resolution.
- h) **Continuous Learning and Service Improvement:** Grievances are treated as a feedback mechanism. Analysis of grievance trends informs systemic improvements, strengthens risk management, and enhances the overall effectiveness and impact of project interventions.

### **3.0 BACKGROUND**

20. Development projects, especially those involving infrastructure, land, water, or labour, can face delays or disputes if grievances are not addressed promptly. Effective GMs allow minor issues to be identified and resolved before they escalate, maintaining stakeholder trust, safeguarding project outcomes, and supporting adaptive management.

#### **3.1 Rationale for the NAVCDP GM**

21. Experience from NAVCDP, including the MTR, confirms that timely grievance resolution is critical. The expanded project scope increases interactions and emerging risks, reinforcing the need for a robust GM that is predictable, accessible, and culturally appropriate.

22. The NAVCDP's GM aligns with the World Bank ESF and integrates grievance handling, consultations, and transparency into project operations. Key applicable standards and the relevance of the GM include:

- a) ESS1 - Assessment and Management of Environmental and Social Risks and Impacts: Enables early identification and resolution of emerging risks.
- b) ESS2 - Labor and Working Conditions: Provides a channel for workers to raise concerns and promotes safe working conditions.
- c) ESS3 - Resource Efficiency and Pollution Prevention and Management: Allows stakeholders to report environmental or irrigation-related issues.
- d) ESS4 - Community Health and Safety: Captures community concerns, including GBV/SEA-SH risks.
- e) ESS5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement: Ensures grievances on land or livelihood impacts are addressed promptly.
- f) ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources: Provides a mechanism for reporting project impacts on biodiversity.
- g) ESS7 - Indigenous Peoples/SSAHUTLAC: Ensures VMGs have equitable access to project benefits and a voice in addressing concerns.
- h) ESS8 - Cultural Heritage: Enables reporting of risks to tangible or intangible heritage, including "chance finds.
- i) ESS10 - Stakeholder Engagement and Information Disclosure: GM provides accessible, inclusive, and transparent channels for stakeholder feedback and redress.

23. The GM ensures that Project-Affected People (PAPs) can raise grievances safely and without barriers, while supporting transparency, accountability, and adaptive project management. It also complements judicial and traditional dispute resolution mechanisms.

### **3.2 Purpose of these Procedures**

24. Post-midterm, NAVCDP remains committed to active community engagement and ensuring that all project activities are responsive to stakeholder needs. The GM is designed to be predictable, accessible, and legitimate, promoting equity and enabling communities to provide feedback, raise concerns, and share compliments on project performance.

25. The mechanism also strengthens opportunities for collaborative problem-solving and alternative dispute resolution. By systematically capturing and addressing grievances, the GM serves as an early-warning tool, helping the project identify, assess, and resolve issues before they escalate, thereby supporting adaptive management and maintaining stakeholder trust.

### **3.3 NAVCDP Approach to GM**

26. The NAVCDP GM approach consists of three interlinked steps:

- a) A risk-based assessment of potential grievances, disputes, or conflicts that may arise during project preparation and implementation.
- b) Assessment of existing GM capacity and institutional suitability at community, county, and national levels.
- c) An action plan that identifies priority areas for strengthening GM capacity or, where necessary, establishing new mechanisms.

27. NAVCDP welcomes grievances, recognizing the right of communities to express concerns and the value of grievances for continuous learning and project improvement. The project ensures clear mechanisms for investigation and response to complaints, in line with World Bank requirements for culturally appropriate, understandable, and transparent processes.

### **3.4 Operationalization of "Tusuluhishe" Digital Grievance Uptake System**

28. NAVCDP has fully operationalized its web-based grievance mechanism, Tusuluhishe, to improve reporting, resolution, and feedback. The system builds on prior assessments of risks, stakeholder concerns, and institutional capacity, and is actively supporting project implementation.

#### **a) Step 1: Identification and Assessment of Risks and Grievances**

Tusuluhishe continuously captures project-related grievances and disputes, informed by prior analyses conducted during project preparation. Potential sources of disputes, including land rights, benefit distribution, environmental concerns, inclusion, and social tensions, are monitored through both digital and manual grievance uptake channels.

#### **b) Step 2: Capacity and Suitability in Practice**

The digital system integrates community and institutional capacity to ensure effective grievance handling. Factors considered include:

- Legitimacy: Committees and staff operate independently from grievance parties.
- Accessibility: Multiple channels (SMS, phone, in-person, by mail, email, WhatsApp) accommodate language, literacy, and confidentiality needs.
- Predictability: Clear procedures and timelines for acknowledgement, assessment, and resolution.
- Fairness: Participation is equitable, including VMGs.
- Rights compatibility: Outcomes align with national law and ESF standards, without limiting other remedies.
- Transparency: Actions and outcomes are documented for authorized stakeholders.
- Capability: Trained staff and committees supported by digital infrastructure ensure timely handling.

#### **c) Step 3: Action and Continuous Improvement**

Tusuluhishe is supported by an action plan that emphasizes:

- Awareness and accessibility: Stakeholders are informed of GM channels and procedures.
- Roadmap and milestones: Timelines for acknowledgement, response, and resolution.
- Reliable back-office: Digital tracking, monitoring, and feedback.
- Roles and responsibilities: Defined accountability at community, county, and national levels.
- Resolution and follow-up: Grievances are closed with documented feedback; lessons inform adaptive management.

#### **4.0 ALIGNMENT TO WORLD BANK'S APPROACH TO GM IN PROJECTS**

29. The World Bank emphasizes that grievance mechanisms should be predictable, accessible, and culturally appropriate, enabling complaints to be resolved promptly and systematically. NAVCDP adopts this approach, encouraging on-the-spot resolution where feasible, while ensuring that all incidents, regardless of how they are resolved, are recorded in the Tusuluhishe system or the manual register.
30. Grievances are categorized by type and potential impact (e.g., environmental, social, operational). This allows complaints to be prioritized according to risk and assigned to the appropriate personnel for timely action. Issues already addressed through other official processes are excluded from GM processing to avoid duplication.
31. NAVCDP staff, service providers, and the Social Accountability and Integrity Committee (SAIC) lead the resolution process. Their responsibilities include:
  - a) Receiving and acknowledging grievances;
  - b) Offering one or more options for resolution;
  - c) Documenting all actions and decisions in the grievance system;
  - d) Ensuring adherence to timelines, procedures, and risk-based prioritization.
32. When the complainant and NAVCDP or a contractor reach an agreement on resolution, a minute of agreement is drafted and signed by both parties. Upon implementation, a final record confirming resolution is signed, and the complainant receives prompt feedback.
33. All supporting documentation, including meeting notes, correspondence, and evidence, is archived with the complaint record. This includes grievances escalated to an appeals level or referred to a third-party mediator. Documentation ensures accountability, transparency, and facilitates learning for continuous improvement.

## **5.0 NAVCDP GM INSTITUTIONAL ARRANGEMENTS**

### **5.1 Grievance Management Committees**

34. At the community level, grievances are first received by local institutions such as CIGs, FPOs, SACCOs, Irrigation Water Users Associations (IWUAs), and Community - Driven Development Committees (DDCs). These groups act as the first point of contact between project beneficiaries and the grievance system.
35. Grievance Management Committees (GMCs) are constituted within these local institutions and adapted to the specific context of each county. In establishing and managing GMCs, NAVCDP ensures that:
- a) Committee members are trained and sensitized to strengthen their capacity, confidence, and understanding of GM processes;
  - b) Members remain motivated and committed over time, recognizing the voluntary nature of their roles;
  - c) VMGs are adequately represented; and,
  - d) The GM is linked with traditional redress mechanisms where applicable.
36. Their role of GMCs includes:
- a) Receiving and attempting to resolve grievances at the community level.
  - b) Escalating unresolved issues to the ward-level Social Audit and Integrity Committee (SAIC).
  - c) Relaying feedback from higher levels back to the community or complainants.
  - d) Sensitizing communities on the existence, purpose, and procedures of the GM.
  - e) Support participatory and culturally appropriate resolution of project-related concerns.

### **5.2 Community Public Forums**

37. Community public forums complement GMCs by providing an inclusive platform for grievance intake and feedback. Specifically, these forums:
- a) Foster trust and constructive dialogue between project-affected communities and implementing agencies;
  - b) Offer a safe and culturally appropriate environment for vulnerable and marginalized groups to raise concerns.
  - c) Provide a safe and culturally appropriate environment for vulnerable and marginalized groups to raise concerns;

- d) Facilitate the capture of grievances from individuals who face barriers to using formal grievance channels;
- e) Are convened alongside project activities or routine community meetings, where practicable, to maximize participation;
- f) Are organized in locations that are physically and socially accessible to ensure broad and equitable stakeholder engagement;
- g) Require the support of appropriately constituted and capable GMCs to function effectively.

### **5.3 Ward-Level Oversight**

38. At the ward level, the SAIC provides formal oversight of grievance management. SAICs review issues escalated from community institutions, ensure compliance with procedural and World Bank ESF requirements, and coordinate with county-level bodies for unresolved cases.

### **5.4 County and National Levels**

39. Unresolved grievances move up to the County Project Coordination Units (CPCU) and ultimately to the National Project Coordination Unit (NPCU). These levels ensure consistent application of procedures, timely resolution of complaints, and reporting to the World Bank and other oversight authorities.

## **6.0 TYPES OF GRIEVANCES**

40. NAVCDP classifies grievances into two main categories:

- a) Non-sensitive grievances - relate directly to NAVCDP project activities or its partners' operations. These are usually operational or administrative in nature and can be resolved through standard GM procedures.
- b) Sensitive grievances - require more complex investigation and may involve:
  - Misuse of funds, corruption, or fraud
  - Sexual exploitation, abuse, or harassment (SEA/SH)
  - Any other serious violations of policy or law

41. Sensitive grievances re handled according to relevant government policies and procedures, including established SEAH/GBV protocols, while all grievances follow NAVCDP's operational principles for timely, fair, and transparent resolution.

42. To be considered eligible, a grievance must:

- a) relate to NAVCDP activities or interventions;
- b) be submitted by a person / community who believes they are adversely affected;  
and

- c) originate from a bidder or potential bidder regarding NAVCDP procurement processes.

### **Requisite Information for Submitting a Complaint**

43. To facilitate effective assessment and resolution, complaints should, where possible:
- a) Identify the relevant NAVCDP activity, sub-project or concern related to the project;
  - b) Clearly describe the alleged adverse impact(s) or concern related to the project;
  - c) Identify the individual(s) submitting the complaint and indicate whether confidentiality is requested;
  - d) Specify whether the complaint is submitted directly by the affected person(s) or through a representative;
  - e) Where a submitted through a representative, include the representative's name, signature, contact details, and written authorization from the affected person(s) or community;
  - f) Provide any supporting information where available. While not mandatory, such information may assist in review and resolution. Complainants may also suggest preferred options for resolving the issue.

## **7.0 DESIGN AND IMPLEMENTATION OF THE GRIEVANCE MECHANISM**

44. Following implementation experience to date, including lessons from the MTR, NAVCDP continues to strengthen its GM to ensure it remains accessible, credible, and responsive during the remaining project period. Community members and other stakeholders have informed refinements to the GM through ongoing engagement, use of existing feedback systems, and practical experience in handling grievances. Particular attention has been given to ensuring that the GM reflects local contexts, cultural norms, and preferred ways of expressing concerns, including where formal complaints may not be the customary approach.

### **7.1 Target Groups of the GM**

45. The NAVCDP GM is designed to serve a broad range of stakeholders, including:
- a) Project beneficiaries
  - b) Representatives or staff of NAVCDP partner organizations
  - c) Contractors and suppliers
  - d) Affected community members, including those not directly benefiting from NAVCDP activities

- e) Other stakeholders impacted by NAVCDP project implementation, including local leaders and county government representatives

## **7.2 Grievance Communication Channels**

46. NAVCDP operates multiple grievance intake channels, including phone calls, SMS, email, written correspondence, in-person reporting, and the Tusuluhishe digital platform. Based on implementation experience, the project continues to ensure that at least two accessible grievance channels are available in each implementing county, with at least one option allowing for confidential submission. Community-based and in-person channels remain critical in areas with limited digital access, while digital and remote options enhance reach, timeliness, and tracking.

## **8.0 SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT AND GENDER - BASED VIOLENCE**

47. NAVCDP recognizes Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV) as serious social risks that may arise during project implementation, including through power imbalances, labour engagement, service delivery interfaces, and interactions between project actors and communities. For purposes of the NAVCDP GM, these are defined as follows:

- a) SEA refers to any actual or attempted abuse of a position of vulnerability, power imbalance, or trust for sexual purposes.
- b) Sexual Harassment (SH) includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
- c) Gender-Based Violence (GBV) refers to harmful acts directed at individuals based on gender and includes SEA and SH among other forms of violence.

48. NAVCDP applies a survivor-centered approach to SEA/SH/GBV-related grievances, prioritizing safety, confidentiality, dignity, non-discrimination, and respect for survivor choice. In line with this approach, the GM:

- a) Manages SEA/SH/GBV complaints through dedicated, confidential channels, separate from non-sensitive grievances;
- b) Applies established Government of Kenya protocols and referral pathways for health, psychosocial, legal, and protection services; Safeguards confidentiality and preserves information without compromising survivors' access to justice;
- c) Integrates SEA/SH risk prevention into community engagement, contractor oversight, and monitoring activities; and
- d) Is supported by trained staff, including a GBV Specialist at national level, to strengthen prevention, case handling, coordination, and quality assurance.

49. Prevention and response to SEA/SH and GBV under NAVCDP is a shared responsibility among communities, contractors, service providers, county and national institutions, and development partners. Through the GM, NAVCDP ensures that:
- a) Survivors are informed of available referral services and supported to access them voluntarily;
  - b) No investigation, disclosure, or information sharing occurs without survivor consent, except where required by law;
  - c) Project-level actions focus on administrative and contractual accountability, including enforcement of Codes of Conduct and corrective measures; and
  - d) SEA/SH risks are mitigated through ongoing training, community sensitization, and supervision of project actors.
50. SEA/SH and GBV cases that fall outside NAVCDP's mandate but are disclosed through the GM are safely and confidentially referred to appropriate government or service providers in accordance with national protocols. This approach enables NAVCDP to meet its duty of care under the ESF while avoiding re-traumatization of survivors and respecting formal justice processes.

## **9.0 NAVCDP GRIEVANCE CHANNELS**

51. NAVCDP provides multiple, complementary channels for stakeholders to submit grievances. All channels are designed to be accessible, safe, and responsive, ensuring inclusivity for vulnerable and marginalized groups. These channels include:

### **Web-Based Portal (Tusuluhishe)**

- a) The Web based grievance link for NAVCDP is <https://grm.navcdp.go.ke/>
- b) Requires internet access and basic digital literacy;
- c) Supports multiple submission formats (web forms, email, WhatsApp, in-person entry via staff);
- d) Allows confidential or anonymous submission, including SEA/SH/GBV complaints;
- e) Reduces time, transport, and mobility barriers;
- f) Tracks grievances through the lifecycle (received, in-progress, under review, resolved, escalated); and,
- g) Supports centralized data management, reporting, and trend analysis at county and national levels.

### **Toll-Free Short Message Service (SMS)**

- a) Accessible in areas with mobile phone coverage;
- b) Supports confidential or sensitive complaints;

- c) Reduces transport and time barriers, including for persons with mobility challenges;
- d) Requires staff to respond promptly and ensure messages meet basic quality standards (length, content, format, non-repetition).

### **Email**

- a) Allows submission of detailed complaints, supporting documentation, and attachments;
- b) Can be accessed remotely, including for confidential submissions;
- c) Staff acknowledge receipt and provide updates through email or other preferred communication channels.

### **WhatsApp (Digital Messaging Applications)**

- a) Provides an additional, familiar platform for mobile users;
- b) Allows sharing of text, audio, images, and documents to support grievance reporting;
- c) Staff respond and update users on progress in the grievance lifecycle.

### **In-Person Submissions**

- a) Grievances can be submitted at designated county or community help desks;
- b) Staff assist those with low literacy or limited digital access;
- c) Offers immediate acknowledgement and, where possible, on-the-spot resolution;
- d) Ensures safe, culturally appropriate engagement with complainants.

### **Phone (Voice Calls)**

- a) Supports verbal reporting for complainants who prefer direct interaction;
- b) Allows real-time clarification and acknowledgement; and
- c) Is handled by trained staff who document complaints using standard intake formats.

## **10.0 NAVCDP GRIEVANCE RESOLUTION OPERATIONAL PROCEDURES**

### **10.1 Grievance Officers and Responsibilities**

52. NAVCDP assigns officers at community and project levels to manage the GM across all channels. Officers are trained to ensure effective, culturally appropriate, and confidential handling of grievances. Selection criteria include:

- a) Presence in the project area to ensure accessibility;
- b) Fluency in local languages for clear communication;

- c) Gender diversity (at least one female and one male) so complainants can choose whom to approach;
  - d) Trustworthiness and integrity to maintain confidence in the GM;
  - e) Commitment to safeguarding confidentiality of all complaints.
53. With Tusuluhishe fully operational, all complaints, submitted via the web portal, SMS, email, WhatsApp, or in-person, are received, recorded, and tracked in a centralized database. Officers are responsible for:
- a) Logging grievances using the official Tusuluhishe intake form, capturing complainant details, nature of grievance, recipient officer, and any referrals;
  - b) Ensuring follow-up at each stage until the grievance is resolved; and
  - c) Recording verbal or in-person complaints in Tusuluhishe to maintain consistency across channels.
54. Manual Uptake: To prevent "dual-tracking" errors (where a case is resolved on paper but remains "open" or "missing" in the national database), all manual logs from Annex 5 must be reconciled with the Tusuluhishe Dashboard daily. The 24-hour digitization rule is a mandatory performance indicator for County Grievance Focal Persons.

## 10.2 Internal Workflow and Timelines

55. The digital-first, hybrid resolution process ensures rapid, transparent, and accountable redress. Every grievance, regardless of the channel, follows a standardized lifecycle.

### Step 1: Intake and Digital Registration

56. **Digital Entry:** Complaints received via Toll-Free SMS, Web Portal, Mobile App, Email, or WhatsApp are automatically registered in Tusuluhishe.
57. **Manual Entry:** Complaints received via walk-ins, letters, or suggestion boxes are entered into Tusuluhishe by the designated officer within 24 hours of receipt.
58. **Acknowledgment:** The system generates a tracking number and sends an immediate acknowledgment to the complainant.

### Step 2: Sorting and Categorization (24 - 48 hours)

59. Upon digital or manual entry, the Grievance Focal Person (Assignee) at the CPCU or NPCU screens the complaint for:
- a) **Eligibility** - Determines if the complaint is project-related.
    - If project-related, it is assigned to the relevant staff or partner for resolution.
    - If not project-related, the complainant is referred to the appropriate authority or ombudsman.
  - b) **Risk Level** - Categorizes the complaint as Low, Medium, or High.

- c) **Sensitive Cases** - SEA, SH, GBV, and corruption allegations follow the confidential Sensitive Case Pathway, bypassing standard technical leads.
    - SEA/SH/GBV complaints are handled using NAVCDP's survivor-centered approach and referred to appropriate support services, in line with government protocols.
    - Non-sensitive grievances follow standard GM procedures.
  - d) **Frivolous or Malicious Complaints** - Complaints that are malicious, unfounded, or outside project scope are archived, and the complainant is informed.
60. To ensure the project meets its mandatory deadlines, this administrative assignment must be completed within 24 - 48 hours, leaving maximum time for actual investigation.

### **Step 3: Investigation and Action (14-Day Cycle)**

61. All grievances must be investigated and a formal resolution proposed within 14 calendar days of the initial registration. This timeline is strictly enforced by the digital system through the following automated "Status Alerts":
- a) Day 7: First system notification to the Assignee to provide a progress update.
  - b) Day 10: Critical alert to both the Assignee and the CPCU/NPCU Super Admin if the case remains "In-Progress."
  - c) Day 14: Deadline for resolution. If a resolution is not possible (e.g., complex land or technical disputes), the case must be updated to "On-Hold" with a documented justification, or it will be subject to Auto-Escalation to the National level.

### **Step 4: Feedback and Complainant Response**

62. The resolution is communicated to the complainant via their preferred channel (SMS, Call, Letter, Email, or Web Portal).
63. The Assignee records the complainant's response and feedback in Tusuluhishe to maintain a complete case history.

### **10.3 Anonymous Complaints**

64. Anonymous complaints are assessed to determine their substance, potential impact, and whether mitigation or corrective action is required. Although acknowledgment or direct feedback is not possible, these complaints serve as early warning signals.
65. Similarly, malicious or unfounded complaints are documented and reviewed as they may indicate underlying dissatisfaction or systemic risks. Both anonymous and malicious complaints inform adaptive management to prevent conflicts and operational issues.

### **10.4 Referral, Escalation and Appeals**

66. All NAVCDP-related grievances are initially received and addressed at the CIG, CDDC, SACCO, or Contractor level. If unresolved, the grievance is referred to the SAIC for further consideration.

67. Remaining unresolved grievances follow a structured escalation path:
- a) Tier 1: Community/Sub-project Level (PMCs, IWUAs, SACCOs, FPOs)
  - b) Tier 2: County Level (CPCU)
  - c) Tier 3: National Level (NPCU)

### **10.5 Right to Appeal**

68. Complainants dissatisfied with Tier 1 or Tier 2 resolutions may submit an appeal within 5 working days of receiving feedback.
69. Appeals are reviewed by an independent committee or a higher-tier officer, and a final decision issued within 7 working days. Complainants are informed of the appeal process upon lodging their appeal.
70. The GM appeal decision is final within NAVCDP procedures; complainants remain free to pursue legal remedies if unsatisfied.
71. If the grievance involves a NAVCDP staff member, the County Project Coordinator (CPC) informs the relevant national component / section head and provides the complainant the option to appeal.
72. Using the NAVCDP GM does not prevent the complainant from seeking legal redress through the Kenyan judicial system or the World Bank Grievance Redress Service (GRS).

### **10.6 Closing the Grievance**

73. A grievance is considered **Closed** only when:
- a) The resolution is implemented and verified by the focal person.
  - b) The complainant accepts the resolution, with satisfaction recorded.
  - c) The 5-day appeal window lapses without escalation.
  - d) Tusuluhishe updates the status to “Closed”, stopping further notifications.

### **10.7 Confidentiality and Data Management**

74. All grievance forms and logs securely stored in Tusuluhishe, accessible only to designated GM officers.
75. Privacy and confidentiality are strictly maintained, especially for SEA/SH/GBV cases.
76. Records are archived at project closure in accordance with government data disposal guidelines.

### **10.8 Continuous Learning and Adaptation**

77. Closed grievances are archived for quarterly trend analysis.
78. NPCU reviews recurring complaint types and hotspot areas to implement adaptive management, adjusting project activities where necessary (e.g., e-voucher timelines, construction safety protocols, or community engagement strategies).

## **10.9 Awareness and Disclosure**

79. NAVCDP maintains ongoing awareness-raising campaigns about the GM among communities, partners, and stakeholders.

80. Messaging emphasizes confidentiality, safety, accessibility, and protection from retaliation.

## **10.10 Escalation to the World Bank Grievance Redress Service**

81. The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The GRS enhances the World Bank's responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed.

82. The GRS considers a complaint admissible when:

- a) The complaint relates to a World Bank-supported project that is under preparation, active, or has been closed for less than 15 months
- b) The complaint is submitted by individuals or communities affected by a World Bank-supported project, or by their authorized representative; and
- c) The complainant(s) allege that they have been or will be affected by the World Bank-supported project.

83. Complaints must be in writing and addressed to the GRS. They can be sent by the following methods:

- a) Online, access the [online form](#)
- b) By email to: [grievances@worldbank.org](mailto:grievances@worldbank.org)
- c) By letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office - print and use this [form](#) (DOCX)

**To:**

The World Bank, Grievance Redress Service  
MSN MC10-1018, 1818 H Street Northwest  
Washington, DC 20433, USA

**Through,**

The World Bank Kenya Country Office  
Delta Center, Menengai Road, Upper Hill  
P.O. Box 30577-00100 Nairobi, Kenya.  
Tel: + 254 20 2936000

**Email:** [Kenyainfo@worldbank.org](mailto:Kenyainfo@worldbank.org)

84. Complaints must:
- a) Identify the project subject of the complaint
  - b) Clearly state the project’s adverse impact(s)
  - c) Identify the individual(s) submitting the complaint
  - d) Specify if the complaint is submitted by a representative of the person(s) or community affected by the project
  - e) If the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative.
85. Supporting evidence is not necessary but may be helpful in reviewing and resolving the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved. All complaints will be treated as confidential. The GRS will not disclose any personal data that may reveal the identity of complainants without their consent.
86. For procurement-related complaints, interested parties may file procurement-related complaints in Bank’s financed projects. Detailed information can be found in [Project Procurement Complaints](#).

## 11.0 MONITORING AND REPORTING

87. Day-to-day implementation of the GM and reporting to the World Bank is the responsibility of the project National Environmental Safeguards Lead (NESL) and Short-Term Expert (STE) - Social Safeguards and Development.
88. To ensure management oversight of grievance handling, the internal audit unit plus STE - Social Safeguards is responsible for monitoring the overall process, including verification that agreed redress are implemented.
89. In case of accidents, SEA/SH, and other complaints with gravity (escalated to the World Bank), the project management must report to the Bank on progress of resolutions as per the stipulated timelines i.e., within 48 hours of occurrence.
90. Information on the project and future stakeholder engagement programs is availed on the Ministry of Agriculture, and Livestock Development or project’s website and also posted on information boards in the Counties and wards where NAVCDP is implemented. Information can also be obtained from NPCU, Offices in Nairobi, and CPCUs.
91. Details of the national point of contact on stakeholder engagement program is shown below.

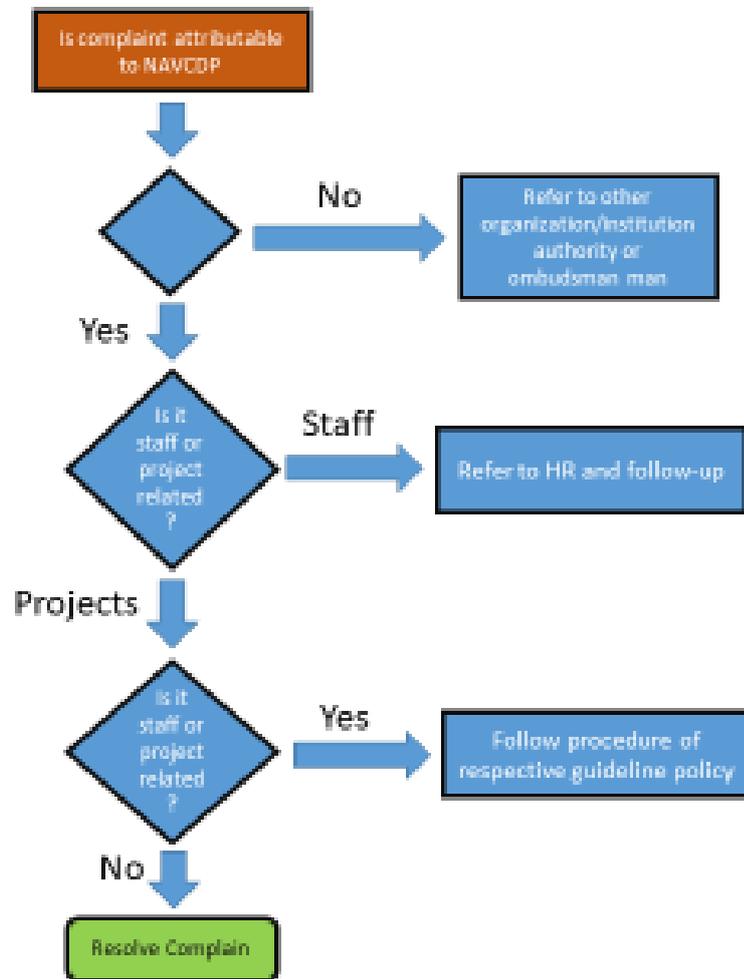
<b>Description</b>	<b>Contact details</b>
--------------------	------------------------

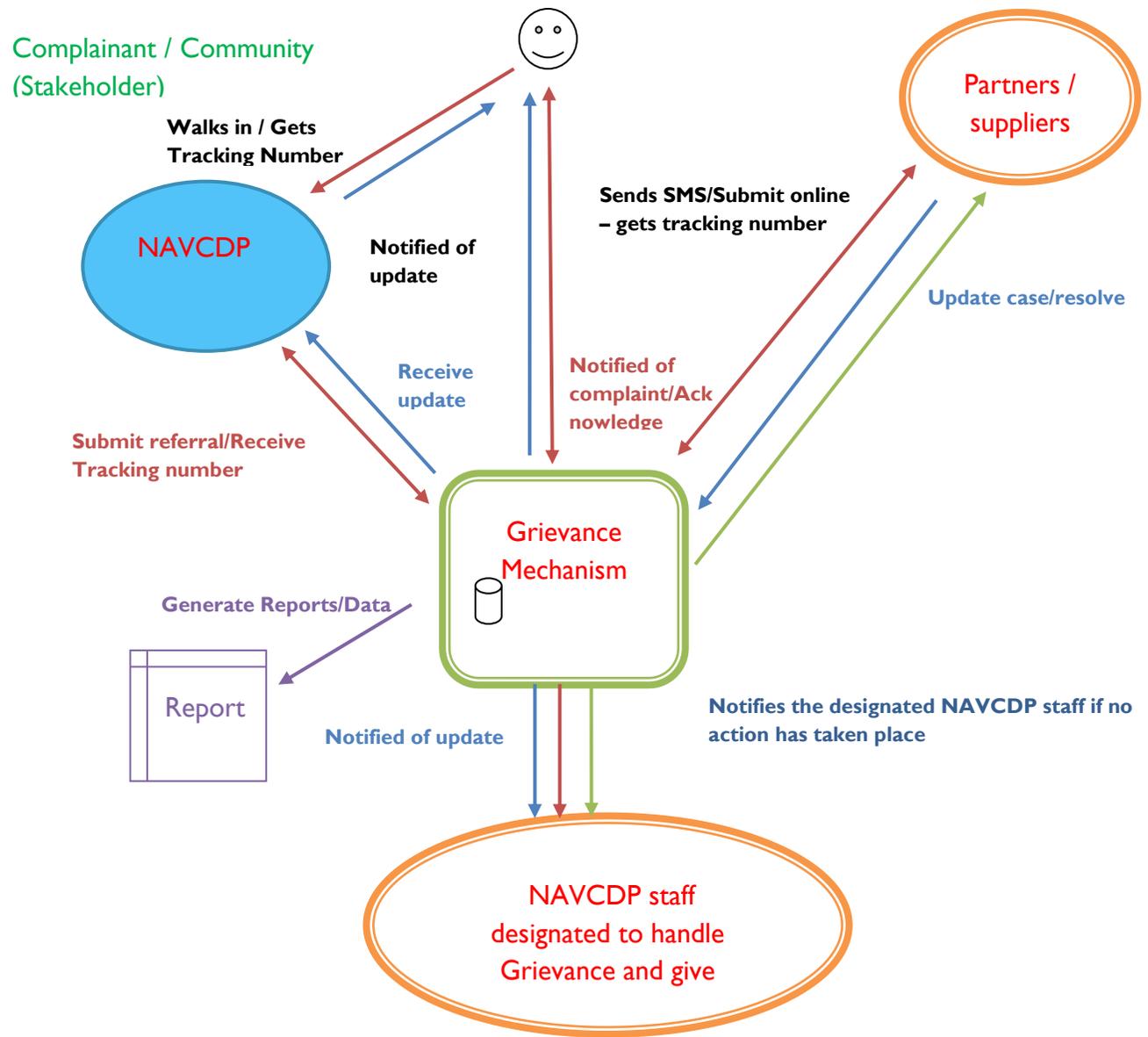
Name and position	Samuel Guto, NPC, NAVCDP
Address:	P.O Box 8073-00200 Nairobi, Kenya
E-mail:	<a href="mailto:info@navcdp.go.ke">info@navcdp.go.ke</a>
Telephone:	+254 020 2715466

<b>Description</b>	<b>Contact details</b>
Name and position	David Olang NESL, NAVCDP
Address:	P.O Box 8073-00200 NAIROBI, Kenya
E-mail:	<a href="mailto:info@navcdp.go.ke">info@navcdp.go.ke</a>
Telephone:	+254 773-206-315
"Tusuluhishe" URL	<a href="https://grm.navcdp.go.ke/">https://grm.navcdp.go.ke/</a>

# ANNEXES

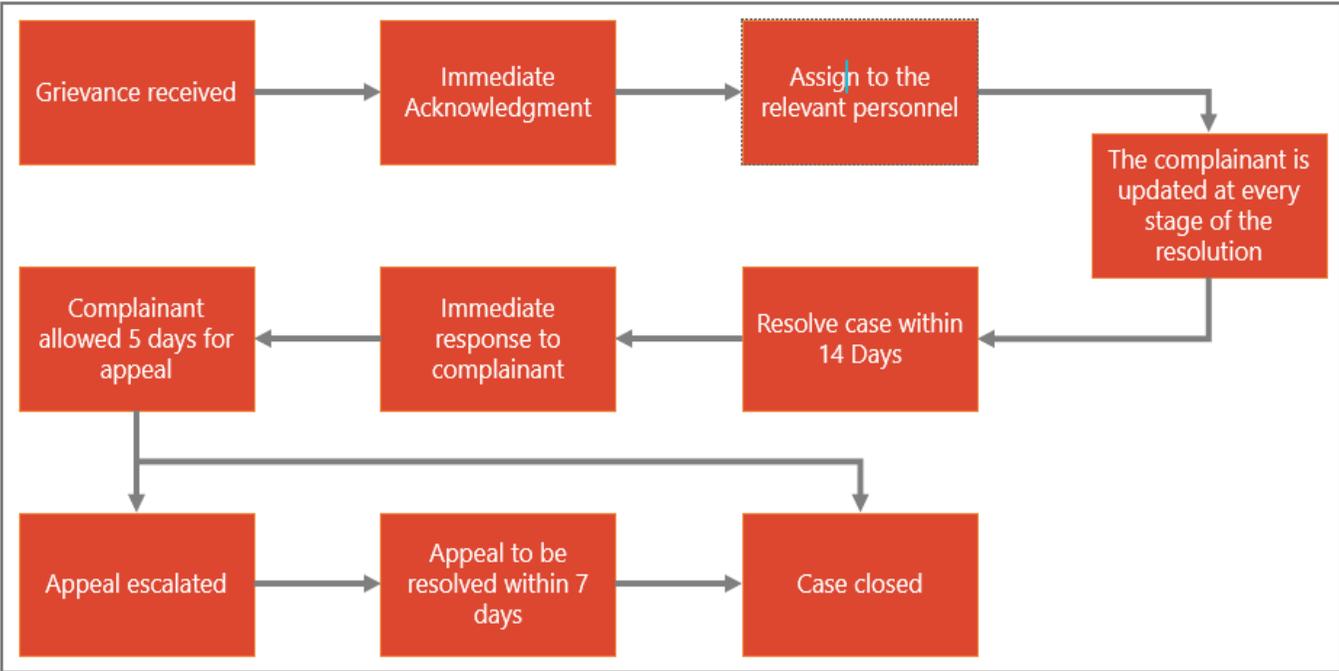
## Annex I: Analysis of Complaints Flow Chart





**Annex 2: Grievance Lifecycle (Tusuluhishe)**

# Grievance Lifecycle



### Annex 3: Tusuluhishe Form



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

<b>Complainant Profile:</b>				
1. Name:				
2. Gender:	Male: <input type="checkbox"/>		Female <input type="checkbox"/>	
Age:	Below 18 <input type="checkbox"/>	18-35 <input type="checkbox"/>	36-60 <input type="checkbox"/>	Above 60 <input type="checkbox"/>
Phone No:		Email:		
County:	Sub-County:	Ward:	Zone:	
Complaint Submission Date:				
<b>Complaint Category:</b>				
<input type="checkbox"/> Non inclusion	<input type="checkbox"/> Corruption (Fraud, Embezzlement, Bribery)	<input type="checkbox"/> Non- Compliance	<input type="checkbox"/> Political interference	<input type="checkbox"/> Conflict of interest
<input type="checkbox"/> Procurement	<input type="checkbox"/> Incompetence (Human resource capacity, service delivery)	<input type="checkbox"/> Staff / contractor behavior	<input type="checkbox"/> Environmental issues	<input type="checkbox"/> Access to resources

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delayed provision of services.	Misuse/Misallocation of project resources	Poor workmanship	Access to information	Recruitment (skilled and unskilled)
<input type="checkbox"/>				
Others (Specify)				
<b>Description of grievance/ Feedback</b>				
Complainant's Signature:				
<b>Feedback Unit</b>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Component 1 head	Component 2 head	Component 3 head	Coordination and Administration	M&E
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Procurement	Finance	Communication / Information Flow	Environmental & Social Safeguards	ICT
<b>Complaint Recipient</b>				
Name:		Phone No:		Date received:
Level (CIG, SAIC, SACCO, FPO, CPCU, NPCU): (Choose one)		Signature:		

If resolved			Date:	
If referred			Date:	
<b>Complaint Referral:</b>				
Name:		Designation:		Date referred:
Level (SAIC, CPCU, NPCU): (Choose one)				
Name:		Phone No:		Date received:
Email:		Signature:		
Date Resolved				
Date resolution communicated to the complainant				

### Annex 4: Grievance Log Form (Manual)

Grievance reference number (to be completed):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Local	<input type="checkbox"/> Kiswahili	<input type="checkbox"/> English
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested redress for the grievance if you have one? Is there something you would like NAVCDP or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Online <input type="checkbox"/>	email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
<b>Signature</b>			
Name of NAVCDP person assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:

<b>Completion</b>			
Final redress (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1 <sup>st</sup> proposed solution			
2 <sup>nd</sup> proposed solution			
3 <sup>rd</sup> proposed solution			

<b>Name of Commenter/Aggrieved</b>		<b>Comment/Grievance Number</b>	
<b>Name of Organization (if applicable)</b>			
<b>Address and position</b>			
<b>Telephone/Fax</b>			
<b>Email Address</b>			
<b>Method of Grievance Placement</b>	Mail Email Phone Walk In (Face to Face)		
<b>Most effective means to send a response</b>	<b>Mail</b>	<b>Email</b>	<b>Phone</b>
<b>Date and Time of Comment/Grievance</b>	Date	Time	

<b>Nature and location of Comment/Grievance</b>	<b>Please provide details of grievance.</b>		
What outcome are you seeking?			
Additional Information			
<b>Any Supporting Documents Attached</b>	Yes	No	
<b>Initial Response details</b>			
<b>Date of initial response:</b>			
<b>Resolved/Addressed by:</b>			
<b>Nature of Resolution:</b>			
<b>Date of Resolution:</b>			

FOR OFFICIAL USE ONLY (SYSTEM SYNCHRONIZATION):

This grievance must be entered into the Tusuluhishe Digital Platform by the designated Reporter within 24 hours of receipt. Once digitized, record the System Tracking Number here:

\_\_\_\_\_

**Annex 5: Grievance Register**

Reference No.	Date	Unique Identification Number (ID)	Email	Description of Grievance	Date of Grievance	One-time grievance	Happened more than once	Ongoing	Expected Resolution/Redress	Action identified to resolve the grievance	Date taken	Taken by whom	Complainant satisfied	If no, why?	Tusulhishe Entry Date/Ref
1.															
2.															
3.															
4.															
5.															
6.															
7.															
8.															
9.															
10.															

11.															
12.															
13.															
...															

**Instructions for the last column:** *Staff must record the date the entry was digitized and the system-generated ID to confirm synchronization.*