KENYA GREEN AND RESILIENT EXPANSION OF ENERGY (GREEN) PROGRAM

P180465

BATTERY ENERGY STORAGE SYSTEM (BESS) PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

KENYA ELECTRICITY GENERATING COMPANY PLC

October 2023

LIST OF ABBREVIATIONS AND ACRONYMS

BESS	Battery Energy Storage System
CBOs	Community Based Organizations
CEC	County Executive Committee
CLO	Community Liaison Officer
E&S	Environment and social
ESS	Environmental and Social Standard
FBOs	Faith Based Organizations
FS	Feasibility Study
GRM	Grievance Redress Mechanism
IPPs	Independent Power Producers
KenGen	Kenya Electricity Generating Company PLC
KeRRA	Kenya Rural Roads Authority
KETRACO	Kenya Transmission Company PLC
KFS	Kenya Forest Service
KPLC	Kenya Power & Lighting Company
KURA	Kenya Urban Roads Authority
KWS	Kenya Wildlife Service
MoE&P	Ministry of Energy and Petroleum
MW	Mega watt of electricity
NEMA	National Environment Management Authority
NGOs	Non-Governmental Organizations
NMK	National Museums of Kenya
PAI	Project Area of Influence
PIU	Project Implementation Unit
PLC	Public Limited Company
SAGAs	Semi-Autonomous Government Agencies
SEP	Stakeholder Engagement Plan
VMGs	Vulnerable and Marginalized Groups
VRE	Variable Renewable Energy
WB	World Bank

Table of Contents

1 Contents

List of Tables

List of Figures

1 PROJECT DESCRIPTION

The Ministry of Energy and petroleum (MoE&P) in Kenya is currently conducting a study on Battery Energy Storage System (BESS) integration to the national grid. The preliminary analysis indicates the need for Battery Energy Storage Systems (BESS) in the grid. The BESS is expected to store the excess energy from geothermal and Variable Renewable Energy (VRE) capacity in the national grid, hence assist in load balancing while offering ancillary services to the grid.

The BESS Component of the GREEN Project phase 2 will be implemented by the Kenya Electricity Generating Company PLC (KenGen) on behalf of the Government of Kenya. The Consultant engaged by MoE&P to study BESS integration to the national grid has recommended installation of the BESS capacity as indicated in the table below.

Table 1: BESS capacity (Source WB study on BESS in Kenya)

Node	2026 MW / MWh	2031 MW / MWh	2036 MW / MWh	2041 MW / MWh
Central Rift	100 / 100	100 / 100	200 / 200	400 / 1,000
Coast	-	100 / 100	400 / 700	300 / 600
Mt Kenya	100 / 100	100 / 100	200 / 200	200 / 200
Nairobi	100 / 100	200 / 200	200 / 200	400 / 1,300
Northern Rift	100 / 100	100 / 100	100 / 100	500 / 500
Western	-	100 / 100	100 / 100	400 / 1,100

The actual site for the BESS project will be determined by the outcome of a Feasibility Study (FS) that KenGen is in the process of conducting. The FS Consultant will suggest the most appropriate site for installing the BESS capacity.

The BESS project has been identified as a possible solution to increased proportion of VREs in the Kenyan power system coupled with considerable level of geothermal baseload capacity which has often resulted in energy curtailment during off peak hours. In addition, the high proportion of VREs in the power system requires enhanced ancillary services to maintain power system stability. On the other hand, the system often experiences firm capacity deficiencies at system peak due to planned and unplanned plant outages, and low wind and solar availability, sometimes leading to load shedding. During such periods the grid relies heavily on expensive thermal generation. Furthermore, sections of the power network experience voltage stability issues arising from long power transmission networks and lack of adequate local generation.

The BESS project is being prepared under the World Bank's Environment and Social Framework (ESF) and its 10 Environmental and Social Standards (ESSs). Per Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

2 OBJECTIVE OF STAKEHOLDER ENGAGEMENT PLAN (SEP)

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Principles for Stakeholder Engagement

To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- ***Openness and life-cycle approach:*** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- ***Informed participation and feedback:*** Information will be provided to, and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- ***Inclusiveness and sensitivity:*** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- ***Flexibility:*** If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication

3.2 Stakeholder Identification

Stakeholders include individuals or groups that may influence or be impacted by the Project directly or indirectly and those who may have interests in a Project and/or the ability to influence its outcome, either positively or negatively.

The stakeholder identification process establishes which organizations and individuals may be directly or indirectly affected (positively or negatively) by the proposed Project, or have an interest in it. To develop an effective SEP, it is necessary to determine exactly who the stakeholders are and understand their priorities and objectives in relation to the BESS Project. By classifying and analyzing the stance, influence, capacity and interests of stakeholders, it is possible to develop an SEP that is tailored to the needs of different stakeholder groups.

Project stakeholders can be grouped into the following categories:

- Affected parties;
- Other interested parties; and
- Vulnerable and marginalized groups (VMGs).

3.2.1 Affected Parties

Affected Parties are persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. For a BESS Project \located within a rural set-up, some of the affected parties include:

- The local community within/near the Project site
- Private Sector & Economic Groups (Pastoralists, Traders)

In case the BESS project will be located within an urban area, some of the affected parties include:

- Businessmen/women
- Landlords & Tenants
- Service providers

3.2.2 Other interested parties

- Other Interested Parties are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. These are:
    - World Bank,
    - NGOs/CBOs/FBOs,
    - Independent Power Producers (IPP),
    - Academia
    - Media,
    - surrounding communities,
    - Local opinion leaders (Community leaders, Community Council of Elders)
    - Political Leaders (Governor, Senator, Women Representative, Area MP, Member of County Assembly)
    - Government Ministries, Departments & Agencies including Semi-Autonomous Government Agencies (SAGAs): Ministry of Energy & Petroleum, NEMA, KWS, KFS, National Museums of Kenya, KeRRA, KETRACO, KPLC, KURA
    - National Government Administration (Regional Commissioner, County Commissioner, Deputy County Commissioner, Assistant County Commissioner, Area Chiefs, Area Assistant Chiefs, Village Elders, Nyumba Kumi)
    - County Government Executives and Administrators (CEC-Energy, CEC-Environment, CEC-Social Development, County/Ward Administrators).

3.2.3 Vulnerable and Marginalized Groups

Vulnerable and Marginalized Groups (VMGs) are persons, groups or communities who may be disproportionately impacted or further disadvantaged by the Project(s) compared with other communities due to their minority status, language and/or socio-cultural identity, gender or age and who may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes associated with the project. VMGs for the Project include: pastoralists communities, hunter-gatherer communities, women headed households; poor widows, youth; elderly, people with disabilities (PWDs), ethnic minority and any other disadvantaged groups that meet the requirements of ESS7. KenGen will identify leaders of the marginalized and vulnerable groups to be partners in stakeholder engagement. Vulnerable groups within the communities affected by the Project may be added in the stakeholder list, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

3.3 Stakeholder Mapping

Stakeholder mapping seeks to understand stakeholders' level of interest in the Project and influence in decision making as well as on other Project stakeholders, and will continue throughout the Project lifecycle. It is also important to note that stakeholder interests and level of influence is dynamic and changes over time; hence the need to periodically update the stakeholder map as well as the wider SEP. Mapping will also help identify stakeholders who may find it more difficult to participate in consultation activities and are affected by or interested in the proposed Project because of their marginalized or vulnerable status .

Stakeholder mapping considers:

- Who is affected by the Project and how;
- Who the formal and informal community leaders are and to what degree they are seen as representative;
- Whether the stakeholder supports, is neutral towards, or is opposed to the Project;
- Each stakeholder's interests and concerns in relation to the Project; and
- How different stakeholders can influence the Project and what risks or opportunities this presents.

According to each stakeholder's levels of interest or impact on the proposed Project, different levels of engagement intensity will be employed. Stakeholders will be mapped using the matrix presented below.

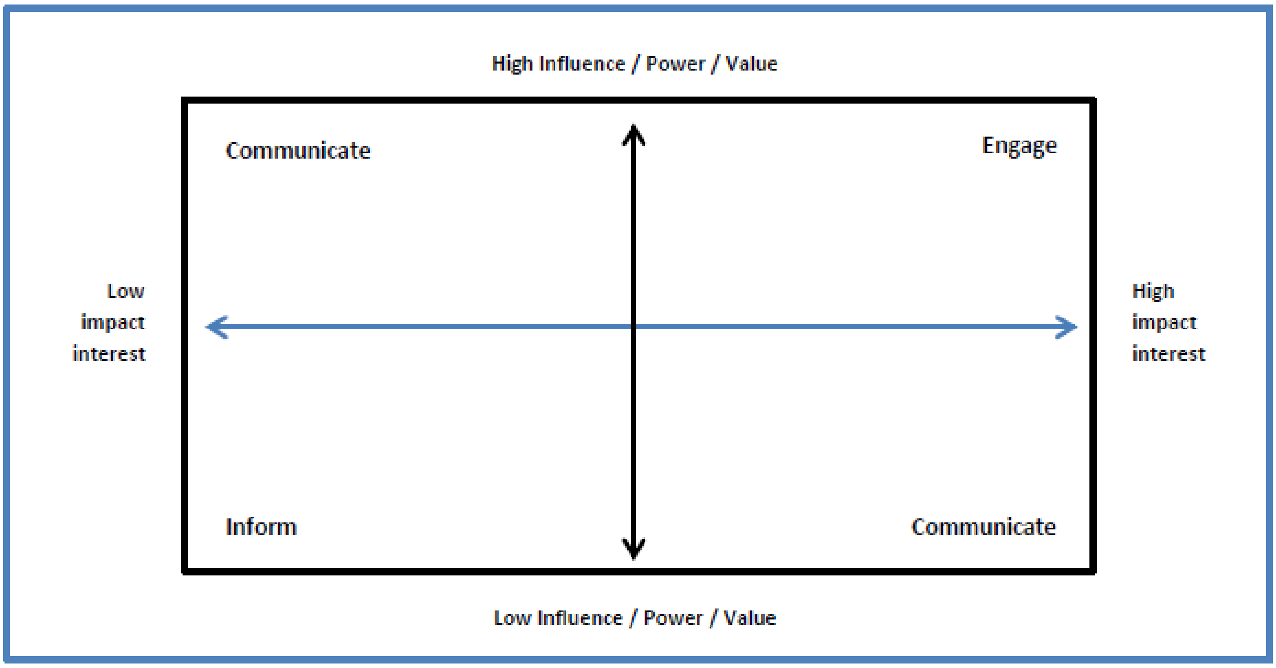

Figure 1: Stakeholder engagement matrix

The outcome of the stakeholders mapping will be considered as a working document to be updated as necessary.

The BESS project definition of impact/interest and influence/power are as described in Table below 2 below.

Table 2: Definition of Impact/Interest/Power

	Impact/Interest axis	Influence/Power axis
High	The stakeholder will experience a high degree of impact as a result of the project (e.g., resettlement, complete loss of livelihood, loss of pasture/water, etc.). **OR:** The project is directly related to stakeholder's institutional field of interest and/or responsibilities.	The stakeholder has decision-making power regarding whether the project will go ahead or not and/or about the adequacy of the ESIA process and/or BESS's mitigation strategies
Medium	The stakeholder will experience some degree of impact, but impacts can be managed and/or mitigated. **OR:** The project or aspect thereof has some relevance to the stakeholder's institutional field of inters and/or responsibilities	The stakeholder can influence the scope and timing of the ESIA and/or BESS's mitigation strategies.
Low	The stakeholder will experience very few effects as a result of the project. **OR:** The project has limited relevance to the stakeholder's institutional field of interest and/or responsibilities.	The stakeholder has very little control over the project.

Figure 2: Definitions for stakeholder Analysis and Mapping

4 Stakeholder Engagement Process/Communication Plan

4.1 Objectives of the Communication Plan

The objective of this communication plan is to define the communication requirements for the Project and how information will be shared. This plan describes the following:

- Information that will be communicated including the level of detail and format;
- How the information will be communicated – face to face meetings, by email, telephone, web portal, WhatsApp, etc.
- When information will be distributed, the frequency of Project communication, both formal and informal;
- Who is responsible for communicating Project information;
- Communication requirements for all Project stakeholders;
- How sensitive or confidential information is communicated and who must authorize this;
- How changes in communication or the communication process will be managed;
- Any constraints, internal or external, which may affect Project communication; and
- The escalation process for resolving any communication-based conflicts or issues.

4.2 Key Issues that should be communicated

The following are some of the important messages that will be communicated to the Stakeholders:

- Background of the Project;
- Project Description;
- Project Activities;
- The potential Project benefits and impacts;
- The process that will be followed to engage with stakeholders;
- The Grievance Redress Mechanism (GRM) for the project; and
- How and when stakeholders can participate in the Project.

4.3 When to communicate

Project communication will be structured and offered regularly but with the flexibility of responding to issues as they emerge. Broadly, stakeholder engagement for the proposed Project has been categorized into preparation and operation engagement activities.

4.4 Communication Methods

A variety of communication methods are used to engage with stakeholders reflecting their level of authority, socio-economic context, and cultural and intellectual factors such as level of education and literacy.

English and Swahili are the official languages of communication in Kenya, especially within the urban set-up. For official/formal project meetings and information disclosure on websites or via emails, English will be the main mode of communication and engagement. However, for rural stakeholders, Swahili will be the main mode of communication and engagement, and as necessary, interpretation to native language will be applied to ensure all stakeholders are able to participate in the subproject decision making processes on issues that affect them.

4.5 Summary of project stakeholder needs and methods, tools, and techniques

Different engagement methods are proposed and cover different stakeholder needs as stated below:

i. Public meetings/ Barazas
ii. Focus group meetings/discussions,
iii. Formal meetings
iv. One-on-one interviews/Key Informant Interviews (KII)
v. Phone/Email/Online meetings
vi. Administering questionnaires
vii. Courtesy calls

Table 3: Summary of methods for informed consultation and participation process

Method	Description	Targeted Stakeholder	Phase
Public meetings (Public barazas)	Forum for providing project information and hosting question and answer session with a large audience. Meetings will be held at community venues which will be easily accessed by all project stakeholders and at convenient times, with sufficient notice. Minutes	Local communities	• Pre-construction (ESIA preparation and disclosure and any other project announcements) • Construction (information disclosure on e.g. employment opportunities and

Method	Description	Targeted Stakeholder	Phase
	and attendance taken in all meetings.		grievance management process)
Focus Group Discussions	Exchange of information with more targeted groups of stakeholders; focus will be on, for example, livelihood, age or gender.	Local communities	• Pre-construction (ESIA preparation and disclosure; data collection for impacts mitigation and planning)
One-on-one and small group meetings (KII)	Meetings with influential stakeholders and those with access to important baseline information.	Government stakeholders, NGOs, CBOs and FBOs	• Pre-construction • Construction/ Implementation (Consultations and ongoing discussions for environmental and social management and monitoring activities)
Phone/Email /Online meetings	Opportunity to ask questions or raise concerns about the project and environmental and social issues in a timely manner	All stakeholders	• Pre-construction • Construction/ Implementation • Operations
Formal Meeting	Meeting with professional experts and other key stakeholders	Professional experts	• Pre-construction • Construction/ Implementation • Operations
Administering questionnaires	To get comments/views about the project	Selected stakeholders	• Pre-construction • Construction/ Implementation • Operations

Attendance sheets, meeting note forms and public meeting notices will be used to support the stakeholder engagement process.

At the local level, notice of meetings will be given at least two weeks in advance through phone calls, emails and visits to community representatives / liaison officers who will share the information with the rest of the community. Suitable days and times for the meetings will be selected factoring in people's work and family commitments; and meetings will be conducted in a culturally sensitive manner.

For engagement with key stakeholders, invitations for meetings will be sent at least two weeks in advance and follow up phone calls with stakeholders will be made to confirm and schedule the meetings.

4.6 Institutional Arrangements for Stakeholder Engagement

Effective stakeholder engagement requires clear lines of communication and effective coordination within the project, between the project and partners, and with stakeholders. The key participants in the management of stakeholder engagement for the BESS project are as outlined in the table below.

Table 4: Stakeholder Engagement Management Team

Management Team	Role/Responsibility
KenGen's BESS E&S Focal Point and Head of the E&S Sustainability Division	• Ensure stakeholder engagement strategy is communicated internally and that E&S staff, resources and systems are in place to enable the SEP to be implemented • Ensure coordination across all stakeholder activities by all parties • Ensure stakeholder database are regularly updated • Assist with communication with key national and local authorities and agencies • Plan and attend key consultation meetings as required • Assist in management of grievance resolution
Construction/ Operations Team	• Ensure the project workforce is briefed in a timely manner about SEP • Plan and attend key consultation meetings as required • Assist in management of grievance resolution. • Report any key developments and incidences of the project on a regular basis
Community Representatives/ Community Liaison Officer (CLO) (reporting to the BESS E&S Focal Point)	• Focal point for communication between the local communities and project management team • Regular reporting to project management officials on engagement and grievances • Implements and monitors grievance mechanism • Records all engagement activities and updates stakeholder database as required
Environmental Health and Safety (EHS)/ Operations Team	• Provide assistance in planning, scheduling and attending meetings arranged when required • Attend stakeholder review meetings as required • Assist in management of grievance resolution

5 STAKEHOLDER ENGAGEMENT PLAN

5.1 Purpose and timing of the Stakeholder Engagement Program

The overall goal of this Stakeholder Engagement Plan (SEP) is to ensure a systematic, consistent, comprehensive and coordinated approach to stakeholder participation and communication throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and the feedback mechanism to be utilized.

The plan will guide timely engagement with key stakeholders as well as dissemination and increased access to relevant project information. The project will innovate ways for consultations to be effective and meaningful to project and stakeholder needs.

5.2 Proposed strategy for information disclosure

To ensure information about the BESS project is accessible to all stakeholders, disclosure will be done in a variety of ways as outlined in Table 3 below.

Information disclosure will be undertaken in culturally appropriate languages and in accessible locations, using culturally-feasible engagement techniques, considering disability, literacy and mobility challenges, in a timeframe that enables meaningful consultations.

Swahili and English have been identified as the main languages for stakeholder consultations and communication materials, as most people within the proposed project area speak Swahili and English. If stakeholders do not speak Swahili, interpreters will be identified during consultations to translate into local languages, as needed. Illustrations and other means of communication will be provided as needed to communicate information to the illiterate.

Table 5: Information disclosure methods

Information to be Disclosed	Method
Relevant Project Information such as project objectives, impacts, benefits etc.	• Information leaflets and brochures distributed at consultation meetings and made available in key public places • Presentations • Posters • Information disclosure to the locals and surrounding communities will be undertaken in accessible locations, using culturally appropriate formats with gender and age considerations, and accessible engagement techniques such as FGDs and public meetings, considering any disability, mobility and literacy challenges. • If stakeholders do not speak Swahili, interpreters will be identified during consultations to translate into local languages as needed.
Project documents including ESIA, SEP, etc.	• Through public consultations/ meetings • Copies of the SEP, ESIA, etc., will be made available in hard copies available to all stakeholders at KenGen, county commissioner's offices, chiefs' offices, NEMA etc. • Electronic versions of the approved ESIA, SEP etc. will be placed in official websites of KenGen and NEMA • Information disclosure will be undertaken in accessible locations using culturally appropriate formats and accessible engagement techniques such as FGDs and public meetings considering disability, mobility and literacy challenges. • If stakeholders do not speak Swahili, interpreters will be identified during consultations to translate into local languages as needed.

Information to be Disclosed	Method
Disclosure of information on project activities and milestones	• Meeting invitations will be sent at least one week prior to meetings • Communication through local authorities in advance of any community meetings. • Notice of meetings (in English, Swahili and Native language) will be placed in locations accessible to all. • Meeting minutes and attendee list will be taken in each meeting. • If stakeholders do not speak Swahili, translators will be identified during consultations to translate into local languages as needed
Disclosure of information on planned stakeholder engagement sessions, such as time, venue and purpose of upcoming meetings, etc.	• Meeting invitations will be sent at least one week prior to meetings. • Communication through local authorities in advance of any community meetings. • Notice of meetings (in English, Swahili and native language) will be placed in locations accessible to all. • Meeting minutes and attendee list will be taken in each meeting. • If stakeholders do not speak Swahili, interpreters will be identified during consultations to translate into local languages as needed.

5.3 Proposed strategy for consultation

Consultations with all identified stakeholders will be undertaken with the aim of creating awareness, improving access to information and receiving/giving feedback on project implementation. The communication channels highlighted above will play a key role in ensuring information flow between implementing entity (KenGen) and its stakeholders. Table 4 below represents the stakeholder consultation plan.

Table 6: Consultation strategy

Project Stage	Information to be disclosed	Target stakeholders	Communication channels	Estimated Period	Responsibilities
Project preparation	Project documents – ESCP, SEP, LMP.	KenGen	Email, intranet, trainings, meetings, website	In person or virtual Within three months after project effectiveness	KenGen World Bank
		Affected and interested parties	Email, website, meetings (in person or virtual)		
	Annual workplan	Affected and implementing parties	Email, website, press	A week after approval by the World Bank	KenGen
Project implementation and monitoring	Monitoring reports on the ESHS performance	World Bank and all other stakeholders	Email, website, meetings	1st report – three months after start of project implementation and subsequent reports quarterly	KenGen
	Project progress reports	All stakeholders	Email, website, meetings	In person or virtual meeting; monthly in the first year, and thereafter, quarterly	KenGen
	Knowledge management and communication products	All stakeholders	Email, website, meetings, social media, posters, banners, leaflets, studies	In person or virtual As and when completed	KenGen

Table 7: Stakeholder Engagement Action Plan

	Target for Engagement	Purpose of Engagement	Engagement Tasks / Methods	Schedule / Frequency	Responsibility	Project Phase
1.	Government and local authorities, regulators and other agencies	Establish and maintain a good working relationship with the various authorities to promote the Project's interests, facilitate compliance and cooperate on issues of material interest to all parties	- Planned communications and liaison with various levels of Ministry / directorates and County / Division authorities - Host regulatory visits and full cooperation during inspections and audits	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc., then as required during Project life cycle)	KenGen / others as designated	Pre-construction / Construction / Operation / Closure
2.	National / international NGOs and academia; local NGOs / CBOs	Provide opportunities for interested parties to obtain information on the Project and its impacts	Regular updates / ad hoc briefings on specific issues / opportunities plus disclosure of specific reports and information on the KenGen website	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc. then as required during Project life cycle)	KenGen management	Pre-construction / Construction / Operation / Closure
3.	Key stakeholders (including lenders)	Seek opportunities for obtaining qualitative feedback on Project - related issues from key stakeholders (e.g. interested parties and/or high influence-power-value contacts)	Meetings, interviews and telephone calls. Can also consider establishing a more formal 'advisory group' for general feedback or on specific issue / material concern.	As required during Project life cycle	KenGen management	Pre-construction / Construction / Operation / Closure

	Target for Engagement	Purpose of Engagement	Engagement Tasks / Methods	Schedule / Frequency	Responsibility	Project Phase
4.	Media	Provide key information to TV / radio / newspaper / on-line media	Provide Press Releases, articles / photographs	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc. then as required during Project life cycle)	KenGen management and PR advisors	Pre-construction / Construction / Operation / Closure
5.	Project affected stakeholders	Sensitization and awareness-raising in relation to Project schedule, activities and impacts	- Undertake community meetings and public barazas to advise on Project progress, brief them on any specific issues (such as heavy construction equipment, electrical safety, increased road traffic, security, potential influx and employment) and explain the grievance procedures - Customized briefings for vulnerable groups	As required by each construction work package - in advance of contractor arrival	CLO/ Consultant as necessary)	Construction
6.	Project affected stakeholders	Sexual exploitation and abuse prevention and mitigation measures, HIV/ AIDS and STD sensitization	- Provide community awareness training ahead of the mobilization of contractor workforces - Collaboration with health authorities / NGOs to support health promotion (other communicable disease, lifestyles, etc.) as well as to respond to SEA cases	- in advance of contractor arrival	Community Liaison office	Construction
7.	Vulnerable groups	Ensure adequate participation in Project activities and access to project	- culturally appropriate meetings with vulnerable groups / individuals, as required to provide subproject information, monitor situation, and	- Minimum 6-monthly during construction /	Community Liaison office	Construction / Operations

	Target for Engagement	Purpose of Engagement	Engagement Tasks / Methods	Schedule / Frequency	Responsibility	Project Phase
		benefits by vulnerable groups and individuals, and monitoring any changes to the level of marginalization or disadvantage of others	if applicable identify additional mitigation measures - Survey / check 'vulnerability status' of stakeholder who have been potentially more marginalised or disadvantaged by the Project - Liaison with relevant authorities and NGOs with a view to developing focused mitigation measures	annually in operations phase		
8.	All affected and interested parties	Provide stakeholders with information on Project progress and performance on matters of material concern including resolution of complaints	- Prepare and disclose brochure on the Project's local stakeholder engagement programme	Separate engagement brochures to be prepared for construction and operations phases	ESHS Manager / CLO	Construction-Operations transition / Operations

5.4 Stakeholder Engagement Tools and Materials

The SEP will be used in conjunction with stakeholder engagement and community relations management tools including:

i. Grievance Redress Mechanism (GRM) which provides a mechanism for communities and affected parties to raise complaints and grievances and allows the BESS project proponent to respond to and resolve the issues in an appropriate manner.
ii. Commitment Register to record any public commitments made by the project proponent or public concerns raised about the project that require action
iii. Engagement Notes Format to ensure that accurate and detailed record of information and views are gathered at every stakeholder meeting and a consultation meeting note will be written.

6 TIMELINE FOR STAKEHOLDER ENGAGEMENT

The SEP provides for procedures and approaches that will be followed during the engagement with the different stakeholders during all phases of the project to ensure the active involvement and participation of the stakeholders.

6.1 Preconstruction Phase

The objectives of engagement during this phase will be to:

i. Keep the local community informed about the nature and purpose of pre-construction activities and further environmental and social studies taking place in the proposed BESS project area, respond to questions or concerns about the proposed BESS project and clarify any unrealistic expectations;
ii. Notify local stakeholders about the expected BESS project start date;
iii. Introduce stakeholders to the grievance mechanism and how it works;
iv. Manage official engagement with local and national authorities in a timely manner in order to achieve the required project permitting schedule;
v. Maintain a record of all consultations and update the stakeholder database.

6.2 Construction Phase

The objective of the engagement during this phase will be to:

i. Continue to provide adequate and timely information about the BESS project; keep local stakeholders updated about the progress of the project; and provide sufficient notice before any major activities take place;
ii. Manage any grievances that may arise as a result of the BESS implementation activities
iii. Track and monitor grievances raised to ensure that all issues are closed out in a timely manner and identify any recurring issue;
iv. Engage both local and national authorities and agencies as required to ensure all necessary permits are maintained up to date;
v. Engage local authorities and national agencies as required on specific environmental and social management and monitoring aspects;
vi. Maintain a record of all consultations and update the stakeholder database.

6.3 Operations Phase

This phase requires minimal engagement. The objectives of the engagement during this phase will be to:

i. Maintain indirect communications with the local community through the area chief and community representatives.

ii. Manage any grievances that may arise as a result of the BESS operation activities.

iii. Engage local authorities and national agencies as required on specific environmental and social management and monitoring aspects;

iv. Maintain a record of all consultations and update the stakeholder database.

7 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

7.1 Resources

The Project Implementation Unit (PIU) at KenGen will oversee all stakeholder engagement activities. The budget for the SEP implementation is KES. 11,338,635 as tabulated in the table below. A Budget for the SEP will be provided to cover costs for organizing engagement activities, sensitization/capacity development, and grievance resolution, among other expenses, amounting to USDxxx as tabulated in the table below.

Table 8: Stakeholder Engagement Action Plan Budget

Budget Category	Quantity	Unit Cost (USD)	Times	Total Costs (USD)	Remarks
1. Stakeholder Consultation					
1a. Organizing for public consultations	100 pax	40	10	40,000	Meeting Venue: tents, seats, & refreshments.
1b. Facilitation fees for Provincial Administrators and local leadership	20 pax	50	10	10,000	Facilitation fee for local administration / village elders etc.
2. Capacity building and Support to Public Awareness Campaign					
2a. Training on social/environmental issues for PIT and E&S team	25 pax	1,500	1	37,500	Training cost
2b. Public sensitization on HIV/AIDs including testing and counselling	250 pax	20	2	10,000	Cost for facilitators, venue, transport etc
Printing/Photocopying				2,500	Printing papers, printers etc
3. Information Materials Development					
Information materials through production of brochures, leaflets, posters among others.				*16,750*	During capacity building BESS project activities

4. Grievance Mechanism					
6a. Training of CRCs committees	20 pax	50	2	2,000	Training costs
Subtotal				**118,750**	
7. Contingency 5% of subtotal				**6,250**	
Total				**125,000**	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET				**125,000**	

7.2 Responsibilities

All project staff will play a key role in the consultation processes through their interaction with the different stakeholders. However, with supervision from the Project Coordinator, Social Safeguards Specialist, the Community Relations Officer and the Environment expert will play a key role in implementing this SEP.

8 GRIEVANCE MECHANISM

8.1 Introduction

The purpose of a Grievance Mechanism is to offer stakeholders an effective avenue for expressing themselves and achieving resolution for their concerns.

The Grievance Mechanism seeks to:

- Provide an equitable and context-specific process which respects the confidentiality of all parties, protects all parties from retaliation and builds trust as an integral component of broader community relations activities.
- Provide a predictable, accessible, transparent, and legitimate process to all parties, resulting in outcomes that are seen as fair, effective, and lasting; and
- Enable more systematic identification of emerging issues and trends, facilitating corrective action and proactive engagement.

The procedure governs how KenGen will receive grievances pertaining to BESS activities. It will capture grievances arising from actual project impacts, as well as issues that are simply perceived to be related to KenGen, irrespective of whether they derive directly from KenGen or contractor activities. Grievances shall be investigated and resolved through a defined series of steps.

This process allows for three stages of resolution. Specifically:

i. Tier 1 (Entry level) procedures define the means through which community-level grievances may be (i) received, acknowledged, and registered by the project; and (ii) how field-level investigation and resolution of grievances will occur.
ii. Tier 2 procedures allow for unresolved grievances to be escalated for further review at the field level.
iii. Tier 3 grievance management, which allows for the grievant to be reported either to the World Bank or to proceed to court if the grievance cannot be resolved to the satisfaction of the grievant and the project, will remain outside the scope of this procedure.

8.2 Minimising Grievances

The following measures are proposed to minimise grievances during project implementation:

i. Information disclosure: The Proponent will ensure that there is continued flow of accurate information regarding the project activities. This will cut down on complaints that mostly arise from misinformation.

ii. Transparency by KenGen especially regarding economic and employment opportunities: The Proponent should ensure there is transparency in terms of available economic and employment opportunities, qualifications and modes of selection to avoid grievances around employment and distribution of available economic opportunities from the locals.
iii. Accessibility of the KenGen's CLO to the community: An active Community Liaison Officer who may also serve as a Grievance Officer (GO) is both the face of KenGen on the ground, and an available link between communities and KenGen. CLO ensures any issues that arise are resolved before they become too serious.
iv. Locally constituted Grievance Management Committee (LCGMC): The members of the LCGMC will be elected by the community within which the project is located.
v. Continued engagement throughout the Project life: This encourages KenGen and host communities' collaboration, and positively impacts project implementation and sustainability.

8.3 Principles of the Grievance Mechanism

This SEP proposes that KenGen operates in line with international best practice for the environmental and social management of projects. This grievance mechanism has been designed in line with the following principles:

- Proportionality: the mechanism is scaled in line with the level of risk and adverse impacts on affected communities.
- Community appropriateness: considering culturally appropriate ways of handling community concerns.
- Accessibility: providing a clear and understandable mechanism that is accessible to all segments of the affected communities at no cost.
- Transparency and accountability: to project affected stakeholders at field (operational) level;
- Appropriate protection: prevents retribution and does not impede access to other remedies.

8.4 Grievance Redress Committee

During the public consultations the community will be sensitized to form a Grievance Committee to acquaint themselves with the implications of the project and be able to articulate their views. They will be informed about how some of the issues that may arise will be communicated and resolved through the committee.

The main function of the committee will be to provide forum for the affected persons or parties to air their dissatisfaction arising from the project implementation process. The committee will be an informal forum to fast-track addressing of emerging issues in a project that can derail a smooth implementation of a project. The Committee is to receive complaints from the PAPs through the project office either verbally or in writing and they endeavor to address the issue to the satisfaction of the complainant.

8.5 Grievance Management Procedure

The Grievance Mechanism is based on a step-by-step procedure for receiving, acknowledging, registering, reviewing, investigating and resolving complaints and grievances from all projects affected stakeholders.

Figure 3: Key steps of the Tier 1 (entry level) grievance management process

8.6 Proposed Grievance Redress Steps

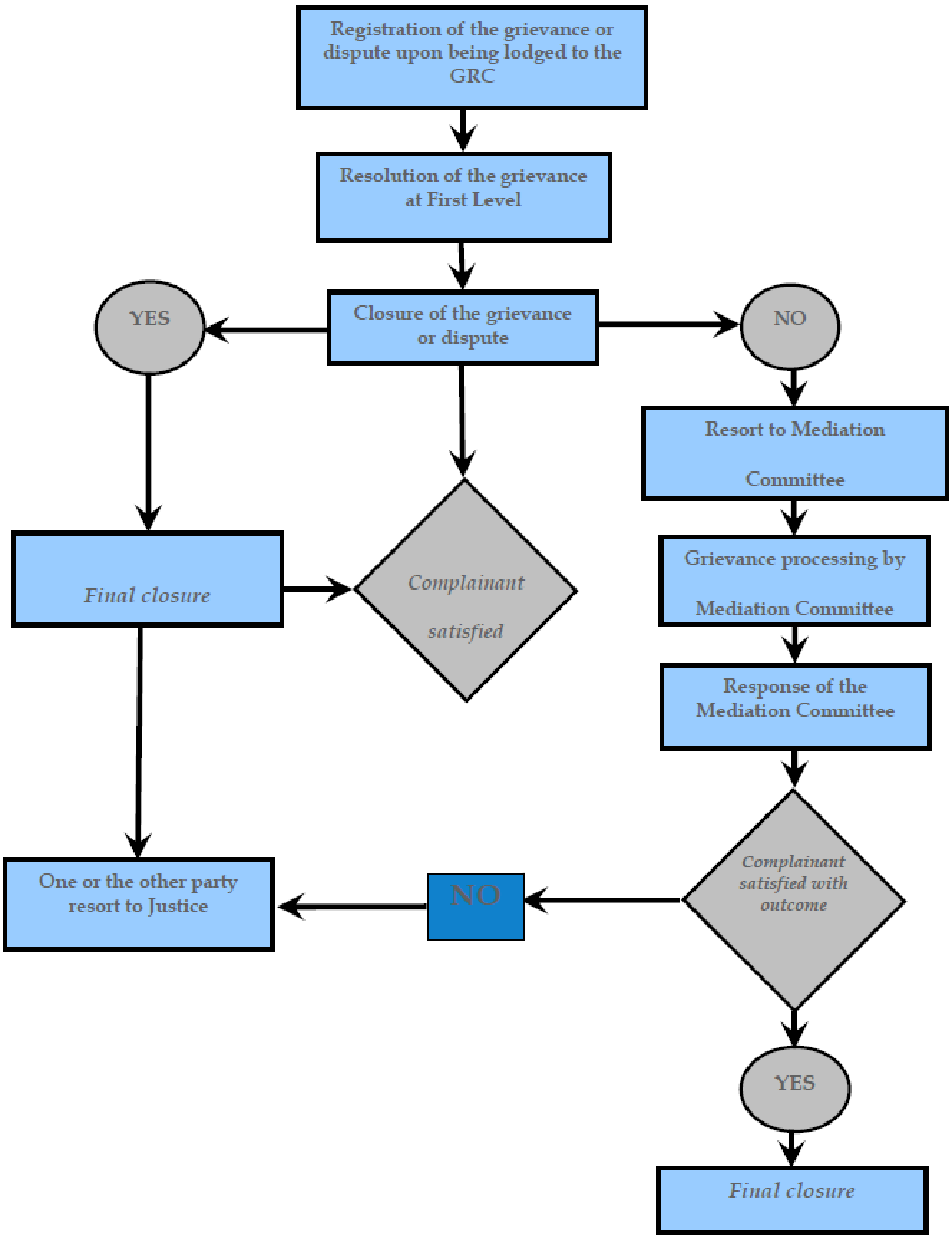

Figure 4: Grievance Redress Flow Chart

8.7 Awareness

GRM will be widely publicized among stakeholder groups such as the affected parties.

9 MONITORING AND REPORTING

9.1 Monitoring

The implementation of the SEP will be monitored on a regular basis. The effectiveness of engagement activities will be evaluated against the goals and objectives set out in the plan. This evaluation will examine the extent to which activities were implemented in accordance with the plan and the extent to which they achieved the objectives defined here.

The Project will monitor the stakeholder engagement activities and in particular:

- The implementation of the SEP;
- The effectiveness of the engagement process in managing impacts and expectations by tracking responses received from engagement activities;
- Consultations and disclosure activities conducted with stakeholders; and
- All grievances received and resolved whether anonymous or non-anonymous.

Performance will be evaluated bi-annually by tracking:

- Place and time of formal engagement events and level of participation by specific stakeholder categories and groups with due consideration for gender disaggregated (e.g., participation in engagement events);
- Numbers and type of grievance and the nature and timing of their resolution;
- Materials disseminated, i.e., type, frequency, and location;
- Number of comments by issue/ topic and type of stakeholders, and details of feedback provided; and
- Community attitudes and perceptions towards the Project based on media reports and stakeholder feedback.

9.2 Reporting

The PIU will develop regular reports (typically quarterly) which will typically be required by the World Bank. The reports will present all activities, including stakeholder engagement activities, for the period and summarize the issues. The report and its annexes will also detail the measures taken to address the issues, timeline of responses, as well as corrective and mitigation measures to address grievances and analysis of trends. Data reported on will include the following activities:

- Information distribution of disclosed materials;
- Public announcements and engagement of media; and
- Disclosure and consultation meetings; and
- Collection and incorporation of comments and feedback.

The SEP will be periodically revised and updated as necessary to ensure that the information and the methods of engagement remain appropriate and effective in relation to the project context. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. Monthly/quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the project.

The monthly/quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner.

ANNEXES

Annex 1: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)

Annex 2: Complaints form

1. Complainant's Details: (Optional)
   Name (Dr / Mr / Mrs / Ms) ____

   ID Number ____

   Postal address ____

   Mobile ____

   Email ____

   County ____

   Age (in years): ____

2. Are you requesting for confidentiality for the information?

   ☐ Yes ☐ No

3. Is there any fear/ risk of retaliation or attack or victimization?

   ☐ Yes ☐ No

4. Which institution or officer/person are you complaining about?

   ____

   ____

5. Have you reported this matter to any other public institution/ public official?

   ☐ Yes ☐ No

6. If yes, which one?

   ____

   ____

7. Has this matter been the subject of court proceedings?

   ☐ Yes No

8. Please give a summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

____

____

____

7.. What action would you want to be taken?

____

____

Signature _______________________________________

Date ____

Annex 3: Grievance Monitoring and Tracking Log (for non-SEA/SH Complaints)

Case no.	Date Claim Received	Name of Person Receiving Complaint	Where/how the complaint was received	Name & contact details of complainant (if known)	Type of Claim Add content of the claim (include all grievances, suggestions, inquiries) *please note if the complaint was related to the project. If not, note it here and refer complainant to PIU for further processing	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication & by whom)	Expected Decision Date	Decision Outcome (include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when, by whom and via what method of communication	Was the complainant satisfied with the decision? Y/N State the decision. If no, explain why and if known, will pursue appeals procedure.	Any follow up action (and by whom, by what date)?