

Republic of Kenya

MINISTRY OF LABOUR & SOCIAL PROTECTION
State Department for Social Protection and Senior Citizen Affairs,

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MINISTRY OF GENDER, CULTURE AND CHILDREN SERVICES
State Department for Children Services

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MINISTRY OF EAST AFRICAN COMMUNITY, ARID AND SEMI-ARID LANDS AND REGIONAL DEVELOPMENT

National Drought Management Authority

The Second Kenya Social Economic Inclusion Project (P504218

Enhanced Grievances and Case Management (EGCM) Operations
Guidelines

OCTOBER , 2025

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Abbreviations and Acronyms

AdoP Adolescent Cash Plus Program

BWC Beneficiary Welfare Committee

CAJ Commission of Administrative Justice

CBO Community Based Organization

CCC County Children's Coordinator

CCTP Consolidated Cash Transfer Programme

CPV Community Health Promoters
CPV Child Protection Volunteers

CSAC Constituency Social Assistance Committee

CT Cash Transfer

DCS Directorate of Children's Services
 DSA Directorate of Social Assistance
 DSD Directorate of Social Development

EFC Error Fraud and Corruption

Enhanced Grievance and Case Management
EGCM Enhanced Grievance and Case Management

EIP Economic Inclusion Programme

FBO Enhanced Single Registry
Faith Based Organization
GBV Gender Based Violence

GCM Grievance and Case Management

GM Grievance mechanism
GOK Government of Kenya

HH Household

HSNP Hunger Safety Net ProgrammeKNBS Kenya National Bureau of Statistics

KNHRC Kenya National Human Rights Commission **KSEIP** Kenya Social and Economic Inclusion Project

MCH Mother and Child Health Handbook
MIS Management Information System

NCPWD National Council for Persons with Disabilities
NDMA National Drought Management Authority
NGAO National Government Administration Officers

NGO Non-governmental Organization
NHIF National Health Insurance Fund

NICHE Nutrition Improvements through Cash and Health Education

NSPS National Social Protection Secretariat

OPCT Older Persons Cash Transfer

OVC Orphans and vulnerable Children

PAPs Project-Affected Parties
PIU Project Implementation Unit
PSP Payment Service Provider
PWSD Persons With Severe Disability
SCCO Sub-County Children Officer

SDCS State Department for Children Services

SEA Sexual Exploitation and Abuse

SLA Service Level Agreement
TWG Technical Working Group
VAC Violence against Children

VMGs Vulnerable and Marginalized Groups

Definition of terms and concepts

Case is a concern / grievance/update that falls within the mandate or scope of the project's Grievance Redress Mechanism (GRM), which can be investigated, addressed, or resolved by the program unless the complainant seeks alternative recourse.

Beneficiary This is a person or household that directly receives support, services or benefits from the project intervention.

Child protection concerns refer to situations where there is a risk or suspicion that a child is being harmed, is at risk of harm, or their wellbeing is not being properly safeguarded

Component G&CM Officer- A technical officer appointed to manage cases and non-cases raised through the EGCM for a specific component.

Data Entry: The process of inputting information from grievance and case forms into the online case management system for further processing and analysis.

Enhanced Grievances and Case Management (EGCM): A harmonized mechanism introduced for all interventions () under KSEIP to receive, record, resolve, and provide feedback on any concerns, grievances and case and non case-related issues from beneficiaries, participants, caregivers, community members stakeholders and general public

Focal Person is a designated Programme Officer at the National, County, or Sub-County level who is specifically trained to receive, manage, and refer sensitive complaints, particularly those related to Gender-Based Violence (GBV), Sexual Exploitation, Abuse and Harassment (SEAH), Violence Against Children (VAC), Environmental and Social (E&S) risks and Security issues. They act as the primary project contact for such issues and coordinate with external service providers.

Grievance and Case Management (G&CM): A mechanism used to receive, record, resolve, and provide feedback on grievances and cases from beneficiaries, caregivers, and the community.

Institutional Roles and Responsibilities: Clear delineation of responsibilities among stakeholders involved in the G&CM process, including intake, resolution, and escalation of cases.

Monitoring and Evaluation: The systematic process of tracking, assessing, and reviewing the implementation and impact of the G&CM mechanism to ensure its effectiveness.

Non-cases are complaints or submissions that will be received through the EGCM that do not fall within the direct services offered but arising out of the project's impact and may be addressed by the program or referred to other relevant institution.

Non-Discrimination and Equity: The principle of ensuring equal treatment and protection of rights for all beneficiaries, regardless of their background or circumstances.

Non-Beneficiary: An individual or household that is not directly receiving any form of support, service, or benefit provided under the project interventions

Programme Officers are technical staff appointed to support the planning, coordination, implementation, monitoring, and reporting of KSEIP 2 interventions. Some of these officers at County and sub county level will be appointed as the programme focal persons.

Periodic Reporting Format: A standardized format used to report on the number of cases received and resolved within a specific time frame.

Risk Assessment: The evaluation of potential risks and vulnerabilities within the G&CM system to identify and implement appropriate mitigation measures.

Service Level Agreements (SLAs): predefined standards and timeframes that govern how quickly and effectively grievances or cases must be acknowledged, addressed, and resolved by the entities responsible in KSEIP 2.

Single Registry: A national database that contains information on beneficiaries of social protection programs, allowing for efficient and coordinated service delivery.

Stakeholders: Beneficiaries of KSEIP 2 interventions, Individuals or organizations involved in the implementation, coordination, and oversight of the KSEIP program, including government agencies, implementing structures, and technical working groups, as well as the general public.

Standard Operating Procedures (SOPs): Established guidelines and protocols that define the step-by-step processes for handling grievances and cases.

Gender based violence is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences. It includes sexual exploitation, abuse and harassment.

Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes.

Sexual Abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment (SH) is unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature.

Violence Against Children These include all forms of violence against people under 18 years old, whether perpetrated by parents or other caregivers, peers, romantic partners, or strangers.

SECTION 1: BACKGROUND AND OVERVIEW OF THE ENHANCED GRIEVANCE AND CASE MANAGEMENT (EGCM) SYSTEM

1.0 Introduction

Enhanced Grievance and Case Management (EGCM is a harmonized mechanism introduced under KSEIP 2 to receive, record, resolve, and provide feedback on grievances, case and non-case related issues from beneficiaries, participants, caregivers, civil society members, and community members. The (EGCM) system is an integral component of KSEIP 2 that centralizes grievance handling, facilitates transparent, accountable, and timely redress for beneficiaries and stakeholders, thereby supporting the project's overarching goal of effective social protection delivery. The eGCM is domiciled at DSA and will be headed by a Project Grieviance Officer at the National PIU based at DSA. Similarly, a GM focal point based at NDMA PIU will be responsible for managing the day-to-day operations of the grievance mechanism, ensuring its accessibility, responsiveness, and effective resolution of concerns, including addressing complaints related to sexual exploitation and abuse/harassment in collaboration with the relevant government agencies in a safe and confidential manner. SDSP County coordinators (47) and NDMA County Drought coordinators (23) have been appointed as E&S focal points are Designated GM roles. The functions of the E & S focal points at County are presented in detail in sub section 5.0.

Non-cases are complaints or submissions that will be received through the EGCM that do not fall within the scope of the project's activities/interventions and may be addressed by the program or referred to another relevant institution. The non-case grievances include issues related to Security, environment, labour, GBV/SEAH, VMGs Child protection among others. Cases and grievances will be addressed through the EGCM project structures while non cases will be captured where applicable be addressed and referred to the relevant authority for resolution. The project will endeavor to provide timely feedback on resolution at all levels.

1 .1 Overview of Kenya Social and Economic Inclusion Projects (KSEIP 1 and KSEIP 2)

1.1.1 Kenya Social and Economic Inclusion Project 1 (KSEIP 1)

The Kenya Social and Economic Inclusion Project (KSEIP 1) was a Five-year (2019-2024) project implemented by the Government of Kenya with support from the World Bank. KSEIP 1 was designed to complement and build on the GOK's flagship National Safety Net Programme (NSNP).

KSEIP 1 aimed at strengthening the safety net delivery systems (set up as part of the NSNP) and helps the GOK to move beyond cash transfers to an integrated Social Protection (SP) system to enhance social and economic

inclusion services and shock-responsive safety nets for poor and vulnerable households.

The GOK, through the Kenya Social and Economic Inclusion Project 1:

- Supported National and sub-national level structures by enhancing institutional capacity and social protection delivery systems, particularly the coverage and functionality of the Single Registry.
- Improved the efficiency of social protection delivery mechanisms and delivery of social protection services at Sub-National levels (County, Sub-County and Location), complementing GOK's priorities.

The GoK priorities implemented through KSEIP 1 were under these components:

- (i) Food and nutrition security by scaling up Nutrition Improvements through Cash and Health Education (NICHE).
- (ii) Universal health care coverage through referrals of NSNP beneficiaries to the National Hospital Insurance Fund (NHIF).
- (iii) Jobs creation through Economic Inclusion (EI) and Livelihoods Enhancement Support.
- (iv)Investing in a shock-responsive safety net to provide timely support to drought- affected households through expanding the coverage of the shock responsive Hunger Safety Net Programme (HSNP).

KSEIP 1 pursued multi-level coordination and cooperation with implementation partners and stakeholders at the National and Local levels. The Project was uniquely positioned to employ a 'learning-by-doing' approach to enable piloting and evaluation of new interventions to ensure sustainability and value for money of possible scale up.

1.1.2 Kenya Social and Economic Inclusion Project 2 (KSEIP 2)

Kenya Social and Economic Inclusion Project (KSEIP2) is a five-year (June 2025- Dec 2030) project which will strengthen the ability of Kenya's Social Protection system to effectively respond to two key challenges: high levels of poverty and climate vulnerability.

The overall objective of the project is to promote economic resilience of poor and vulnerable households and strengthen the adaptive social protection system.

KSEIP2 will move toward the goal of poverty prevention through:

- (i) Incentivizing investments in human capital, especially for children and adolescents, which will equip them for healthy and productive adulthoods and thereby contribute to a demographic dividend
- (ii) Promoting sustainable and inclusive employment through climateresilient economic activities

(iii) Facilitating linkages with social insurance schemes to promote longterm savings.

Kenya remains highly vulnerable to climate change, which threatens the food and nutrition security of poor households in particular, who have limited capacity to cope with such shocks.

The project will strengthen the climate resilience and shock responsive capacity of the SP system through investments in system modernization and provision of emergency (scalable) temporary social assistance to prevent households from falling deeper into poverty due to recurrent climate-related shocks.

The GOK, through the Kenya Social and Economic Inclusion Project 2 will:

Enhance system wide modernization to improve the efficiency and impact of SP programs and advance delivery platforms that can be used government-wide to reach poor households

Improve the capacity of the SP system to support climate adaptation and food and nutrition security of vulnerable households

Make crucial investments in the SP system in Kenya to improve its coverage, effectiveness, and shock responsiveness within the GoK's policy framework. KSEIP 2 has four (4) project components as indicated below: -

Table 1: Four (4) project components

NO.	COMPONENTS	
1.	Building Human Capital of Children and Adolescents	By applying a life-cycle approach, this component will scale up the existing NICHE program for young children and test an innovative cash-plus program that supports adolescents.
2.	Building Climate and Economic Resilience of Adults	This component will invest in inclusive and gainful employment for adults from poor and vulnerable households by supporting sustainable micro-enterprises. Additionally, support will be provided to households in the most climate-vulnerable counties and to link households with existing social insurance schemes. This sub component will link EIP participants with existing social insurance schemes to promote long-term savings opportunities.
3.	Advancing Systems and Strengthening Adaptive Social Protection	This component will support system wide reforms to increase the overall efficiency, impact, and climate-shock responsiveness of SP programs and delivery platforms. These system improvements will also strengthen the efficient implementation and impacts of Components 1 and 2.
4.	Project Management, Monitoring and Evaluation, and Policy and Legislation	This component will support project management, including capacity building, M&E, and environmental and social (E&S) risk management for both implementing agencies (IAs).

KSEIP 2 pursues multi-level coordination and cooperation with implementation partners and stakeholders at the National and Local levels.

1.1.3 Project Implementation Arrangements

KSEIP 2 will be implemented by three main Implementing entities:-the Ministry of Labor and Social Protection (MLSP), Ministry of Gender, Culture and Children Services(MGCCS) and National Drought Management Authority (NDMA) within the Ministry of East African Community ASAL & Regional Development (MEACARD). SDSP and SDCS will have overall implementation responsibility for the proposed project. MLSP, MGCCS and

NDMA staff at the national, regional and subcounty levels are responsible for the delivery of the cash transfer and complementary programs, in coordination with the county governments, where appropriate.

Within MLSP, the National Social Protection Secretariat (NSPS) has the mandate for coordination of all Social Protection (SP) policy and programs in the country. The Secretariat serves as the PIU for KSEIP2 and will have overall responsibility for project oversight and coordination, including E&S risk management under Component 4. This will particularly involve coordination among other line ministries, humanitarian actors, and county governments on the implementation of project activities across all components. The NSPS will also lead the systems investments for the ESR (Subcomponent 3a).

Two other directorates within MLSP will also have implementation roles in KSEIP:

- (a) Directorate of Social Assistance (DSA): Under KSEIP2, DSA will lead the Subcomponent 3b investments and carry out activities related to recertification of CCTP beneficiaries, systems enhancements, two-way citizen engagement, and manage project grievanceredress mechanism. It will also ensure cash payments to the beneficiaries of NICHE, EIP, and the adolescent program (NSNP and non-NSNP beneficiaries) under Components 1 and 2, in coordination with the Directorate of Children's Services (DCS), Directorate of Social Development (DSD), and NDMA.
- (b) DSD. For KSEIP2, DSD will lead the implementation of Subcomponents 2a and 2c at the national and county levels. The DSD will coordinate the County Multisectoral Committees to support implementation of economic inclusion activities.

Under the Ministry of Gender, Culture and Children Services:

(a) Directorate of Children Services. For KSEIP2, DCS will lead all Component 1 activities, including NICHE and the new adolescent program, both at the national level and on the ground through county and subcounty officers, in collaboration with county and subcounty health and education officials. The DCS will also coordinate County Multisectoral Committees for implementation of Component 1.

In addition, Social Protection activities are supported by five community volunteer groups, Lay Volunteer Counselors (LVCs), Beneficiary Welfare Committees (BWCs), Community Drought and Food security Committees (CDFSCs), Child Protection Volunteers (CPVs), and Community Health Promoters (CHPs_

The eGCM coordination and implementation is presented in detail in section 3 of the manual. Further, Table 2 presents GCM mechanism by programme component.

1.1.4 Functions of the Grievance officer

The role of a Project Case Management and Grievance Management Officer within the PIU is to ensure the effective handling of beneficiary cases and grievances related to the Project, thereby supporting social protection and community engagement goals. This role includes:-

- 1. Managing the Project's grievance redress mechanism to receive, document, and facilitate timely resolution of concerns and complaints raised by Project-affected people, ensuring accessibility and responsiveness in accordance with the Environmental and Social Commitment Plan (ESCP) and relevant Environmental and Social Standards (ESSs).
- 2. Coordinating with the Social Officer, Environmental and Social Focal Points, and other relevant PIU staff to address social risks and safeguard implementation issues that arise from grievances or case management.
- **3.** Supporting the identification, registration, and follow-up of individual beneficiary cases, ensuring that social protection services and interventions are delivered effectively and equitably.
- **4.** Maintaining accurate records and reports on grievances and case management activities, providing regular updates as well as Project monitoring and reporting
- **5.** Facilitating communication and engagement with affected communities and stakeholders to promote awareness of the enhanced grievance and Case mechanism and encourage its use.
- **6.** Collaborating with county-level focal points to ensure consistent application of grievance and case management procedures across all Project implementation areas.
- 7. Assisting in the preparation and implementation of social safeguards and stakeholder engagement plans, including the Sexual Exploitation Abuse and Sexual Harassment (SEA/SH) Prevention and Response Action Plan, to ensure that grievances related to these issues are managed appropriately.
- **8.** Contributing to capacity building within the PIU and county offices on grievance handling and case management best practices.

1.2 Rationale for Grievance and Case Management Mechanism

The KSEIP 2 project, under strengthening Social Protection delivery systems, envision a Grievance and Case Management Mechanism that supports all the implementing components. EGCM provides avenues for grievance and complaint management across the different KSEIP Components. Each component MIS and program officer will have an interface to access the EGCM platform. A beneficiary is able to lodge a complaint at any program officer who will relay the complaint to the relevant component programme officer and provide feedback.

This mechanism enables anonymous and non-anonymous case recording (complaint, grievance or information updates), resolution and with assurance of a timely feedback and satisfactory resolution to the concerned case applicant ensuring better Programme implementation, and increased coordination of GCM. The aim is to have a transparent platform for people to hold the programs accountable. The mechanism will also provide avenue for non-case complaints and provide the referral mechanisms at all levels with an appeal process with an alternative avenue for the dissatisfied persons to seek redress on their complaint.

An independent assessment conducted by the World Bank evaluated the EGCM's effectiveness in promoting stakeholder engagement and addressing concerns related to both case and non-case grievances. The assessment,, captured in the stakeholder Engagement Plan (SEP) identified several key gaps that needed to be addressed to enhance the mechanism's overall performance. The Gaps included:

- 1. NSNP and NDMA Grievance and Case Management (GCM) setup, emphasized on beneficiary case management as reported by beneficiaries or caregivers. The CMS handled common programme errors such as error in data collection, data entry or implementation of processes, and issues related to rights. The Case-management complaints were resolved largely at the national level.
- 2. There were no mechanisms for reporting SEA/SH grievances and log them into the MIS system. Under KSEIP 1, SEA/SH grievances at community level were being handled by Beneficiary Welfare Committees (BWCs) or a panel of elders in conjunction with chiefs, who counsel households, caution perpetrators and take measures against them.
- 3. Timelines for acknowledging, processing and communicating outcomes to a survivor as SEA/SH cases were handled outside the existing GMs were not provided. The only timeline that is known by the community members is the less than 72 hours presentation in cases of sexual abuse, for a Post Exposure Prophylaxis (PEP) test to be administered at the hospital.

These guidelines have addressed the Gaps as follows:

- 1. The mechanism will create awareness among marginalized groups and provide cross component coordination. It also provides expanded outreach (multichannel reporting in local languages), stricter resolution timelines, a centralized digital case management system, robust reporting and analytics for trend detection, and stronger anonymity safeguards. These will ensure a more responsive, integrated, and secure grievance mechanism, fostering greater trust and accountability in the project's social protection delivery.
- 2.The Enhanced Grievance and Case Management Mechanism (EGCM) has integrated GBV/SEAH-related grievances into its complaint modules to enable structured reporting, and timely feedback. This integration supports stakeholder's awareness creation and sensitization at all levels of stakeholder engagement to enhance its usage and provision of various uptake channels for reporting purposes. The mechanism adopts a survivor-centric approach by ensuring confidentiality and providing multiple, accessible reporting channels for individuals to safely raise GBV/SEAH concerns. Additionally, the EGCM facilitates access to essential support services, including psychosocial support, medical treatment, and safe spaces through referral mechanisms.
- 3.The EGCM will engage the existing government structures at the National, County, sub county and Locational levels. To strengthen coordination and local response, Programme officers at the Sub County and County levels will be trained as E&S focal persons. Additionally E&S Focal person will be appointed the National level
- 4. Tlocal complaints resolution structures have been adopted into EGCM. Specifically, at the village level identification and documentation of the existing locall Grieviance Mechanisms among Communities will be applied as first Tier of the eGCM.
- 5. Provision has been made for linkage and contact information of alternative mechanisms for addressing grievances especially for complainants who are dissatisfied with the project GM.
- 6. Clear timelines for managing grievances at the respective tiers have been provided. Furthermore, an appeal process that serves as alternative avenue for the dissatisfied individuals to seek judicial recourse /redress on their complaint is incorporated to the EGCM.

1.3 Purpose and objectives of the EGCM operational guidelines

Grievance & Case Management (G&CM) or EGCM is a mechanism which receives, records, resolves and give appropriate feedback to beneficiaries

and non-beneficiaries¹. It aims to strengthen transparency and institutional responsibility by fostering greater public accountability. It ensures that beneficiaries and non-beneficiaries have multiple access channels appropriate to their abilities, through which they can voice their concerns about the programmes, anonymously and non-anonymously register and get their complaints and grievances resolved and update their information details in the programmers' Management Information Systems (MISs).

Each KSEIP implementing component has its own GCM mechanism that is managed independently by their respective Programme Officers as detailed in the table below. The Operation Manuals of each of the implementing components provide procedures for generating, reporting, receiving, recording and responding to grievance and case management issues.

The purpose of the EGCM is to ensure that different KSEIP 2 components have an additional Enhanced Grievance and Case Management Mechanism that aims to bring them under one platform with the objective of harmonizing the GCM mechanisms, improving efficiency in programme implementation, and increasing coordination in responding to GCM. Moreover, it helps in improved decision making, better communication with the programme beneficiaries and non-beneficiaries, and better supervision and control in the GCM implementation and utilization.

Table 2:GCM mechanisms by programme component

Program me Compone nt	Key features	Key Typologies	Reporting / Uptake Channels	Resolution Timeline
Economic Inclusion Program me (EIP)	- Managed by Mentors, Mentor supervisors & SCSDOs with escalation and feedback mechanisms (County, Regional, National levels) - Integrated with CDMIS/CCTPMIS - Focus on business/fraud cases	- PSP payment issues - Livelihood grievances	- Mentors/Mentor Supervisors -Email/social media 1. In-person to SCSDO/CCSD offices/ Mentors/Mentor Supervisors 2. Letter to SCSDO/CCSD offices 3. Toll free line 4. Online form	- 15-21 days (payment/bu siness cases)

¹ Please define who the non beneficiaries are as potential users of the GM

Consolida ted Cash Transfer Program me (CCTP)	-Addresses updates and complaints -Decentralized to SCOs/CDSOs/CCs - CCTP users roles defined for escalation of updates and complaints - Uses call centre for programme complaints -Public portal available -Integrated to National Registration Bureau, ESR, NICHE -Payments done through Mobile Network Operators	- Payments related - Household details update - Targeting related - Exits -E&S related complaints	5. Physical / hard copy form 6. SMS 7. Email 8. Social media 9. 1. In-person to BWCs/Chie fs/Nyumba Kumi/Villag e Elders - Sub- County/Co unty /National officers 2. Toll-free line (1533) 3. Letter 4. Online form 5. Physical / hard copy form 6. SMS 7. Social media)	- 15 days (updates) - 24hrs (payment failures) - 20 days (targeting complaints)
NICHE (Nutrition Impro vement through Cash and Health Education	-Health/Nutrition Focus -Targets pregnant and Lactating mothers and children under 36 months - Core NICHE	- Pregnancy/chil d status updates - Nutrition/Health counselling complaints	-In person Community Health Promoters (CHP) -Community Health Assistant (CHA)	-15 days (status updates) -20 days (health service complaints) -Immediate

	(Nutrition and Counselling and nutrition sensitive cash transfers) -NICHE Plus (Positive Parenting and Shock Responsive Cash Transfers) -Linked to NSNP systems -Utilizes NICHE MIS -On Demand Registration (ODR)	-Child protection cases -Targeting related complaints -Payment related complaints -Registrations -Child Protection Cases -GBV/SEAH cases - Inclusion/Exclusi on -Quality of service - Corruption/Frau d -Loss of supporting documents	-Health facilities -Sub-County Children and Social Development Officers -Chiefs -Nutrition Officers (NO) -BWCs -Ombudsman -Health Records Information Officer (HRIO) -County and Sub-County Health Focal Persons -Child Protection Volunteers (CPVs) 1. Letter 2. Toll free Line 3. Online form 4. Physical / hard copy form	(child protection)
ESR (Enhance d Single Registry	-Integrated Beneficiary Registry -Social Registry -Welfare ranking	-Types of complaint -Update of beneficiary data	-ESR MIS staff -Sub county officer enumerators, supervisors, NDMA, DSA, and	- 3-7 days (updates)

	-Complementary -Reporting & Analytics	-Registration-inclusion & exclusion -Grievance and Case management - Missed households, -Data submission Delay	other SP actors through integration by API 1. Letter 2. SMS 3. Social media	
AdoP (Adolesce nt Cash plus Program)	-Target: Adolescents aged 10 to 18 years in vulnerable households -Focus: School Re-Enrolment and Retention -Conditional Cash top ups. -Plus Components: Adolescent Safe Spaces, Life Skills & Light Touch Entrepreneurship, Positive Parenting, Mental Health and Psychosocial Support (MHPSS) and Case Management -On-Demand Registration (ODR) -Utilise AdoP MIS -Integrated CPIMS -Linked to NSNP and ESR systems	-Updates on new adolescentsChild protection cases -Payment related cases -Targeting complaints -Registrations -GBV/SEAH -Equity - Inclusion/Exclusi on -Quality of service -Household Dynamics & Caregiver Complaints -Peer-to-Peer complaints	In person Sub-County/County and Regional officers (DCS) -NGAO -Teachers -Adolescent mentors -BWCs -CPVs -CHPs -Ombudsman 1. Letter 2. Online form 3. Physical / hard copy form 4. SMS 6 Social media	-15 days (status updates) - 20 days (health service complaints) - Immediate (child protection)

	a	-Group dynamics complaints -Exit and Transition Complaints - Compliance Complaints -Adolescent Voice and Participation Complaints - Corruption/Frau d		
HSNP	- Decentralized From Sub-location to Location to Sub-County to County to National level -Managed by CDFSC/Sub-chief/Chief/POs/PMs/CDC - Utilizes HSNPMIS -IPRS Data -NDMA-HSNP Telegram CMF Hsnp@info.com integrated to EGCM MIS, ESR and PSPs	-Registration Complain - Missed households, targeting Complain- Inclusion/exclusi on errors, -Payments Complaints, -Updates; -Change of recipient -ID update -Bank complaints -Address update -Proxy update -grievance and	In person -CD&FSC, -Sub-chiefs -Chiefs -POs, -PMs, -NGAO officers, Web portal, -sub county offices -Email -Agents -PSP -EIP-PLUS Facilitators -Mentors and Mentor supervisors	-5-14 days for updates -30 days for Complaint's resolution and feedback

complains	1. Letter
-Related to program and	2. Online form
Bank	3. Physical / hard copy form
	4. SMS
	6 Social media

The objectives are.

- (i) To develop and use a standard reporting format on cases of all KSEIP interventions received and resolved.
- (ii) To define clear institutional and individual roles and responsibilities for the intake, resolution, escalation and feedback for all cases.
- (iii) To integrate GCM mechanisms through harmonization.
- (iv)To implement the enhanced GCM mechanism for all interventions across all KSEIP counties.
- (v) To enable generation of Standard system reports for monitoring EGCM.

1.4 Guidelines for implementation of EGCM

The program, has designated Grieviance Officer domiciled at DSA to coordinate the management of complaints and Grievances across programme components in liaison with the programme components G & CM focal persons. Additionally, each implementing organization has an Environmental and Social (E&S) Officer at the National, County and Sub County level in management of Grievances and cases including GBV cases at that level will also be responsible for handling programme-specific complaints in liaison with the Program G & CM Focal Person.

- The EGCM Technical Working Group (TWG) provides an oversight on the implementation of the EGCM.
- Program officers, BWCs, Chiefs and other implementation entities/partners will be sensitized on their roles in the EGCM.
- Capacity building of programme officers and other implementation stakeholders on the EGCM to enable them to execute their responsibilities efficiently.
- Programme officers should be able to query the EGCM with the programme number, household ID, name, account number.
- Beneficiary/Citizen (case applicant) should be served through a variety of channels without needing to incur significant time and

- travel. They should be served from any of the NSNP/KSEIP program office.
- The program officer should be able to log an update or complaint for any NSNP/KSEIP program while beneficiaries and non-beneficiaries can also reach out to the BWCs, Chiefs, Asst Chiefs, Mentors, Mentor supervisors, CHAs, FBO leaders, EIP Plus facilitators, Village elders CHPs, CPVs, Opinion leaders Lay Volunteers and Community Drought and Food Security committees through paper-based forms and EGCM system
- A case logged will be received by any NSNP/KSEIP program officer but will be referred to the respective case owner for resolution, redress and feedback.
- The E&S Focal Persons at all levels will be responsible for receiving and managing GBV/SEAH related cases. GVB/SEAH cases will be handled with utmost confidentiality by the grievance handling officers.
- Establish effective communication channels among stakeholders involved in the implementation of the EGCM system. Regular meetings, email correspondence, and dedicated communication platforms facilitate timely information sharing and collaboration.
- All project officers will be trained on EGCM including how to manage confidential complaints such as GBV/SEAH.
- Develop and implement a robust M&E framework to assess the performance, effectiveness, and impact of the EGCM system and the programs it supports. This involves setting up indicators, data collection mechanisms, and analysis processes to evaluate the achievement of desired outcomes.
- Foster collaboration with other key players, such as other government agencies, NGOs, and community organizations, that are involved in social protection projects. This collaboration can leverage resources, expertise, and best practices, leading to more comprehensive and impactful outcomes.

1 1.5 Guiding Principles

The enhanced GCM mechanism shall be guided by the following principles, but not limited to: -

- (i) **Integrity:** Ethical standards shall be upheld in implementation of the EGCM.
- (ii) **Common standards:** A common set of standards including common reporting procedures shall be followed including reporting and handling of GCM issues.
- (iii) **Professionalism:** All players are expected to handle grievance and case management issues with competence and impartiality.

- (iv) **Timeliness:** GCM issues shall be addressed within the timeframe captured in the agreed Service level Agreements (SLAs).
- (v) **Confidentiality:** Programme implementers are expected to handle beneficiary and non-beneficiary information with the utmost secrecy, and particularly GBV-SEA/SH cases.
- (vi) **Non-discrimination and equity:** Implementers shall respect, protect and fulfil the rights of marginalized and disadvantaged groups, ensuring non-discrimination and equity.
- (vii) Child best interest; implementers shall ensure that all decisions and actions concerning a child must prioritize their well-being and development as the primary consideration.
- (viii) **Respect**-All persons interacting with the EGCM system shall be treated with dignity, courtesy, and fairness, regardless of their background or the nature of their grievance. Mutual respect shall be fostered among staff, stakeholders, and complainants.
- (ix) **Safety and security** The mechanism shall ensure that all complainants, particularly those reporting sensitive issues such as GBV/SEA, are protected from retaliation or harm. Safe reporting spaces, secure communication channels, and protective protocols shall be established to guarantee both physical and emotional safety for all users of the EGCM
- (x) **Anonymity -** The GM will provide for anonymous complaints through its different uptake channels to ensure all individuals feel safe when raising sensitive issues or the situations that they may feel the risk of retaliation, reprisal, abuse, or discrimination. Hence, the Project expressly prohibits any adverse action against complainants, whether the grievance is submitted openly, confidentially, or anonymously

1.5 Programs Under the Kenya Social and Economic Inclusion Project

1.5.1 Consolidated Cash Transfer Programmes (CCTP)

The Consolidated Cash Transfer Programmes consists of:

- Cash Transfer programme for Orphans and Vulnerable Children (CT-OVC);
- Older Persons Cash Transfer programme (OPCT), and
- Person with Severe Disability Cash Transfer Programme (PWSD-CT).

These programmes are coordinated by the Directorate of Social Assistance (DSA). The PWSD-CT is implemented in collaboration with the National Council for Persons with Disabilities (NCPWD).

The CCTP operates nationally in all the 290 constituencies across the 47 Counties and are based on categorical targeting. The categories targeted

have been identified based on prevailing indicators of poverty and vulnerability. The OPCT is an individual-based programme and CT-OVC and PWSD are household-based programmes.

An individual-based programme is where the cash transfer is issued to each individual in a household who meets the set eligibility criteria while a household-based is issued to a household with at least one member who meets the set eligibility criteria.

KSEIP 2 supports critical reforms and enhancements to CCTP to improve its efficiency and poverty impact. A systematic recertification of existing cash transfer beneficiaries will be financed to assess their eligibility, leveraging data from the ESR to determine poverty status and other eligibility criteria

The project also supports innovations to improve two-way citizen engagement. A modernized call center will be established to proactively reach out to NSNP beneficiaries, including all KSEIP2 programs, through phone and short message service (SMS) surveys to track outcomes and identify implementation bottlenecks.

1.5.2 Economic Inclusion Programme (EIP)

EIP focuses on enabling extremely poor households to participate in social and economic activities by improving their access to skills, productive inputs, assets, finance, and economic opportunities.

The program aims to achieve this by providing Consumption Support and Asset Transfer to participants, which will help them to meet their day-to-day household needs and provide capital to start income-generating activities respectively. To ensure the sustainability of the businesses initiated by the participants, rigorous mentorship and capacity building through mentors is provided.

Under KSEIP, the program was implemented as a pilot in five (5) Counties, namely, Taita Taveta, Murang'a, Marsabit, Kisumu and Makueni in selected sub counties, testing two economic graduation models. The results of this pilot are to inform the scale-up of the programme under KSEIP2 and aid in the graduation of enrolled households from poverty.

The pilot targeted 15,000 participants, divided into two cohorts of 7,500 each. The Directorate of Social Development, in collaboration with the Global Development Incubator (GDI), is leading the implementation of the program.

KSEIP 2 EIP Building Climate and Economic Resilience of Adults

This component supports investment in inclusive and gainful employment for adults from poor and vulnerable households by aiding sustainable microenterprises. Additionally, support will be provided to households in the

most climate-vulnerable counties with existing social insurance schemes. The program covers 25 ASAL and non-ASAL counties.

1.5.3 Hunger Safety Net Program (HSNP)

HSNP implements a scaled up, unconditional cash transfers, integrated, government-led and financed safety net programme to support some of the most vulnerable and poor households in arid and semi-arid parts of Northern Kenya.

The HSNP is an unconditional cash transfer programme implemented by the National Drought Management Authority (NDMA) since 2009 in eight poorest and most arid counties, namely, Turkana, Wajir, Mandera, Marsabit, Garissa, Tana River, Isiolo, and Samburu. HSNP is also one of four cash transfer programmes under the National Safety Net Programme (NSNP) collectively called Inua Jamii.

The Second Kenya Social and Economic Inclusion Project (KSEIP2) supports expansion of HSNP and enhancements to its climate shock-responsive capacity by introducing anticipatory actions and enabling a risk based multi-hazard and multi-layered response mechanism under a reviewed Disaster Risk Financing Strategy (DRFS). Additionally, the project will expand to 32,000 new households in 15 ASAL counties while also supporting expansion of HSNP through investments in its delivery systems.

1.5.4 Nutrition Improvement through Cash and Health Education (NICHE)

The Nutrition Improvements through Cash and Health Education (NICHE) intervention is primarily an initiative of the Government of Kenya implemented and led by the Directorate of Children's Services (DCS), with the collaborative support from DSA and the NDMA to ensure timely disbursement of top-up payments to NICHE beneficiaries and to resolve any complaints or case management issues related to NICHE.

The Ministry of Health and UNICEF support effective delivery of relevant capacity for the implementation of NICHE in the County health services, and DCS staff supports at county and Sub-County regarding registration and other front-line operations. Under KSEIP, the programme was implemented in 5 counties namely, Kilifi, Turkana, Marsabit, Kitui and West Pokot.

In KSEIP2, the project will provide monthly cash top-ups of KES 1,000 and nutrition education to pregnant or lactating women (PLW) or children under age three years in households already receiving GoK-financed NSNP transfers. Nutrition education will be delivered by Community Health Promoters (CHPs) of the county health departments and will include mother-to-mother and father-to-father support groups and community-wide education on optimal health and nutrition practices for both PLW and young children.

The program applies a life cycle approach which is keen in building human capital of children which entails offering nutrition- sensitive cash-plus programs for children under three years and pregnant or lactating women (PLW) with a keen focus on expanding the coverage of NICHE twenty-five counties. On the cash plus, a positive parenting package and anticipatory shock responsive support, in five counties will be concluded.

On component 1b: Cash-plus program supports adolescent education and prevent teen pregnancy.

Cash-plus programs support poor and vulnerable adolescents to remain in or re-enter school and prevent teen pregnancy. Providing a comprehensive package of support to adolescents and their families depending on the presence/severity of risk factors among adolescents and their willingness to remain in or re-enter education. Cash top-ups will be provided to support enrolment and attendance in basic primary or secondary school among adolescent boys and girls in poor and vulnerable households.

1.5.5 Adolescent Cash Plus Programme

The Adolescent Cash Plus Programme is a targeted, multi-sectoral intervention designed to address the specific vulnerabilities of adolescents aged 10-18 years. Implemented by the Directorate of Children Services (DCS) under the State Department for Children Welfare Services, its primary objectives are to:

- Increase school enrolment, attendance, and retention.
- Reduce teenage pregnancies and early marriages.
- Empower adolescents with life skills and knowledge for a safe transition to adulthood.

The programme is operational in nine counties with high rates of school dropout and adolescent pregnancy: Nairobi, Marsabit, Wajir, Mandera, Samburu, Bungoma, Migori, Homa Bay, and Kilifi.

Programme Design:

The "Cash Plus" model combines two core elements:

- 1. Conditional Cash Transfers: A top-up of KES 1,000 per adolescent per month (up to KES 2,000 per household), paid termly and conditional on school attendance and participation in "Plus" components.
- 2. Comprehensive "Plus" Services: A holistic package of non-cash support, including:

- Adolescent Safe Spaces for mentorship and peer support.
- Life Skills and Light-Touch Entrepreneurship Training.
- Mental Health and Psychosocial Support (MHPSS).
- Social Behaviour Change Communication (SBCC) on sexual health and rights.
- Case Management for personalized support and referrals.
- o Positive Parenting sessions for caregivers and adolescent parents.

The programme leverages the Enhanced Single Registry (ESR) for targeting and integrates a robust Monitoring and Evaluation framework to track progress on key indicators like school attendance and reduction in teenage pregnancy.

1.5.6 Enhanced Single Registry (ESR)

The Enhanced Single Registry (ESR), managed by the National Social Protection Secretariat, serves as Kenya's centralized database of poor and vulnerable households across all 47 counties.

The ESR contains data for beneficiaries (single registry) and potential beneficiaries (social registry) and it has a functionality of providing targeting data (potential beneficiary lists based on program eligibility criteria and household poverty score from the registry) for programs and flagging the existing beneficiaries.

KSEIP 2 supports system wide reforms to increase the overall efficiency, impact, and climate-shock responsiveness of SP programs and delivery platforms.

KSEIP2 is to further improve the coverage, accuracy, and effectiveness of the ESR to bolster its significance and capability to serve as a national platform for delivering SP and other pro-poor programs. Investments will develop and implement ODR functionalities of the ESR to allow for new enrolment or information updates using dynamic, decentralized processes, moving away from the large-scale data collection model used to populate the registry to date. ODR will be rolled out across the country under this project.

1.6 Awareness Creation for KSEIP 2 EGCM

To enhance utilization of the EGCM, the KSEIP 2 Project team in close collaboration with the County, sub-county, location teams will ensure that it is widely publicized among stakeholder groups, such as the potentially

affected communities, government agencies, and civil society organizations. These will be done through print and non-print awareness methods including social media engagements, barazas, and posters. Awareness creation will employ the following principles: cultural appropriateness, inclusivity, gender equity & equality, non-discrimination and confidentiality. Inadequate disclosure of the EGCM may potentially lead to its under-utilization and eventually the EGCM loses its relevance and validity of the purpose for which it was established. Stakeholders will be informed about other Grievance Management (GM) options such as the World Bank Grievance Redress System (GRS) Independent Inspection Panel, (IIP) and national judicial system, where complainants can be referred to if they feel that their arievance has not been adequately addressed. GM awareness campaigns venues will be decentralized up to the local levels leveraging on the community structures to facilitate greater access to information for marginalized groups. The campaign will adopt a culturally appropriate and gender sensitive approach. An effective awareness campaign, launched to give publicity to the GM will include among others the following aspects:

- Scope of the project, target beneficiaries, components, and key interventions.
- Environmental and social risks and impacts and the appropriate mitigation measures.
- The EGCM and other alternative GMs (the World Bank's GRS IP and other national systems for GM).
- How the different GMs can be accessed.
- Who can access the GMs and how complaints can be reported to those GMs and to whom, e.g., phone and facsimile numbers, postal and e-mail addresses, and websites of the GMs as well as information that should be included in a complaint.
- Procedures (including levels of escalation) and time frames for initiating and concluding the grievance redress process; boundaries and limits of GMs in handling grievances; and
- Roles of different agencies such as project implementers and funding agencies.

The awareness campaign on GM will employ the following 4 broad strategies to achieve the overall goal:

- (i) Internal coordination and capacity strengthening of the State Department for Social Protection, Ministry Staff and implementing partners to ensure delivery of KSEIP2 GM
- (ii) Strategic engagement mechanisms for continuous outreach and advocacy with political, policy and technical leadership at national, county, Sub County and community levels to support KSEIP 2 GM.
- (iii) Beneficiary outreach to improve knowledge of the KSEIP2 GM interventions package, build political and policy level support, sensitize beneficiaries of the program's benefits, rights and entitlements, and foster understanding and uptake of the KSEIP2 interventions.

(iv) Media advocacy to promote accurate coverage and publicity of the national social protection and shock-responsive safety net programs and KSEIP2 GM in particular.

The project will adopt a variety of methods to widely publicize the project GM, including:

- (i) displaying graphical posters and summaries of project instruments in public places accessible to all stakeholders, such as in offices of the chiefs, sub-county, and county offices of MoLSP, NDMA, Huduma Centres, community centres and religious places. The posters and summaries will be written in languages understandable to all (including refugee-friendly languages and braille;
- (ii) through public forums held at the location, sub-county and county levels by program staff;
- (iii) social media platforms,
- (iv) Vernacular radio and TV stations (as applicable).
- (v) Utilization of local administration structures such as chief, village elder and, nyumba kumi
- (vi)Utilization of the five (5 No) community Volunteer groups, namely: BWCs, Community spokes- persons/leaders, CPVs, CHPs, LVCs, Community Drought & Food security committees(CDFSCs).

1.7 EGCM for SEAH and VAC survivors

Recognizing that project implementation under KSEIP may trigger sensitive GBV/SEAH/VAC issues that have potential negative social impact and risks in exchange for programme benefits, the EGCM incorporates dedicated and confidential channels for lodging such complaints. Such complaints can be lodged through the local community structures such as the CHPs, LCVs, CPVS, BWCs and drought and food security committees who in turn are able to refer the complaint to the relevant GBV service providers such as health facility, the police, legal aid, shelters trusted local organizations, mapped service providers, toll-free hotlines, SMS/online platforms, and secure complaint boxes, service providers and GBV Focal point and champions at the various tiers including at the community level etc.

In cases where the issue is not conclusively addressed it will be escalated to the E & S focal point persons at county level (SDSP Coordinators, SDCS Coordinators and NDMA County Drought Coordinators) and County Disability Service Officers) who will work hand in hand with the County Gender Officers and other mapped GBV Service providers. All community structures and designated project E & S focal points will be sensitized on how to handle these cases professionally, maintain confidentiality and be sensitive and County Disability Service Officers). and in turn they become GBV Champions. GBV Focal Points will also be appointed at sub-county, county, and national

levels, with standardized training on SEAH/VAC response, survivor-centered approaches, and age-appropriate child safeguarding protocols.

The project advocates for behaviour and attitude change that support changing social norms and behaviours to reduce GBV-related risks. In addition, stringent confidentiality measures—including restricted access protocols and secure data storage—are implemented to protect survivors' personal information in accordance with both Kenyan law and KSEIP Project Operational Manual. SEAH survivor will be advised on mandatory reporting requirement and limits of confidentiality as required under Kenyan law.

Information on how to report complaints will be disseminated among project beneficiaries, communities and members of the public. Personal information of survivors will be safeguarded and access to the MIS restricted to authorized personnel to ensure confidentiality.

These focal points will play a pivotal role in responding to and managing reports of SEAH (Sexual Exploitation, Abuse, and Harassment). Additionally, comprehensive awareness and training programs on SEAH will be provided to all staff members, beneficiaries and their leadership to build capacity and sensitivity towards these issues.

The E &S focal point person will primarily refer complainants to GBV/VAC service providers at the sub-county and county levels. They will coordinate access to mapped quality GBV service providers who can offer specialized care and support. This referral system ensures that survivors receive timely and appropriate assistance from professionals trained in dealing with GBV cases. All project staff will be sensitized on how to handle GBV/SEAH/VAC complaints with the utmost respect and adherence to established protocols. Specific procedures will be followed for complaints involving children to ensure their protection and well-being. This includes age-appropriate communication strategies and safeguarding measures tailored to the needs of young survivors. Moreover, ongoing monitoring of complaints and followup support will be ensured by E & S focal point person in collaboration with GBV service providers, guaranteeing that survivors receive continued care and that their cases are handled with diligence and sensitivity. . In the event a complainant is dissatisfied with the response they can seek other alternative redress mechanism like judicial recourse, Ombsuman, KNCHR.

Furthermore, periodic reviews and audits of the complaint handling process will be conducted to maintain high standards of accountability and effectiveness. These reviews will help identify any gaps or areas for improvement, ensuring that the EGCM remains responsive and adaptive to the needs of the community. By fostering a culture of continuous learning

and improvement, the EGCM aims to deliver justice and support to all survivors while upholding their dignity and rights.

1.8 Scope and applicability of the EGCM Operations Guidelines

It is important to note that these guidelines are specific to the KSEIP 2 programme and may not be directly applicable to other social protection or cash transfer programmes unless they adopt similar mechanisms and processes. However, the NSNP programs intend to train all officers and other implementation stakeholders at all levels in the country to be able to use EGCM for managing issues of the beneficiaries and non-beneficiaries.

The scope and applicability of the guidelines ensure consistency, coordination, and accountability in handling grievances and cases within the KSEIP programme, ultimately aiming to improve service delivery, beneficiary satisfaction, and overall programme effectiveness.

These guidelines cover the implementation of the EGCM mechanism within the framework of the second Kenya Social and Economic Inclusion Project (KSEIP 2). They are designed to ensure consistent and standardized procedures for receiving, recording, resolving, and providing feedback on grievances and cases related to the KSEIP programme. The guidelines apply to all implementing components of the KSEIP 2, include CCTPMIS, NICHE, ESR, EIP and NSNP. In future, the trainings will ensure that the EGCM is used across the country.

The guidelines are applicable to the following stakeholders involved in the KSEIP 2 program:

- **Program Officers** (POs): They are responsible for reviewing and processing new cases, capturing information into the Case Management System, and coordinating the resolution of grievances and cases.
- Chiefs and Assistant Chiefs: They serve as local administration representatives and would manage registrations of updates and complaints from beneficiary and non-beneficiary household representatives. They play a crucial role in collecting programme related information, verifying details, and forwarding the same to the Program Officers.
- Beneficiary/ caregiver/ community: They engage BWCs, LVSc, CPVs, CHPs Programme officers, Chiefs or Assistant Chiefs to register updates for their information or complaints and grievances related to the KSEIP Programme me. They have the right to voice their concerns and seek resolution through the EGCM mechanism using all available channels.
- Community structures:

- Beneficiary/ caregiver/ community: They engage BWCs, LVSc, CPVs, CHPs Programme officers, Chiefs or Assistant Chiefs to register updates for their information or complaints and grievances related to the KSEIP Programme me. They have the right to voice their concerns and seek resolution through the EGCM mechanism using all available channels. LVCS- support in counselling, parenting and handle GBV/SEAH cases, support grievance reporting.
- **CHPs**: they support NIche program in mobilization of beneficiaries, nutritional counselling, and health education and support GBV/SEAH cases, support grievance reporting.
- **CPVs**: Engage in direct adolescent support, facilitation of adolescent safe spaces, adolescent basic reproductive health education, address Child protection issues, support grievance reporting GBV/SEAH and case management.
- Community Drought & Food Security Committee: support in Early Warning & Monitoring for drought, Drought Preparedness and Response Planning, Coordination of Relief Efforts during emergency interventions and coordination of Economic Inclusion Programs.
- Receive, record and forward updates to Sub-County Programme me officers and make a follow up.
- Implementing Structures: these include the DSA, DCS, DSD, NCPWD, HSNP, NSPS and other relevant entities responsible for implementing different components of the KSEIP Programme me.
- Enhanced Grievances and Case Management Technical Working Group (EGCM TWG): It is composed of representatives from various implementing structures, the EGCM TWG is responsible for the development, implementation, and oversight of the enhanced EGCM system. They ensure the guidelines are followed and coordinate efforts to enhance the EGCM mechanism

SECTION 2: EGCM CASE AND NON CASE REPORTING AND REGISTRATION PROCESS

2.1 Case and non-Cases Reporting and Registration

Case and non-case reporting and registration under KSEIP 2 will be completed via multiple channels. These Channels are designed to suit the varied literacy levels and a ccess needs of beneficiaries. During this phased implementation, emphasis is placed on capacity building for local structures, with print materials gradually expanding to ensure all beneficiaries can easily report their cases.

2.1.1 Cases

A case is a grievance that falls within the mandate or scope of the project's grievance redress mechanism (GM), which can be investigated, addressed, or resolved by the program.

2.1.2 Non case

Non-cases are complaints or submissions that will be received through the EGCM that do not fall within the scope of the project's activities and may be addressed directly by the program or be referred to another relevant institution for resolution. During the implementation of KSEIP 2 it is anticipated that these non-cases may arise. Some of these cases will include but not limited to; GBV/SEAH/ VAC Cases.

- 1. Employment related issues
- 2. Security Concerns-
- 3. Political or legal matters outside project control
- 4. Environmental concerns
- 5. Work related concerns
- 6. Health and safety concerns

These non-cases will be received, recorded and addressed and where necessary referred accordingly to the relevant entities for necessary action and feedback. The cases will be captured using the case and non-case management form (annex I). .

Once a complaint or request is registered, it is promptly referred on to the relevant programme through the EGCM platform, based on the approval hierarchy. This efficient system allows for immediate attention and resolution of issues based on SLA, ensuring that the voices of people (beneficiaries or non-beneficiaries) including people with disabilities are heard and their concerns addressed effectively. The presence of these offices fosters a supportive environment where individuals feel empowered to seek assistance

and provide feedback, thereby improving the overall efficacy of the programme is designed to assist them.

This multi-channel approach accommodates the diverse needs and preferences of beneficiaries, making it easier for them to report their cases in a manner that suits their circumstances. By providing various registration options, the system enhances inclusivity and accessibility, ensuring that no beneficiary is left behind.

In this regard, the project will carry out periodic training, system enhancements and continuously improve the channels. The A person (beneficiary or a non-beneficiary can use the channels for EGCM are given below:

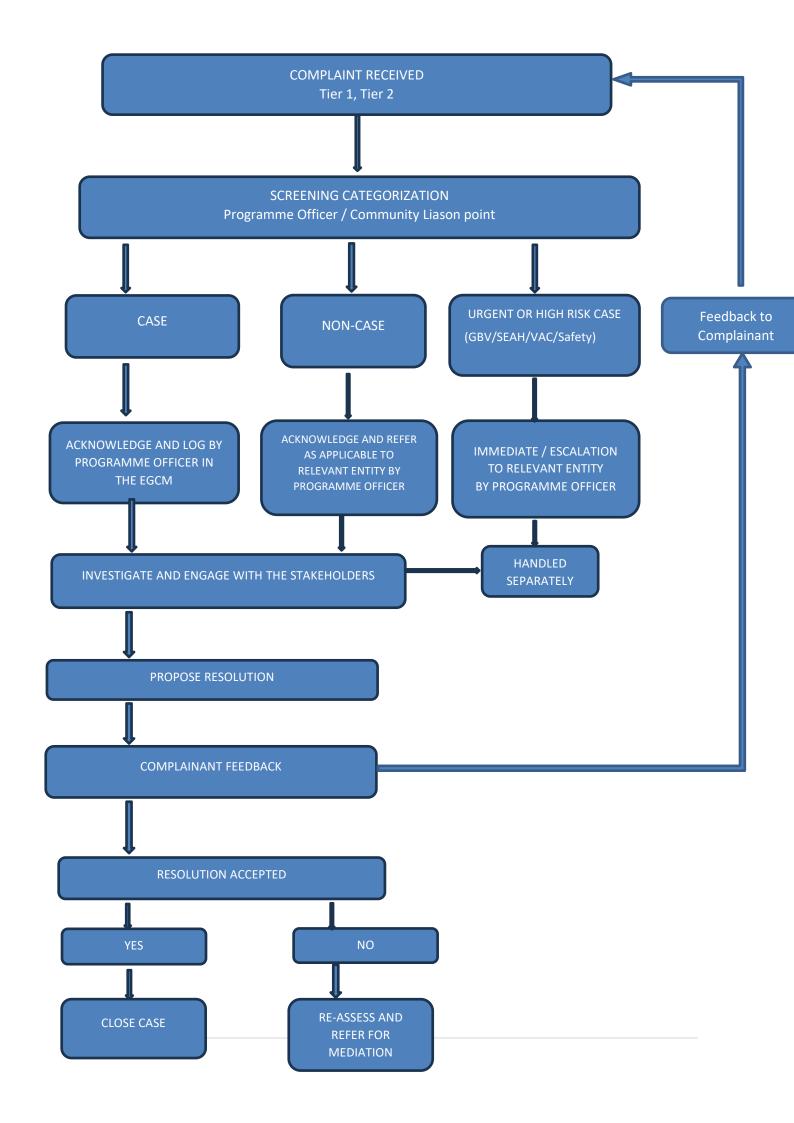
- paper-based forms distributed at chiefs' offices, health centers, schools, or directly via the EGCM public portal,
- call on the Call center of the Ministries using a toll-free number (1533) for inua Jamii, 116 child help line, 1195 for GBV, 999 for National police,
- through post/email to the Ministries or use the social media (Facebook and twitter) handles of the Programme
- visit the offices of the chiefs or assistant chiefs at location or sub-location levels.
- Through a member of the community structures e.g. BWC, CHPs, CPVs, LVCs, community drought and food security committee, mentors/mentor supervisors, village elders or Nyumba Kumi to register a case at any time.
- Walk into the Ministries headquarters and ministries/Programme offices at national, regional, county or sub-county offices to report their issues/cases, seek information, track their cases and get feedback.
- Public portal- the beneficiary or non-beneficiary can lodge a complaint through the public portal https://invajamii.go.ke:2029/

All these implementation stakeholders will be provided with a case booklet which will have a triplicate form with a serial number that will be used as a tracking number once a case is registered. One copy of the filled triplicate form will be handed over to the case applicant for his/her record, one copy to the person who registers a case on behalf of the case applicant and the last copy will remain with the Programme officers for data entry into the EGCM portal at their offices or even in the field as and when they interact with the case applicants or the registrars (intermediary implementation stakeholders as explained above).

In most cases, Chiefs, BWCs, Programme officers and other community structures will be filling out the paper forms on behalf of the persons registering their cases due to the literacy levels of the beneficiaries.

- The beneficiaries can interact with the EGCM portal on their own for those who are not able to use the platform; they can register a case through the help of their relatives, neighbors etc.
- National and county offices of the National Council for Persons with Disabilities will also serve as focal points for complaint registration, information update requests, and feedback provision. These offices are accessible to persons with disabilities, beneficiaries of other Programme s and even non-beneficiaries. The staff in these offices are trained on EGCM tools, procedures and the platform ensuring they can help people in lodging their complaints or update requests to their information with the ESR or the

Figure 2: procedure for reporting a case or no case complaint



2.2 Reporting Channels: A Two-Tiered Approach

To ensure complaints are captured efficiently and handled consistently, the EGCM operates a two-tiered system for reporting. This structure guarantees accessibility for all beneficiaries while maintaining the integrity and confidentiality of the case management process.

Tier 1: Official Intake Channels

These are the primary and recommended channels for submitting a complaint or update request. They are staffed by personnel trained in EGCM procedures and have direct access to the case management system. All complaints received through these channels are guaranteed to be formally registered and tracked.

- Toll-Free Hotlines: Call 1533 for Inua Jamii programmes or 116 for child-related issues.
- **Digital Platforms:** The official EGCM public portal, dedicated program email addresses, and monitored official social media pages.
- Government Offices: Walk-in services at:
 - Sub-County Social Development Offices (SCSDO)
 - Sub-County Children's Offices (SCCO)
 - NDMA County and Sub-County Offices
 - Huduma Centres

All Tier 1 channel staff undergo mandatory, standardized training on EGCM procedures, data privacy, and the handling of sensitive complaints.

Tier 2: Community Liaison Points

Recognizing that beneficiaries often first turn to trusted local figures, the following community structures are designated as Liaison Points. Their primary role is to be aware of the EGCM and to guide complainants to the nearest or most appropriate Tier 1 Official Intake Channel.

- Chiefs, Assistant Chiefs, and Village Elders
- Community Health Promoters (CHPs), Child Protection Volunteers (CPVs) and Lay Volunteer Counselors
- Beneficiary Welfare Committees (BWCs) and EIP Mentors/Mentor Supervisors
- Drought & Food security committees (CDFSCs)

These community actors will receive awareness and referral training, focusing on recognizing a grievance, maintaining confidentiality, and knowing how to connect individuals with Tier 1 channels. They are not expected to investigate or hold complaint information.

Awareness campaigns will prominently promote the Tier 1 Official Intake Channels to ensure the public knows the most effective ways to report an issue.

2.3 Case data entry into the EGCM:

Once a case is received, the Sub-County Officer (SCO) verifies the details and enters the information into the EGCM portal attaching the necessary documents. The record is then moved into a centralized 'common tray' for further processing. An automatic notification is sent via a pop-up message to the assigned case owner, ensuring prompt review and action. This notification mechanism is designed to ensure that the case owner is immediately aware of the new record and can take the appropriate action without delay. By receiving timely alerts, case owners can promptly address the issues raised, contributing to a more responsive and effective case management system.

The common tray is an integral part of the case management workflow. This action ensures that the record is ready for further processing and attention from the designated authorities. The common tray serves as a centralized system where all logged cases are managed, facilitating systematic monitoring and follow-up.

In instances where the grievance, complaint, or update pertains specifically to the sub-county officer's Programme, it is managed through their dedicated Programme system. However, if the issue concerns another Programme, it is promptly logged into the EGCM. This clear delineation helps in proper routing and handling of the case, ensuring that it reaches the appropriate authorities for resolution. Such a structured approach ensures that each case is addressed by the relevant Programme, thereby enhancing the efficiency of the resolution process.

2.4 Case Review

Cases and documents are then reviewed by sub-county, county, and/or HQ officers following the configured workflows. This hierarchical review process ensures that cases are examined thoroughly at multiple levels, allowing for a comprehensive evaluation of the issues raised. By involving officers at different administrative tiers, the system promotes accountability and oversight, ensuring that each case receives the attention it deserves and is handled according to established protocols. The case owner then undertakes a thorough verification of the record to determine whether it is acceptable, rejectable, or incomplete due to missing information. This

decision-making process is crucial as it dictates the next steps for the case or complaint. The case owner's verification ensures that only valid and complete records are processed further, maintaining the system's efficiency and reliability.

2.5Case Resolution

Based on the outcomes of the case review, cases are resolved at the Programme, pay point, or referral level. This resolution process involves determining the appropriate course of action for each case, whether it involves providing assistance through specific Programme s, addressing financial concerns through payment channels, or referring the case to relevant authorities or services. The tailored resolution approach ensures that each case is addressed in a manner that aligns with its unique context and requirements, leading to effective and satisfactory outcomes for beneficiaries.

If the record is accepted, it follows the respective Programme 's case management verification processes and moves to PSPs for updates. This ensures that the case is handled according to established protocols, leading to an organized and efficient resolution by the respective Programme.

If the record is rejected, the SCO who initially logged the record receives a notification message explaining the reason for the rejection. This feedback allows the SCO to understand any errors or issues with the initial submission and re-initiate the record if necessary. Such a feedback mechanism ensures that no valid case is left unresolved due to initial submission errors, allowing for continuous improvement in the case management process.

2.6 Escalation and resolution process

The EGCM escalation process is part of the case resolution process. Escalation may occur based on the nature of the case/non-case and /or inability to resolve the issue. At the community level there are several structures where cases/non-cases can be reported by beneficiaries or non-beneficiaries. The structures are: the chiefs, Assistant Chiefs, Village elders, Nyumba Kumi, BWCs, CPVs, CHPS, CHAs LVCs, Mentors and Mentor Supervisors.

If the case or non-case is not resolved by the community structures, it should be escalated to the Sub County Officers (SCSDO/SCCO/Sub County NDMA

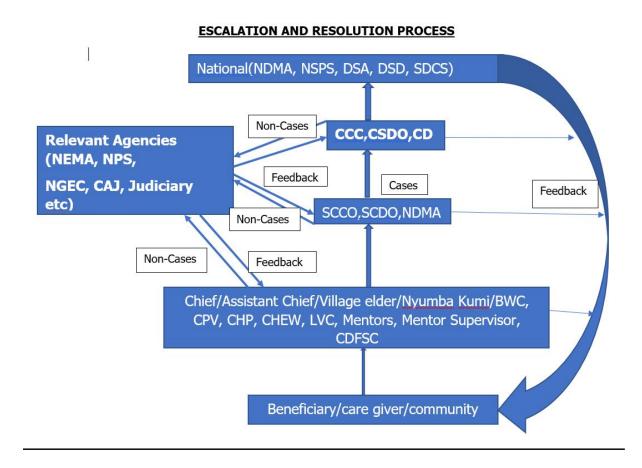
Officer) for resolution. Non cases will be referred to the relevant agencies (NEMA, NPS, Ombudsman, Gender Officers),

Programme cases not resolved at the sub-county level, will be escalated to the county level for action. Unresolved cases at the county level will further be escalated to the national level for resolution.

Feedback should be given at all levels of reporting for both cases or non-cases. For cases referred to other agencies, feedback should be given to the program focal persons at the respective levels.

Figure 2: Escalation and resolution process for a case or no case complaint

The case management system aims to provide a comprehensive and effective resolution process for beneficiaries, ensuring that their issues are addressed in a timely and satisfactory manner as indicated in figure 3 below.



2.7 Case Feedback

Feedback is provided through the web portal, call center, or email, and can be extracted at any stage within the resolution process. Keeping beneficiaries informed about the status and progress of their cases is crucial for transparency and trust-building. The feedback mechanism ensures that beneficiaries receive timely updates and are aware of any necessary actions they need to take. By maintaining open communication channels, the system fosters a responsive and beneficiary-centric approach to case management.

2.8 Alternate EGCM Referral Channels

Some of the alternate referral channels for KSEIP II beneficiaries and non-beneficiaries include the offices of the chiefs and assistant chiefs who are the representatives of the ministry of interior and are an administrative arm of the government of Kenya. The chiefs hold regular barazas for people to know about government Programme s and address any issues that might be of concern for the people. Additionally, people can reach out to the commission for administrative justice, judiciary and the ECitizen platform. The objective here is to encourage people to report their issues through a variety of independent channels/mechanisms for redress of their issues if the project redress mechanism presents delays or other issues. Programme cases received through CAJ, Huduma Centres, Human Rights Commissions or any other organization will be addressed and feedback channeled accordingly through the same institutions.



CHIEFS BARAZAS



COMPLAINTS
RECEIVED THROUGH
THE COMMISSION
FOR ADMINISTRATIVE
JUSTICE



JUDICIARY



INTEGRATE
GRIEVANCES AND
COMPLAINTS
MECHANISMS INTO
THE ECITIZEN
PLATFORM (FUTURE)

Figure 2: Alternative EGCM Referral Mechanism

Table 3: Grievance & Complaint categories & Resolution timelines

The following table outlines grievance and complaint categories under KSEIP including their respective Service Level Agreement (SLA) timelines. These timelines are designed to ensure rapid response, particularly for issues affecting Vulnerable and Marginalized Groups (VMGs)as well as disadvantaged individuals and groups. The resolution time for Targeting related cases (inclusion or exclusion), Payment Related, Service delivery related, Vulnerable and Marginalized Groups (VMGs) categories is indicated until closure. The resolution time for Sexual Exploitation and Abuse, Gender Based Violence and Violence Against Children indicates the time taken to report, refer to the resolving agency and give feedback to the case applicant

Grievance & Complaint Category	Resolution Time	
Targeting related-inclusion or exclusion	15 working days	
Payment Related	15 working days	
Service delivery related	15 working days	
Sexual Exploitation Abuse and Harassment.	7 working days	
Categories of Gender Based Violence		
Sexual violence	72 hours	
Physical violence	72 hours	
Emotional and psychological violence	48 hours	
Harmful traditional practices	72 hours	
Socioeconomic violence	48 hours	
Violence Against Children	72 hours	
Vulnerable and Marginalized Groups (VMGs)		
Orphans and Vulnerable Children (OVC)	15 days	
Youth	15 days	
Persons with Disability	15 days	
Indigenous People	15 days	

Older Persons	15 days
Informal Workers	15 days
Teenage/Young Mothers	15days

Table 3: Grievance & Complaint categories & Resolution timelines

2. 9 Case and Non case Management Form

EGCM has a case and non-case management form that covers a variety of cases and non-cases including information on updates, complaints and grievances. The objective is to allow the public to use this form in their proximities, to register their cases and non-cases. EGCM does not depend on one type of a channel and would invest in training and capacity building of Programme officers to facilitate case registration for beneficiaries and non-beneficiaries. The sections of the EGCM Case and non-case Management are given below and form (Annex 1) will be availed to the local structures for utilization.

- Section on Personal Information: The EGCM case and non-case management form requires basic information on the case applicant to identify them in case they want to register an information update request or a complaint or a grievance while intending to identify themselves. The information update request cannot be anonymous as the household of the person registering a case has to be identified to update their information in the system. However, beneficiaries and non-beneficiaries can report their grievances anonymously.
- Information Updates: The update request can be on updating the personal information of the household head/recipient/caregiver. The personal information includes the name of the person, ID number, phone number, address of the household. Additionally, the updates cover changes to the household composition including births, deaths or exit of members of the household. The update requests can also be to change the caregiver (if it applies to the household) or the recipient.
- Complaints on Payment related issues: The EGCM complaints as per the case and non-case management form covers complaints related to the Pay points, payment service providers for mobile based payments, their pay agents, accounts and other payment issues. The system groups different complaints into these categories and all types of complaints that can be registered against the payment system are presented in the case and non-cases management form. These complaints can include account opening/activation issues, account

status issues (inactive/dormant), card issues, agent distance from the households, forced purchase issues by the agents, forced to pay commissions, payment errors, payment fraud, missed payments, misuse of payments etc.

- Complaints on household registration: The household registration issues
 that relate to ESR can also be captured through the EGCM case and
 non-case management form. It covers complaints related to the
 missed-out registrations of the individual households or the
 villages/areas that could not be enumerated.
- The Programme's will be keen to track environmental and social (E&S) issues: The Programme's will be keen to track environmental and social issues arising from implementation of KSEIP II. The EGCM platform and tools will be able to collate a variety of E&S issues as they arise including gender related issues, violence against a specific gender and/or children, exclusions due to biases related to ethnicity, tribalism and societal stigmas. The Programme will maintain separate data for vulnerable and marginalized groups. These groups can be disproportionately impacted by E&S risks and impacts and therefore the Programme will ensure they are well informed about the Programme their entitlements, the EGCM channels and other platforms available to them in order to enable them to effectively report their issues and get them redressed.

2.10 Case Management Workflows

The section describes different avenues used by Programme me officers to access systems to handle/solve complaints, grievances and updates raised by beneficiaries or community members.

Process Flow

- (i) The concerned party engages available access channels to update their information.
- (ii) The Programme me officer from the component contacted will check the validity of the information provided and fill in a standard EGCM form
- (iii) The Programme me officer from the component contacted will scan and upload the standard EGCM form with other supporting documents
- (iv)The record will automatically move to the common tray
- (v) The system will automatically relay the record to the case owner who will be alerted by a pop-up message on the EGCM Module.
- (vi)The case owner will verify the record for either acceptance, rejection or incomplete for cases with missing information or.

- (vii) If accepted, rejected or marked as incomplete the feedback is given via an SMS/Email to the concerned party.
- (viii) If the record is accepted, the case will follow the respective Programme me case management verification processes.
- (ix) If the record is rejected the Programme me officer who initiated it will get a notification message with the reason for rejection and re-initiate the record.

Table 4: Updates categories and their respective SLAs

Update Type	Description	Detailed Reporting Process	Required Documents	SLA	Applicable Programme
Change or Add a Caregiver/Proxy/EIP Participant	Occurs due to: - Death /relocation of previous caregiver - Misuse of funds - Abandonment - Mobility issues (OPCT) - ID issues - Caregiver turns 70 (eligible for OPCT)	1. New caregiver presents self with beneficiary (or old caregiver if possible) to Mentor and Mentor Supervisors, BWC/CHV/CHEW. 2. Programme me officer verifies. 3. Programme me officer confirms change, fills & uploads form to Enhanced G&CM Module. 4. Respective Programme me officer confirms required documentation is attached as per	-Case management form -New caregiver's ID -Burial permit/death certificate (HSNP) -Death declaration form - BWC minutes -Mentor or Mentor Supervisors minutes - Sub- County letter (for misuse/abandon ment)	3 days (lodging) + Programme me- specific SLA (processing)	CCTP, HSNP, EIP, NICHE, ADOP

		policy and effects update 5. Update to follow respective Programme me processes. 5. Feedback relayed.			
Correction of HH Member/Benefici ary Details	Fixes errors in: - Names - ID number - Phone number - DOB - Sex	1. Recipient provides proof to BWC/CHV/Programme me officer/Mentor/Mentor Supervisor. 2. Programme me officer verifies. 3. Officer submits correction via EGCM. 4. Respective Programme me officer confirms required documentation is attached as per policy and effects	- Case management form - Supporting docs (ID, affidavit for name changes)	3 days (lodging) + Programme me SLA	CCTP, EIP, NICHE, HSNP, ADOP

		update 5. Updates to follow respective Programme me processes. 6. Feedback relayed.			
Adding New HH Member/New Pregnancy (NICHE)	New member (birth) or pregnancy in household.	1. Mentor/Mentor Supervisor/BWC/ CHV/beneficiary reports change. 2. Programme me officer verifies. 3. Documents uploaded to the system. 4. Respective Programme me officer confirms required documentation is attached as per policy and effects update 5. Updates to follow respective	- Case management form - Birth certificate/notific ation - MCH booklet	3 days (lodging) + Programme me SLA	CCTP, NICHE, ADOP

		Programme me processes. 6. Feedback provided.			
Exit of Household Member	Due to: - Death -Duplication - Relocation - Caregiver turns 70 (OPCT) -Upon request -Wrong entry - Adolescent attains 18 years - NICHE pregnant woman attains EDD, NICHE child attains 3 years	1. Mentor/Mentor Supervisor/BWC/ CHV reports exit. 2. Officer verifies reason (e.g., death cert). 3. Update logged in EGCM. 4. Respective Programme me officer confirms required documentation is attached as per policy and effects update 5. Updates to follow respective Programme me processes. 6. Feedback provided.	- Case management form - Death cert/burial permit - ID (if applicable)	3 days (lodging) + Programme me SLA	CCTP,NICHE, ADOP

Exit of Beneficiary/Partici pant//Household	Due to: - Double-dipping - Death - Inclusion error	1. Programme me officer investigates. 2. Update logged in EGCM. 3. Respective Programme me officer confirms required documentation is attached as per policy and effects update 5. Updates to follow respective Programme me processes. 6. Feedback provided.	- Case management form - Death cert/chief's letter - Original ID	3 days (lodging) + Programme me SLA	CCTP MIS, HSNP, EIP
Account Number Update (HSNP)	Needed if: - No account at PSP - Wrong account details - Stipend sent to personal account	 Programme me officer verifies HH details. Respective Programme me officer confirms required 	- PSP alert - Account slip - ID copy - County Drought Coordinator authorization	3 days (lodging) + Programme me SLA	HSNP

instead of Programme account	documentation is me attached as per policy	
	3.PO effects update which goes through the approval work flows	
	4.Programme me manager/CDC sends the beneficiary to PSP for account opening	
	5. Recipient opens new account → PSP informs Programme me.	
	6. The Programme me receives the updated details (Account number) and updates the HSNP	

		MIS accordingly 7. Feedback provided to the beneficiary			
HH Geo-Location Correction/Reloc ation	Wrong mapping or permanent relocation.	1. HH reports to the new jurisdiction's officer. 2. Documents verified. 3. Update logged in EGCM. 4. Respective Programme me officer confirms required documentation is attached as per policy and effects update 5. Updates to follow respective Programme me processes. 6. Feedback provided.	- Case management form - Chief's letter - ID copy	3 days (lodging) + Programme me SLA	CCTP, EIP, NICHE, HSNP, AdoP

Death of Beneficiary	Beneficiary reported deceased.	1. Caregiver/HH provides death proof. 2. Officer logs update in EGCM. 3. Respective Programme me officer confirms required documentation is attached as per policy and effects update 4. Updates to follow respective Programme me processes. 5. Feedback provided.	- Case management form - Death cert/burial permit - ID copy	3 days (lodging) + Programme me SLA	CCTP, EIP, HSNP, NICHE, AdoP
Phone Number Update	Recipient requests number change.	1. Done at Safaricom shop/Safaricom dealer shop. 2. Field Officer can also update via USSD. 3. Recipient must:	- Original ID - New preferred mobile number - Enrollment number -	24 hours	ССТР

		- Present original ID - Dial *222# to activate. 4. eCitizen updates CCTPMIS.			
Reinstatement	Reactivation after erroneous exit.	1. Beneficiary provides proof of life (in-person verification). 2. Officer logs update in EGCM. 3. Respective Programme me officer confirms required documentation is attached as per policy and effects update 4. Updates to follow respective Programme me processes. 5. Feedback	- Case management form - Current full photograph of beneficiary - Officer's confirmation letter	5 days	CCTP

	provided.		

2.10 Grievances, Complaints categories and their respective SLAs

Table 5: Registration & Mobile Wallet Issues

Complaint Type	Reporting Channels	Resolution Process	Responsible Parties	SLA	Feedback Channel
Unable to register a line	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Document case & escalate to Safaricom	Sub- County/County/Re gional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	2 days	Email, Phone calls
*222# Activation Errors	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Verify status in CCTPMIS Safaricom to Whitelist number	Sub- County/County/Re gional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	2 days	SMS, Calls

Wrong Activated		Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	1. Delink via *222# + 2. Beneficiary activate preferred line via *222#	Sub- County/County/Re gional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Instant	SMS
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Table 6: Payment Processing

Complaint Type	Reporting Channels	Resolution Process	Responsible Parties	SLA	Feedback Channel
Zero Balance	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	 Check payroll Query status in CCTPMIS Verify ministatement 	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Immediate	SMS
Cash-Out Failure	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	1. Check airtime/system status	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	24 hours	SMS

Overpayment	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Investigate Investigate Investigate Investigate Investigate in be recovered in subsequent payment cycle	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	1 month	Calls
Underpayment at Agent	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Investigate & rectify	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	24 hours	Calls
Delayed Transaction	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Troubleshoot/Resolv e	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	24 hours	SMS/Calls
Funds Clawed Back	Sub- County/County/Region al/National DSA, SPS,	·	Sub- County/County/R egional/National	Case-by- case	SMS/Calls

	DCS, DSD, NCPWD, NDMA offices, PSPs Email, SMS, Letters	next targeting	DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs		
Missed Payments	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs Email, SMS, Letters	Verification and reconciliation.	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	inclusion in Next payroll	SMS/Calls

Table 7: Card and Account Related

Account not opened/					
activated	Sub-	Troubleshoot/Resolve	Sub-	24 hours	SMS/Calls
Account balance not	County/County/Re		County/Count		
provided	gional/National		y/Regional/Na		
Unfunded /	DSA, SPS, DCS, DSD,		tional DSA, SPS,		
underfunded	NCPWD, NDMA		DCS, DSD,		
accounts	offices, PSPs		NCPWD,		
Card not issued			NDMA offices,		
Card not replaced			PSPs		
Account Closed					
Card not activated					
Account made					
inactive					

Account made			
dormant			
Card not received			
Account balance not provided			

Table 8: Technical System Failures

Complaint Type	Reporting Channels	Resolution Process	Responsible Parties	SLA	Feedback Channel
Network Issues	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices,, PSPs		Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	24 hours	SMS/Calls
Failed BIOS	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs		NRB +Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices,	14 days	Calls

			PSPs		
Poor Network Coverage	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Network optimization	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	24 hours	Calls/SMS
Mini-Statement Not Received	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Resend or troubleshoot	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	1 hour	Calls/SMS
Barred/Locked Line	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Unlock line	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	1 hour	Calls/SMS

Table 9: Fraud & Misconduct

Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs, Security Agencies	Investigate & log in as EFC in CCTPMIS/EGCM		14 days	Calls/SMS
Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs, Community Leaders	Case investigation & Change of Caregiver		5 days	Calls/SMS
Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs	Investigate & penalize agent	Sub- County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices,	Case-by- case	Calls/SMS

	PSPs	

Table 10: Targeting & non case Complaints

Complaint Type	Channels	Resolution Process	Responsible Parties	SLA	Feedback Channel
Inclusion/Exclusi on Errors	Sub- County/County/Region al/National DSA, SPS, DCS, DSD, NCPWD, NDMA offices, PSPs Email/SMS/Calls Letters Call, Centre 1533 Chiefs/Asst. Chiefs	 Complaint raised 2. EGCM Form filled → 3. Captured in EGCM module → 4. Respective Component Officer resolves 	County/County/R egional/National DSA, SPS, DCS, DSD, NCPWD,	20 Working Days	Calls/SMS/Email
Gender-Based Violence (GBV) Sexual Exploitation & Abuse (SEA) Discrimination (VMG/Gender/Di	Sub-County Social and Children officers, Gender officer, E and S focal person, Toll free line 1195 for GBV	\rightarrow 2. EGCM Form filled \rightarrow 3. Captured	+ Gender officers, GBV service		Calls/SMS/Email

sability)				
Violence Against children	DCS, 116	Complaint raised → 2. EGCM Form filled → 3. Captured in EGCM module → 4. Escalated to relevant agencies	7 working days	Call/sms/Email

2.11 Process Flow

- a) The concerned party raises the complaint / allegation for resolution.
- b) A standard EGCM Case / Non case Management Form is used to manually record all the complaints.
- c) The Programme Officer captures the case onto the EGCM module whereby it is channeled to the EGCM common tray.
- d) The respective component G & CM officer will pick the case for resolution using their case resolution mechanism. If the case is resolved, the beneficiary / caregiver gets an SMS of resolution and next steps where necessary. If the case is not resolved it is forwarded to the County Coordinator (ML&SP) / Programme me Manager (HSNP).
- e) Once the County Coordinator (ML&SP) / Programme me Manager resolves the case the beneficiary / caregiver receives an SMS on case resolution.
- f) If the case is not resolved, it is escalated to the National Office for follow up and resolution
- g) The complainant is free to resort to judicial recourse if they are not satisfied at any tier

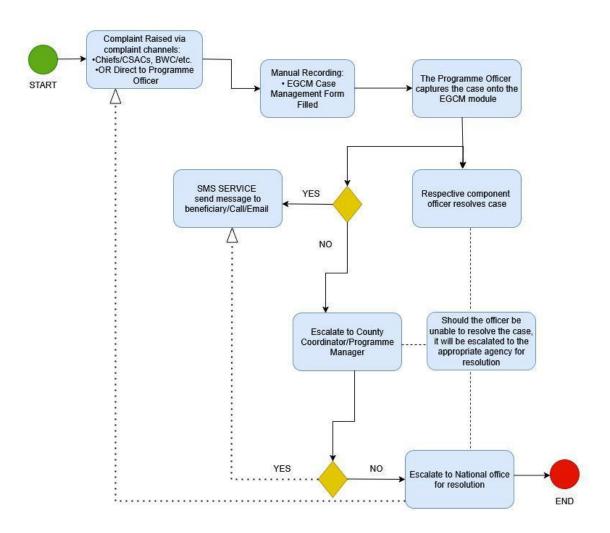


Figure 3: Process flow

SEAH/VAC COMPLAINTS PROCESS FLOW

Kenya has numerous organizations and centers providing support to Gender based Violence (GBV)/VAC Survivors. These include hotlines, Counselling services, legal aid and Psychosocial support. This process ensures that all SEAH cases are reported through confidential and safe channels and treated with sensitivity. Once reported/ SEAH complaints are prioritized, immediately escalated, and referred to the appropriate service provider. GBV service provider mapping will be undertaken in all Counties to update the list and this will be done in consultation with County and Sub- County teams to incorporate service providers at the local level. (The list of GBV/VAC service Providers has been annexed) (annex 2).2.11.1 Process Flow for SEAH and VAC Complaints in the EGCM

- The complainant will notify the community structures or the E & S Focal Persons at the respective level. The information to be collected from the person reporting will include:
 - (a) Age and gender
 - (b) Nature of the complaint in the survivor's own words
 - (c) Whether the perpetrator was known to him/her and is related to the project
 - (d) Whether any services were offered

If the case is reported to community structures, the receiving party should refer for services depending on the nature of case and report the same to the E and S focal person as soon as possible.

- The E and S focal person will organize for any required emergency support and concurrently refer the case to a reputable VAC /SEA/SH service provider.
- The service provider will inform the Sub County or county E and S focal
 person on the gravity of the case. For serious cases, the sub
 county/County focal person should contact the National Focal Person
 within 48 hours.
- •
- The E & S focal person notes the resolution and closes the case and notifies the Grievance officer at the PIU Upon resolution, the Focal Point and SEA/SH /VAC Services Provider will advise the survivor that it has been closed..
- The survivor can also track the case via a case. tracking number generated via EGCM.

2.12 EGCM for Workplace

EGM for workplace will apply to all project workers as described in the Project Labour Management Procedures 2024. The Project worker include: Project Management Unit; Implementing Ministries, County Governments, Departments and Agencies; consultants and contractors (Casuals, mentors); primary supply workers and; community workers (CHPs, CPVs, LVC, and BWCs). Typical work place grievances include demand for employment opportunities; labor wage rates; delays of payment; disagreement over working conditions; health and safety concerns in work environment and GBV/SEA/SH.

All Direct Worker under the Programme will continue to utilize the available GM as provided for in the Human Resource Policies and Procedures Manual for the Public Service (Part V). As much as possible, the Public Officers will report their complaints to their supervisors or escalate to high level including Human Resource Offices for their respective institutions. Community Workers who are aggrieved by the Project will as much as possible direct their concerns to the Sub-County Officers under their jurisdiction. If the Community worker is still dissatisfied or the complaint concerns the Sub-County Officer, he or she can report to the County Coordinator, Regional Office, Project EGM (including the Toll Free Line 1533) at the National level whichever is preferred.

On SH raised by workers will be recorded with the actions taken by each concerned entity. SH cases affecting or concerning project workers will follow the procedure described for SH incidents as described under section 2.11.1.

The aggrieved worker may wish to escalate their issues or raise their concerns anonymously to a level beyond their immediate supervisor.

2.13 Data privacy and Protection

All information captured through the EGCM is treated with strict confidentiality and is managed in accordance with the Data Protection Act, 2019, as well as KSEIP-specific data security protocols.

Section 3: EGCM COORDINATION AND IMPLEMENTATION STRUCTURES

3.1 National Steering Committee

- KSEIP II Project Steering Committee chaired by Principal Secretary for State Department for Social Protection and Senior Citizen Affairs. Member refers to POM.
- KSEIP II Project Steering Committee chaired by the Head of NSPS.
 Member refers to POM

Role of National Steering Committee

 Responsible for oversight of EGCM, Policy Direction and Accountability of the EGCM delivery

3.2 EGCM Technical Working Group (EGCM TWG)

The TWG will comprises of the following members drawn from the following Directorate/Institutions:

- National Social Protection Secretariat
- Directorate of Social Assistance
- State Department for Children Services (Directorate in charge of CT-OVC/NICHE// AdoP (To be agreed the best to use)
- Directorate of Social Development
- National Drought Management Authority
- National Council for Persons with Disabilities
- NSSF
- EGCM Focal points.

The roles and responsibilities of the EGCM Technical Working Group

- 1) Develop and disseminate the EGCM Operations Guidelines
- 2) To undertake institutional infrastructural need assessment related to EGCM
- 3) To organize capacity building for the stakeholders
- 4) Monitor the rollout and implementation of the EGCM
- 5) Liaise with external stakeholders on implementation EGCM
- 6) To review quarterly EGCM reports and share with management.
- 7) To ensure review and updating EGCM operational guidelines
- 8) Ensure that risk assessment on EGCM has been carried out.
- 9) Ensure integration with other systems from line ministries
- 10) Ensure compliance with EGCM by all KSEIP II components
- 11) Explore possible areas of EFC and recommend mitigation measures.
- 12) Investigate and resolve all EFC related issues.
- 13) Refer all EFC issues to relevant government agencies.
- 14) Provide legal and compliance advise.
- 15) Advise on risk management.
- 16) Training and awareness creation on EFC matters.
- 17) Report to the Principal Secretary on EFC matters in the Programme me

3.3 Regional Level

The regional coordinators will oversee the implementation of EGCM at the Regional level

3.4 County Technical Working Group

EGCM will utilize the already existing County Technical Working Groups in the Counties. These shall be reconstituted to include KSEIP Programme

The core members include:

- County Commissioner Chairperson.
- County Coordinator, DCS.
- County Coordinator, DSD.
- County Disability Services Officer, NCPWD.
- County Drought Coordinator (NDMA).
- Representative of the County Government Officer (CCs) responsible for Social services
- Representatives of VMGS (applicable where minority VMGs are present) communities in the county
- County gender officer
- County E&S focal point

Co-opted members are:

- Representative from the Department of Health.
- Representative from Kenya National Bureau of Statistics (KNBS).
- Representative from the Department of Education.
- Representative from the Department of Registrar of persons.
- Representatives from NGO, CBO and FBO.

Roles of County Operational structure/Technical Working Group

- a) Oversee implementation of EGCM at County level
- b) Resolve Escalated complaints from the Sub County
- c) Resolve cases presented to them at the County level
- d) Initiate case updates (Disability Services Officers)

3.5 Sub-County EGCM Technical Working Group

The Sub County EGCM technical working group will assist in Programme me implementation and act as a link between political leaders and the community.

Composition:

The Sub County EGCM technical working group constitutes representatives of the elected members of parliament and will comprise of the following members

- Deputy County Commissioner (Chairperson).
- Sub-County Social Development Officer.
- Sub-County Children's Officer.
- Programme Officer (NDMA)
- Sub-County Education Officer.
- Sub-County Registrar of Births and Deaths.
- Sub-County Registrar of Persons.
- Sub-County Medical Officer of Health.
- Three nominees of the Member of Parliament (at least one must be a youth).
- Two nominees of the Women representatives (at least one must be a person with disabilities).
- Two religious representatives from dominant denominations in the constituency.
- Representatives of VMGS (applicable where minority VMGs are present) communities in the county
- Representative of PWDs.

Roles of the Sub-County Technical Working Group

- a) Follow up on resolution of grievance or case management issues on all KSEIP components.
- b) Provision of necessary documents for case management.
- c) Sensitization and awareness creation of beneficiaries and stakeholders on KSEIP Programme
- d) Provide oversight on Programme me implementation and ensure Programme me transparency.

3.6 Community Structure

Chiefs, Assistant-Chiefs / BWCS /Lay Counselors/Mentor/ Child Protection Volunteers (CPV)/ Community Health Promoters (CHP)/Community Health Assistant (CHA), Faith-Based Leaders, EIP-Plus Facilitators, Village Elders and Opinion Leaders

Roles

- a) Act as a link between the beneficiaries/participants and Programme officers through receiving complaints and update requests from the beneficiaries and forward to the Programme officers. Pass Programme information to beneficiaries/participants information.
- b) Distribution of IEC materials.
- c) Act as champions for EGCM.

SECTION 4: KEY STAKEHOLDERS AND THEIR ROLES

There are several key stakeholders involved in the implementation of the EGCM. These are

4.1 Directorate of Social Assistance (DSA)

DSA is the coordinator of the Inua Jamii Programme. The EGCM will allow case management, complaints and grievances for Inua Jamii to be captured by any of the officers under the KSEIP Programme and assigned to the respective Programme Officer for resolution.

4.2 National Social Protection Secretariat (NSPS)

The NSPS is the coordinator of the KSEIP Programme me. It has a database of poor and vulnerable HHs in Kenya. The EGCM will allow case management for ESR to be captured by any of the officers under the KSEIP Programme and assigned to the respective Programme Officer for an update on the poor and vulnerable households.

4.3 State Department for Children Services (SDCS)

The DCS implements the Nutrition Improvements through Cash and Health Education (NICHE and pilot The Adolescent Program (AdoP)

The EGCM will allow case management for NICHE, ADOP households to be captured by any of the officers under the KSEIP Programme and assigned to the respective Programme Officers for resolution.

4.4 Directorate of Social Development (DSD)

The DSD implements the Economic Inclusion Programme me (EIP) which is a graduation Programme. The G&CM for EIP is done via CCTP MIS G&CM module where the field officers upload the cases and escalate for resolution to the National team. The enhanced GCM will allow case management for EIP households to be captured by any of the officers under the KSEIP Programme and assigned to the respective Programme Officers for resolution.

4.5 National Drought Management Authority (NDMA – HSNP)

The NDMA is the coordinator of the Hunger Safety Net Programme (HSNP). HSNP has a Case Management System (CMS) through which the Programme me handles updates, complaints and grievances. The CMS process involves several stakeholders (Chiefs, Programme Officers, Programme Manager and Case Managers). The enhanced GCM will allow case management for HSNP households to be captured by any of the officers under the KSEIP Programme and assigned to the respective Programme Officers for resolution.

4.6 National Council for Persons with Disabilities (NCPWD)

The NCPWD jointly with the DSA coordinates implementation of the Persons with Severe Disabilities Cash Transfer (PWSD-CT). The Disability Service Officers (DSOs) and the Sub-County Social Development Officers (SCSDOs) lodge the cases to the CCTP MIS for resolution and feedback to beneficiaries.

4.7 Commission of Administrative Justice (CAJ)

The CAJ plays a vital role in addressing complaints and grievances related to maladministration, abuse of power, unfair treatment, or delays by public institutions involved in the project. CAJ investigates such complaints, recommends corrective actions, promotes fair administrative practices, and ensures that project-affected persons receive transparent and accountable service delivery from government agencies.

4.8: National Gender and Equality Commission.

The National Gender and Equality Commission (NGEC) addresses complaints and grievances by investigating discrimination cases, offering legal advice, facilitating redress through mediation or referrals, and monitoring compliance with equality laws to protect the rights of marginalized groups.

4.9: Registrar of Persons.

Registrar of Persons plays a key role in handling complaints and grievances related to identity verification and civil registration. This includes resolving issues such as delays or errors in the issuance of identification documents, correcting personal data, addressing cases of exclusion from project benefits due to lack of documentation, and ensuring that all individuals especially vulnerable groups have equal access to registration services essential for project participation and accountability

4.8 Kenya National Human Rights Commission (KNHRC)

The Kenya National Human Rights Commission (KNHRC) is a national, independent non-governmental organization that promotes and protects human rights in Kenya. KNHRC plays a supportive, oversight, and advocacy role in the Grievance Redress Mechanism (GRM)

4.9: Huduma Centres.

Huduma Centres serve as accessible public service hubs where citizens can lodge complaints and grievances related to service delivery, including delays, exclusions, or mistreatment by government agencies involved in the project. They facilitate the resolution process by receiving and forwarding complaints to relevant departments, offering feedback mechanisms, and ensuring timely responses, especially for vulnerable or marginalized populations who may face barriers in accessing project benefits.

5.0 E and S Focal Persons

The County and Sub County officers will act as the focal persons for E&S, SEAH GBV AND VAC cases. Their roles will includes;

- Coordinating the implementation of environmental and social standards including the EGCM at the county and sub-county levels.
- Ensuring compliance with the Environmental and Social Commitment Plan (ESCP) and relevant safeguards.
- Supporting grievance redress mechanisms and monitoring the resolution of complaints as reported in the EGCM.
- Providing technical input and support to sub-project screening, risk classification, and implementation to prevent, respond to or mitigate complaints and grievances.
- Capacity build, train and raise awareness on environmental and social standards including EGCM.
- Reporting on environmental and social performance to the national-level safeguards team
- Monitoring the KSEIP 2 programs at the respective levels.

SECTION 5: MONITORING, EVALUATION AND REPORTING

5.1 Monitoring

Monitoring and evaluation of the EGCM are integral to KSEIP's continuous improvement process. The system tracks performance against established indicators through monthly, quarterly, and annual reports. Feedback loops and independent audits are used not only for accountability but also to inform adjustments in service delivery.

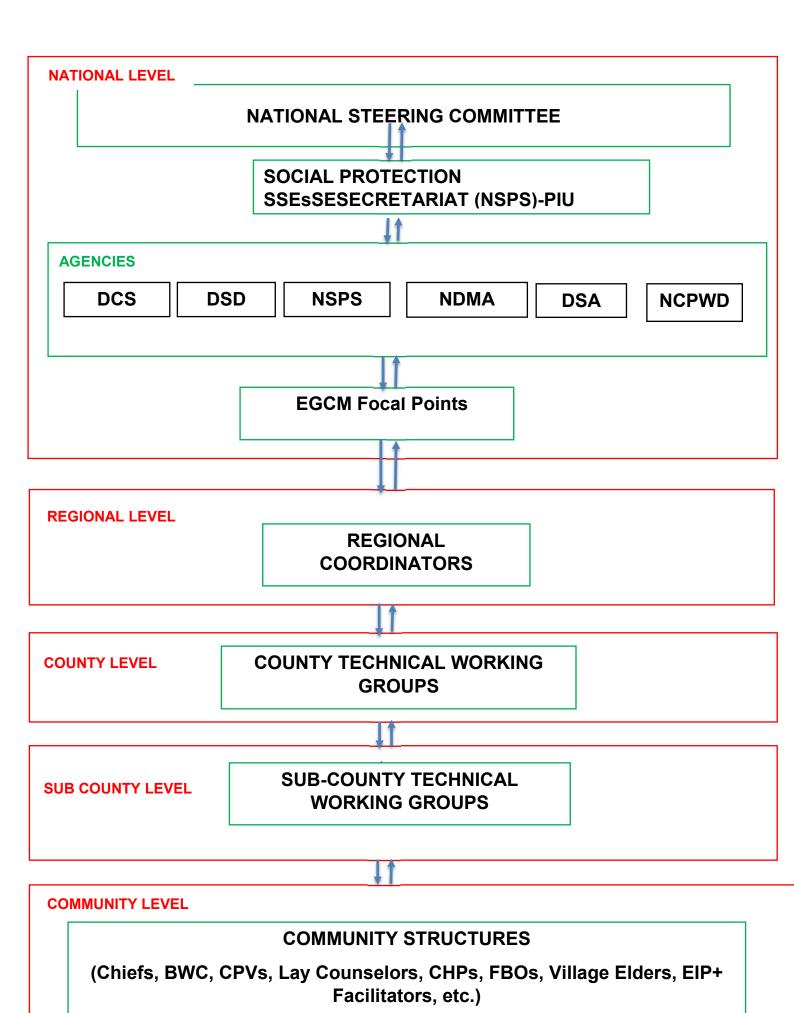
Monitoring and Evaluating of EGCM will progressively cover implementation and service delivery processes of the EGCM. This will involve the assessment of the Programme efficiency and effectiveness and further document success, impacts and of lessons learnt to aid in coordination and Programme decision-making. The EGCM tracking of performance will be incorporated in the M and E for the implementing components. The tools for routine data collection on different components will incorporate EGCM indicators. A compiled report will be shared to the NSPS on quarterly basis.

5.3 Reporting on EGCM

The report presents a comprehensive picture of the situation of beneficiaries and the progress of eGCM implementation. Reporting on the EGCM will be done for purposes of accountability and transparency which will enable policymakers and stakeholders to make informed decisions and corrective action to be taken on EGCM implementation.

Regular monitoring and reporting mechanisms will be established through the EGCM Management Information system (MIS) to track the status of grievances

- Directorate of Social Assistance will lead in the monitoring and reporting
 of EGCM in collaboration with the SDSP Planning Department. However,
 the Directorate of Children's Services (DCS), Directorate of Social
 Development (DSD), and NDMA will also undertake programme specific
 monitoring and evaluation. Reports will be provided to the PIU. Monthly,
 Quarterly, and Annual Reports summarizing grievances received,
 resolved, and pending.
- **Feedback Loops:** data will be used to improve service delivery and address systemic issues.
- **Independent Audits/Reviews:** To ensure integrity and transparency in arievance handling.
- Adjustments; Based on monitoring and feedback, adjustments are made to improve the GM's



The following three screenshots explain how EGCM can be used by people (beneficiaries and non-beneficiaries) to register or track their cases in simple steps.

Case Registration through online EGCM portal

Easy to use online portal (3 clicks and some text – try it on your phones)

- Type in the browser and click go: https://egcm.inuajamii.go.ke:5100/
- · The page on the top right opens up
- Click on the Lodge a complaint and the complaints page (bottom right) opens up
- Select Anonymous/non -anonymous option





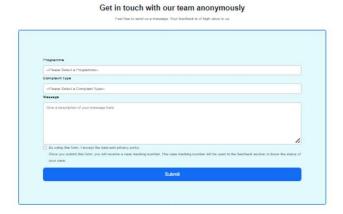
Case Registration through online EGCM portal

- In case of non -anonymous complaint:
- · Personal details are also taken
- Select program name, complaint type and write the complaint in the box
- Submit the complaint and get a tracking number for feedback



Case Registration through online EGCM portal

- In case of anonymous complaint:
- Select program name, complaint type and write the complaint in the box
- Submit the complaint and get a tracking number for feedback



Annex 1: Case Management Form



ENHANCED GRIEVANCES AND CASE MANAGEMENT



CCTP = EIP = HSNP = NICHE = ESR =

Case and Non case Management Updates and Complaints and Grievance Form

<u>This form provides for launch of complaints and updates in anonymous or non-anonymous state. To report anonymously</u>

<u>"SKIP" section A. To report Non-Anonymously fill sections A to F</u>

A. Basic Information	l				
Programme No/HH	ID)				
CURRENT BENEFICIA	RY: Name (In Full)	I.D. No	Sex	Phone	
No	(Personal □ Family Membe	er's □ Neighbor's□)			
CURRENT CAREGIVE	R: Name (In Full)	I.D. No	Sex	Phone	
No	(Personal □ Family Membe	er's □ Neighbor's□)			
NON-BENEFICIARY:	Name (In Full)	I.D. No	Sex	Phone	
No	(Personal 🗆 Family Membe	er's □ Neighbor's□)			
B. Request for Progre	amme Updates:				
(Please select □ Upo	dating information of Current	Recipient/Caregiver OR□Re	equesting for Cha	ange of Recipient/Care	giver)
	y: □ New Household Membe Changes (Specify) □	r □ Exit of Household Member	□ Exit of Househ	old □ Correction of det	ails□.

(Name as per the ID	card)			
	Middle Name		NameID	
	Account Number			
County	Constituency	Location	Sub	
location	Village	Phone	Neighbour's Phone	
Details / Reason for (Change:			
C. Complaints on Ba	ink Operations:			
☐ Agent issues:	Agent Name	Shop Name		
			ent	
), Underpayment (Amount:), 🗆
Forced Purchase 🗆 A	Agent is Out of Service □ Agent re	efused to pay	,	,
	nt in the area is not serving \square Pay	• •	Give approximate distance in	
_	alance not confirmed on request	•		
,	·			
□ Branch issues:	Officer Name	Branc Branc	h Name	Date
of incident				
□ Account	not opened □ Card not delivered	ed □ Card not replaced □ .	Account not activated □ PIN not	issued □
Forced to pay comr	nission (Amount), 🗆 Unde	erpayment (Amount:	_)	
· ·	•	• •	I Account closed □ Account mad	de inactive
	ormant 🗆 Money lost from accou	•		

D. Complaints on other Prog	ramme Operations:			
□ Inclusion Error: HH Membe	er Name		Location	Sub-
location	Village			
□ Household Missed Registro	ation: Name		Location	Sub-
location	Village			
□ Village Missed Registration	n: County	Constituency	Sub-	
CountyLoc	cation	Sub-		
locationVillag				
·	•	□ Recipient not char	nged □ Address not	updated □ Feedback never
received □ Quality of Service	ce			
□ Others (Specify)				
Give a brief description of th	ie Compiaini/Grievan	ice		
E. Complaints on Social and	d Environmental Risks:			
First Name	Middle Name_	Las	t Name	I.D. No
Sex Phone No	(Persono	al □ Family Member's	□ Neighbor's□)	
Comunity	_Location			
□ GBV (Gender Based Viole	nce)			

□ VAC (Violence Against (Children)			
□ VMG Inclusion				
□ Security Concerns				
□ Environmental Concerns	;			
□ Labour & Employment re	elated issues			
□ Health and Safety Conc	erns			
□ Others (Specify)				
Give a brief description of	the Complaint/Grievance			
F. Form Filled by:				
·	Middle Name	Last Name	ID	
	 Organization			
	Sub-Location			
	 Date			
Signatures :				
•				
ID Numbers :				

	Original Recipient	New Recipient/Caregiver	Chief/ Assistant Chief	BWC
Programme office	er Other			