NATIONAL AGRICULTURAL VALUE CHAIN DEVELOPMENT PROJECT (NAVCDP)

STATE DEPARTMENT FOR AGRICULTURE

(P176758)

SECURITY MANAGEMENT PLAN (SMP)

Annex

Of

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Updated   January 2026

SECURITY MANAGEMENT PLAN (SMP)

1) This Security Management Plan (SMP) is an important part of the Environmental and Social Management Framework (ESMF). It was prepared, reviewed, consulted, approved, cleared, and disclosed both in country (https://kilimo.go.ke) and the Word Bank External website in December 2021 for the National Agricultural Value Chain Development Project (NAVCDP) which is a World Bank financed project implemented by the State Department for Agriculture in the Ministry of Agriculture and Livestock Development (MoALD). Sometime in January 2023, the Government of Kenya requested for additional counties for NAVCDP through a National Treasury Ref. "***Inclusion of Additional Counties to the National Agricultural Value Chain Development Project (NAVCDP)***", (IDA Credit. No. 7064-KE) letter dated January 23, 2023. Subsequently, the 1st ISM for NAVCDP was held on February 13-17, 2023, and The World Bank, Country Director gave an "IDA No Objection letter" on the same Ref. February 2, 2023. Additional financing was disclosed to stakeholders on 21st January 2026 who consented on the request to the 8 additional counties. Later on in 2025, the ministry of agriculture added an additional 3 value chains namely- Maize, Edible oil and Tea.

2) NAVCDP has adopted the recommended project changes that have affected the project design in the following areas:
   a) NAVCDP is currently in 34 counties which include: Meru, Nyeri, Muranga, Kirinyaga, Kiambu, Embu, Machakos, Kitui, Makueni, Tharaka Nithi, Nandi, Uasin Gishu, Trans Nzoia, Nakuru, Narok, Kajiado, Nyandarua, Kericho, Bomet, Kakamega, Busia, Bungoma, Vihiga, Homa Bay, Migori, Kisii, Siaya, Nyamira, Kisumu, Taita Taveta, Kwale, Kilifi, Tharaka Nithi,Vihiga, Bungoma. Kajiado, Siaya, Nyamira and Kisumu, additionally two counties which include Mombasa and Nairobi are implementing Safe urban food systems.
   b) The project has allowed Saturation- in all wards of the project counties.
   c) Each county selected up to 5 value chains, however 4 must be from the 12 VC menu and one more an open county choice.
   d) Farmers Producer Organizations are value chain sensitive and is being funded directly - (FPOs is benefiting from three grants: inclusion grant; Enterprise Development grant; and Value Chain Upgrading Matching grant)
   e) There are no micro-project grants - instead the Common Interest Groups (CIGs) has access funds as a revolving fund from Savings and Credit Cooperative Organizations (SACCOs) mainly at these wards level.
   f) Through the CDDCs, the CIGs/VMGs are supported with inputs to demonstrate different technologies and innovations using the FFBS model. Within the wards, it was agreed that to start with, every farmer (including the dereferencing) has to be registered and subsequently both the CDDCs (for wards) and CIGs mobilization is undertaken based on the PICD process.
   g) Every ward has a prioritized farmers SACCO. A diagnostic is done to determines whether a new SACCO is mobilized, or an existing SACCO is leveraged upon.

h) Farmer registration, SACCO membership, and accessing SACCO funds are value chain neutral activities.

i) No grants are provided at the CIG level and all grants provided are either at the CDDC level (for selective crop demonstrations) or at the SACCO level (for revolving fund).

Objective of the Security Management Plan

3) **Objective of the SMP:** To provide and maintain a safe physical environment and manage staff activities to reduce the risk of personal injury and property loss during the implementation of the National Agricultural Value Chain Development Project (NAVCDP). The plan describes how security is organized to face identified threats and how it is continuously reassessed and reorganized in correlation with security situations and operations being undertaken. The SMP covers sub-project activities in Component 1, 2 and 3 as well as project management and coordination under Component 4.

SECURITY ASSESSMENT

Security Context & Threat Environment

4) **Strengths:** Generally low to moderate petty crime around aggregation centers and rural markets during daytime. Active local administration (chiefs, village elders) mediates minor disputes effectively.

5) **Gaps / Risks:** Night-time theft of stored produce and inputs in isolated storage facilities, Sporadic livestock theft risks occur in some county border spaces such as around Migori and Trans Mara and within Migori county itself, between Kisumu and Kericho and also within Kisumu County itself and Seasonal influx of casual labor (harvest periods) raises opportunistic crime risk and SEA vulnerabil**ity.**

6) **Implications:** Need for targeted night security measures, safe storage design, and clear protocols for watchmen (including SEA safeguards).

Community-Based Security Arrangements (Watchmen)

7) **Strengths:** Farmer groups commonly use watchmen who are familiar with local terrain and social networks, Informal accountability via producer group leadership reduces misconduct.

8) **Gaps / Risks:** Watchmen often lack written contracts; payment and hours are informal, the farmer groups do not provide written terms of engagement and are not compliant with ESS2., No standardized Code of Conduct; limited awareness of SEA/SH prohibitions, Solo night deployment; poor lighting and no communication devices except mobile phones which do not have airtime most of the time; this leads to OHS risks.

Implications: Formalize watchmen engagement under ESS2: contracts, duty rosters, OHS provisions, SEA-integrated CoC, supervision, and training.

Physical Security of Assets

9) **Strengths**: Basic locks and fencing exist in many aggregation points, Some sites maintain visitor logs during the day.
10) **Gaps / Risks**: Inadequate lighting, weak doors, and single-lock systems; lack of CCTV or community alarm solutions, Poor perimeter control; informal access routes through neighboring plots and Mixed-use spaces (store + office) create private contact points that may promote SEA risk.
11) **Implications**
   - Upgrade to layered physical controls (lighting, reinforced doors, two-lock system, controlled access points).
   - Reconfigure spaces to keep private rooms separate from storage/operations.

Procedures & Incident Management

   - Farmer group leaders respond promptly to theft or disputes.
   - Occasional collaboration with chiefs or police for incident reporting.

Gaps / Risks

   - No written incident SOPs; reporting is ad hoc and undocumented.
   - Lack of 24/7 contact tree; no escalation timelines.
   - Incidents handled informally, there is a weak evidence chain and accountability.

12) Implications

   - Establish SOPs for incident reporting, escalation, preservation of evidence, and coordination with local administration/police.

   - Embed SEA-sensitive referral pathways connected to project GRM.

SEA/SH Risk and Survivor Pathways

Strengths

   - GRM exists at the project level and or county-level with community awareness in some areas.
   - Women's groups and CBOs can serve as allies for sensitization.

Gaps / Risks

   - Low awareness among watchmen and farmers of SEA/SH definitions and sanctions.
   - No confidential reporting option at the site level; there is fear of retaliation or stigma.

13) Implications

- Integrate SEA/SH training for watchmen and leaders; introduce confidential reporting channels; map services county by county; ensure non-retaliation and survivor-centered handling.
- There exist mapped referral services (health, psychosocial, legal) and clear links for cases involving security actors.

Stakeholder Coordination

- Chiefs, elders, and police posts are generally accessible.
- Extension officers engaged in farmer group activities.

Gaps / Risks

- Coordination is person-dependent; turnover disrupts continuity.
- Unclear protocols for joint patrols, emergency response, or transport after incidents.
- Minimal connection to county gender desks or GBV focal points.

14)Implications

- Formalize MOUs or SOPs with local police/administration; include contact points for GBV/SEA desks and county referral networks.

Worker Safeguards (ESS2)

Strengths

- Communities value fair treatment and community trust.

Gaps / Risks

- Child labor risks if youth are informally engaged as night watchmen and when children are engaged to harvest and transport produce on their heads.
- Excessive hours without rest; unsafe solo patrols; lack of PPE (reflective vests, torches).
- No access to a worker GRM for watchmen and children's workers.

15)Implications

- Enforce 18+ hiring identification cards, written terms, clear shift rotation, PPE; connect watchmen to worker GRM and disciplinary procedures.

Community Perceptions & Trust

Strengths

- High trust in local watchmen known to the community.
- Positive perception of project benefits.

Gaps / Risks

- Reports of favoritism or informal fees to access stores or equipment.
- Women and youth feel uncomfortable engaging with male guards at night.

16) Implications

- Clear zero-fee policy, transparent access rules, gender-sensitive interaction protocols, and mixed-gender presence where feasible.

World Bank Environmental and Social Standards

17) This security management plan is anchored on World Bank Environmental and Social Standard 4 (ESS4) that covers Community Health and Safety on sub section (b) Personnel Security in line with the World Bank Good Practice Note on Assessing and Managing Risks and Impacts of the Use of Security and the Guidelines for Implementation of the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.

18) The standard role of public security is to maintain the rule of law, including safeguarding human rights and deterring acts that threaten the project personnel and facilities. The public security forces to be deployed shall be competent, appropriate and proportional to the threat. Government of Kenya shall abide by the World Bank Good Practice Note on Assessing and Managing Risks and Impacts of the Use of Security to comply with the commitments on human rights extended throughout the NAVCDP management activities and bolstered by its compliance with:

- World Bank Good Practice Note on Assessing and Managing Risks and Impacts of the Use of Security Personnel,
- Voluntary Principles on Security and Human Rights Toolkit Version 3, 2008,
- Guidelines for Implementation of the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, 2016,
- The Penal Code 2016,
- Prevention of Terrorism Act 2012,
- Prevention of Organized crime Act 2012,
- Counter Trafficking in Persons Acts 2012,
- Independent Policy Oversight Act 2011,
- Kenya Police Service, Service Delivery Charter, 2015, and
- The Universal Declaration of Human Rights, 1948.

SECURITY MANAGEMENT APPROACH

19) The NAVCDP National Project Coordinator (NPC) ensures that security procedures and criteria are fully designed and updated, and that the necessary means are fully available to ensure the security for project operations.

The NPC is leveraging the use of existing national and local security infrastructure to access and share security and conflict related information. In addition, and working with the National Police Service (NPS), NPC specifically address conflict risks in community engagement activities in a timely manner and to identify any security risk that can pose a threat to Project staff and assets both at the National and County coordinating units.

The micro-projects initiated by individual farmers, CIGs/VMGs and medium level FPO investments (Component 1) and the value chain/infrastructural investments (Component 2 and 3) are implemented in areas within the beneficiary communities. The farmers, CIG/VMGs use the locally available security personnel while the SACCO, FPOs and project management committees for value chain/infrastructural investments deploy security staff to guard the investments. The implementation committees for all the sub-projects informs the nearest police officers for support in case of any emerging security threats they cannot handle.

STANDARDS AND GOOD INTERNATIONAL PRACTICE

20) This security management plan is anchored on (a) World Bank Environmental and Social Standard 4 (ESS4) that covers Community Health and Safety on sub section (b) Personnel Security in line with the World Bank Good Practice Note on Assessing and Managing Risks and Impacts of the Use of Security and (c) the Guidelines for Implementation of the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.

21) The standard role of the Public Security Agencies is to maintain the rule of law, including safeguarding human rights and deterring any actions that threaten the project personnel and facilities. The Public Security agents deployed when needed are competent, appropriate, and proportional to the threat. Government of Kenya adopts the World Bank Good Practice Note on Assessing and Managing Risks and Impacts of the Use of Security to comply with the commitments on human rights extended throughout the NAVCDP activities and bolstered by its compliance with:

- Voluntary Principles on Security and Human Rights Toolkit Version 3, 2008,
- Guidelines for Implementation of the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, 2016,
- The Penal Code 2016,
- Prevention of Terrorism Act 2012,
- Prevention of Organized Crime Act 2012,
- Counter Trafficking in Persons Acts 2012,
- Independent Policing Oversight Authority Act 2011,
- National Police Service Act, 2014
- Private Security Regulation Act, 2016
- The National Government Coordination Act 2013
- Kenya Police Service, Service Delivery Charter, 2015, and
- The Universal Declaration of Human Rights, 1948.

A. SECURITY MANAGEMENT

22) NPC is responsible for project security management at both National and County levels under the direct oversight and guidance of the MoA&LD as the implementing agency. MoA&LD is working closely with the Ministry of Interior and Coordination of National Government in the deployment of the public security officers to the project based on the security risk assessment. The command and communication structure of the National Police Service is adopted. The police service shall perform its functions under the overall direction, supervision and control of the Commissioner of Police at National Level and County Commissioner at County level and Officer Commanding Police Division (OCDP) at Local Level. The management of security for NAVCDP operations complies with the four basic pillars of security management:

- DETECT an adversary.
- DETER an adversary if possible.
- DELAY the adversary until appropriate authorities can intervene.
- RESPOND to the adversary's actions.

B. OVERVIEW OF THE SECURITY SITUATION

23) Different security risks exist in the selected NAVCDP counties, that would be new or changing which may impact the project, that must be communicated without delay through the relevant designated project liaison officers at National, County and Community levels. The project liaison officers are expected to record the identified risks in the security log. The security risks can be categorized into:

a. Internal Risks may include but not limited to: -illegal, unethical, or inappropriate behaviour of project personnel or those directly affiliated with it, such as employee theft, workplace violence, and labour unrest, potentially with associated sabotage).

b. External Risks are those caused by the actions of people outside the project who seek to take advantage of opportunities presented by the development and operation of the project, such as common criminal activity; disruption of the project for economic, political, or social objectives; and other deliberate actions that have a negative impact on the effective, efficient, and safe operation of the project. In extreme cases, these could include banditry attacks, terrorism, armed insurgency, coups, or war.

24) The main security risks within the NAVCDP Counties include:

1. Criminal offences
2. Banditry attacks
3. Terrorism
4. Cattle rustling/Inter-tribal or communal violence which could pose a threat to project personnel
5. Industrial Action leading to strike or disruption of work, social conflict, civil unrest
6. Breakdown of relationships with Community groups and Committees
7. Reaction of community to an incident or accident involving project personnel or asset
8. Threat of armed attack

9. Theft/ Larceny; and
10. Kidnapping

25) The project has adopted a systematic and careful examination of the workplace, work activity, working environment and those people who may be at any security risk. Risk assessments identify what might go wrong and with an evaluation of any security hazards undertaken, adequate control measures needed to prevent or minimize the potential security risks are determined.

26) A consequence risk assessment matrix has been adopted comprising of the impact and likelihood of potential security risks (Table 1-1). The matrix works by selecting the appropriate consequences from across the bottom, and then cross referencing against the row containing the likelihood, to read off the estimated risk rating.

Table 1-1: Risk Assessment Matrix

Likelihood \ Impact	Negligible	Minor	Moderate	Significant	Severe
Very Likely	Low Med	Medium	Med Hi	High	High
Likely	Low	Low Med	Medium	Med Hi	High
Possible	Low	Low Med	Medium	Med Hi	Med Hi
Unlikely	Low	Low Med	Low Med	Medium	Med Hi
Very Unlikely	Low	Low	Low Med	Medium	Medium

27) The Likelihood verses Consequences Risk Assessment Matrix has been supported with a table which ties together the risks with the mitigations, roles and responsibilities and timelines and the security situation analysis for the 33 Counties see Table 1-2:

Table 1-2: Project Security Risks and Mitigation Measures

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
I	Criminal offences: Theft/ Larceny	Medium	Medium	Medium	National Project Coordinator	• Use of physical security personnel i.e., private unarmed security guards • Staff crime security awareness, • Permanently etching on equipment (spray paint and initials on a piece of equipment does not qualify as being	• Escalate to the Project Coordinator • Undertake joint risk assessment process including representatives of NPS in use • Maintain close contact with representatives of NPS at different levels		VPSHR Toolkit https://www.miga.org/sites/default/files/archive/Documents/VPSHR_Toolkit_v3.pdf

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
						"positively" identified). ● Installation CCTV and Alarm Systems: either stand alone or integrated combined with wireless communication to an off-site, ● Establish formal and consistent reporting and communications mechanisms with public security			

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
						forces and other stakeholders ● Adequate lighting, ● Perimeter fencing especially materials areas and camp(s).			
2	Terrorism	Medium	High	High	National Project Coordinator	Enhance intra/intra agency cooperation within the project area and NPS. Meet on regular basis with the security apparatus at the sub-county and county level	Conduct effective risk analysis assessments, and SWOT analyses and Force-Field Analyses related to gaps		VPSHR Toolkit https://www.miga.org/sites/default/files/archive/Documents/VPSHR_Toolkit_v3.pdf

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
						Assess the security situation and make changes to the security management plan

Ensure travelling project staff have NPS escort

Engage with and empower border communities as key contributors in border security and management,

Implement Border Community Policing programs,

Implement information exchange | and needs assessments. | | |

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
						programs and mechanisms[1].			
3	Cattle rustling	Medium	Medium	Medium	National Project Coordinator	Initiate peace building process among the affected project counties, Use Traditional institutions in creating peace, security, law and order in community policing and conflict management, Carry out civic education by use of the local Civil Society Groups, and	Strengthening of surveillance within the County boundaries and develop protocols for cross border use,		

---

[1] Good Practices in the Area of Border Security and Management in the Context of Counterterrorism and Stemming the Flow of "Foreign Terrorist Fighters"

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
						Offer vocational and technical skills to the youths and or initiate income generating project to engage youths[2].			
4	Armed attack / Kidnapping	Medium	High	High	National Project Coordinator	Use of physical security personnel, Staff crime security awareness, Permanently etching on equipment (spray paint and initials on a piece of equipment does not qualify as being "positively" identified).	Never fight back when apprehended with armed people, Listen carefully to instructions and do as you are told (if instructions are difficult to hear, ask politely but firmly for them		VPSHR Toolkit https://www.miga.org/sites/default/files/archive/Documents/VPSHR_Toolkit_v3.pdf Crisis management corporate guidelines

---

[2] Social and Economic Costs of Cattle rustling in Kenya. IGAD Policy Brief Series No ICPALD 20/CLE/I/20-17

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
						Installation CCTV and Alarm Systems: either stand alone or integrated combined with wireless communication to an off-site, Establish formal and consistent reporting and communications mechanisms with public security forces and other stakeholders Adequate lighting Perimeter fencing especially materials areas and camp (s).	to be repeated), Inform the victim's family timely manner, Do not make any sudden movements that might startle the criminals or be interpreted as an attempt to resist or escape, Do not hesitate if told to move and do so in a controlled manner. Do not try to argue or make		

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
							provocative comments. Do not stare or make eye contact with the criminals.		
5	Industrial Action[3]	Low	Medium	Medium	National Project Coordinator	Adhere to all provisions in the Project Labour Management Procedures, Understand the nature of the dispute the stated reasons, the underlying reasons and any "hidden agenda",	Use the alternative dispute resolution: Conciliation, mediation and or arbitration, Identify the legal strategy to be pursued and associated consequences.		NAVCDP Labour Management Procedures

---

[3] *Industrial action occurs when disputes in the workplace are not resolved by negotiations and the workers either go on strike, stage sit in, embark on a go slow or are locked out of the premises.*

S.No.	Risk description	Likelihood of the risk occurring	Impact if the risk occurs	Severity Rating based on impact & likelihood.	Responsibility (Person who manages the risk)	Mitigating action (Actions to avoid or reduce the risk impact)	Contingent action (Action to be taken if the risk happens).	Progress on actions	Useful resources
6	Community Hostility	Low	Medium	Medium	National Project Coordinator	Adhere to all provisions in the Project Stakeholder Engagement Plan,	Set some ground rules within the community groups, and Revisit the group's purpose.		NAVCDP Stakeholder Engagement Plan
7	SEAH, and incident response	Low	Low	Low	National Project Coordinator	Adhere to all provisions in the Project Grievance Redress Mechanism Abide by the requirements of SEAH Action Plan for the project being prepared,	Continuous SEAH awareness creation the hired firm.		NAVCDP Grievance Mechanism NAVCDP SEAH Action Plan

Table 1-3 provides an overview of the security situation analysis for the project participating counties for various potential security threats such as theft, cattle rustling. From the geographical risk assessment, NPC leverages this process to determine which locations require National Police Service, armed security support and importantly, which do not.

Table 1-3: Situation Analysis Matrix for the security within the project counties

#	SECURITY THREATS PROJECT COUNTIES	Criminal offences	Theft/ Larceny	Terrorism	Cattle rustling	Armed attack / Kidnapping	Industrial Action	Community Hostility	SEAH, and incident response
1.	Kitui	Medium	Medium	Medium	High	Medium	Low	Low	Medium
2.	Machakos	Low	Medium	Medium	High	Medium	Low	Low	Medium
3.	Migori	Medium	Low	Medium	High	Medium	Low	Low	Medium
4.	Makueni	Medium	Low	Medium	High	Medium	Low	Low	Medium
5.	Bomet	Medium	Low	Medium	High	Medium	Low	Low	Medium
6.	Embu	Medium	Low	Medium	High	Medium	Low	Low	Medium
7.	Meru	Medium	Low	Medium	High	Medium	Low	Low	Medium
8.	Homa Bay	Medium	Low	Medium	High	Medium	Low	Medium	Medium
9.	Kiambu	Medium	Low	Medium	High	Medium	Low	Medium	Medium
10.	Kilifi	Medium	Low	Medium	High	Medium	Low	Medium	Medium
11.	Muranga	Medium	Low	Medium	High	Medium	Low	Medium	Medium
12.	Kisii	Medium	Low	Medium	High	Medium	Low	Medium	Medium
13.	Kakamega	Medium	Low	Medium	High	Medium	Low	Medium	Medium
14.	Taita Taveta	Medium	Low	Medium	High	Medium	Low	Medium	Medium
15.	Nakuru	Medium	Low	Medium	High	Medium	Low	Medium	Medium
16.	Nandi	Medium	Low	Medium	High	Medium	Low	Medium	Medium

#	SECURITY THREATS PROJECT COUNTIES	Criminal offences	Theft/ Larceny	Terrorism	Cattle rustling	Armed attack / Kidnapping	Industrial Action	Community Hostility	SEAH, and incident response
17.	Narok	Medium	Low	Medium	High	Medium	Low	Medium	Medium
18.	Nyandarua	Medium	Low	Medium	High	Medium	Low	Medium	Medium
19.	Busia	Medium	Low	Medium	High	Medium	Low	Medium	Medium
20.	Trans-Nzoia	Medium	Low	Medium	High	Medium	Low	Medium	Medium
21.	Uasin Gishu	Medium	Low	Medium	High	Medium	Low	Medium	Medium
22.	Nyeri	Medium	Low	Medium	High	Medium	Low	Medium	Medium
23.	Kakamega	Medium	Low	Medium	High	Medium	Low	Medium	Medium
24.	Kirinyaga	Medium	Low	Medium	High	Medium	Low	Medium	Medium
25.	Kwale	Medium	Low	Medium	High	Medium	Low	Medium	Medium
26.	Tharaka Nithi	Medium	Low	Medium	High	Medium	Low	Medium	Medium
27.	Bungoma	Medium	Low	Medium	High	Medium	Low	Medium	Medium
28.	Kajiado	Medium	Low	Medium	High	Medium	Low	Medium	Medium
29.	Vihiga	Medium	Low	Medium	High	Medium	Low	Medium	Medium
30.	Siaya	Medium	Low	Medium	High	Medium	Low	Medium	Medium
31.	Nyamira	Medium	Low	Medium	High	Medium	Low	Medium	Medium
32.	Kisumu	Medium	Low	Medium	High	Medium	Low	Medium	Medium
33.	Nairobi	Medium	Low	Low	Low	Low	Low	Medium	Medium
34	Mombasa	Medium	Low	Low	Low	Medium	Low	Low	Medium

28) In the Counties with low risk security threat, the project could consider using private unarmed security personnel. Due diligence involving back ground checks is undertaken to ensure that only those from reputable security firms are engaged. The unarmed security personnel can undertake basic security duties such as access control and perimeter security management; and if deemed necessary, the police may be engaged on a reactive basis. This approach alleviates undue pressure on local policing resources and reduce the risks of engaging armed officers. An appropriate, formal agreement is developed to support service delivery and mitigate the identified security risks and respond to any stakeholder concerns.

NB: Care is being taken to ensure that security response or presence of security forces does not result in additional risks to communities or individuals within the project implementation areas.

1. **Social Conflicts, Civil Unrest**
29) The main risk is the general population including the local communities, who presume to have been aggrieved that would mobilize crowds that may include villagers for a demonstration. Compensation and environmental as well as social concerns can create this kind of scenario. Most of the time, negotiations facilitated by local leaders and government entities can resolve the situation but some can escalate leading to violent actions.
30) Any indications of such a threat must be communicated through the project local liaison officers to the designated field police officers and complaints may be made to the officer-in-charge of a Police Station (Officer Commanding Station - OCS) and be recorded in an occurrence book for future reference. The threat should in turn be communicated to the Officer Commanding Police Division (OCPD) at the sub-County level and to the County Commander of Police using the existing public security channels.
31) National, county, and local workers could also demonstrate, if there is a perceived discrimination and unfair working conditions in terms of wages, overtime, and welfare. It is the responsibility of the Ministry of Agriculture and Livestock Development (MoA&LD) and the NAVCDP coordinating team to ensure that working conditions for all workers/employees are in line with the National legal framework.

2. **Criminal Offenses**
32) The main risk remains small scale thefts of light equipment, fuel and personal effects which can involve aggressions. To mitigate this risk, materials storage and control, inventory and maintenance of storage areas for raw materials, equipment, etc. is according to the national laws and regulations and relevant good international industry practice, including the World Bank Group Environmental, Health and Safety Guidelines.

3. **Terrorism**
33) There is the ever-imminent threat of terrorism from the lawless Al-shabab from neighboring Somalia in the northern counties that could pose a serious threat to the implementation of the NAVCDP activities. None of the project counties lies along the Somalia border. However, the project stakeholders are on high alert to avoid incidences

of infiltration of the terrorists into the project areas. The stakeholders are sensitized to report any situations that may indicate signs of an attack from the terrorist groups.

4. Cattle Rustling

34) Official project documents list cattle rustling alongside theft and terrorism as potential security threats that could disrupt implementation. To protect livestock and farmers, NAVCDP is supporting the rollout of **digital animal identification** in implementing counties to improve traceability and deter theft.

Armed attacks and kidnappings

35) The project stakeholders may be exposed to this risk where the project personnel are expected to carry huge sums of money or valuable items. The stakeholders are sensitised to use cashless transactions as much as possible. Where risks are high, the armed security teams are called upon to provide escort to the destinations.

5. SEAH AND SECURITY MANAGEMENT

36) Farmers under NAVCDP may engage watchmen to safeguard agricultural investments such as stores, irrigation equipment, and aggregation facilities. The watchmen's responsibilities include patrolling, controlling access, and reporting security incidents. Because of their position of authority and frequent interaction with community members, all watchmen shall sign and abide by a Code of Conduct prohibiting Sexual Exploitation and Abuse (SEA). Watchmen must demonstrate respectful behavior toward all farmers, especially women and vulnerable persons, and shall not use their role to seek sexual favors or engage in any misconduct. They receive SEA orientation and are required to report any SEA-related concerns through the project's SEA/SH reporting channels. Non-compliance leads to immediate removal and further action as determined by project requirements and Kenyan law. The updated SEP places emphasis on awareness-raising, accessibility, confidentiality, and timely resolution of grievances, particularly in newly included counties for urban food system interventions.

SECURITY ALERT STATES

37) MoA&LD adopts the NAVCDP project area alert status in evoking the security state response levels, triggers, and actions specific to the project site. Table 1-4, 1-5, 1-6 and 1-7 with the color shades of Green, Yellow, Orange and Red respectively are the security level responses to be adhered to.

Table 1-4: Security Response Level: Green- Business as Usual- Security Risks Effectively Controlled

Security Response Level GREEN Business as Usual- Security Risks Effectively Controlled	
Event Indicator	**Recommended Action(s)**
No direct threat exists, and no incidents have taken place to warrant heightened security measures: This is the default threat level. There is no current, general, or undirected threat to government supported works projects within the County. Under this level the status remains at GREEN. ● Site operations are running normally with employees going about their lives with no, or very limited, restrictions. ● There are no restrictions on vehicle movement or crew changes ● Peaceful protest demonstrations take place. ● Occasional unrest or demonstrations away from operational sites. No direct threat to the operation ● Effective government control and/or rule of law in place. Liaison remains regular and effective ● Continued good will of the majority of the local community remains assured	**No restriction to normal movement compliant with local Journey Management Plan (JMP) requirements. Staff and vehicles may move around the area within the protective envelope of the project area security.** ● Complete all pre-planning actions ● All visitors or returning staff receive an arrivals Security brief ● Train staff and ensure awareness of actions to be taken- site drills. ● Ensure JMP is in place and followed ● All crisis management and evacuation plans are in place and are maintained as 'living documents' ● The security situation, crime levels, political and social events are monitored closely. On-going collection and assessment of information through liaison with authorities and local community, ● Ensure daily Personnel on Board (POB) is maintained. ● All stakeholders are aware of the contents of the evacuation plan and understand their role within it ● Vehicle Escorts taken when traveling to areas where civil unrest or cattle raids has occurred. ● Maintain close liaison with social safeguards and good community relations
STANDARD OPERATING PROCEDURES	

Project Security Assets

Police Foot Patrols and Escort:

    Roles and responsibilities include:

● The conduct of regular inner peripheral patrols and reporting of findings to Control room.
● To ensure safe weapon handling and clearing is carried out at the unloading bays prior to entry to the guard rest area or main compound.
● Gathering information and intelligence by interaction with local people.

Security Response Level GREEN Business as Usual- Security Risks Effectively Controlled	
Event Indicator	**Recommended Action(s)**
- Questioning of strangers or suspicious persons or vehicles. - Observing physical signs or evidence of potential hostile activity or presence (Noise, footprints, fire traces, etc.) and reporting to Control Room. - Developing Hearts & Minds assurances with the community of security in the Area. - Developing community relations on behalf of NAVCDP. - Creating a deterrent factor by the presence of the patrol in the area Centralized Mobile Police Patrols **Introduction**: The Centralized Police Mobile Patrols has responsibility for security of the entire project by patrolling the surrounding area, visiting areas of possible threat, local villages, and satellite locations. Their secondary responsibility is to provide immediate reaction and support inner peripheral security, - Roles and responsibilities include: - The conduct of regular area patrols and reporting of findings Officer Commanding Station OCS - To react to Emergency situations as a Quick Reaction Force as directed OCS, - To ensure safe weapon handling and clearing is carried out at the unloading bays prior to entry to the guard rest area or main compound, - Gathering information and intelligence by interaction with & questioning of local people, - Questioning of strangers or suspicious persons or vehicles, - Developing Hearts & Minds assurances with the community of security in the Area, - Developing community relations on behalf of NAVCDP. - Creating a deterrent factor by the presence of the patrol in the area. Contractors Camp Sites: - Main Gate - Barrier Check of vehicle occupants and main gate access control. Random Cursory Vehicle searches on arrival and random checks (10% of vehicles) on departure to deter theft or when a vehicle is deemed suspicious. - Perimeter Foot Patrol–Daytime every hour at irregular times around the camp perimeter. - Assist Journey Management with coordination of vehicles departing and arriving at camp, and the management of visitors. - Quick Reaction Force (QRF) (if allocated) specific to the Contractor.	

INTERFACE OF SMP AND ESS2-LABOUR AND WORKING CONDITION

ESS2 covers all categories of project workers, including:

- Contracted watchmen from the community.
- Any other security staff engaged by farmer groups or private firms.

Therefore, the SMP ensures their:

- Fair terms of engagement of the community watchmen
- Safety and welfare of the watchmen
- Non-discriminatory treatment of the watchmen on wages and other benefits.
- Protection from child labour and forced labour on the investment as watchmen
- Access to a grievance mechanism- the locally engaged watchmen should have access to the grievance mechanism.
- The watchmen are given induction training on professional conduct and SEA/SH prevention, they are also sensitized on the Code of Conduct and sign the same.

Table 1-5: Security Response Level: Yellow- Enhanced Security Measures Required

Security Response Level Yellow Enhanced Security Measures Required	
Event Indicator	**Recommended Action(s)**
Increased level of disturbance and/or increased probability of impact to operations. Sporadic civil disorder events. A direct threat has been detected to one or more areas of the operation, but it is not considered imminent. ● Area-wide protests and/or strike action that do not directly impact project operations or personnel but do present a risk to external logistical operations or works. ● Increase in inter-tribal violence adjacent to project area of operations or locations. ● Vehicle or aircraft movement is disrupted ● Increased difficulty in accessing mission critical items or functions due to local security situation	**Project operations continue. Enhanced security controls and operational restrictions required:** ● Necessary communications equipment Satellite Phones / Very Small Aperture Terminal & Very high frequency radio calls (SATPHONES/VSAT/VHF) available and all systems checked ● Ensure site specific plans are available to the FRT and have been revised and practiced ● Ensure all security, crisis and evacuation plan representatives understand their roles and responsibilities ● Brief local security forces on roles and responsibilities and rules of engagement. Apply controls to ensure actions are tracked. ● Review local security risks and controls; operating area Journey Management Plan- implements additional controls. ● Maintain regular communication with all stakeholders, including authorities, local community, other sites and activities. ● Daily call with Officer Commanding Station, ● If situation likely to continue, re-assess stocks of resources at operational sites and ability to re-supply (food/water/fuel/people). ● Verify POB and carry our muster drills,

Security Response Level Yellow Enhanced Security Measures Required	
Event Indicator	**Recommended Action(s)**
- Significant police or paramilitary deployment required to maintain rule of law localized curfews in place. - Heavy handed response from police and security service - Erosion of the support and good will of local communities - Difficulties in maintaining good relations with local authorities and traditional leaders	- Assess requirements to increase physical security controls, access, perimeter protection, and road escorts. - Issue "Business Essential" travel advisory (If not already done). - All employees are briefed / updated on the security situation and controls- revise the evacuation plan - Confirm all expatriates registered with appropriate embassy and all visas and passports valid. - Consideration given to recommending changes to the daily routine to include: - identification of any out of bounds areas - local travel restrictions - Review which business critical and sensitive documents need to be protected and how.

STANDARD OPERATING PROCEDURES

These actions are in addition to the normal activities required at Security Status Green. Increased actions are:

Police Foot Patrols:

Roles and responsibilities include:

- Reinforce construction camp sites entries.
- Conduct patrols around construction camp inner and exit gates.
- Off camp personnel interrogation.

Centralized Mobile Police Patrols

Armed Security Force (ASF):

- **Quick Reaction Force** (QRF)4x Man armed team on standby within the construction camp on Notice to Move (NTM) States:
  - **Daytime -** No change. But to include:
    - Local area patrols are increased and cover the clearance patrol area of a radius of 300m from the camp perimeter.
    - Clearance Patrols must be completed after any suspicious activity is noted or the camp is stood to.
  - **Nighttime** – As per normal daytime QRF with second pair at 2 minutes NTM.
- **Mobile Patrol** – location of **the** threat dictates the exact patrol requirement. Options:
  - 1 x patrol performing routine zone patrols or operating in a screening role.

Security Response Level Yellow Enhanced Security Measures Required	
Event Indicator	**Recommended Action(s)**

Construction Camp Sites:

- Check ID along with issued badge for all external workers whenever arriving.
- All external contractor/vendor visits must have been notified to the Main Gate Reception in advance – no unexpected arrivals are allowed entrance. As with Green all individuals and guests must be escorted by their host.
- Implementation of restricted access areas. Areas such as construction camp site are by authorized badge only. Access point to be physically controlled.
- Lighting must cover all areas of the site to ensure guard force have clear visibility whilst conducting foot patrols.
- Vehicle checks are up to 25% of vehicles (10% comprehensive, 15% cursory).
- Quick Reaction Force (QRF) (specific to Contractor)
- **Isolated Locations**
    - Consider increasing security at isolated locations and field operations.

Table 1-6: Security Response Level: Orange-Increased Security Measures

Security Response Level Orange Implementation of Increased Security Controls and Preparation for Lock Down and/or Site Evacuation	
Event Indicator	**Recommended Actions**
Significant obstacle or direct threat has been detected to operations and is deemed imminent, or a security incident has taken place close to one of the project sites: ● Widespread civil unrest, not contained by police or paramilitary forces. ● Frequent acts of violence close to project operations. ● NAVCDP specifically threatened and/or targeted. ● Reinforcement of police by military forces to enforce martial law and impose curfews in key areas. ● Substantial political or inter-tribal violence ● Government ordered curfew in place ● Law and order become fragile, shortages of food/water /supplies/power/ communication outages. ● Failure to observe security restrictions regarded as life-threatening. ● Loss of support and good will of majority of local community, ● Liaison with authorities and traditional leaders breaks down	Project operations are suspended. Significant increase in security controls and operational restrictions. All movement outside construction camps ceases. ● All external movement ceases ● Twice daily call schedule with Client Security Manager ● Ensure sites including plant, machinery and equipment are secured – security protection in place. ● Consider further increase in security controls including further reinforcement of security guarding, (police support) and asset hardening of critical equipment and safe havens. ● Briefings to local security forces on roles and responsibilities- liaison with local commanders increased. ● Consider resupply requirements for all locations and caretaker maintenance and security of unmanned locations. ● Instigate evacuation drills and brief all staff on actions ● Pack grab bags and ensure POB and documentation is available ● Prepare vehicles for possible road moves and ensure thorough rehearsals have been conducted for any moves under escort.
STANDARD OPERATING PROCEDURES	
These actions are in addition to the normal activities operating at Security Status Yellow. Increased Actions: <u>Police Foot Patrols:</u> ● Reinforce camp main gate and Emergency Exits security. ● Conduct thorough searches on the arrivals. ● Ensure all gates within the camp are padlocked. ● Intensify inner perimeter patrols. <u>Centralized Mobile Police Patrols</u> ● Inner perimeter fence 360 area check. ● Ready to react to emergency.	

Security Response Level Orange Implementation of Increased Security Controls and Preparation for Lock Down and/or Site Evacuation	
Event Indicator	**Recommended Actions**
● Main gate and emergency exit manning. ● Will be ready for escort tasks. ● Questioning strangers or suspicious persons or vehicles. ● Developing hearts and minds assurance.	

Table 1-7: Security Response Level: Red-Cease Operations, Lock down & Evacuation

Security Response Level RED Cease Operations and Lock Down or Evacuate Site	
Event Indicator	**Recommended Actions**
The operation has experienced a direct attack or there is credible evidence of an imminent attack. • Direct threats against project operations • Major civil disorder in areas of operation • Lines of supply untenable (road closures/security risks) • Total collapse of law and order • Diplomatic missions advise nationals to leave. • No or limited local security forces protection • Security force reaction may damage reputation • Major difficulties in accessing necessities • Frequent power and communications disruption.	**Suspension of operations and/or activation of total lock down or evacuation plan:** • Confirm operational plan and nomination of alternative managers or key points of contact during evacuation. • Implement evacuation plan • Ensure adequate caretaker security in place if full operations are suspended. • Ensure all critical or sensitive documents have been collected and are readies for destruction or removal • Detailed briefing of all remaining personnel on situation and emergency response plans. • Provide ongoing communications, guidance and assistance to local and security staff remaining in country • Finalize plans for remote management of operations if full evacuation is implemented.
STANDARD OPERATING PROCEDURES	

Security Response Level **RED** **Cease Operations and Lock Down or Evacuate Site**

These actions apply to ensure the project area and camps are locked down to maintain the security of the core staff, whilst the NAVCDP Incident Management Team decides on the final course of action. Increased Actions:

Police Foot Patrols:

- Main gate sentry reinforcement.
- Intensify inner perimeter patrols.
- POB confirmation.
- Conducting thorough searches at the main gate.
- Ensure all exits are padlocked.
- Reporting suspicious activities to the control room.

Centralized Mobile Police Patrols:

- Inner perimeter fence 360 area check.
- Ready to react to emergency.
- Main gate and emergency exit manning.
- Will be ready for escort tasks.
- Questioning strangers or suspicious persons or vehicles.
- Developing hearts and minds assurance.

Camp Sites:

- Main gate and all access routes closed and secured with vehicle entry prevention devices. This is in addition to vehicle tyre spikes.
- No access allowed unless authorised by security management. If authorized Red measures apply and all vehicles are searched comprehensively.
- No vehicle is authorised to move in or out of the perimeter unless directed by the security advisor.
- Static guards reinforced by armed police or military if available. All perimeter patrols and main gate to operate with an armed presence as well as the unarmed guard.
- Wider patrolling only as situation requires, as this is done with coordination of any military presence.
- Perimeter is secured so internal and external patrols are stopped to provide manpower to reinforce the perimeter security.
- Internal security patrols to ensure direct observation on the perimeter at all times.

38) Alert levels provide specific guidance on recommended security measures and actions to be adopted on the basis of the prevailing security situation. It is anticipated that local or regional events (triggers) are monitored daily and linked to the alert status. All the available security information is assessed to ensure early identification of increases in risk which may require a change in alert state. Changing of rating level is done on instruction from the NAVCDP project office.

C. ALERT STATE STATUS BOARDS

39) Alert State boards are to be displayed at the camp and indicate the current security alert state and associated restrictions to movement in the project area. Movement restrictions are to be covered in Journey Management Plan.

D. SITE SECURITY LAYERS

All project facilities undergo the following security layers/protocols.

i. Physical security (guards).
ii. Access control system.
iii. Intelligence Network.
iv. Security induction.
v. Awareness.
vi. Trainings.

40) The combination of the different security layers reduces the risk of having one system being by-passed.

1. Physical Security

Physical security involves the use of security barriers, such as fences, gates, locks, guard posts, surveillance/electronic security systems at all the project premises (project investment offices, sites).

Security barriers

41) These mainly comprises of fences, gates, guard posts, surveillance / electronic cameras which are manned by trained personnel who shall document and record daily incidents at the various points and provide reports to their superiors for appropriate action.

2. Security operating Procedures

This shall entail some of the key security operating procedures which comprises of:

- **Boundary security:** Security maintains control of the project's perimeter by deploying personnel at strategic points along the boundaries of the project facilities and also channel people to access-control points that have security personnel (both armed and unarmed as well as those in uniform and non-uniformed personnel);
- **Access Control Policy and Procedures:** Access to project sites is by project personnel and visitors through a formal, documented access control procedures to facilitate the implementation of access control policy and associated access controls. MoA&LD personnel are issued with badges andat all times carry and display these badges when in the field. The badges enable the bearer to access project facilities upon site security enquiry. Visitor badges are issued to all visitors who are not employees of MoA&LD.
- **Unexpected / Unplanned Visitors:** In case of unexpected (unplanned) visitors, the OCS is notified immediately by the security officers. Access endorsement/authorization is issued only by the OCS after consultation with the

Project Coordinator, and thereafter a visitor's badge is issued. The visit does not exceed the time agreed upon during access authorization and they must be accompanied by the project personnel /staff in charge of the visit.

- **Visitor Badge Process:** Visitors badge is issued after the visitor has been authorised by the site project personnel/staff. The visitor then fills a visitor form providing all his/her details and purpose of the visit. A visitor's badge is then be processed and issued by the Access control office. Security induction must be done before the badge is issued to the applicant and the visitor must sign on the induction document for acknowledgement. A data file with information regarding the visitor is recorded and kept in the site access register.

- **Luggage search:** A search of personal luggage is performed by the guards at the access control point to ensure all prohibited items such as alcoholic beverages, firearms, knives and dangerous drugs are not smuggled into the project facilities.

- **Vehicle Access Control Procedures:** All Vehicles accessing project facilities to only have a driver and should undergo a security check/search for prohibited items i.e., alcohol beverages, firearms, knives, explosives and dangerous drugs. The driver must also declare the entire luggage at the main gate (personal luggage) for checking.

- **Materials Storage and Control:** *w*here applicable, the project institutes controls over the transport, inventory, and maintenance of storage areas for raw materials, equipment, etc. Note that these are stored in accordance with appropriate Kenyan national laws and regulations and relevant good international industry practice, including the World Bank Group Environmental, Health and Safety Guidelines.

- **Decision tree model**: the project security shall adopt a structured approach using the collaborative approach for all the armed security operatives in prioritizing the collection of relevant data during incident response. The structured tree model approach helps to define how questions are answered and allows the incident response team to respond consistently with predictable results. The structured approach also provides for definable, reproducible structures to be created facilitating controlled cost exposure during an incident response cycle.

- **Information and Communication:** The project details procedures for categorizing, handling, and controlling sensitive information. County Policing Authorities and Community Policing Committees are part of community policing, which improves the transparency and accountability in service delivery to the community. The reporting mechanisms include: using of the emails: incidents@ke-cirt.go.ke; info@dcicpu.co.ke and the toll-free numbers: call 116,112 and 999.

In cases where a report should be made against the security teams (Police), the documented channels of receiving complaints at National Police Service Internal Affairs Unit (IAU) are:
   a. Visiting the nearest police stations,
   b. Through letters P.O Box 1880 -00200 Nairobi,

c.   Through-email–iau@nationalpolice.go.ke,
d.   Social media – Twitter - @ NPS Official-KE,
e.   Anonymous Reporting Information System (ARIS) USSD *683#, SMS 40683, Toll Free Line 0800721230, Mobile App ARIS, NPS, & Web Form www.iau.go.ke,
f.   Mobile +254 798474619,
g.   WhatsApp (Videos and Pictures) 0758729917, and
h.   Through the media.

- **Code of conduct** (Police Act 2010, Cap 64). Every police officer shall be subject to Force standing orders and to the provisions of the Code of Regulations for the time being in force, so far as the same are not inconsistent with the provisions of this Act or of any regulations or standing orders made thereunder.

- **Firearms Security:** The project has developed a policy regarding firearms on-site, as well as the responsibilities and procedures for issuing and storing any security firearms, ammunition, and non-lethal weapons. This includes location for storage; how weapons are properly secured during storage; records for issuance; who they may be issued to; safeguarding while in possession of the personnel; and audits.

- **Special Situations:** There may be instances where large-scale events (e.g., criminal activity, demonstrations, civil disorder) require interventions by public security which is not specifically associated with the project. When planning for such events or emergencies, there shall be clarity on how project security passes control over to formal public security (for example, police, military, emergency responders in line with the National Police Service procedures in conjunction with the project established decision tree in armed police incident response. This involves also collaborative and or leveraging with the existing projects being implemented within the project areas.

E. SECURITY SUPERVISION AND CONTROL

42) The project has a clearly defined management structure and responsibility, including overall lines of control, accountability, and supervision for the security effort. In making such arrangements, the project is guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. The project seeks to ensure that government security personnel deployed to provide security services act in a manner consistent with paragraph 24 of ESS 4 and encourage the relevant authorities at County and National level to disclose the security arrangements for all facilities to the public, subject to overriding security concerns.

43) The Project coordinator (i) makes reasonable inquiries to verify that the direct or contracted workers retained by the Ministry to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in international human rights standards or minimal use of force techniques (less use of

firearms), and appropriate conduct toward workers (in line with the Labour Management Plan) and affected communities (in line with SEAH Action Plan); and (iii) require them to act within the applicable law and any requirements set out in the ESCP.

44) All incidents including thefts, attempted, attempted break-ins must be reported to the OCS and recorded in the occurrence book, who initiates an investigation to determine sequence of events, what may have contributed to the incident, probable cause (s) and contributing factors), and recommendations, corrective actions, and mitigation measures (based on investigative findings) – an incident report is issued to the Project Coordinator with details of the above actions.

45) There shall be a broad agreement at the national level, and there after communicated to the local level where it is more likely and achievable, with each local Officer Commanding Station. This includes the specific project requirements such as stakeholder engagement, security arrangements disclosure, incident response, and grievance management would benefit from being formally agreed with the appropriate authorities in line with the Project Stakeholder engagement Plans and Grievance Mechanism (GM).

46) Depending on the security incident, the Project Coordinator decides as to whether there is need to inform external agencies of the security incident. Project organization requires security personnel to manage security aspects;

1. **Security Organization**

47) All security activities are supervised and coordinated by the OCS on behalf of the Project Coordinator. The organisation of security responsibilities, authorities and communication process shall follow Government of Kenya (GoK) organisation from project management down through the project staff when reporting security breaches or vice-versa as the case may be.

48) **County Project Coordinator** is the responsible person for the operations on site and he is accountable of the actions by security personnel in charge of site security.

49) **Security Team/Officers** (National Police Service, the National Youth Services, and the Kenya Wildlife Service) may be appointed to oversee specific security activities for project sites (storage and lay down areas, work sites, field transportation and day to day operations). They supervise such activities and report directly to the Project Coordinator. In addition, the NPC works closely with the National Police Service to develop a set of project related messages and in line with the project stakeholder engagement plan to be aligned with the broader project engagement security plan designed to promote the rule of law, discuss security arrangements, and elicit responses from key stakeholders. Project security team shall draw valuable insights and the structure of the key security messages and methods of engagement for each of the six major security stakeholder groups including the Employees and contractors, Government, Police, Communities and the Non-

Government Organizations or Civil Society Organizations from the GIIP (VPSHR[4]) (Section V, Stakeholder Engagement).

50) **All project personnel** are required to be aware of the need for constant vigilance, care and compliance with security procedures, as well as the necessity to report any incident or suspicion to the OCS.

51) **Officer Commanding Station (OCS):** Security personnel; the police are deployed to provide security to all project sites and facilities to be headed by OCS. The police officers have been trained on the following specific topics; securing project sites, patrols, communication, use of radio call units, Quick intervention, and access control procedures. They are professional with a very good appearance and good English and Swahili command in terms of spoken and written. Their roles and responsibilities are detailed below: -

- To Implement the Standard Operating Procedures properly without fear or discrimination.
- To ensure respect of the access control procedures and make sure that they are applied to all project personnel.
- Perform interior Patrols days and nights to ensure that the national borders are intact or no intruders within the project facilities.
- Check the border status on a regular basis using back tracking security method.
- To report any security incident to the guard posts or security commanders.
- Maintain constant communication with the control room on hourly basis while on duty.
- Report to the control room in case of any technical issues.
- Ensure a proper behaviour at all times while applying the SOP; avoid exchanging of words with the project staff.

52) **Security Community Engagement:** The results of the security community engagement and security risk assessment process (**see Table 1-3**) shall be further examined by the relevant parties and appropriate mitigations included in a project level Memorandum of Understanding (MoU), setting out a framework for cooperation and setting standards and expectations. Key clauses for drafting MoU have been adopted from the DCAF/ICRC Knowledge Hub[5] and customised to suit the project including:
- Building trust among relevant government stakeholders especially the County Government and Ministry of Interior and Coordination of National Government, NGOs, civil society and community members to prepare the ground for a meaningful MoU,
- Adherence to the provisions contained in the VPs (Voluntary Principles on Security and Human Rights) and the UN Code of Conduct for Law Enforcement Officials and

---

[4] VPSHR Toolkit https://www.miga.org/sites/default/files/archive/Documents/VPSHR_Toolkit_v3.pdf
[5] *Addressing Security and Human Rights Challenges in Complex Environments*

the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (see Section K),

- Institute a vetting procedure to ensure that no one allegedly implicated in past human rights and international humanitarian law abuses (i.e. there is a conviction, pending case or very strong evidence) provide security to the company.
- Institute a training programme, for public security forces assigned to the project operations (See Section G Paragraph 2: Training),
- Develop an acceptable protocol to manage equipment transfers in a manner that aligns with the VPs.
- Operationalize acceptable modalities for project contributions to salaries, goods or services, if applicable, based on the risk assessment from time to time,
- An agreed system of information-sharing around security issues, with due regard for necessary Confidentiality,
- Have a commitment to a collaborative working relationship with the joint objective of respecting human rights and international humanitarian law.

53) Other softer measures to be included in the MoU include the camp access protocols, grievance mechanisms, engagement commitments that can, without concern for confidentiality, be made publicly available in order to build trust and or promote cooperation.

F. JOURNEY MANAGEMENT

54) NPC has the overarching responsibility for project-wide journey management. This is delegated to the County Project Coordinator who monitors all staff in while in the field through the journey management system in collaboration with the County social safeguards compliance officer. A journey management log is maintained at the control room whereupon vehicle movements are logged and monitored. This is   shared with the County and National PCU safeguards team by email.

55) Project staff are   required to complete a Journey Management Plan form, which has to be authorized by the project Coordinator and inform the Control Room on arrival and departure to update the POB.

G. COMMUNICATIONS

56) A Radio network controlled from the Control Room under the direction of the OCS is established at the camp in order to maintain control and to monitor the movement of personnel and vehicles within and around the vicinity of the camp. Beyond the range of local radio nets, communication is by mobile or satellite phone. Journey management requires periodic contact via radio or telephone in order to monitor the location of personnel.

57) The Control Room is manned by English / Swahili speaking person who is required to monitor all radio communications by day and whilst any project personnel are deployed at night. The Acquisition Security Framework are integrated into the communications plan

in order to allow effective command and control and immediate reaction to emergency situations once sufficient assets are on site.

H. SECURITY GRIEVANCE MECHANISM

58) NAVCDP is operationalizing SMP as one of the grievance mechanisms including Project-level GM, the Labour Management Procedures (LMP) GM, and a dedicated GBV/SEAH GM. To extent possible, the SMP is adopting the Project Grievance Mechanism in managing the security related grievances. The NPC has engaged the relevant project personnel to ensure security personnel grievances are included in the Project GM and Stakeholder Engagement Plan, and work with public security leaders to integrate the project GM with internal procedures. Key areas of emphasis are on the following steps:

- Step 1: Publicizing Grievance Management Procedures,
- Step 2: Receiving and Keeping Track of Grievances,
- Step 3: Reviewing and Investigating Grievances,
- Step 4: Developing Resolution Options and Preparing a Response,
- Step 5: Monitoring, Reporting, and Evaluating a Grievance Mechanism, and
- Step 6: Dedication of adequate resources both human and capital.

59) Grievances related to the security team shall adhere to the National Police Service Internal Affairs Unit (see section F of the SMP sub-section 2 bulletin 8) and the Independent Policing Oversight Authority to expressly deal with the matters. See Figure 1-1 below:
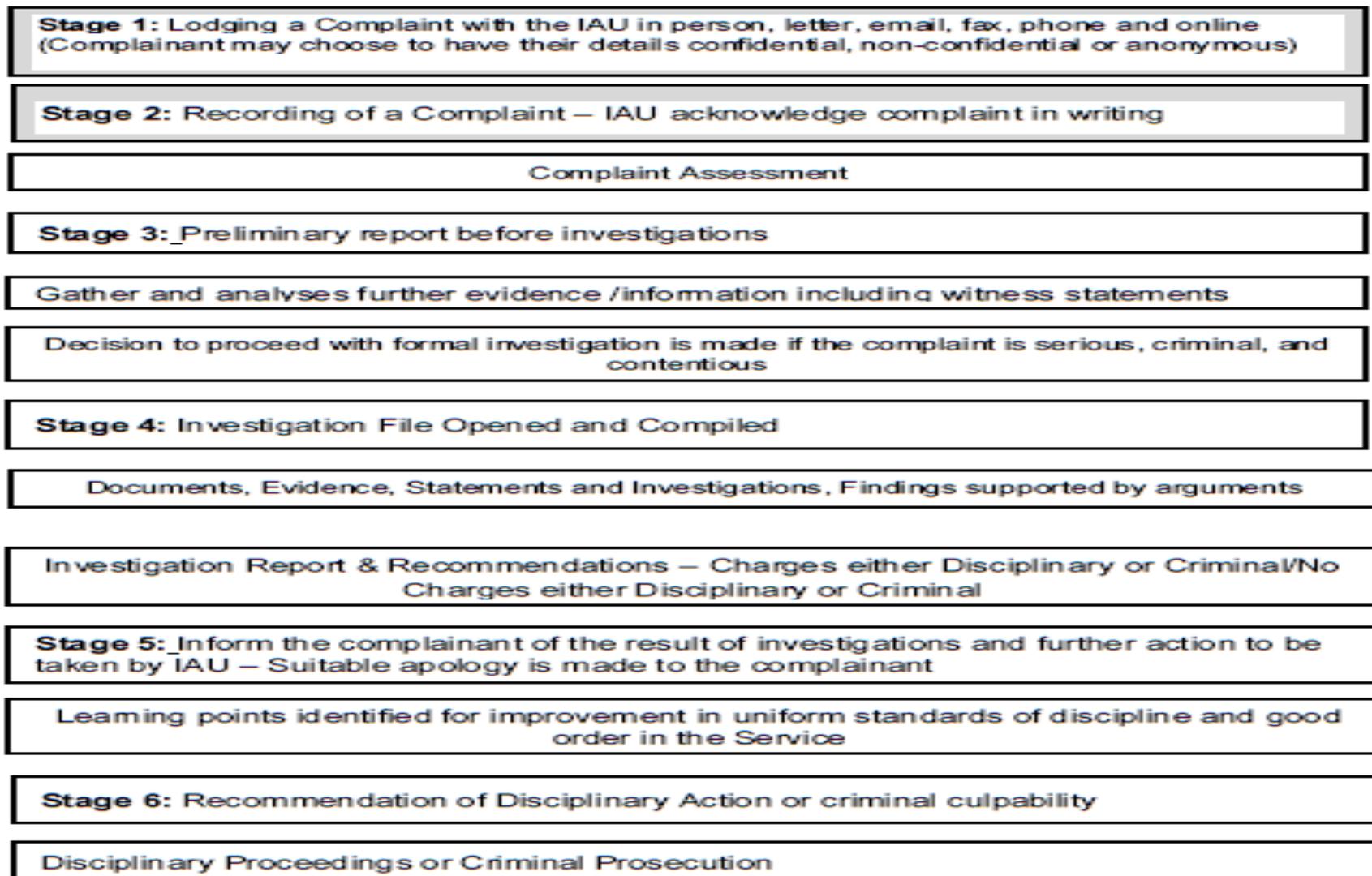
2.3 Complaints Management Process

Stage 1: Lodging a Complaint with the IAU in person, letter, email, fax, phone and online (Complainant may choose to have their details confidential, non-confidential or anonymous)

Stage 2: Recording of a Complaint – IAU acknowledge complaint in writing

Complaint Assessment

Stage 3: Preliminary report before investigations

Gather and analyses further evidence /information including witness statements

Decision to proceed with formal investigation is made if the complaint is serious, criminal, and contentious

Stage 4: Investigation File Opened and Compiled

Documents, Evidence, Statements and Investigations, Findings supported by arguments

Investigation Report & Recommendations – Charges either Disciplinary or Criminal/No Charges either Disciplinary or Criminal

Stage 5: Inform the complainant of the result of investigations and further action to be taken by IAU – Suitable apology is made to the complainant

Learning points identified for improvement in uniform standards of discipline and good order in the Service

Stage 6: Recommendation of Disciplinary Action or criminal culpability

Disciplinary Proceedings or Criminal Prosecution

Figure 1-1: National Police Service Complaints Management Process (Internal Affairs Unit-IAU)

BASIC PRINCIPLES ON THE USE OF FORCE AND FIREARMS BY LAW ENFORCEMENT OFFICIALS

60) The project has adopted the basic principles from the guidelines for implementation of the UN basic principles on the use of force and firearms by law enforcement officials. The guidelines promote the proper role that law enforcement officials must consider and require their respect by project implementers within the framework of Kenya national legislation and practice. The adopted principles and guidelines shall be brought to the attention of law enforcement officials as well as other project persons and include:

1. MoA&LD and appointed law enforcement agency (National Police service) shall adopt and implement rules and regulations on the use of force and firearms against persons by law enforcement officials.
2. MoA&LD and appointed law enforcement agency shall develop a range of means as broad as possible and equip law enforcement officials with various types of weapons and ammunition that would allow for a differentiated use of force and firearms.
3. The use and deployment of non-lethal incapacitating weapons shall be carefully evaluated in order to minimize the risk of endangering uninvolved persons,
4. Law enforcement officials, in carrying out their duty, shall, as far as possible, apply non-violent means before resorting to the use of force and firearms. They may use force and firearms only if other means remain ineffective or without any promise of achieving the intended result,
5. Whenever the lawful use of force and firearms is unavoidable, law enforcement officials shall:
   a) Exercise restraint in such use and act in proportion to the seriousness of the offence and the legitimate objective to be achieved;
   b) Minimize damage and injury, and respect and preserve human life;
   c) Ensure that assistance and medical aid are rendered to any injured or affected persons at the earliest possible moment;
   d) Ensure that relatives or close friends of the injured or affected person are notified at the earliest possible moment.
6. Where injury or death is caused by the use of force and firearms by law enforcement officials, they shall report the incident promptly to their superiors. A detailed report shall be sent promptly to the Internal Affairs Unit for responsible administrative review and judicial control,
7. MoA&LD shall ensure that arbitrary or abusive use of force and firearms by law enforcement officials is punished as a criminal offence in line with National Police Service Internal Affairs Unit and the Independent Policing Oversight Authority,
8. Exceptional circumstances such as internal political instability or any other public emergency may not be invoked to justify any departure from these basic principles,

9. The appointed law enforcement agency shall ensure that all law enforcement officials are selected by proper screening procedures, have appropriate moral, psychological and physical qualities for the effective exercise of their functions and receive continuous professional training, and

10. MoA&LD and appointed law enforcement agency shall undertake the policing of unlawful assemblies, policing persons in custody or detention in line with the provision of the UN basic principles on the use of force and firearms by law enforcement officials, 2016.

I. ALARMS

Alarms (Hand winding and electric sirens) for emergencies are to be held at the Control Room. All security related incidents shall be document in the Security Log Event on Table 1-8.

Table 1-8: Security Occurrence Book / Log Matrix

Security Log Event.			
DATE: ---/----/----	TIME: ----:----	INCIDENT:	Event Logger: Name +Signature
TIME	**DEVELOPMENT/ACTIONS TAKEN**		