



GOVERNMENT OF KENYA

**NATIONAL YOUTH OPPORTUNITIES TOWARDS ADVANCEMENT
(P179414)**

VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK (VMGF)

JUNE 2024

Table of Contents

EXECUTIVE SUMMARY	iii
1. INTRODUCTION	7
1.2 Justification for a VMGF.....	7
1.3 Objectives of the VMGF	8
1.4 Approach and Methodology for preparation of the VMGF	8
1.5 Disclosure of the VMGF and VMGPs.....	9
2. DESCRIPTION OF THE PROJECT AND COMPONENTS	9
2.1 Project Development Objective.....	10
2.2 NYOTA Project Beneficiaries	10
2.3 PDO Level Indicators	10
2.3 Project Structure	10
2.4 Institutional and Implementation Arrangements for the NYOTA	11
2.5 Results Monitoring and Evaluation Arrangements	11
3. POLICY AND FRAMEWORKS FOR VULNERABLE AND MARGINALIZED GROUPS	12
3.1 The National Policy and Legal Frameworks on VMGs.....	12
3.2 The World Bank Environmental and Social Framework.....	16
3.3 Differences between National Legislation and ESF (ESS7).....	17
4. BASELINE OF VULNERABLE AND MARGINALIZED GROUPS IN KENYA.....	17
4.1 Vulnerable and Marginalized Groups in Kenya	17
4.2 Potential Impacts on VMGs.....	20
4.3.1 Potential Benefits of the Project to VMGs.....	20
4.3.2 Potential Negative Impacts of the projects on VMGs	20
4.3.3 Proposed Mitigation Measures.....	20
5. IMPLEMENTATION OF THE NYOTA VMGF.....	24
6. CULTURALLY APPROPRIATE PROCESS FOR CONSULTATION WITH VMGs	24
7. VULNERABLE AND MARGINALIZED GROUPS PLANS.....	29
8. INSTITUTIONAL ARRANGEMENTS	29
9. GRIEVANCE MECHANISM	30
9.1 Key Staff Coordinating Grievance Management under NYOTA.....	31
9.2 Grievance Handling Structures Under NYOTA	32
9.3 Meeting Schedule of the Grievance Committees.....	34
9.4 Mode of Receipt and Recording of Complaints	34
9.5 Grievance Redress Process Steps	34
9.5.1 Step 1: Reporting and Receiving Grievances.....	34
9.5.2 Step 2: Recording and processing of grievances.....	35
9.5.3 Step 3: Reviewing and Investigating Grievances.....	36

9.5.4 Step 4: Developing resolution options and preparing a response.....	36
9.5.5 Step 5: Feedback mechanism.....	36
9.5.6 Step 6: Monitoring and Reporting of Grievance Mechanism	36
9.6 Use of Alternative Dispute Resolution Mechanisms	36
9.6.1 Traditional grievance mechanism among VMG communities.....	36
9.6.2 National Referral Institutions.....	37
9.6.3 World Bank Grievance Redress Service	37
9.7 The Grievance Management Information System (MIS).....	37
9.8 Grievance Documentation, Monitoring and Reporting.....	37
9.9 Evaluating the Grievance Mechanism	38
9.10 Grievance Mechanisms and Referrals for SEA/SH Survivors	38
10. MONITORING AND EVALUATION	39
11. BUDGET REQUIREMENTS FOR IMPLEMENTATION OF THE VMGF	41
12. ANNEXES.....	43
Annex 1: Profile of the Vulnerable and Marginalized Peoples in Kenya	43
Annex 2: List of Minority VMGs and respective county of residence	55
Annex 3: Social Screening Form.....	56
Annex 4: Three Point Rank Order System For VMGF and VMGPs (Sample)	57
Annex 5: Minutes	60
Annex 6: List of Participants	66

List of Tables

Table 1: PDO Level Indicators.....	10
Table 2: Policy, legal and institutional Frameworks on VMGs	12
Table 3: List of VMGs and respective county of residence	Error! Bookmark not defined.
Table 4: List of VMGs and their county of residence	Error! Bookmark not defined.
Table 5: Potential Negative Impacts and Recommended Mitigations Measures	21
Table 6: Key actions for implementing the NYOTA VMGF.....	24
Table 7: Framework for Consultation with VMGs throughout the NYOTA Project Cycle.....	26
Table 8: Proposed Monitoring and Evaluation Framework	40
Table 9: Budget for Implementation of the VMGF.....	42

List of Acronyms

ASAL	Arid and semi-arid lands
CBO	Community Based Organization
CIDPs	County Integrated Development Plans
COK	Constitution of Kenya
CSOs	Civil Society Organizations
DRS	Department of Refugee Services (within the Ministry of Interior and National Administration)
E&S	Environmental & Social Safeguards
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
ESSA	Environmental and Social System Assessment
FBOs	Faith Based Organizations
FGDs	Focus Group Discussion
FIF	Financial Inclusion Fund
FPIC	Free Prior Informed Consent
GBV	Gender Based Violence
GBV	Gender Based Violence
GCRF	Global Crisis Response Framework
GFF	Global Financing Facility for Women, Children and Adolescents
GM	Grievance Mechanism
GoK	Government of Kenya
GRM	Grievance Redress Mechanism
ICT	Information and Communication Technology
IP/SSAHUTLC	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
IPOs	Indigenous Peoples Organization
IT	Information Technology
KCB	Kenya Commercial Bank
KCDP	Kenya Coastal Development Project
KFS	Kenya Forest Service
KLMIS	Kenya Labor Market Information System
KSEIP	Kenya Social Economic Improvement Project
KWFT	Kenya Women Finance Trust
KWSCR	Kenya Water Security and Climate Resilient Project
KYEOP	Kenya Youth Employment and Opportunities Project
KYEP	Kenya Youth Empowerment Project
LFP	Labor force participation rate
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MC	Master Craftsmen
MIS	Management Information Systems
MSEA	Micro and Small Enterprises Authority
MSME	Micro, Small and Medium Enterprises
MOYACES	Ministry of Youth Affairs, Creative Economy, and Sports
NAVCDP	National Agricultural Value Chain Development
NEA	National Employment Authority
NEDI	North and Northeastern Development Initiative
NGO	Non-Governmental Organization
NITA	National Industrial Training Authority
NPCU	National Project Coordination Unit
NSC	National Steering Committee
NSSF	National Social Security Fund
NYOTA	National Youth Opportunities Towards Advancement Project
OHS	Occupational Health And Safety
PAD	Project Appraisal Document

PAP	Project Affected Persons
PDO	Project Development Objective
PITC	Project Implementation Technical Committee
SA	Social Assessment
SDG	Sustainable Development Goals
SDL&SD	State Department for Labor and Skills Development
SD-MSMED	State Department for Micro, Small and Medium Enterprise Development
SDYACE	State Department for Youth Affairs and Creative Economy
SEAH	Sexual Exploitation, Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
ToRs	Terms of Reference
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNHCR	United Nations High Commissioner for Refugees
VMGF	Vulnerable and Marginalized Groups Framework
VMGs	Vulnerable and Marginalized Groups
WB	World Bank
WEF	Women's Enterprise Fund
WHR	Window for Host Communities and Refugees
YEDF	Youth Enterprise Development Fund

EXECUTIVE SUMMARY

1. The Government of Kenya (GoK) in collaboration with the World Bank (WB) are preparing the National Youth Opportunities Towards Advancement (NYOTA) project. The key objective of NYOTA is to increase employment, earnings and promote savings for the targeted youth, at national scale. The project will be implemented by the Ministry of Youth Affairs, Creative Economy, and Sports (MOYACES), the Micro and Small Enterprise Authority (MSEA) and National Social Security Fund (NSSF). NYOTA represents a national scale-up of several successful interventions implemented under Kenya Youth Employment and Opportunities Program (KYEOP) and it is structured into four (4) components consisting of:

- Component 1: Improving youth employability;
- Component 2: Expanding employment opportunities;
- Component 3: Supporting youth savings;
- Component 4: Strengthening youth employment systems, capacity, and project management.

2. As the NYOTA will be implemented nationally, there is a likelihood that some of the proposed project interventions will be undertaken in areas where Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLC) also referred to in Kenya under World Bank -funded projects as Vulnerable and Marginalized Groups (VMGs) are present in, or have collective attachment to, the project area. In order to avoid negative impacts on VMGs, and to ensure VMGs access project benefits and opportunities that are culturally appropriate, the project will apply the provisions of the national policy and legal procedures and the World Bank Environmental and Social Framework (ESF), particularly the Environmental and Social Standard (ESS) 7 on VMGs.

3. Article 260 of the Constitution of Kenya (COK), 2010, defines “Marginalized Community” as:

- A community that, because of its relatively small population or for any other reason, has been unable to fully participate in the integrated social and economic life of Kenya as a whole;
- A traditional community that, out of a need or desire to preserve its unique culture and identity from assimilation, has remained outside the integrated social and economic life of Kenya as a whole;
- An indigenous community that has retained and maintained a traditional lifestyle and livelihood based on a hunter or gatherer economy; or pastoral persons and communities, whether they are (i) nomadic; or (ii) a settled community that, because of its relative geographic isolation, has experienced only marginal participation in the integrated social and economic life of Kenya as a whole;

4. Similarly, ESS7 constitutes, the term “Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities” (IP/SSAHUTLC) which is used in a generic sense to refer exclusively to a distinct social and cultural group possessing the following characteristics in varying degrees:

- Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas;
- Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

5. This Vulnerable and Marginalized Groups Framework (VMGF) is prepared in fulfilment of the ESF provisions (ESS7). The VMGF establishes a mechanism to determine and assess potential risks and impacts of project activities on VMGs. Projects affecting the VMGs, whether negatively or positively, need to be prepared with care and with the participation of affected VMG communities.

6. The National Project Coordination Unit (NPCU) has prepared this VMGF to guide the implementation of NYOTA interventions in a manner that allows VMGs to participate in, and benefit from the development process in ways that do not threaten their unique cultural identities and well-being. The VMGF describes the policy requirements and planning procedures that NYOTA will follow during the preparation and implementation of projects especially those identified as occurring in areas where minority VMGs are present. The purpose of this VMGF is to ensure: i) the management of issues relating to VMGs are integrated into the development and operation of proposed investments to be financed under the NYOTA; ii) the effective mitigation of potentially negative impacts while enhancing VMG's access to project benefits.

7. In preparing the VMGF, a screening process needs to be undertaken, to determine whether VMGs are present in, or have collective attachment to, the project area. Once the World Bank makes a determination that VMG communities are present in, or have collective attachment to the project area, ESS7 requires the Borrower to conduct a targeted SA to understand the relative vulnerabilities of the affected VMGs and how the project may affect them.

8. In Under World Bank-funded projects in Kenya, VMGs are categorized as either majority or minority. Majority VMGs are the dominant communities in their respective counties and sole beneficiaries of project benefits and opportunities, while minority VMGs share benefits and opportunities with other communities. Tables 3 and 11 highlight the majority and minority VMGs in Kenya.

9. In the specific case of NYOTA, the presence of VMGs in the NYOTA project areas is confirmed through the review of VMGFs, VMGPs and Social Assessments (SA) for a number of completed and ongoing World Bank- financed interventions within the same counties, and findings from consultations with VMGs during the Environmental and Social Systems Assessments (ESSAs) carried out for ongoing and recently approved World Bank financed Program for Results (PforR) operations. Further, consultations done as part of NYOTA project preparation with representatives of VMG communities, and key project stakeholders in Nairobi in December 2022, Kilifi in February 2022, and Nakuru in August 2023 also confirmed the presence of the VMGs in the project area. Invited to the consultations were also representatives of, i) VMG communities (Bajuni, Duruma, Samburu, Orma, Waatha, Ilkunono, Maasai, Sengwer, Ndorobo and Ogiek), and ii) organizations championing the interests of VMGs such as the Ogiek People Development Program (OPDP), the Yaaku Indigenous Young Moms and Hunters and Gatherers' Forum (HUGAFO) Kenya. The aim of the consultations was to discuss strategies for overcoming barriers to social economic empowerment of VMG youths associated with various causes of vulnerability. More details on the consultations are presented in Annex 5.

10. The review of the above-mentioned documents coupled with the consultations undertaken as part of NYOTA project preparation, provide good quality information on VMGs and as such, it will not be necessary to conduct a separate SA. Rather, the NYOTA NPCU will take the review of the said documents and the information obtained from the consultations held with stakeholders including VMGs into account, to satisfy the requirement under ESS7 and proceed to prepare the VMGPs. VMGPs will be prepared for minority VMGs who are potentially at risk of exclusion. Once completed, the VMGPs will be validated by respective VMG communities to capture VMG specific issues and context. The validation workshops will be facilitated by the Sub-County Youth Development Officers (SCYDOs) in all applicable counties. No VMGP will be prepared for the majority VMGs. However, the project will engage them in line with the provisions of the ESS 1 and ESS 10 to ensure they are meaningfully consulted, and that the vulnerable or disadvantaged youth amongst them have access project benefits and opportunities.

11. The VMGPs will set out the measures for: i) consultation with VMGs to ensure that they receive culturally appropriate social and economic benefits and ii) minimizing, mitigating, and compensating potential negative impacts associated with NYOTA project interventions. The level of detail and comprehensiveness of VMGP will vary depending on the specific subproject and the nature of impacts to be addressed.

12. This VMGF seeks to ensure that VMGs are informed, consulted, and mobilized to participate in

the NYOTA project. NYOTA will undertake prior consultations with VMGs who will potentially be impacted by the project and stakeholders such as VMG organizations who work with and/or are knowledgeable of VMGs development issues and concerns. Participation of VMGs is to be ensured in selecting, designing, and implementing the NYOTA project.

13. NYOTA will strengthen and adopt the Grievance Mechanism (GM) developed under KYEOP for purposes of addressing grievances from affected parties, including VMGs. The GM procedure for grievance redress will be incorporated in the project information pamphlet to be distributed prior to consultation with affected VMGs during project planning and implementation stages. The GM will incorporate the existing traditional conflict resolution mechanisms within respective VMG communities, that will be applied as the first step in resolving grievances. VMGs will be provided with a variety of options for communicating issues and concerns, including walk ins into Youth offices at the county and sub county levels, writing, public forums, by telephone, over the internet or through social media platforms.

14. Grievance Committees will be formed at the national, county and sub -county levels with involvement of representatives of VMGs at the sub-county and county levels. The Committees shall be formed and activated before commencement of project activities. Where necessary, VMGs will be assisted to document and resolve received complaints. The GM is designed with the objective of solving disputes at the earliest possible time, which will be in the interest of all parties concerned and therefore implicitly discourages referring such matters to the law courts for resolution, which would otherwise take a considerably longer time. Further, specific provisions will be included for complaints related to Sexual Exploitation, Abuse and Harassment (SEAH) arising from the project to ensure survivor's confidentiality and rights. To effectively address GBV risks, the GM needs to be in place prior to commencement of activities requiring interaction with project beneficiaries. More details are provided in the separate GM report prepared for NYOTA.

15. The NPCU will establish a monitoring system involving the project staff at national, county, and sub-county levels, as well as representatives of VMGs to ensure effective implementation of VMGPs. The implementation of the VMGPs will be closely monitored and documented. At the county level, the County Director Youth (CDY) will prepare monthly monitoring reports and submit to the NPCU. At the NPCU level, the E&S Specialist will take the lead responsibility in compiling all the monthly county monitoring reports and share with the World Bank on quarterly basis for review. An appropriate format will be prepared by NPCU and adopted by counties for monitoring and reporting requirements.

16. A set of M&E indicators as proposed in Tables 5 and 8 will be determined and agreed upon during VMGP development. It is important that the M&E plan is developed with the active involvement of the VMGs in order to come up with mitigation measures that are applicable to their context and are culturally appropriate. Project results indicators will be disaggregated by disability and by gender to monitor women's participation in the project interventions. The SDS and support consultants will carry out monitoring to capture both process and outputs indicators including the number of VMG participating in consultations, by category, issues deliberated and how they were resolved, negative impacts and mitigation measures and determination of the impacts of the project on the welfare of the VMGs among others. The NPCU will capture the progress on VMG inclusion in the quarterly reports that will be submitted to the WB for review.

17. The Project will cater for all costs related to preparation and implementation of VMGPs. It is important to note that, in this VMGF an estimated budget has been provided and more accurate costs will be agreed upon by the project team after consultation with VMGs and determination of need for any additional measures targeting VMGs have been finalized. The budget for the implementation of this VMGF mainly includes costs for validating draft (generic) VMGPs with VMGs, costs for implementing VMGPs, such as consultancy support, travel costs of the relevant NPCU members, and other participating stakeholders as appropriate.

The budget related to all capacity building activities, such as training of project staff and service providers and awareness to beneficiaries on the VMGF/VMGPs, are captured in the Stakeholder Engagement Plan, while the monitoring of VMGPs shall be covered under the overall project monitoring cost. The estimated

budget for the implementation of the VMGF/VMGPs is **KES 6, 050, 000 (About USD 48,000)**.

18. The final VMGF and VMGPs will be made available the affected VMGs and other stakeholders in an appropriate form, manner, and language. Electronic versions of the VMGF and VMGPs will be placed on the external websites of the MOYACES , the MSEA and the NSSF and other technical agencies as applicable, in accordance with the WB Access to Information Policy. Each VMGP will be disclosed to the affected VMGs in locations accessible to all, using feasible techniques (focus -group discussions, public forums) in languages commonly understood by VMGs. Summaries of the VMGPs translated into relevant local languages (understandable by all) will be made available at the: (i) sub-county youth offices; (ii) respective County youth Offices; and (iii) any other local level public offices including the chiefs and Ward administrator's offices.

1. INTRODUCTION

The Government of Kenya is preparing the National Youth Opportunities Towards Advancement (NYOTA) project, in collaboration with the World Bank (WB) through the Ministry of Youth Affairs, Creative Economy and Sports (MOYACES), the Micro and Small Enterprise Authority (MSEA) and National Social Security Fund (NSSF) that constitute the three implementing agencies. The Project aims to increase employment, earnings and promote savings for targeted youth. NYOTA represents a national scale-up of several successful interventions implemented under Kenya Youth Employment and Opportunities Program (KYEOP).

In recognition of NYOTA's national scope, the proposed project interventions are likely to be implemented in areas where Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLC) also referred to in Kenya as Vulnerable and Marginalized Groups (VMGs) are present in, or have collective attachment to, the project area. In order to avoid negative impacts of projects on VMGs, NYOTA will apply the National policy and legal procedures and the WB's Environmental and Social Framework (ESF), particularly ESS 7, in the management of the potential social risks and impacts associated with project interventions.

Article 56 of the Constitution of Kenya (CoK) requires that State to put in place affirmative action programmes designed to ensure that minorities and marginalized groups: a) participate and are represented in governance and other spheres of life; b) are provided special opportunities in educational and economic fields; c) are provided special opportunities for access to employment; (d) develop their cultural values, languages and practices; and (e) have reasonable access to water, health services and infrastructure.

Similarly, ESS7 recognizes the importance of rights and interest of the VMGs and mandates their engagement in the design, determination, and implementation of development projects. The ESS7 requires that VMGs are fully consulted about and have opportunities to actively participate in project design and the determination of project implementation arrangements. This VMG Framework (VMGF) is therefore prepared by the Government of Kenya (GoK) consistent with the requirements of the national policy and legislative frameworks and the ESS7.

1.2 Justification for a VMGF

The purpose of this VMGF is to guide the preparation and implementation of NYOTA interventions in a manner that allows VMGs to participate in, and benefit from the development process in ways that do not threaten their unique cultural identities and well-being. As per ESS7, a VMGF is also prepared when the design of a proposed project is not finalized thus making it impossible to identify all the negative risks and impacts, necessary for preparation of a Vulnerable and Marginalized Groups Plan (VMGP). At the time of preparation of this VMGF, the preparation of the NYOTA project is yet to be finalized. However, it is important to note that, the VMGs likely to be affected by the project as well as the potential impacts (negative and positive) of the NYOTA project have been defined to a large extent.

Investments under NYOTA might impact VMGs' rights, livelihoods, and culture. Due to these reasons, and in line with the provisions of ESS7, the project has prepared a VMGF to ensure that the development process fully respects the dignity, human rights, economies, and culture of VMGs. This VMGF therefore seeks to meet the requirements of ESS7 on VMGs that addresses the needs of distinct, vulnerable, social, and cultural groups possessing the following characteristics:

- a. Self-identification as members of a distinct cultural group;
- b. Collective attachment to geographically distinct -habitats or ancestral territories;
- c. Customary cultural, economic, or social institutions that are separate from those of the rest of the society; and
- d. An indigenous language, often different from the official language of the country or region.

The VMGF applies to all NYOTA components and activities that will impact the VMGs and recommends procedures to ensure that such impacts are mitigated. The VMGF also details broad principles and procedures for ensuring VMGs have access to project benefits and opportunities that are culturally appropriate, and that they are included in project development and implementation. Once the impacts of project activities on the VMGs become clearer as informed through the engagement of VMGs, VMGPs

will be prepared. The NPCU will ensure that project activities that may affect VMGs do not commence until VMGPs are finalized and approved by the WB.

1.3 Objectives of the VMGF

The purpose of this framework is to set out the requirements of ESS7 on VMGs, specifically to ensure that VMGs are consulted and have full access to opportunities and benefits accruing from NYOTA. The objectives of this VMGF includes:

- a. To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of VMGs;
- b. To avoid negative impacts on VMGs, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts;
- c. To promote sustainable development benefits and opportunities for VMGs in a manner that is accessible, culturally appropriate, and inclusive;
- d. To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with VMGs;
- e. To recognize, respect and preserve the culture, knowledge, and practices of VMGs and to provide them with an opportunity to adapt to changing conditions in a manner and timeframe acceptable to them.

1.4 Approach and Methodology for preparation of the VMGF

To prepare the VMGF, the following steps were followed:

- a. **Literature and documents review** to understand the project, its context, scope and target beneficiaries. The review of literature was also for purposes of familiarizing with policy and legal frameworks applicable to VMGs, identification of the affected majority and minority VMG communities, establish the potential risks and impacts (positive and negative) associated with the NYOTA interventions. The documents reviewed include:
 - Anthropological studies of various VMGs;
 - National policy and regulatory frameworks applicable to VMGs in Kenya such as the Constitution of Kenya 2010, Vision 2030, County Government Act 2012 among others;
 - NYOTA and KYEOP Project Appraisal Documents (PAD);
 - KYEOP VMGF and VMGP;
 - Relevant VMGF, VMGP and Social Assessment documents prepared for other completed and ongoing WB financed projects such as the KYEOP, Kenya Social Economic Improvement Project (KSEIP), Kenya Coastal Development Project (KCDP), Kenya Water Security and Climate Resilient Project (KWSCR), National Agricultural Value Chain Development Project (NAVCDP), and Secondary Education Quality Improvement Project (SEQIP) among others;
 - Environmental and Social Systems Assessments (ESSAs) carried out for ongoing and recently approved WB financed Program for Results operations such as Green and Resilient Expansion of Energy Program (GREEN), Kenya Primary Equity in Learning Program (KPELP), Kenya Devolution Support Program II (KDSPII), Kenya Urban Support Program II (KUSPII), Kenya Water and Sanitation and Hygiene Program (KWASH). Through the various ESSA's a number of VMG communities were consulted on aspects such as strategies for enhancing VMG participation in development interventions and barriers faced in accessing program benefits and strategies to address such challenges;
 - World Bank ESF and related standards-ESS7 and ESS10;
 - Relevant legislative documents in Kenya on VMGs.
- b. **NYOTA's potential benefits and negative impacts** are based on available information on project interventions planned under the different components and sub-components, and as captured in the relevant project documents and plans. Due to the project's nationwide coverage, the project is likely to be implemented in areas inhabited by VMGs. Some of the key social risks and impacts include the exclusion of target youths, VMGs, and other traditionally excluded groups; Sexual Exploitation and Abuse/ and Sexual Harassment (SEAH) including other forms of GBV; exploitation and abuse of child apprentices; challenges in meaningful stakeholder engagements,

grievance redress and inadequate compliance monitoring. Other anticipated concerns include elite capture, as well as mobility, disability, and literacy limitations. Detailed impacts are discussed under chapter 4 of this VMGF.

- c. **Stakeholder consultation workshops** were held in Nairobi in December 2022, Kilifi in February 2022 and Nakuru in August 2023 with participants drawn from, KYEOP beneficiaries and implementing institutions (MOYACES , NSSF, and MSEA), National Employment Authority (NEA), National Youth council (NYC); National Council for People with Disability (NCPWD), . Gender Director, Nairobi Collaborative Centre for Gender, and Development NCCGD) and the National Council for Population Development (NCPD) among others. In attendance were also representatives of VMG communities (Bajuni, Duruma, Samburu, Orma, Waatha, Iikunono, Maasai, Sengwer, Ndorobo and Ogiek). and organizations championing the interests of VMGs such as the Ogiek People Development Programs (OPDP), the Yaaku Indigenous Young Moms and Hunters and Gatherers Forum (HUGAFO), Kenya. The NYOTA NPCU also held similar consultations with refugee and host communities in Kakuma and Kalobeyei on 30th and 31st August 2023. Annex 5 presents more details on the stakeholder consultations.

The aim of the stakeholder consultation workshops was to discuss lessons and best practices from implementation of Environmental and Social (E&S) aspects under KYEOP including strategies for enhancing their application under the NYOTA. The stakeholders also discussed ways of overcoming barriers to social economic empowerment of youths associated with various causes of vulnerability. Other discussions held revolved around aspects such as:

- Strategies to ensure inclusivity of VMG youths challenged in accessing project benefits or living in hard-to-reach areas during project implementation.
- Preferred approaches for enhancing employability skills and employment opportunities for illiterate youths, teenage mothers, and other vulnerable individuals among VMG youths.
- Enhancing inclusivity of VMG youths living with disability in project implementation and ways of mainstreaming gender aspects in the NYOTA project.
- VMG concerns, preferences, including anticipated benefits and foreseen risks associated with NYOTA interventions and potential mitigation measures.
- Enhancing access to project benefits by VMG youths.
- Preferred mechanisms and approaches for identification, mapping, consultation and engagement of youths, and ways for ensuring that their concerns, and suggestions are systematically considered.
- Measures to promote confidential reporting and handling of SEAH including other forms of GBV.

1.5 Disclosure of the VMGF and VMGPs

19. The final VMGF and VMGPs will be made available to the affected VMGs and other stakeholders in an appropriate form, manner, and language. Electronic versions of the VMGF and VMGPs will be placed on the external websites of the MOYACES , the MSEA and the NSSF and other technical agencies as applicable, in accordance with the World Bank Access to Information Policy. Each VMGP will be disclosed to the affected VMGs in locations accessible to all, using feasible techniques (focus -group discussions, public forums) in languages commonly understood by VMGs. Summaries of the VMGPs translated into relevant local languages (understandable by all) will be made available at the: (i) sub-county youth offices; (ii) respective County youth Offices; and (iii) any other local level public offices including the chiefs and Ward administrator’s offices.

2. DESCRIPTION OF THE PROJECT AND COMPONENTS

The NYOTA project is designed to provide integrated interventions that address barriers facing vulnerable youth in accessing better employment opportunities and earnings. The barriers include lack of soft, digital, basic (reading and writing) and more advanced technical skills needed to get good jobs or to set up thriving micro-enterprises among youth with lower levels of education. The MOYACES will be responsible for the overall coordination, implementation, and supervision of the project. Other NYOTA implementing agencies include MSEA and NSSF.

2.1 Project Development Objective

NYOTA’s Project Development Objective (PDO) is to increase employment, earnings and promote savings for targeted youth, at national scale. The project will represent a national scale-up of several of the successful interventions under KYEOP that improved employability and skills as well as supported entrepreneurs by providing them with start-up capital.

2.2 NYOTA Project Beneficiaries

The NYOTA Project is expected to impact 800,000 vulnerable youth aged 18 - 29 across all 47 counties of Kenya including 10,000 refugees and 10,000 vulnerable host community members. The targeted youths include those with little or no education, who are unemployed, underemployed, or in low-tier employment with very low earnings. Such youth face exclusions and are often unable to access government sponsored jobs programs. The project will reserve 50 percent of slots for female beneficiaries and 5 percent for people with disabilities. Women face additional barriers to participate in the labor force, to access better quality employment, to earn what a man would earn in an identical job, and when they start-up and run their own businesses. Persons with disabilities (PWDs) also have additional barriers across the life cycle, such as accessing education and employment and continue to face negative attitudes and stigma. Given delays with acquiring education, the target age group for PWDs is expanded to 18-35. Officials from participating government implementing institutions will directly benefit from professional capacity building, technology upgradation, systems enhancement and monitoring and evaluation support.

2.3 PDO Level Indicators

The PDO will be measured using three key results areas and associated project development indicators aligned to the primary outcomes of the PDO.

Table 1: PDO Level Indicators

Results Areas	Outcome indicators
Results Area 1: Increasing employment among targeted youth.	Beneficiaries of job-focused interventions (Number) <ul style="list-style-type: none"> Beneficiaries of job-focused interventions – Female (Number). Youth beneficiaries living with disabilities (Percentage).
	Youth beneficiaries in wage or self-employment at least 6 months after completing the package of project interventions (Percentage). <ul style="list-style-type: none"> Female beneficiaries in wage or self-employment at least 6 months after completing the package of project interventions (Percentage). Host community beneficiaries in wage or self-employment at least 6 months after completing the package of project interventions (Percentage). Refugee beneficiaries in wage or self-employment at least 6 months after completing the package of project interventions (Percentage).
	Female beneficiaries who are in wage or self-employment in male dominated sectors at least 1 year after training with gender-specific module (Percentage).
Results Area 2: Increasing earnings among targeted youth.	Average earnings among wage and self-employed youth beneficiaries 6 months after completing the package of project interventions (Percentage). <ul style="list-style-type: none"> Average earnings among wage and self-employed female beneficiaries at least 6 months after completing the package of project interventions (Percentage).
Results Area 3: Promote savings among targeted youth.	Youth beneficiaries contributing to long term savings at least once in the 6 months after their auto-enrollment in NSSF’s Haba Haba scheme ends (Percentage). Females with maternity benefits who have had at least 1 post-natal health visit (Percentage).

2.3 Project Structure

The NYOTA project is structured into four components as presented below. Annex 8 presents a detailed description of the components.

- **Component 1: Improving youth employability:** This component will connect targeted youth

to better employment opportunities by providing them with training, on the job experience, and access to intermediation services. It will address the supply side constraints related to low levels of educational attainment, lack of appropriate skills, lack of on-the-job experience, as well as lack of access to intermediation services. It will additionally support women by providing access to quality child-care providers. This component has two subcomponents comprising **Subcomponent 1.1: Provision of training and work experience** and **Subcomponent 1.2: Operationalization of labor market observatory and supporting intermediation.**

- **Component 2: Expanding employment opportunities.** This component aims to expand employment opportunities through entrepreneurship development and support to social enterprises. Key constraints and market failures that limit the participation of vulnerable youth, aged 18 - 29, in productive entrepreneurship, as outlined in the context section will be addressed through this component. This component has two subcomponents comprising **Subcomponent 2.1: Support for entrepreneurship** and **Subcomponent 2.2: Results Based Financing Partnership with Social Enterprises.**
- **Component 3: Supporting youth savings.** This component will provide savings opportunities to beneficiaries of components 1 and 2. Saving opportunities via the Haba Haba scheme, administered by the NSSF, will be provided to the 190,000 Kenyan youth beneficiaries of components 1 and 2. This component has two subcomponents comprising **Subcomponent 3.1: Supporting savings through monetary incentives and nudges** and **Subcomponent 3.2: Enhancing NSSF operations by upgrading processes, systems, and communications.**
- **Component 4: Strengthening Youth Employment Systems, Capacity, and Project Management.** This component will strengthen the systems and capacity of national and county-level implementing agencies, and finance project management activities. With the aim to build sustainable systems that last beyond the lifetime of this project, this component will finance building government capacity, Monitoring and Evaluation (M&E) and overall project management. This component has three subcomponents comprising **Subcomponent 4.1: Build County Government capacity to invest in youth employment, Subcomponent 4.2: Monitoring Evaluation, Delivery Systems, and Subcomponent 4.3: Project Management and Coordination.**

2.4 Institutional and Implementation Arrangements for the NYOTA

The MOYACES will be responsible for the overall implementation and supervision of the project. In addition to coordinating the overall implementation of all the components, will lead the implementation of component 1. Further, on Component 1, the State Department of Labor and Skills Development (SDL&SD), National Industrial Training Authority (NITA) and National Employment Authority (NEA) will implement those parts for which they have the mandate. Micro and Small Enterprises Authority (MSEA) will take the lead in implementing Component 2 and NSSF will take the lead in supporting Component 3. and the State Department for Micro, Small and Medium Enterprise Development (SD-MSMED) will lead implementation of Component 4. will work closely with Department of Refugee Services (DRS) and United Nations High Commissioner for Refugees (UNHCR) on all Window for Host Communities and Refugees (WHR) components implemented in the refugee hosting areas.

2.5 Results Monitoring and Evaluation Arrangements

The project's M&E activities will be the responsibility of MOYACES in collaboration with MSEA, NSSF and DRS, while the day-to-day monitoring and consolidated reporting will rest with the State Department for Youth Affairs and Creative Economy (SDYACE). The progress and achievement of the PDO will be monitored and evaluated through various activities, including: (a) assessing the PDO indicators and intermediate results indicators in the Results Framework, (b) tracer studies to track progress 6 months after completion of project interventions; (c) conducting independent surveys and an impact evaluation; (c) reporting project progress for each semester; (d) conducting a Mid-Term Review; and (e) producing an Implementation Completion and Results Report at the time of the project closing. The World Bank's semi-annual implementation support missions will jointly review the progress with MOYACES, MSEA and NSSF and other relevant agencies toward the achievement of the PDO and any findings will inform whether project restructuring, or additional support is necessary.

3. POLICY AND FRAMEWORKS FOR VULNERABLE AND MARGINALIZED GROUPS

3.1 The National Policy and Legal Frameworks on VMGs

This section summarizes the national policy, legal and institutional frameworks that are relevant to VMGs. Essentially, the frameworks seek to enhance opportunities for VMGs to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being.

Table 2: Policy, legal and institutional Frameworks on VMGs

No	Policy/ Legislations /institutional	Provisions as Written
1.	Constitution of Kenya (CoK) 2010	<p>The CoK 2010 is the supreme law of the Republic and binds all persons and State organs at all levels of government. The CoK has clear provisions on VMGs that are consistent with the ESF and the related ESSs as presented below.</p> <p>Article 21 (3) sets the requirement for all State organs and all public officers to address the needs of vulnerable groups within society, including women, older members of society, persons with disabilities, children, youth, members of minority or marginalized communities and members of particular ethnic, religious or cultural communities.</p> <p>Article 27 (4) states: “The State shall not discriminate directly or indirectly against any person on any ground, including race, sex, pregnancy, marital status, health status, ethnic or social origin, colour, age, disability, religion, conscience, belief, culture, dress, language or birth” and partially applies to VMGs</p> <p>Article 28 states that “every person has inherent dignity and the right to have that respected and protected”. This compels the proponents of the project to respect and protect the dignity of the members of VMGs during the project preparation, implementation including construction, and operation. For instance, the project should carefully examine the extent to which the project potentially affects the livelihoods of VMGs, because dignity - the state or quality of being worthy of honor or respect - is part of a people’s livelihoods. It is notable that VMG livelihoods are usually precarious and liable to disruption if exposed to external factors without care</p> <p>Article 56 provides that the State shall put in place affirmative action programs designed to ensure that minorities and marginalized groups: (a) Participate and are represented in governance and other spheres of life, (b) Are provided special opportunities in educational and economic fields, (c) Are provided special opportunities for access to employment, (d) Develop their cultural values, languages and practices, and (e) Have reasonable access to water, health services and infrastructure. Article 56 thus compels projects to leave VMGs better not worse off, and to preserve their environment, cultural values, languages, and practices. In the project under review, it is critical to consider and remedy any chance of disrupting VMG culture.</p> <p>Article 69, 1(d) provides that the state shall - encourage public participation in the management, protection, and conservation of the environment. This includes the environments of VMGs, hence the need for meaningful consultation of the VMGs on how any environmental impacts arising from the proposed project shall be managed</p> <p>The project activities shall be conducted to ensure compliance with the CoK on all aspects related to ensure inclusion of marginalized and minority groups,</p>

No	Policy/ Legislations /institutional	Provisions as Written
		management of grievances with consideration fort gender, and disability mainstreaming, among others.
2.	The Kenya Vision 2030	Kenya’s Vision 2030 is the current national development blueprint covering the period 2008 to 2030. The blueprint aims at transforming Kenya into “a newly industrializing, middle-income country providing a high quality of life to all its citizens in a clean and secure environment.” The Vision is anchored on three key pillars: Economic; Social; and Political Governance. The social pillar envisages efforts towards equitable social development that protects people from discrimination, and ensuring respect for gender, youth, and vulnerable groups. Further, the pillar sets in motion efforts for equity and poverty reduction. The social pillar of Vision 2030 is people-centred, result-oriented, and accountable to the public. Vision 2030 advocates for adherence to the rule of law applicable in Kenya, as well as inclusion of VMGs as envisaged under ESS7 and ESS10. In this regard, all activities to be implemented under NYOTA will be required to comply with the established social laws foreseen in Vision 2030, which are aligned to the World Bank’s requirements for effective consultation and engagement of VMGs.
3.	Public Participation Policy 2023	<p>The policy provides the framework for the management and coordination of public participation in Kenya for the fulfilment of the constitutional requirement on citizen engagement in development and governance processes in the country. Public bodies in Kenya will comply with this policy as a constitutional requirement. This policy seeks to address gaps and challenges in public participation in order to improve and entrench public participation in development and governance processes in Kenya. The policy is organized into nine policy areas that highlight the key policy concerns and objectives and sets the standards for public participation in Kenya. These standards legally bind all public bodies at the National and County levels. The policy areas include access to information; civic education; capacity building; planning, budgeting, and implementation; inclusion of minorities and marginalized groups, funding; monitoring, evaluation, and learning; feedback and Reporting mechanisms; and complaints and redress mechanism.</p> <p>The policy aligns with the World Bank’s provisions on inclusive stakeholder engagement, information disclosure and grievance management as outlined in ESS 10 as well as the provisions of ESS7 on inclusion of minorities and marginalized groups, NYOTA will adhere to the provisions of the Act to ensure VMGs are meaningfully consulted and as applicable, their views are taken into consideration in the implementation of the project.</p>
4.	National Gender and Equality Commission Act, 2011	<p>The Act establishes the National Gender and Equality Commission mandated to promote gender equality and freedom from discrimination in accordance with Article 27 of the Constitution; co-ordinate and facilitate mainstreaming of issues of gender, persons with disability and other marginalized groups in national development and to advise the Government on all aspects thereof; co-ordinate and advise on public education programmes for the creation of a culture of respect for the principles of equality and freedom from discrimination; and, work with the National Commission on Human Rights, the Commission on Administrative Justice and other related institutions to ensure efficiency, effectiveness and complementarity in their activities and to establish mechanisms for referrals and collaboration in the protection and promotion of rights related to the principle of equality and freedom from discrimination, amongst other functions.</p> <p>The provisions of the Act become relevant in areas such as during selection of beneficiaries for the training program, provision of start-up capital, formation of project governance structures to ensure gender representation, distribution of award of program contracts etc. It may also apply in grievance redress if an aggrieved person escalates a complaint to the Commission. NYOTA will adopt</p>

No	Policy/ Legislations /institutional	Provisions as Written
		gender inclusive mechanisms in its implementation process to ensure equitable access to program benefits.
5.	National Policy on Gender and Development, 2019	<p>The Policy outlines the national agenda for gender equality and how Kenya intends to realize these ideals. It details the overarching principles, which will be adopted and integrated into the National and County Government sectoral policies, practices, and programmes and by all state and non-state actors. Aims of the policy include achieving equality of opportunity and outcomes with respect to access to and control of national and county resources and services, and equality of treatment that meets the specific and distinct needs of different categories of women and men. Special focus is however given on the empowerment of women who are currently the marginalized gender. Policy applies specifically and directly to all Government Ministries, Independent Bodies, Quasi-autonomous entities, and Departments and Agencies both at the national and county levels of government.. The proposed policy actions include inter alia: developing and implementing national guidelines for mainstreaming gender, and standards for measuring compliance to gender mainstreaming in all sectors at all levels; Strengthening capacity of institutions with the responsibility of implementing and monitoring gender-related interventions; Enacting legislation to enhance women participation in economic, social and political spaces in both public and private spheres; Strengthening the legal and administrative framework for labour administration to integrate women in non-traditional trades such as construction, mining, infrastructure development, among others; Implementing labour policies that support minimum wage guidelines, regulations on work hours, and protection for trade union and collective bargaining rights, particularly for women to close the differences in access to economic opportunities, earnings and productivity gaps; and enforcement of sexual and gender based violence (SGBV) related laws and policies.</p> <p>NYOTA shall comply with the objectives of policy by ensuring gender equality will be necessary under the project and the implementing agencies shall demonstrate commitment to gender equality in their operational policies and in employment opportunities.</p>
6.	National Policy for Prevention and Response to Gender Based Violence, 2014	<p>The Policy acknowledges that GBV is a serious global health, human rights, and development issue, and although affecting women, girls, men and boys, women and girls have however been found to be disproportionately affected. Forms of recognised GBV issues include sexual violence, physical violence, emotional/psychological violence, harmful traditional practices, and socio-economic violence (through discrimination and/or denial of opportunities and services, social exclusion etc). The Policy expresses the government's commitment to the elimination of all forms of GBV and to the effective provision of quality and accessible services to all survivors. Aims of the Policy include improving the enforcement of laws and policies towards GBV prevention and response; increasing access to quality and comprehensive support services across sectors; and improving sustainability of GBV prevention and response interventions. Actions proposed to realise the policy objectives include inter alia: gender mainstreaming into all legislation, policies, plans and programmes; Developing work place policies addressing GBV prevention and response in public and private set ups; Implementation of Standards and guidelines for GBV prevention at public and private service delivery centres; Establishment and strengthening health, legal, social infrastructure to ensure integration of GBV response; Establishing an elaborate communication strategy incorporating all actors including the public, service providers, government agencies and non-state actors so as to effectively respond to GBV.</p> <p>The project will also support the establishment and/or enhancement of the client's internal GBV (especially SEA/SH) policies and strategies and support their</p>

No	Policy/ Legislations /institutional	Provisions as Written
		entrenchment at all levels including within implementing agencies its contractors and its suppliers, in alignment with this National Policy.
7.	Kenya National Youth Policy, 2006	This Policy seeks to promote a society in which the youth enjoy equal opportunity to usefully engage in social, economic, political, cultural, and religious life. The youth constitute a significant component of VMG populations in Kenya and any initiatives that address their plight therefore speaks to the needs of VMGs and the disadvantaged.
8.	Policy Framework on Nomadic Education in Kenya, 2010	The framework shows that there are three kinds of nomads - hunter-gatherers, pastoral nomads, and peripatetic nomads (fishing nomad). The vision of the framework is a globally competitive Nomadic quality education, training, and research for Kenya's sustainable development. This is to be achieved with the recognition of education as a basic human right and the Kenya government's commitment to SDGs and Vision 2030. The framework is to ensure conformity with other government policies on education generally and the development of nomadic areas in general. The framework additionally aims at developing partnerships with CBOs, NGOs, and other actors to promote high quality education for nomadic children in Kenya. The framework is relevance to NYOTA that seeks to support targeted youth including VMGs from to access better employment opportunities by providing them with training, on the job experience, and access to intermediation services.
9.	National Cohesion and Integration Act, 2008	The Act is meant to promote National cohesion and integration by protecting Kenyans from discrimination on the bases of ethnic or racial backgrounds. It is the basis of aspirations for equitable distribution of public resources in Kenya. It provides that the distribution of public resources should consider Kenya's diverse population and poverty index. The latter points to affirmative actions in favour of VMGs and other peripheral populations to meet their expressed development needs and aspirations. The project under preparation should be alive to this Act and make specific provisions to reach and benefit VMGs in culturally appropriate ways.
10.	County Governments Act, 2012	The Act operationalizes the constitutional provisions on devolution of resources and power to the 47 counties in Kenya. It bestows the power of decision-making on people in the counties through their representatives in the county assembles and enhances their participation in local development. It attempts the protection of and promotion of the interests and rights of minorities and marginalized communities, through participatory budgeting and representation in the county legislatures deemed to be closer to the people at the grassroots. Support to youths and skills development/training is a devolved function, and the project should engage VMGs to ensure they have access to benefits associated with NYOTA interventions.
11.	Access to Information Act (No. 31 of 2016	The Act's purpose is to: (a) give effect to the right of access to information by citizens as provided under Article 35 of the Constitution; (b) provide a framework for public entities and private bodies to proactively disclose information that they hold and to provide information on request in line with the constitutional principles; (c) provide a framework to facilitate access to information held by private bodies in compliance with any right protected by the Constitution and any other law; (d) promote routine and systematic information disclosure by public entities and private bodies on constitutional principles relating to accountability, transparency and public participation and access to information; (e) provide for the protection of persons who disclose information of public interest in good faith; and (f) provide a framework to facilitate public education on the right to access information under this Act. The Act mandates government agencies to make official information more freely available, to provide for proper access by each person to official information relating to that person, to protect official information to the extent consistent with the public interest.

No	Policy/ Legislations /institutional	Provisions as Written
		This Act is aligned to the ESS 10 on information disclosure and will be upheld by NYOTA in relation to ensuring VMGs have access to timely information on all project activities, including the effects of each project activity. NYOTA will also ensure prior disclosure and dissemination of relevant and easily accessible project information in a timeframe that enables meaningful consultations, in a culturally appropriate format, and in relevant local languages.

3.2 The World Bank Environmental and Social Framework

The World Bank’s ESF consists of ten (10) Environmental and Social Standards that set out the requirements for identification and assessment of E&S risks and impacts associated with projects supported by the Bank. ESS7 on Indigenous peoples/sub-Saharan Africa Historically Underserved Traditional Local Communities IP/SSAHUTLC and ESS10 on stakeholder engagement and information disclosure are most relevant to VMGs. The two standards are presented in the following section

3.2.1 ESS7 Indigenous Peoples/sub-Saharan Africa Historically Underserved Traditional Local Communities (IP/SSAHUTLC), known in Kenya as VMGs.

The World Bank in ESS7 Paragraph 6 defines indigenous people as a “distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees: (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to natural resources in these habitats and territories; (iii) customary cultural, economic, social or political institutions that are separate from those of the dominant society and culture; and (iv) an indigenous language, often different from the official language of the country or region.

This ESS applies whenever VMGs are present in or have collective attachment to a proposed project area, as determined during the environmental and social assessment. The ESS applies regardless of whether VMGs are affected positively or negatively, and regardless of the significance of any such impacts. ESS7 recognizes that VMGs have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development. Therefore, the proposed project should respect these identities and aspirations, and must strive to ameliorate rather than deepen their disadvantage. A key purpose of this ESS is to ensure that VMGs are fully consulted about, and have opportunities to actively participate in, project design and determination of project implementation arrangements. The scope and scale of consultation, as well as subsequent project planning and documentation processes, will be proportionate to the scope and scale of potential project risks and impact as may affect VMGs. ESS 7 requires the borrower to prepare a consultation strategy and identify the means by which affected VMGs will participate in project and implementation.

The ESS calls for avoidance of negative impacts on VMGs where possible and where not possible, minimization and/or compensation for these impacts in a culturally appropriate manner proportionate to the nature and scale of such impacts and the form and degree of vulnerability of the affected VMGs. This ESS recognizes that the roles of women and men in VMGs are different from those in the larger society, and that women are often marginalized both within their own VMGs communities and because of external development and may have specific needs. Further, the ESS calls for mitigation measures as well as opportunities for culturally appropriate and sustainable development benefits.

This process should adhere to stakeholder engagement and information disclosure provisions under ESS10.

3.2.2 ESS10 Stakeholder Engagement and Information Disclosure

ESS10 seeks to promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies. The project implementing agencies will undertake an engagement process with affected VMGs, as required in ESS10. The process of VMG engagement will involve: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders in a culturally appropriate and gender and

inter-generationally inclusive manner. Cultural appropriateness relates to the usual communication channels that VMGs use. For example, in the case of meetings, if men and women usually meet separately, that should be maintained during consultation. Additionally, any written material being shared during consultation should be in a language commonly understood by VMGs

For VMGs, the process of meaningful consultation will: i) involve VMG' representative bodies and organizations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members; ii) provide sufficient time for VMG' decision-making processes; and iii) allow for VMGs effective participation in the design of project activities or mitigation measures that could potentially affect them either positively or negatively.

3.3 Differences between National Legislation and ESF (ESS7)

The Constitution of Kenya and other related legislations have a lot of similarities with the tenets of ESS7. There is considerable overlap between groups identified by the constitution of Kenya as vulnerable and marginalized and groups that have triggered ESS7. Thus, there is no significant discrepancy between Kenyan laws and regulations and the World Bank's ESS7.

However, while the constitution protects the indigenous people, it is not specific on the self-identity of these communities. As such, they go unnoticed since not many people know that they exist and hence they miss-out opportunities from development interventions. NYOTA will therefore adopt the recognition of VMG identity in ESS7 and the Constitution's non-discrimination stance.

In addition, the Bank's ESS7 comprehensively describe the objectives, principles, and procedure to safeguard the VMGs. The VMGF, therefore, will be prepared on the basis of the World Bank's ESS7 by taking into consideration relevant Kenya policies and regulation. A consultation strategy prepared in a participatory manner with VMGs will be used to ensure that the VMGs are engagement throughout the project cycle. During implementation, a Grievance Redress Mechanism (GM) will be established and operated to provide VMGs a platform for articulating their concerns, preferences, and any complaint regarding the project for resolution.

4. BASELINE OF VULNERABLE AND MARGINALIZED GROUPS IN KENYA

Most of the VMG communities in Kenya are pastoralists with a few engaging in small-scale farming and fishing activities while others have remained as hunters and gatherers. The pastoralists mostly occupy the arid and semi-arid lands of northern Kenya and towards the border between Kenya and Tanzania in the south. All VMGs face challenges such as land and resource tenure insecurity, poor service delivery, poor political representation, discrimination, and exclusion exacerbating their low socio-economic status. This section provides a highlight of the VMGs in Kenya, informed through literature review and consultations with VMG communities and organizations that represent their interests. The section also captures the potential positive and negative risks and impacts of NYOTA on VMGs and proposed measures to mitigate such impacts.

4.1 Vulnerable and Marginalized Groups in Kenya

Table 3 provides information on the VMGs present in the project area, estimated population, source of livelihood, and highlights the counties where the VMGs are the majority or minority. The list of VMGs will be validated by the YDOs using a predefined form (Annex 3). More details on the VMGs are provided in Annexes 1 and 2.

Table 3: List of VMGs and their county of residence

Name	Other Names Usually derogatory	Estimated Population	Livelihood	Administrative Location Counties	Majority	Minority
1. Aweer	Boni	7,000	Hunter Gatherers	Lamu, Tana River		√
2. Borana		136,936	Pastoralists	Marsabit, Wajir		√
3. Daasanach		21,810	Farming and Livestock Keeping	Marsabit		√
4. El Molo		2,900	Fishing	Marsabit, Samburu		√
5. Endorois	Dorobo	60,000	Fishing/Farmers/ Livestock Keeper	Baringo, Laikipia		√
6. Gabaweyn		4000	Farmers	Mandera		√
7. Gabra		31,000	Pastoralists	Marsabit, Samburu		√
8. Gagabey		1,548	Undertake menial work and pottery	Wajir		√
9. Ilchamus		33,000	Fishing/Farmers/ Livestock Keeper	Baringo		√
10. Lkunono		NA	Artisans	Samburu		√
11. Maasai		666,000	Pastoralists	Narok, Kajiado	√	
12. Munyoyaya		15,000	Fishing/Farmers	Tana River, Garissa		√
13. Ndorobo		1395	Hunter Gatherers	Samburu, Isiolo		√
14. Ogiek	Dorobo	40,000	Hunters Gathers /Farmers	Nakuru; Baringo; Uasin Gishu; Bomet; Kericho; Narok; Nandi, Kiambu,		√
15. Pokot		230,000	Pastoralists	West Pokot /Baringo	√	
16. Rendille		62,000	Pastoralists	Marsabit, Samburu		√
17. Sakuye		11,508	Fishing, Farming and Livestock Keeping	Marsabit		√
18. Samburu		NA	Pastoralists	Samburu	√	
19. Sanye		10,000	Bee keeping, subsistence farming and livestock keeping	Lamu		√
20. Sengwer		50,000	Hunters Gathers /Farmers	Trans-Nzoia; Uasin-Gishu; West Pokot; Keiyo-Marakwet		√
21. Talai		698	Livestock keeping	Kericho		√
22. Turkana		1,008,463	Pastoralists	Turkana, Baringo, Laikipia	√	
23. Waatha	Wasanye	13,000	Hunter Gatherers /Farmers	Kwale; Tana River; Marsabit, Kilifi, Isiolo, Taita Taveta, Mandera		√

Name	Other Names Usually derogatory	Estimated Population	Livelihood	Administrative Location Counties	Majority	Minority
24. Wailwana	Malakote	12,000	Fishing/Farmers/ Bee Keepers	Tana River, Garissa		√
25. Wakifundi		NA	Fishing, Bee keeping, subsistence farming and livestock keeping	Kwale		√
26. Wamakonde		NA	Fishing, Farming	Kwale		√
27. Wapare		24,096	Farming and Livestock Keeping	Taita Taveta		√
28. Wapemba		NA	Fishing	Kwale		√
29. Warabeyi		3,000	Initially blacksmith but now nomadic pastoralism	Mandera		√
30. Watswaka		NA	Fishing, Bee keeping, subsistence farming and livestock keeping	Kwale		√
31. Wayyu	Waata	7,235	Undertaking casual work	Marsabit		√
32. Yiaaku	Dorobo	4,000	Hunters Gatherers /Farmers	Laikipia		√

4.2 Potential Impacts on VMGs

From the consultation sessions held with the various stakeholders including VMG communities, it is anticipated that the NYOTA project interventions are likely to have both positive and negative effects on the VMGs across the participating counties. This section therefore outlines both the positive and negative effects and proposes materials measures for addressing negative impacts on VMGs. The proposed measures also seek to enhance participation of the VMGs in the project leading to improved access to project benefits and opportunities in a culturally appropriate way.

4.3.1 Potential Benefits of the Project to VMGs

Overall, the project is expected to strengthen youth employment, entrepreneurship, and savings outcomes in Kenya in a way that builds a sustainable system that continues to provide solutions long after the project closes. Specifically, the project targets to generate significant socio-economic benefits through several channels. The anticipated benefits to VMGs include but are not limited to:

- **Employment and entrepreneurship in the formal and informal sectors.** Matching employers with suitable youth through job placement services, to reduce the cost of job searching and placements, as well as the risk of a mismatch of job opportunities and applicants, and social unrest caused by high youth unemployment. Enhance the opportunity to access business start-up capital and business development services.
- **Knowledge and skills.** Building the technical capacity of youths through training and provision of intermediation services to engage in productive sectors of the economy, socio emotional and business skills.
- **Financial literacy and saving culture among the youths,** contributing to improved incomes and business growth
- **Inclusion of VMGs and other disadvantaged and vulnerable groups,** in the public participation process leading to improved access to benefits and opportunities (trainings, grants, internships, apprenticeships), as well as the provision of childcare support for female youths.
- **Effective management of grievances at sub-county, county, and national levels,** leading to timely resolution of concerns and grievances throughout the project cycle, including the management of SEAH cases.

4.3.2 Potential Negative Impacts of the projects on VMGs

The anticipated negative impacts of the NYOTA project include but not limited to:

- Inadequate staff capacity and budgetary allocation towards managing negative impacts on VMGs.
- Inadequate targeting and inclusion of VMGs and other disadvantaged or vulnerable individuals among the VMGs in project related activities and limited/inequitable access to project information, benefits and opportunities that are culturally appropriate such as credit facilities, skills training, business start-up assistance, employment opportunities, or such opportunities are not provided in a culturally appropriate manner.
- Elite capture and/or political interference in beneficiary targeting and selection.
- Cause or exacerbate social conflict between dominant communities and VMGs due to application of biased selection criteria on project interventions.
- Implementing interventions for the achievement of project outcomes resulting to social conflicts and grievances within the VMG communities potentially delaying project delivery.
- The project bureaucracy may present opportunities for project staff and associated companies to engage in SEAH of VMG women, girls, men, and boys.

4.3.3 Proposed Mitigation Measures

Proposed mitigation measures for the potential negative impact are provided in Table 2.

Table 4: Potential Negative Impacts and Recommended Mitigations Measures

Sub Project/Activities	Negative Risks and Impacts	Proposed Mitigation Measures	Responsible Entity
Component1: Improving youth employability			
Provision of training and work experience Operationalization of labour market observatory and supporting intermediation	<ul style="list-style-type: none"> • Inadequate targeting and inclusion of VMGs and other disadvantaged or vulnerable groups to project information, benefits, and opportunities. • VMGs may not always be adequately consulted on the design or implementation of project that would profoundly affect their lives and communities. • Inadequate access to project information by VMGs on training opportunities, business start-up grants among other project benefits. • Elite capture and/or political interference in beneficiary targeting and selection. 	<ul style="list-style-type: none"> • Ensure timely and prior disclosure of relevant project information in an easily accessible format and in a timeframe that enables meaningful consultations with VMGs in a culturally appropriate format, in relevant local language(s). • Ensure adequate and ongoing consultation with VMGs in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation. • Consider and responds to feedback promptly. • Ensure adequate representation of VMGs in project governance structures. • Where feasible ring-fence project benefits and opportunities for VMGs. • Document and disclose all VMG consultation foras clearly providing minutes, signed list of attendance. 	NPCU
	Cause or exacerbate social conflicts between dominant communities and VMGs due to application of biased selection criteria on project interventions.	<ul style="list-style-type: none"> • Support the development and implementation of a well-functioning grievance mechanism that receives and facilitates resolution of grievances promptly and protects against reprisals for the use of its services. • Ensure that the grievance mechanism is designed in consultation with affected VMGs 	NPCU
		<ul style="list-style-type: none"> • Sensitization of communities on GM process in the course of its community engagement activities. • Ensure the project GM incorporates existing traditional dispute resolution mechanism as the lowest tier. • Ensure that all VMGs are sensitized on GM and its procedures. • Ensure that all concerns/conflicts are addressed promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. • Ensure all received grievances including all anonymous ones are logged, dated; processed, resolved, and closed out. 	NPCU

Sub Project/Activities	Negative Risks and Impacts	Proposed Mitigation Measures	Responsible Entity
	<p>Limited access of VMGs to project supported income-earning opportunities such as credit facilities, skills training, business start-up assistance, employment opportunities, or such opportunities are not provided in a culturally appropriate manner.</p>	<ul style="list-style-type: none"> • Ensure timely and prior disclosure and dissemination of relevant and easily accessible information in a timeframe that enables meaningful consultations with VMGs in a culturally appropriate format, in relevant local language(s). • Ensure adequate and ongoing consultation with VMGs in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation. • Consider and responds to feedback promptly. • Specifically target and grow VMG-owned business for inclusion. • Deliberately enhance VMGs technical capacity in social enterprises. • Where feasible ring-fence project benefits and opportunities for VMGs. 	NPCU
Component 2: Expanding employment opportunities			
	<p>Failure to communicate or deliver on agreed action plans or benefits to VMGs that are considered culturally inappropriate.</p>	<ul style="list-style-type: none"> • Ensure timely and prior disclosure and dissemination of relevant and easily accessible information in a timeframe that enables meaningful consultations with VMGs in a culturally appropriate format, in relevant local language(s). • Ensure adequate and ongoing consultation with VMGs in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation. • Engage VMG representatives in project monitoring and evaluation activities of the project. • Ensure fidelity of implementation of the VMGs. 	NPCU
Component 3: Supporting youth savings			
<ul style="list-style-type: none"> ○ Provide savings opportunities to beneficiaries of components 1 and 2 ○ Supporting savings through monetary incentives and nudges 	<ul style="list-style-type: none"> • Limited access of VMGs to project supported income-earning opportunities such as credit facilities, skills training, business start-up assistance, employment opportunities, or such opportunities are not provided in a culturally appropriate manner. • Due to their social status, VMGs may not receive equitable project benefits. 	<ul style="list-style-type: none"> • Ensure adequate and ongoing consultation with VMGs in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation. • Ensure adequate representation of VMGs in project governance structures. • Where feasible ring-fence project benefits and opportunities for VMGs. 	NPCU
Component 4: Strengthening Youth Employment Systems, Capacity, and Project Management			

Sub Project/Activities	Negative Risks and Impacts	Proposed Mitigation Measures	Responsible Entity
<ul style="list-style-type: none"> ○ Build County Government capacity to invest in youth employment 	<ul style="list-style-type: none"> ● Inadequate staff capacity and budgetary allocation towards managing negative impacts associated with NYOTA interventions on VMGs. 	<ul style="list-style-type: none"> ● Avail adequate and competent human resources to manage negative impacts on VMGs. ● Allocate adequate resources for managing negative impacts on VMGs. ● Support the development and implementation of a well-functioning grievance mechanism that receives and facilitates resolution of grievances promptly and protects against reprisals for the use of its services. 	NPCU
<ul style="list-style-type: none"> ○ Monitoring and Evaluation and Delivery Systems 	<ul style="list-style-type: none"> ● VMGs indicators may not be included in the M&E system, and VMGs participation in monitoring their inclusion may be minimal. 	<ul style="list-style-type: none"> ● Include VMG focused process and output indicators. Make the M&E system more participatory through VMG representatives who are part of the sub-county and county grievance committees. 	NPCU

5. IMPLEMENTATION OF THE NYOTA VMGF

In implementing this VMGF, the Table 6 summarizes key actions that need to be carried out by various stakeholders and key indicators for monitoring its implementation.

Table 5: Key actions for implementing the NYOTA VMGF

Issues	Activity	Responsibility	Indicators
Screening.	Review the list of VMGs to validate the presence of VMGs in the project area.	NYOTA NPCU, Partner executing agencies VMGs/VMG organizations.	Validated list of majority and minority VMGs in the project area.
Capacity Building of VMGs and VMG Organizations (VMGOs).	Trainings/Information dissemination on project activities, policy requirements for VMGs and VMGOs, VMG rights and entitlements.	NYOTA NPCU, Partner executing agencies VMGOs /VMGs.	VMGs and VMGOs aware of policy requirements, project activities, VMG rights and entitlements.
Development of strategies for participation of VMGs and mitigation measures for potential negative risks.	Develop draft (generic) VMGP for minority VMG groups in Kenya addressing aspects of consultation, risk mitigation, enhancing access to culturally appropriate project benefits and opportunities.	NYOTA NPCU, Partner executing agencies VMGOs /VMGs.	Generic VMGP developed for all VMGs in the project area.
Consultation with VMGs.	Validate the draft VMGP with each VMG in the respective counties.	NYOTA NPCU, Partner executing agencies VMGOs /VMGs.	Draft VMGPs reviewed by VMGs and VMGOs as correct and a true representation of their needs and priorities including amendment where necessary. Traditional GM within VMG communities documented.
	Document existing traditional GM among VMGs.		
Representation of VMGs in decision making organs.	Ensure Representation of VMGs in relevant project decision making organs.	NYOTA NPCU, Partner executing agencies VMGOs/VMGs.	Active participation of VMGs in project implementation. Documented representation of VMGs in project decision making organs.
Training and Capacity Building for implementation of VMGF and VMGP.	Training of staff from partner executing agencies and county staff on VMGF and VMGPs.	NYOTA NPCU, Partner executing agencies VMGOs /VMGs.	Staff from partner executing agencies and county staff trained on VMGF and VMGPs. Participants are able to implement VMGF.
Participatory M&E with VMGs	Ensure engagement of VMGs in project monitoring and evaluation processes.	NYOTA NPCU, Partner executing agencies VMGOs /VMGs.	VMG representatives engaged in project M&E processes.

6. CULTURALLY APPROPRIATE PROCESS FOR CONSULTATION WITH VMGs

The project will undertake meaningful consultation with the VMG communities throughout the project implementation cycle to i) build local project support or ownership; ii) reduce the risk of project-related delays or controversies and iii) ensure that the concerns and preference of VMG Communities are addressed

and captured in the project design. The VMG engagement and consultation process will include among others:

- Stakeholder analysis and engagement planning;
- Disclosure of information, and meaningful consultation, in a culturally appropriate, gender, and inter-generationally inclusive manner;
- Involve VMG representative bodies and organizations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members;
- Provide sufficient time for VMG Communities' decision-making processes and
- Allow for effective participation VMG communities' in the design of project activities or mitigation measures that could potentially affect them either positively or negatively.

During consultation with VMGs, it is important to review and agree on the following aspects:

- Time frames to make decisions throughout the lifetime of the project, taking into consideration logistics, local customs, commercial requirements, and time needed to build trusting relationships should be pursued. Ensure that it is clear how the timetable for involvement links into when project decisions are made. Ideally VMGs initial involvement should be sought well in advance of commencement or authorization of activities, considering VMGs own decision-making processes and structures.
- Mechanism to resolve disputes or grievances in order to proactively address the likelihood that differences of opinion will arise.
- Terms and conditions for the provision of any ongoing youth support with affected vulnerable and marginalized stakeholders and any associated reciprocal obligations.
- Record the process and decisions reached where VMGs are involved, including the results of any monitoring or reviews, to provide a record for on who may be affected by the decisions, and to ensure transparency in the decision-making process. Support the communities' capacity to engage in decision-making: for example, by providing access to independent expert advice, capacity building, facilitation, and mediation, or involving external observers.

The project will consider and apply the following strategies to ensure that VMGs are effectively engaged and consulted:

- Discuss and agree with the VMGs at the outset on how they wish to be engaged.
- Understand and respect local entry protocols as they relate to permission for community entry.
- Build on existing customary institutions and decision-making processes utilized by the affected VMGs for a more effective engagement.
- Consider divergent views and opinions within VMGs while respecting traditional cultural approaches to consultations and decision making
- Commit to open and transparent communication and engagement from the beginning and have a considered approach in place.
- Ensure that all representatives of the NYOTA and executing partner agencies (including third party contracted parties) are well briefed on local customs, history, and legal status, and understand the need for cultural sensitivity.
- Regularly monitor performance in engagement and consultation with VMGs.
- Enlist the services of reputable advisers with good local knowledge on VMGs.

To facilitate effective engagement of the VMGs, the project will follow a schedule aligned to the various stages of the project cycle for all the ongoing and planned consultation activities with the VMGs. During the project preparation phase and prior to final selection of project interventions, the NPCU engaged VMGs to: i) disclose project information; ii) assess project benefits and risks on VMGs, iii) define appropriate mitigation measures to address negative impacts; vi) align on interventions to benefit VMGs, and v) discuss strategies to ensure VMGs can access project benefits and opportunities in a culturally appropriate manner (see Annex 4). The feedback from the aforementioned consultations were used to strengthen this section of the report and more specifically contribute to the development of the VMG consultation schedule described in Table 7. The consultation strategy which will form a critical part of the VMGP will be validated by representatives of VMG communities in the respective counties.

Table 6: Framework for Consultation with VMGs throughout the NYOTA Project Cycle

Issues	Activity	Consultation Participants		Consultation Method	Indicators
		Project Authority	Stakeholders		
Project preparation phase					
Initial consultation with VMGs and screening of the NYOTA project interventions.	<p>Disclosure of relevant project information including culturally appropriate project benefits and opportunities, and VMGs rights and entitlements.</p> <p>Assessment and documentation of the project's impacts on VMGs, appropriate measures to mitigate negative impacts and enhance positive impacts, interventions beneficial to VMG communities.</p>	NPCU YDOs	-VMG Youths (PWDs, women, youth at risk, youth in hard - to- serve areas, among others); -VMGOs; -Local leadership; -CBOs, NGOs, FBOs.	Public forums and Focus Group Discussions (FGDs) Key Informant Interviews (KIIs).	Signed lists of participants. Minutes of meetings.
Stakeholder analysis and planning including identification of existing customary institutions, grievance management mechanisms and decision-making processes used by VMGs.	<p>Identification of :</p> <ul style="list-style-type: none"> -VMG youth representatives -male and female; - Representatives of VMGOs; -Customary institutions, grievance management mechanisms and decision-making processes; - Key project stakeholders consistent with the requirements of ESS10 and the project SEP. 	NPCU YDOs	VMG Youths ; (PWDs, women, youth at risk, youth in hard - to- serve areas, among others); -VMGOs; -Local leadership; -CBOs, NGOs, FBOs.	Public forums; FGDs; KIIs.	Mapped stakeholders per county. Minutes of Meetings. Signed list of participants.
Validation of VMGs presence in the respective counties.	Review the draft list of VMGs per county to validate their presence in the applicable counties.	NPCU YDOs	VMG Youths (PWDs, women, youth at risk, youth in hard - to- serve areas, among others); -VMGOs; -Local leadership; -CBOs, NGOs, FBOs.	Public forums; FGDs; KIIs.	Validated VMG list based on the CoK 2010 and the ESS7 provisions. Signed list of participants. Minutes of Meeting.

Issues	Activity	Consultation Participants		Consultation Method	Indicators
		Project Authority	Stakeholders		
Disclosure of Draft GM and VMGF/VMGPs	Discuss the draft GM, identify, and document existing cultural mechanisms for dispute resolution. Disclose the draft GM including the various GM tiers, responsible staff, and uptake mechanism Disclose the draft VMGF/VMGP with the representatives of the VMG communities	NYOTA NPCU YDOs	VMG Youths (PWDs, women, youth at risk, youth in hard - to- serve areas, among others); -VMGOs; -Local leadership; -CBOs, NGOs, FBOs.	Public forums; FGDs; KIIs.	Signed list of participants. Minutes of meetings. Validated and revised GM, VMGF/VMGP.
Project Implementation Phase					
Representation of VMGs in community-based governance structure in the project.	Ensure Representation of VMGs in relevant project implementation governance structures including Grievance Committees.	NPCU and partner executing agencies, VMGOs.	VMG Youths (PWDs, women, youth at risk, youth in hard - to- serve areas, among others); -VMGOs; -Local leadership; -CBOs, NGOs, FBOs.	Public forums; FGDs; KIIs.	Active participation of VMGs in relevant forums. Signed list of participants.
Training and Capacity Building of staff from implementing and technical agencies (on VMGPs.	Training of staff from implementing and technical agencies on VMGPs.	NYOTA NPCU and partner executing agencies.	-Staff of implementing and technical agencies.	Training workshops and FGDs to interrogate the VMGPs.	Signed list of participants. Training report.
Project Monitoring and Evaluation					
Participatory M&E with VMGs.	Formal participation of VMGs representatives in monitoring of VMGP implementation, review and reporting.	NYOTA NPCU, VMGs ,VMGOs/ Youth leaders and CBOs and elders.	VMG Youths (PWDs, women, youth at risk, youth in hard - to- serve areas, among others); -VMGOs; -Local leadership;	Formal participation in monitoring VMGP implementation, review, and reporting.	Signed list of participants. M&E reports accessible to VMGs and other vulnerable or disadvantaged groups. Mechanism for feedback to

Issues	Activity	Consultation Participants		Consultation Method	Indicators
		Project Authority	Stakeholders		
			-CBOs, NGOs, FBOs.		VMGPs in place and implemented.

7. VULNERABLE AND MARGINALIZED GROUPS PLANS

As highlighted in Table 4, a significant majority (31 out of 35) of the VMG communities found in Kenya are minorities in their respective counties of residence and therefore, they are not the sole beneficiaries of the NYOTA project. As provided for under the ESS7, the NYOTA NPCU will design and implement the project in a manner that provides affected VMG communities with equitable access to project benefits while ensuring that their concerns and or preferences are addressed through meaningful consultation. In this context, the NPCU will prepare a time bound VMG Plan (VMGP) that sets out mitigation measures for all potential negative risks and facilitates access to project benefits by VMG youths in culturally appropriate manner. Specifically, the VMGP will outline the following elements as needed:

- A summary of the results of the meaningful consultation tailored to VMGs.
- A framework for meaningful consultation tailored to VMGs during project implementation.
- Measures for ensuring VMGs receive social and economic benefits that are culturally appropriate and gender sensitive manner and steps for implementing them. If necessary, this may call for measures to enhance the capacity of the project implementing agencies.
- Measures to avoid, minimize, mitigate, or compensate VMGs for any potential negative impacts that were identified in the social assessment, and steps for implementing them.
- The cost estimates, financing plan, schedule, and roles and responsibilities for implementing the VMG Plan.
- Accessible procedures appropriate to the project to address grievances by the affected VMGs arising from project implementation, as described in paragraph 35 of ESS7 and in ESS10.
- Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the VMG Plan, including ways to consider input from project affected VMGs in such mechanisms.

From the review of VMGF, SA reports and VMGP documents for previous and ongoing WB financed projects, it is noted that VMGs communities including Pokot, Samburu, Turkana and Maasai are the overwhelming majority in their respective counties (West Pokot, Samburu, Turkana and Kajiado) of residence and hence the sole beneficiaries of the NYOTA project. In this context, the NPCU will:

- Proactively engage with the relevant VMG communities to ensure their ownership and participation in project design, implementation, monitoring and evaluation.
- Consult with the respective VMGs as to the cultural appropriateness of proposed services and will seek to identify and address any economic or social constraints (including those relating to gender and disability) that may limit opportunities to benefit from, or participate in, the project.
- Ensure vulnerable or disadvantaged youth amongst the VMGs access project benefits and opportunities.

The above requirements on consultation will be included in the overall VMG consultation framework provided under chapter 6, and the preparation of a stand-alone VMGP for the four VMG Communities plan is not necessary.

8. INSTITUTIONAL ARRANGEMENTS

In ensuring compliance with the Banks' safeguards requirements, the NYOTA project will use the following structures:

National Project Coordination Unit

The NPCU E&S Specialist will provide technical support and ensure compliance with the VMGF by coordinating and working with implementing and technical agencies as well as service providers and VMGs.

The NYOTA E&S Specialist will be responsible for:

- Screening for projects affecting VMGs;
- Ensuring the project adequately apply the World Bank's ESS7 and ESS10;

- Assessing the adequacy of the assessment of project impacts and the proposed measures to address issues pertaining to affected VMGs. When doing so, project activities, impacts and social risks, circumstances of the affected indigenous communities, and the capacity of the applicant to implement the measures should also be assessed.
- Assessing the adequacy of the consultation process and monitor project implementation. Ensure constraints, lessons learned concerning VMGs and the application of this VMGF is included in the progress and monitoring reports.
- Ensuring that VMGs are included in monitoring and evaluation exercises.

Youth Development Officers

- Outreach, mobilization, marketing, and promotion of the project to the youth including the VMG youths.
- Identify VMGs within the sub-counties.
- Respond to inquiries on opportunities available to youth.
- Respond to inquiries on project goal, eligibility, and clarify expectation.
- Assess whether the needs of the youth and the VMG youth in the community during and after the project have been addressed.
- Make deliberate efforts to reach and consult with VMGs.
- Operationalize and raise awareness on the grievance mechanism (GM) at all levels.

Non-Governmental Organizations/ Civil Society Organizations

The NGOs present and active in the area will be engaged during the validation of the VMGPs and documentation of the traditional dispute resolution mechanisms within the VMG community as well as during the monitoring and evaluation. The formation of Grievance Committees (GCs) and Steering Committees at county level will also include representation by NGOs.

Other Partners

NYOTA will also work with Social Enterprises to provide employment to youth that are particularly hard to reach through a results-based financing agreement. In this regard, Social Enterprises with a franchise-type or seller-agent model will be pre-qualified and will include an entrepreneurship training component along with guided support and kit-provision (where applicable) to help beneficiaries run their micro-franchise. MOYACES will also closely coordinate with the Department of Refugee Services (DRS) and United Nations High Commissioner for Refugees UNHCR on the Window for Host Communities and Refugees (WHR) components implemented in the refugee hosting areas.

World Bank

The Bank will receive the prepared VMGF for review and if satisfied, provide a No Objection or otherwise prior to sub project implementation. During implementation, the Bank will also conduct field monitoring and evaluation.

9. GRIEVANCE MECHANISM

The NYOTA project will adopt and strengthen the GM developed and implemented under KYEOP. For this purpose, the NYOTA project team engaged various stakeholders to assess the performance of the KYEOP GM and propose measures for its enhancement. The stakeholders comprised the Sub-County Youth Development Officers (SCYDOs), NPCU, project technical teams, youth representing VMG communities including Samburu, Waatha, Orma, Yaaku, Ogiek, Ndorobo, Iikunono and Sengwer, and representatives of VMG organizations such as the YAAKU indigenous Moms, OPDP and HUGAFO. The consultation also sought to establish if the VMGs had access to functional GMs with established procedures for addressing grievances, considering suggestions and, if such mechanisms are responsive to sensitive issues such as GBV related complaints.

The recommended actions for GM strengthening provided by the stakeholders have been considered in the development of the NYOTA GM. They include, engaging a dedicated team responsible for

recording, processing and resolving grievances; providing for confidential reporting and handling of SEAH cases and having clear timelines for resolving and escalating grievances within the tiers; setting up a multi-institutional committee responsible for grievance management at sub-county and county levels; designating specific staff with responsibility of managing grievances with mandates to ensure close follow-up of all the reported grievances; reducing the turnaround time for escalated grievances to allow prompt feedback to the complainant, and strengthening the staff capacity in management of grievances and especially those related to SEAH. Detailed findings from the engagement are provided in Annexes VI and VII.

NYOTA will operate a three-tier GM structure at the sub-county, county and national levels with specific staff designated as GM Focal Persons (FPs) as presented in the subsequent sections. The existing MIS will complement the project GM. More details are provided in the standalone GM prepared for the NYOTA project.

9.1 Key Staff Coordinating Grievance Management under NYOTA

The NPCU's E&S Specialist (SDS) will be the main FP in charge of grievance management under the project, while the sub-county and county levels grievance focal persons responsible for receiving and handling grievances at the project level.

E&S Specialist at the NPCU

Specifically, the SDS will undertake the following activities.

- Coordinate the formation of Grievance Committees (GCs) at the national, county and sub county level before the commencement of project interventions.
- Serve as the main FP for Grievance Management under the project, liaise with, and assist to resolve all grievances in collaboration with sub-county and county levels grievance FPs, maintain overall project GM log detailing grievances, received, resolved, and closed out and monitor the performance of the GM through quarterly audits and recommend any corrective actions as appropriate.
- Compile and prepare consolidated quarterly GM monitoring reports and submit to the WB through the NPCU coordinator.
- Liaise with the project coordinator to ensure adequate resources are allocated for implementing the GM.
- Facilitate GM trainings for NYOTA staff and stakeholders in the counties as well as information dissemination to beneficiaries in liaison with project sub-county/county teams.

County Director Youth (CDY)

The NPCU will nominate staff responsible for grievance management. Specifically, the CDY will be designated as the grievance FP at the county level with the following responsibilities:

- Serve as the main FP for grievance management at the County level;
- Create awareness of the GM amongst all the stakeholders at the County level;
- Register, categorize, analyse, resolve grievances at the county level and provide feedback to the aggrieved;
- Maintain the GM log in both soft and hard copies;
- Follow up on pending issues with the sub-county, county, and national level grievance committees;
- Identify gaps and recommend actions for improving the GM to the NPCU;
- Prepare monthly/quarterly reports on all grievances received and processed and submit to the NPCU
- Build the capacity of the project staff at county and sub county level on grievance management;
- Monitor performance of the project GM by taking periodic audits of all GM activities at the county level;

Sub-county Youth Development Officers (SCYDOs)

Similarly, the NPCU will nominate staff responsible for grievance management at the sub-county level.

Specifically, the SCYDOs will be designated as the grievance FP at the sub-county level with the following responsibilities:

- Serve as the main FP for grievance management at the sub-county level;
- Create awareness of the GM amongst all the stakeholders at the sub-county level;
- Register, categorize, analyse, resolve grievances at the sub-county level and provide feedback to the aggrieved;
- Maintain the GM log in both soft and hard copies;
- Follow up on pending issues with the sub-county, county, and national level grievance committees;
- Identify gaps and recommend actions for improving the GM to the NPCU;
- Prepare monthly/quarterly reports on all grievances received and processed and submit to the NPCU;
- Build the capacity of the project staff at the sub-county level on grievance management;
- Monitor performance of the project GM by taking periodic audits of all GM activities at the sub-county level.

9.2 Grievance Handling Structures Under NYOTA

Borrowing from the lessons of operating the KYEOP GM, the NYOTA NPCU will implement a three Tier GM process operated at the national, county, and sub-county levels through Grievance Committees.

a. First Tier of Redress (Sub-County Grievance Committee)

The first level of grievance redress will be at the Sub-county level where the SCYDO will be designated as the FP responsible for grievance management. The SCYDO will be responsible to maintain grievance records and ensure that the grievance log is routinely updated. After registering the complaint, the SCYDO will study the complaint made in detail and forward the complaint to the concerned officer at the sub-county with specific dates for redress. If necessary, meetings will be convened with the concerned complainant to address the grievance. The SCYDO will record and file all deliberations made during the meeting and decisions taken.

The resolution at the first tier will be provided within 14 working days and complainant notified through a disclosure form. If the grievance is not resolved within this period, it will be referred to the next Tier of the GM. However, if the SCYDO feels that adequate solutions are worked out, but it would require a few more days for actions to be taken, he/she can decide to retain the issue at the first level by informing the complainant accordingly. However, if the complainant requests for an immediate transfer of the complaint to the next level, it would be accepted and the issue would be taken to the next tier, especially if the issue is not addressed within 21 days.

To augment the effort of the SCYDO, in grievance management, the NPCU will constitute a sub-county grievance committee prior to commencement of the project activities. The SCYDO will serve as the FP and will engage a representative of the National Government Administration Office (NGAO) to serve as the chair of the committee. Members of the committee will consist of:

- Representative of NGAO-Deputy County Commissioner (Chairperson);
- Sub-County Youth Development (SCYDO) - FP also doubling up as (the Secretary);
- Representative of women;
- Representative of youths;
- Representative of PWDs;
- Representative of local CBOs/NGOs active in the area;
- Representative of the VMGs community in the area (applicable where minority VMGs are present);
- Representatives of MSEA and NSSF.

The respective SCYDO will coordinate with the chairperson in getting this Committee constituted and get the necessary circulars so that the meeting can be convened whenever required. The SCYDO will

coordinate the convening of the meetings including briefing the committee on the grievances and deliberations of the first level of redress, outcomes and on the views of the aggrieved parties.

b. Second Tier of Redress (County Grievance Committee)

At the county level, NPCU will constitute a committee to serve as the second tier for grievance management. All grievances that cannot be resolved at the first tier will be referred to this level for redress. It is important to ensure that the committee is constituted prior to commencement of the project activities. The County Director Youth (CDY) will serve as the FP. Members of the committee will consist of:

- Representative of NGAO -County Commissioner (Chairperson);
- County Director Youth (CDY) – FP also doubling up as the Secretary;
- Representative of local CBOs/NGOs active in the area;
- Representative of the VMG community in the area (applicable where minority VMGs are present);
- Representative of Youth;
- Representative of Women;
- Representative of PWDs;
- Representative of MSEA and NSSF.

The CDYD will coordinate with the chairperson c in getting this committee constituted and get the necessary circulars so that the meeting can be convened whenever required. The CDYD will coordinate the convening of the meetings including briefing the committee on the grievances and deliberations of the second level of redress, outcomes and on the views of the aggrieved parties.

The sub-county and county level committees will hold the necessary meetings with the complainant and attempt to find a solution acceptable to all. The SCYDO and CDYD shall record the minutes of the meetings and file. Annex III provides a sample Meeting Recording Format. The decisions of the committees will be communicated to the complainant formally and if he/she accepts the resolutions, the complainant's acceptance is obtained in writing and signing off is done between the complainant and the committees. Annex IV provides a sample grievance resolution form.

If the complainant does not accept the solution offered by the committees or if no solution is reached within 14 days, then the complaint is referred to the third tier. However, in cases where there are strong possibilities of finding an amicable solution at the second tier, the case can be retained to a maximum of 21 days.

c. Third Tier of Redress (National Grievance Committee)

If the affected complainant does not agree/accept the resolution provided at the 2nd level, or there is a time delay of more than 14-21 days in solving the issue, the complainant can opt to take the grievance to the third level. The NPCU will constitute a committee prior to commencement of the project activities. The NPCU Coordinator will be the chairperson while the E&S Specialist will serve as the FP/Secretary. The FP will be responsible in getting the committee constituted and getting the necessary circulars issued in this regard so that they can be convened whenever required.

Members of the Committee will consist of:

- NYOTA National Project Coordinator- Chair person;
- NPCU E&S Specialist– FP and Secretary;
- Representative of NYOTA implementing Agencies (NSSF, MSEA, MOYACES);
- As needed, representative from the NYOTA technical agencies (NEA, NITA, SDL&SD, SD-MSMED, DRS and UNHCR);
- Representative from relevant Ministries, Departments and Agencies (MDAs) focusing on pertinent social, health and safety aspects, including minority and vulnerable groups, social protection, gender and GBV, PWDs, grievance management, labour and working conditions,

among others will be brought on board as needed to help address issues that fall within their constitutional mandates.

The third-tier structure will deliberate upon the issue and give suitable recommendations. The minutes of the meetings will be recorded and kept at the NPCU office. The decisions of the third-tier structure would be final from the project side and will be communicated to the complainant formally and if he/she accepts the resolutions, the complainant's acceptance is obtained and signed off by the complainant and NPCU FP. If the complainant does not agree with the resolution provided at the third tier, or there is a time delay of more than 21 days in solving the issue, the complainant will be offered the option of reaching out to an independent mediation process at an alternative arbitration body such as local administration, Commission on Administrative Justice (CAJ), or through the judicial system/courts or other avenues as prescribed in CoK 2010.

The beneficiaries will be made aware that project level GMs are accessible at no cost, however, they would have to bear the cost of legal redress at the courts if they chose to go to court. Complainants should be advised to exhaust all the three levels of the project GM before seeking help from alternative arbitration institutions. The committees are to be formed and activated prior to commencement of project implementation process to allow for sufficient time for creating awareness on the GM process amongst stakeholders. Traditional dispute resolution structures existing within communities especially the VMGs will also be used as the first step in resolving grievances. Where necessary, VMGs communities will be assisted to document and record the complaint.

9.3 Meeting Schedule of the Grievance Committees

The committees will meet whenever required to address grievances referred to their level. The committees will also be convened on quarterly basis to review progress made in grievance management and minutes of meetings taken by the FPs. The quorum at the meeting shall be two third of the total membership. Besides progress, the committees will also review pending grievances and recommend appropriate measures for ensuring their timely resolution. The proceedings of the meeting shall be recorded and filed.

9.4 Mode of Receipt and Recording of Complaints

Complaints can be made in writing, over the phone, by emails, using anonymous boxes, over the internet or verbally through walk ins into the sub -county, county and NPCU offices or through the project MIS and social media platforms. Stakeholders will be sensitized on various grievance uptake points during the grievance sensitization workshops and brochures with this information shared out. At county and sub county levels, the FP will receive, record, and collate all the grievances from the various uptake points on a regular basis. As soon as the officer receives a complaint, he /she should issue an acknowledgement receipt (Annex I) to the complainant including the details of the person reporting the grievance. The officer receiving the complaints should try to obtain and document all the relevant basic information regarding the grievance. To enhance access to the GM by VMG communities, a more proactive approach will be applied to ensure that their concerns have been identified and articulated. This will be done for example, by ensuring that the FPs meet periodically with VMGs or through their representatives to find out if they have any issues of concern and to act as an intermediary.

9.5 Grievance Redress Process Steps

9.5.1 Step 1: Reporting and Receiving Grievances

NYOTA NPCU with the support of the counties will undertake workshops to sensitize all stakeholders on the project GM including where and how to submit grievances. The NYOTA project will provide various uptake channels as shown in Table 8 The uptake channels will be set up before commencement of project activities.

Table 7: NYOTA Grievance Uptake Channels

No	Mode	Contact
1	NPCU's physical and postal address to submit verbal and written complaints. <ul style="list-style-type: none"> • GM and GBV Focal Person Desk • Anonymous boxes • Grievance Log 	NYOTA Project Coordinator (NPCU); Kencom building, 3 rd floor; P. O. Box 30050- 00100 Nairobi, Kenya.
2	County Level physical address to submit verbal and written complaints. <ul style="list-style-type: none"> • GM and GBV Focal Person Desk • Anonymous boxes • Grievance Log 	Offices of the State Department for Youth Affairs and Creative Economy (SDYACE) located at the County Commissioner's headquarters.
3	Sub-county Level physical address to submit verbal and written complaints. <ul style="list-style-type: none"> • GM and GBV Focal Person Desk • Anonymous boxes • Grievance Log 	Offices of the State Department for Youth Affairs and Creative Economy (SDYACE) located at the Deputy County Commissioner's headquarters.
4	1 (one) NPCU Toll Free line with a provision for WhatsApp and SMS, and E-mail address	TBD
5	47 County Level Toll Free Lines with a provision for WhatsApp and SMS, and E-mail address	TBD
6	NYOTA Twitter/X	TBD
	NYOTA Facebook	TBD
7	Project MIS Link	TBD

9.5.2 Step 2: Recording and processing of grievances

Documentation of complaints and grievances is important, including those that are communicated informally and orally. Records provide a way of understanding patterns and trends in complaints, disputes, and grievances over time. While transparency should be maintained for example, through regular reports on issues raised and rates of resolution, – provision should also be made for confidentiality of information or anonymity of the complainant(s) whenever necessary. At both the national and county level, all submitted complaints and grievances will be entered into the MIS database and GM log book and archived including all scanned documents received or related to the case along the process. A sample grievance redress log is provided in Annex II. Once logged, the grievance should be assessed, assigned to an individual for management, tracked and closed out or “signed off” when resolved, ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution. The MIS database will be used to track complaints and their resolution.

The sub-county, county and national level offices will maintain a GM log book in which complaints received by GM FPs or other project staff, either in written or verbal form, are entered. A complaint register should capture the following information:

- Serial number;
- Reference number;
- Uptake channel used;
- Name and address of the complainant/s./their representatives/if anonymous;
- Date of complaint;
- Summary of the complaint/grievance;
- Signature of the complainant/s;
- Category;
- Resolution process (Not commenced/In process/Completed);
- Referred;
- Signature of the complainant/s.

9.5.3 Step 3: Reviewing and Investigating Grievances

20. All grievances will need to undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances.

9.5.4 Step 4: Developing resolution options and preparing a response

Once the grievance is well understood, resolution options can be developed taking into consideration stakeholders' preferences, project policy, past experience, current issues, and potential outcomes.

9.5.5 Step 5: Feedback mechanism

One of the most important steps of the NYOTA GM is to provide clear feedback of outcome to the complainants. The GM FPs at the County and sub county levels are responsible to give feedback to the complainants via email, message, or call. The complainants must know that their complaints were recorded by the GRC's and that they are investigating the issue. In case of anonymous complain/grievance, acknowledgement will not be possible. The means through which the complainant has been acknowledged shall also be recorded in the database. In this regard, the complainants shall receive acknowledgement feedback within 7 working days after the issue is reported. The resolutions agreed upon must also be recorded in the MIS for purposes of tracking grievance management and reporting. The NYOTA GM will use various approaches for **acknowledgment and communicating the grievance redress outcome and this includes:**

- a. **Email/messaging:** Either an automatic or manual reply will be sent to the complainants confirming the receipt of their complaints and getting back to them after analyzing it. The complainant, who has sent his /her grievance through email, will receive the final feedback through email.
- b. **Grievance resolution form:** A printed, or soft copy grievance resolution form will be used. The form is provided in Annex IV.
- c. **Phone call:** The complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by relevant GM FP, or verbally.

9.5.6 Step 6: Monitoring and Reporting of Grievance Mechanism

Monitoring and reporting can be a useful tool for measuring the effectiveness of the GM and for determining broad trends and recurring problems so that they can be resolved proactively before they become points of contention. Monitoring and reporting create a base level of information that can be used to report to communities. To ensure smooth operation of GM, NYOTA NPCU will conduct frequent supervisions and monitoring missions on GM to ensure that it is functioning as anticipated and GM aspects are included in regular reporting mechanism. The status of grievances received and resolved or escalated will be reported by county level GM FPs on a monthly basis. The GM reports will be submitted to the SDS (who serves as the main GM FP) for compilation and submission to the WB in consultation with the NPCU Coordinator.

9.6 Use of Alternative Dispute Resolution Mechanisms

Besides the project GM, other grievance redress alternatives that are available to the affected and other interested parties include:

9.6.1 Traditional grievance mechanism among VMG communities

Prior to engaging with the project GM, the traditional dispute resolution structures existing for each of the VMGs will be used as the first step in resolving grievances. During the validation of the VMGPs, the SCYDOs will document the existing traditional dispute resolution structures existing for each of the VMGs communities including identifying VMG GM focal points and involvement of VMG traditional councils. Those seeking redress and wishing to state grievances would do so by notifying their VMG GM focal points or the appropriate VMG traditional councils. If the complainant does not agree with the resolution provided through the traditional grievance mechanism existing within each VMG community, the complainant will be offered the option of reaching out to the three-tier project GM outlined earlier. NYOTA will provide additional uptake channels for the project GM in VMG areas to enhance its utilization.

9.6.2 National Referral Institutions

All the complainants dissatisfied with resolution provided through the project GM will be referred to the other grievance handling structures in Kenya such as the National Gender Equality Commission, National Council for Persons with Disabilities, Kenya National Commission on Human Rights, , the Ethics and Anti-Corruption Commission, , CAJ and the Kenyan Courts of Law as the last resort.

9.6.3 World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by NYOTA project may submit complaints to the World Bank Kenya office as follows: Country Director, World Bank Kenya Office, Delta Center Menengai Road, Upper Hill P.O. Box 30577-00100 Nairobi, Kenya. Tel: +254-20-3226000. Fax: 254-20-3226382. Kenyaalert@worldbank.org.

If no response is received from the WB Kenya office, the complainant can also report directly to the WB Grievance Redress Service (GRS) on email: grievances@worldbank.org. The GRS ensures that complaints received are promptly addressed by engaging both the WB project team and the complainant. Project affected communities and individuals may also submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org. These contact email addresses will also be shared by project stakeholders through the GM disclosure workshops.

9.7 The Grievance Management Information System (MIS)

To complement the three tier GM, the project will adopt the MIS operated under KYEOP that had a specific platform for reporting, processing, and resolving grievances. The MIS will be critical in ensuring centralizing and consolidating grievance management including, sending automated acknowledgements and responses, generation of standard reports. The NYOTA NPCU will collaborate with the ICT specialist in the project to define the operational protocol including making decision on access, user rights and related responsible staff.

9.8 Grievance Documentation, Monitoring and Reporting

Documentation of complaints and grievances is important, including those that are communicated informally and orally. These should be logged, assessed, assigned to an individual for management, tracked and closed out or “signed off” when resolved, ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution. Records provide a way of understanding patterns and trends in complaints, disputes, and grievances over time. While transparency should be maintained – for example, through regular reports on issues raised and rates of resolution – provision should also be made for confidentiality of information or anonymity of the complainant(s) whenever necessary.

A grievance log (sample provided in Annex 7) will be maintained by the NPCU consolidating grievances received at the sub-county, county and national levels, and copies of the records kept with all the NYOTA implementing agencies at the national level. The GM FPs shall maintain a grievance log that captures the following information.

- Date of the complaint;
- Individual grievance reference number;
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously);
- Details of the complaint, feedback, or question including his or her location;
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.);

- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution;
- Date when proposed resolution was communicated to the complainant (unless anonymous);
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution;
- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out;
- If necessary, details of escalation procedure;
- Date when the resolution is implemented (if any).

The updated GM log will be submitted every month to the SDS at the NPCU level for consolidation and reporting to the Bank on quarterly basis. The NPCU shall monitor the implementation of the GM on a quarterly basis. The monitoring of the GM will include the following indicators:

- Number of grievances received, logged, acknowledged, processed, resolved, and closed within a set time frame;
- Number of cases requesting external review or alternative third-party arbitration;
- Number of stakeholders satisfied with resolution;
- Number and percentage of grievances received per categories/thematic area;
- Number and percentage of grievances received per severity level;
- Number and percentage of grievances resolved versus rejected;
- Number and percentage of grievances per operation site/location.

Through the project MIS, NYOTA should analyse aspects such as the typology of complaints, geographic areas with most complaints, status of grievance management etc. This information provided by the database will help NYOTA to improve the GM and also improve the management processes of the project.

9.9 Evaluating the Grievance Mechanism

An evaluation system should assess the overall effectiveness and the impact of the GM. Such evaluations can take place either annually and their results should contribute to improving the performance of the GM and provide valuable feedback to project management. In conducting the evaluation, the following questions can be used:

- a. How many complaints have been raised?
- b. What types of complaints have been raised?
- c. What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)?
- d. How long did it take to solve the problem?
- e. How many complainants have used the grievance redress procedure?
- f. What were the outcomes?
- g. Are the GMs effective in realizing the stated goals, objectives, and principles?
- h. Are the GMs capable of responding to the range of grievances being reported?

At mid-term stage of the project, an in-depth evaluation of the performance of the GM will be done using the tool presented in Annex V. The information obtained will be used to enhance the effectiveness of the GM and also improve project management processes for purposes of proactively reducing the number of reported grievances.

9.10 Grievance Mechanisms and Referrals for SEA/SH Survivors

The NYOTA project GM will be adapted to receive, record, and refer all SEAH complaints to qualified GBV service providers. In adapting the GM for receiving SEAH complaints the following considerations will be made:

- The GM will adopt a survivor-centered approach in which the safety and well-being of the SEAH survivor is the first priority and, in relation to adult GBV survivors, any action is only taken with the survivor's consent.

- In order to act in the best interests of children, GMs will develop specific protocols for children who are survivors of SEAH. GM operators will be trained on how to respond to cases involving children, regardless of whether the child or a third-party lodges the complaint.
- The GM will provide multiple channels through which complaints can be registered in a safe and confidential manner, including through anonymous complaint reporting mechanisms.
- The GM will ensure that information on how to report complaints is disseminated among project beneficiaries and communities.
- The GM will advise SEAH survivors of mandatory reporting requirement and limits of confidentiality as required under Kenyan law.
- The GM will ensure that personal information of a survivor is protected. No identifiable information on the survivor will be stored in the GM and all information must be kept confidentially. The GM will not require disclosure of, or record, information on aspects of the SEAH incident other than (a) the nature of the complaint (what the complainant says in her/his own words without direct questioning); (b) if, to the best of the complainant's knowledge, the alleged perpetrator was associated with the project; and (c) if possible, the age and sex of the survivor. Where mandatory reporting requirements apply, information disclosure should be made in accordance with legal requirements, and information should only be released to the appropriate authority or agency.
- **The project GM will serve primarily to refer complainants to GBV service providers** (whether related to the project or not) immediately after receiving a complaint. Where the complainant consents, the GM should initiate procedures to determine whether disciplinary measures should be implemented. The GM should also monitor follow-up actions and record resolution of the complaint in line with survivor-centered principles.
- The GM will operate without prejudice to any other complaint mechanisms or legal recourse to which an individual or community may otherwise have access under national, regional, or international law, or under the rules and regulations of other institutions, agencies or commissions.

The NPCU will appoint GBV FPs at the sub-county, county and national levels, and awareness created to beneficiaries and service providers on SEAH. In addition, each technical agency will appoint a GBV FP. The GBV FP at the national level will coordinate all GBV FPs under NYOTA. SEAH trainings will be availed to all GBV FPs.

All GM staff will be trained to receive SEAH complaints, to frame questions in a non-accusatory manner, and to treat complainants with respect. In addition, they will be trained to follow specific protocols when receiving complaints related to SEAH against children. The GM may also verify whether the allegation is linked to the project and will have an ongoing role in monitoring progress and conclusion of the complaint, including actions taken. Follow-up support to the survivor is provided by the GBV service providers, while the GM will monitor effective access to holistic care based on each survivor's needs and wishes.

For project GMs to be able to respond appropriately to incidents of SEAH, it is important that the NPCU identifies in advance competent GBV service provider (s) to refer survivors for support. GBV service providers play an essential role in supporting survivors and mitigating the harm of SEAH including through health services; psychosocial care; and security, legal, and financial support. However, the availability and quality of GBV service providers varies significantly in different counties. At the time a complaint occurs, it is often too late to identify and evaluate a suitable GBV service provider for referral. For this reason, the NPCU should seek to identify referral pathways before project activities commence, as recommended in the NYOTA SEAH Prevention and Response Action Plan.

10. MONITORING AND EVALUATION

This section presents the proposed monitoring and evaluation framework to monitor the extent of inclusion of VMGs in the project and also determine implementation of the VMGPs and the related mitigation measures for addressing project related negative impacts. The overall objective of the monitoring and evaluation (M&E) framework is to guide all data collection activities to help determine if project targets, impacts, mitigation measures and expected benefits to the VMGs have been attained.

The NPCU will establish a monitoring system involving the project staff at national and county level, as well as community groups of VMGs to ensure effective implementation of VMGPs. The implementation of the VMGPs should be closely monitored and documented. At the county level, the social development staff will prepare monthly monitoring reports and submit to the NPCU. At the NPCU level, the E&S Specialist (SDS) will take the lead responsibility in compiling all the monthly county monitoring reports and share with the WB on quarterly basis for review. An appropriate format will be prepared by NPCU and adopted for monitoring and reporting requirements

As proposed under Table 9, a set of M&E indicators will be determined and agreed upon during VMGP development. It is important that the M&E plan is developed with the active involvement of the VMGs in order to come up with mitigation measures that are culturally appropriate to their context. Project results indicators will be disaggregated by gender to monitor women’s participation in the project interventions. The M&E indicators should capture both process and outputs in indicators including:

- Consultation processes including how many participants by category, issues deliberated and how they were resolved;
- Extent of inclusion of VMGs who are eligible for the project, barriers to inclusion and how they should be addressed;
- Any negative impacts and how they should be mitigated;
- Whether the project GM is accessible to the target VMGs under NYOTA, and whether it is capturing their concerns and addressing them, including a record of the complaints and grievances;
- Monitoring the perception of the VMGs towards the project during the implementation phase;
- Determination of the impact of NYOTA on the welfare of the VMGs in the proposed interventions compared to pre-project baseline

In the event that during monitoring, the project interventions are found to have significant negative impacts on VMGs, independent experts (such as CBOs or NGOs) should be involved to verify monitoring information of the VMGPs in that particular intervention. The experts will advise on compliance issues and if any significant issues are found, the responsible NYOTA officer at the county in liaison with the SDS at NPCU level should prepare a corrective action plan or an update to the approved VMGP. The officer should also closely assess the progress of the corrective measures to ensure their effectiveness. Annex 4 presents sample tools for monitoring implementation of the VMGF and VMGPs.

It is proposed that the project will ensure no VMGs are excluded and are able to access culturally-appropriate benefits from the NYOTA interventions.

Table 8: Proposed Monitoring and Evaluation Framework

Aspect to be Monitored	Indicator	Responsibility	Means of Verification
Validation of the VMG list to confirm whether VMGs are present or have collective attachment to, the project area.	Verified list of VMGs per county.	NPCU	Report on Validation of VMGs in all counties.
Strengthening the capacity of national and county staff on the VMGF and implementation of VMGPs.	Number of staff from national and county level trained.	NPCU	Training reports with signed lists of participants.
Trainings/Information dissemination on GoK and WB policy requirements for VMGs and VMGOs.	Number of VMGs/VMGOs meetings; Number of VMGs sensitized.	NPCU	Training reports with signed lists of participants.
Develop draft (generic) VMGP for all minority VMGs in the counties addressing aspects of consultation, risk mitigation, enhancing access to project benefits.	Generic VMGP developed.	NPCU	VMGP report.

Aspect to be Monitored	Indicator	Responsibility	Means of Verification
Validate the draft VMGP with each VMG community in the respective counties.	Draft VMGP validated by respective VMGs in each county.	NPCU	Validated VMGPs.
Document existing traditional GMs among VMGs.	Documented traditional GMs.	NPCU	Traditional GMs for each VMG community.
Ensuring equitable representation of VMGs in project structures.	No of VMGs in the grievance committees.	NPCU	Inclusivity reports showing VMGs in grievance committees.
Consultation sessions with VMGs -on potential negative impacts of project, benefits and opportunities, rights, and entitlements; -identification of culturally appropriate measures to mitigate negative impacts; -development of corrective action plans.	Number of VMG Consultation sessions held.	NPCU	Training reports with signed lists of participants.
Accessibility of the GM to VMGs, grievances received, resolved, and closed out.	GM reports highlighting number of grievances received, resolved, and closed out, as well as those unresolved and escalated.	NPCU	GM reports highlighting number of grievances resolved and closed out, as well as those unresolved and escalated.
Extent of inclusion of VMGs who are eligible for targeting under NYOTA interventions.	Reports indicating VMGs inclusion in project interventions.	NPCU	Reports highlighting extent of VMG Inclusion
Involvement of VMGs in monitoring and evaluation of VMGP implementation.	Number of VMGs involved in NYOTA M&E activities.	NPCU	Monitoring and evaluation reports showing engagement of VMGs.
Monitoring and evaluation of the VMGP implementation.	M&E reports.	NPCU	Monitoring and evaluation reports showing extent of VMGP implementation.
Annual VMGP Audit.	Annual audit report.	NPCU	Annual audit report on implementation of VMGP.

11. BUDGET REQUIREMENTS FOR IMPLEMENTATION OF THE VMGF

The budget for the implementation of the VMGF is presented in Table 9. The Project will cater for all costs related to preparation and implementation of VMGPs. It is important to note that, in this VMGF an estimated budget has been provided and more accurate costs will be agreed upon by the project team after consultation with VMGs and determination of need for any additional measures targeting VMGs have been finalized. The budget for the implementation of this VMGF mainly includes costs for validating draft (generic) VMGPs with VMGs, costs for implementing VMGPs, such as consultancy support, travel costs of the relevant NPCU members, and other participating stakeholders as appropriate.

The budget related to all capacity building activities, such as training of project staff and service providers and awareness to beneficiaries on the VMGF/VMGPs, are captured in the Stakeholder Engagement Plan, while the monitoring of VMGP implementation shall be covered under the overall project monitoring cost. The estimated budget for the implementation of the VMGF/VMGPs is **KES 6, 050, 000** as presented below.

Table 9: Budget for Implementation of the VMGF/VMGPs for 5 Years

Item	Units	Estimated Cost (KES)
Validate the VMG list with each VMG community in the project area. Validate the generic VMGP with each minority VMG communities in the respective counties. Document existing traditional Grievance Mechanism among VMGs.	One off	500, 000
Implement and monitor the VMGPs	5 @ 1,000, 000	5, 000, 000
10% Contingency		550, 000
Total		KES 6, 050, 000 USD (50, 000)

12. ANNEXES

Annex 1: Profile of the Vulnerable and Marginalized Groups in Kenya

1. Sengwer

The Sengwer live in the three administrative districts of Marakwet, West Pokot and Trans Nzoia in and along Cherangany. It is estimated that the current population of the Sengwer, considered as one of the most marginalized groups, is about 30,000. As their land in the plains of Trans Nzoia turned out to be the best area for agricultural production in Kenya, they were displaced entirely from there to make way for white farmers. A minority stayed behind as farm workers, but the majority went up into the forests of the Cherangany hills. As the Sengwer were not considered as independent group, they were also not invited to join the settlement schemes in which the independent Kenya redistributed the white farms to the farm workers and the dominant ethnic groups of the area. While most Sengwer are officially landless, some few Sengwer especially in the northern parts of the Cherangany hills received some land, but even this land is contested.

The Sengwer have increasingly been restricted to areas with home ‘bases’ involving agriculture and livestock rearing and outlying areas where some honey gathering is still practiced. The Sengwer continue to experience expropriation of their land and restrictions on access to natural resources- especially forests and water- which have further increased their sedentarization, marginalization, social discrimination, and impoverishment. Even though they are considered, from the formal legal point of view, as citizens equal to all other Kenyans, they do not have the same access to land and other resources, protection against cattle rustlers, social and political influence, legal status and/or organizational, technical or economic capacities as other Kenyan citizens. Their livelihoods revolve around agriculture, beekeeping, and honey harvesting, and livestock. Their governance rests on a council of elders that is devolved to the clan level.

2. Ogiek

Marioshoni ward of Molo constituency is home to the largest proportion of Ogiek people in Kenya. Ogieks are an indigenous minority ethnic group in Kenya comprising about 20,000 members. The land they inhabit was forest land and has been cleared for settlement in the last twenty years. The Ogiek claim this land as their traditional territory as hunters and gatherers over several generations. However, this claim has been contested and a court case has progressed through Kenyan courts over the years and landed in the African Court on Human and People’s Rights where it was decided in favor of the Ogiek on May 26th, 2017. The African Court ruled *inter alia* that the Mau forests are the ancestral home of the Ogiek peoples and stated that the most salient feature of indigenous societies is their unhindered access to and use of their traditional land. Even after the court ruling however, the Ogiek continue to live on the land without title deeds.

There are Ogiek populations in Kiambu, Nandi, Uasin Gishu, Trans Nzoia, Nakuru, Kericho, and Narok Counties. They are all linked together by Language propagated through an FM Radio that broadcasts 24 hours every day from Marioshoni. The NGO Ogiek Peoples’ Development Program (OPDP) speaks for all Ogiek people in Kenya.

The Ogieks’ livelihoods revolve around bee keeping and honey. Honey is critical to their religion and belief systems and is a central item in their rituals and ceremonies. They have placed beehives in the forests around them and on their farms. They sell the surplus honey through cooperatives and self-help groups. They also grow maize, beans, vegetables, and potatoes for domestic consumption and for sale of surpluses to the rest of the country through middlemen who transport it. The Ogiek rear dairy cattle and sell most of the milk in Njoro and Nakuru towns.

The Ogiek are a patriarchal society. They have a strong council of elders that holds sway in most community-wide decisions. All members of the council are men, but women participate in local community meetings and contribute to discussions without hindrance. Other representative organizations of the Ogiek include churches, self-help groups organized around honey production and sales, the NGO Ogiek Peoples Development Program (OPDP) and several Community-Based Organizations.

3. Waatha/Waata

In the literature the names Waata and Watha are used interchangeably and refer to the same people. The difference is in the county where they are located. They live in scattered territorial groups along Tana and Galana rivers. In Kilifi County, the Watha community is found in four divisions (i.e., Malindi, Langobaya, Marafa and Magarini). In Tana River county the Watha are found in Sombo and Laza divisions while in Mandera the Watha are found in Central division. The population of Watha community in the districts is estimated at approximately 30,000 persons.

The Watha people are traditionally hunters and gatherers. However, since the government abolished unlicensed hunting of game and wild animals, the Watha people now live in permanent settlements, some of them along the river and where there are forests, mainly in the mixed farming and livestock farming zones. The forests afford them an opportunity to practice bee keeping while those along the river practice mixed farming and fishing. They have a traditional council of elders and headman known as Abagaaza who govern them. Land ownership is communal, and a few have managed to get titles for their land.

4. Aweer

The Aweer people are known for their unique tradition of whistling to birds that guide them to honey. They are mostly found in Lamu county where they are concentrated mainly in Witu, Hindi and Kiunga ares. The community is located in villages of Bargoni, Milimani, Bodhei, Basuba, Mangai, Mararani, Kiangwe and Kiunga (Kiunga Ward), Pandanguo and Jima (Witu Ward). Their population is about 4,000, compared to 25,000 half a century ago (Source: Organization for the Development of Lamu Communities (ODLC). They are nomadic hunter-gatherer tribe of mainly Cushitic origin with a unique characteristic. The community sources their subsistence from forest products such as honey, wild plants/fruits for consumption and medicinal purposes.

Traditionally they depend on their elders for leadership and do not normally meet for village discussion. The lives of the Aweer were drastically changed when the Kenyan government curtailed their traditional way of life as a response to the insecurity of the region after the Shifta War (1963–1967), forcing them to settle in villages along the Hindi-Kiunga Road on Government Land between the Boni National Reserve and the Dodori National Reserve while adopting slash and burn agriculture.

5. Ilchamus

Ilchamus formally known as the Njemps are a small group of Maa speaking people. They are originally a pastoralist people who used to live on the mainland but due to clashes they have been forced to migrate to an island in Lake Baringo . They have a population of 34,000 now predominantly live on the south and southeast around Lake Baringo and southwest shores of the lake and as far north as Kambi ya Samaki. The Ilchamus are a very traditional and culturally bound society, hierarchical and male-dominated. They live from fishing in small boats made of balsam tree that dates back maybe a thousand years. They also do some souvenirs, and they have some livestock Beyond livestock, the Ilchamus also depend on agriculture for their livelihood but primarily at subsistence level.

The Ilchamus traditions have a close semblance to those of Maasai as they perform both male and female circumcision; value the warrior Moran and age set systems and have similar dress and tradition. The Ilchamus culture and customs are slowly shifting to resemble those of their Tugen neighbors. For instance, they have abandoned the manyatta housing style and adopted permanent round mud-walled huts like the Tugen. Families are patriarchal and when an Ilchamus man dies his eldest son must hold his hand as he dies as it is believed that this confers blessing to the son. Many are uneducated and can only communicate in their local language.

6. Wailwana

They are also called Malakote especially by their neighbours Wardei, Pokomo, Ormas and others. The Wailwana occupy a 150-mile strip along the north-eastern part of the Tana River, bordering Garissa County. They currently occupy three wards in Bura constituency comprising Chewele, Sala and Madogo, they are also found in Garsen.

They mostly ascribe to the Islamic faith, and they are politically dominated leading to their non-participation in decision regarding resource allocation. Their economy and livelihood mainly depend low paying jobs such as casual labour, small scale farming and fishing and bee-keeping. The Wailwana have a social system with developed leadership structures referred to as headmen system. They speak in Kilwana/kimalakote and are closely related to the neighboring Pokomo to the south, a small southern Somali community, and various other

small Cushitic groups like the Dahalo, Waata and Munyo. The name Malakote (meaning slave) was given to this people group by the Somalis. The Somalis introduced them to Islam and made them slaves. The people today prefer to be called Ilwana (meaning free men) closely related to the Kiswahili word muungwana translated by Krapf and Cust (1882) to be "a free man".

The Wailwana are marginalized because of their small population, poor education (over 85% of the Wailwana are illiterate) and economic background. They are also discriminated as a result of their geographical set up where they only confined themselves along the riverbanks. Their localities are also denied development opportunities by being termed as areas of marginal economic productivity and culturally undeserving due to the presence of the Wailwana. Consequently, the Wailwana live in areas with poor roads that are critically dilapidated, lack access to clean water, and are denied education support (bursary) opportunities targeting the poor families in the county. The communities around them publicly stereotype and derogate the Wailwana thus, affecting their self-esteem and suffer discrimination in all spheres of social, economic and political life

7. Endorois

Endorois community is a minority community that was living adjacent to Lake Baringo and has a population of about 20,000. However, the Government of Kenya forcibly removed the Endorois from their ancestral lands around the Lake Bogoria area of the Baringo and Koibatek as well as in the Nakuru and Laikipia within the Rift Valley region in Kenya, without proper prior consultations, adequate and effective compensation.

Endorois are a community of approximately 60,000 people who, for centuries, have lived in the Lake Bogoria area. They claim that prior to the dispossession of Endorois land through the creation of the Lake Hannington Game Reserve in 1973, and a subsequent re-gazetting of the Lake Bogoria Game Reserve in 1978 by the Government of Kenya. The Endorois had established, and, for centuries, practiced a sustainable way of life which was inextricably linked to their ancestral land. However, since 1978 the Endorois have been denied access to their land and at independence in 1963, the British Crown's claim to Endorois land was passed on to the respective County Councils. However, under Section 115 of the Kenyan Constitution, the County Councils held this land in trust, on behalf of the Endorois community, who remained on the land and continued to hold, use and enjoy it. The Endorois' customary rights over the Lake Bogoria region were not challenged until the 1973 gazetting of the land by the Government of Kenya. The act of gazetting and, therefore, dispossession of the land is central to the present to their current predicament.

The area surrounding Lake Bogoria is fertile land, providing green pasture and medicinal salt licks, which help raise healthy cattle. Lake Bogoria is central to the Endorois religious and traditional practices. The community's historical prayer sites, places for circumcision rituals, and other cultural ceremonies are around Lake Bogoria. These sites were used on a weekly or monthly basis for smaller local ceremonies, and on an annual basis for cultural festivities involving Endorois from the whole region. To date, the Endorois community has not received adequate compensation for this eviction, nor have they benefited from the proceeds of the reserve. Because they no longer have free access to the lake or land,

8. Talai

The Talai (Orgoik or Laibons) originated from Nandi County in the early 1800s and were assimilated as one of the Kipsigis clans. They moved to Kipsigis land just before the advent of the British colonialism in early 1890s. Once the colonialists arrived, they played a pivotal role in the resistance to the invasion of Kipsigis land. For their role in continual resistance of British occupation the Talai were deported to Gwassi in South Kavirondo in 1934. The Talai totaling about 698 males and females were rounded up and banished to Gwassi. Their deportation ended in 1962 when they were repatriated to Kericho District. However, to date, the majority of them are eking their living from very difficult situations since upon their return to Kipsigis land they were not allocated any land not even from where they had been deported from. They are largely squatters and keep livestock for a living.

9. Pokot

They speak Pökot, language of the Southern Nilotic language family, which is close to the Marakwet, Nandi, Tuken and other members of the Kalanjen grouping. Kenya's 2009 census puts the total number of Pokot speakers at about 620,000 in Kenya. They are considered part of the Kalenjin people who were highland Nilotic people who originated in southern Ethiopia and migrated southward into Kenya as early as 2,000 years ago. Though the Pokot consider themselves to be one people, they are basically divided into two sub-groups based

on livelihood. Population: 662,000. The Pokot are located in the Rift Valley Province, Baringo and West Pokot districts.

Currently, Pokot are semi-nomadic, semi-pastoralists who live in the lowlands west and north of Kapenguria and throughout Kacheliba Division and Nginyang Division, Baringo District. These people herd cattle, sheep, and goats and live off the products of their stock. The other half of the Pokot are agriculturalists. Mixed farming is practiced in the areas of Kapenguria, Lelan and parts of Chepararia. These areas have recorded rainfall between 120mm to 160mm while pastoral areas include Kiwawa, Kasei, Alale and parts of Sigor receiving 80mm and 120mm. The livelihood of the Pokot has led to constant conflict between them and other pastoral communities – the Turkana, Matheniko and the Pokot of Uganda. Over access to semi-arid savannah and wooded grassland terrain that cuts along the habitation area. Resources such as land, pasture, water points are communally owned, and they are no specific individual rights.

10. Munyoyaya

The Munyoyaya is a small community living in Tana River County. They are part of the large Oroma group of people whose heritage goes back to Ethiopia. They are believed to have migrated from Ethiopia and settled in their current area by about 1900. They are also known as Korokoro by their neighbors.

The Munyoyaya community has an estimated population of about 15,000 persons. 90% of this population lives in Madogo ward in Tana North Sub-County, while the remaining 10% are found in Galole and Tana delta sub-counties. In Madogo ward they are found in villages of; Bula Boji, Adele, Madogo center, Bula Huzuni, Bula Karatasi, Bula Baraka and Lag Ganso. In Saka location, they live in the villages of Lagbadana, Konoramadha, Matawarsesa, Fafbare A and B, Mulanjo, Adhama, Malkamansa and Korati. In Bua location, they are found in the villages of Rhoka, Buwa, Mansguda, Asako and Pamba. In Mororo location, the community live in the villages of Mororo, Hatata, Anole, Gubatu and Maramtu. In Galole Sub-county the Munyoyaya people live in the villages of Kalaule, Kalkalcha, Titila and Waldema. In Tana Delta Sub-County, they are found in the villages of Malakoteni and Kilelengwani. Also, the Munyoyaya community is found in Hindi, Mokoe and Bargoni in Lamu County. They get their social services mainly in Madogo and Garissa town. They have not been fully integrated into the development programmes due to their population, social status and lack of political representation.

The Munyoyaya have community structures comprising of a king (Hayyu) and council of elders. The current king is Hayyu Kesi Wario. Under him, there are representatives of six clans of Munyoyaya namely; Karara, Mandoyu, Baretuma, Ilani, Nyurtu and Meta and each Clan representative has three elders making a total of 24 clan representatives. The council of elders are key in running the affairs of Munyoyaya, overseeing cultural ceremonies, settling disputes and representing them in other social and political responsibilities.

The Munyoyaya community live along River Tana and this makes them practice fishing and subsistence farming for a living. They also do charcoal burning, mat weaving, bee keeping and sell building materials. Their neighbors and customers trust them for supplying quality honey. A good number of them practice pastoralism precisely goat and sheep keeping. This community subscribes to the teaching of Islamic religion and their marital statuses are polygamous with an average family size of six persons per household. They have a specific language known as Afaan Munyo which is same as Afaan Oromo a family of Afro-asiatic languages.

The Munyoyaya community feel marginalized because of limited basic social services, poor economic and livelihood opportunities as well as limited political representation. Majority of the Munyoyaya community are poor as a result of historical marginalization. They consider themselves as a minority due to their small population. Initially education was not embraced by this community and as a result only a few went to school. This was due to the myth they have towards education for instance girl child was not allowed to get education because they believed she will become a prostitute and damage the reputation of the community. On the other hand, they believed educating a boy is seen as breeding gangsters or thieves in the society. They are slowly being displaced by commercial farmers and reduced to laborers on what used to be their tradition communal land. They have a strong believe system which promotes collectiveness more concerned about prosperity of few, this make them less competitive in comparison with their neighbor who are more aggressive influencing government workers and other development organization.

11. Maasai

Kenya's most well-known ethnic tribe, the Maasai is semi-nomadic people located primarily in Kenya and northern Tanzania. They are considered to be part of the Nilotic family of African tribal groups. The Maasai probably migrated from the Nile valley in Ethiopia and Sudan to Maasai land (central and south-western Kenya and northern Tanzania) sometime around 1600 AD, along the route of lakes Chew Bahir and Turkana bringing their domesticated cattle with them. The Maasai speak the Maasai language, an Eastern Nilotic language closely related to Samburu (or Sampur), the language of the Samburu people of central Kenya, and Camus spoken south and southeast of Lake Baringo. Maasai's population is about 684,000 and is located in the Rift Valley Province, Kajiado and Narok districts.

The Maasai are cattle and goat herders, their economy almost exclusively based on their animal stock, from which they take most of their food: meat, milk, and even blood, as certain sacred rituals involve the drinking of cow blood.

12. Gabra

The Gabra are an Oromo people who live as camel-herding nomads, mainly in the Chalbi desert of northern Kenya and the highlands of southern Ethiopia. They are closely associated with other Oromo, especially their non-nomadic neighbors, the Borana. The Gabra speak the Borana dialect of Oromo, which belongs to the Cushitic branch of the Afro-Asiatic language family and have a population of about 3,000. They are located in Samburu District, Lake Baringo south and east shores; and in Rift Valley Province (Chamus), Baringo District.

Livelihood: Gabra are pastoralists who keep and depend on cattle, sheep, goats, donkey, and camels. They solely rely on access to water and pastures for the survival of their livestock. Cattle provide the majority of income from livestock production followed by goats, sheep, and camels. –The bulk of the grain consumed by Gabra household in this zone is purchased. This includes maize, rice, and sugar. Households also rely on the wild food including fruits and berries, honey, roots, and tubers. Climate change has had an impact on new weather patterns and prolonged drought pushing the Gabra community to frequent water shortages. They have a conglomerate of peoples living north of the Tana River in Kenya, the area around Lake Turkana and the highlands of southern Ethiopia.

13. Rendille

The Rendille are a Cushitic tribe that inhabits the climatically harsh region between Marsabit hills and Lake Turkana in Northern Kenya where they neighbor the Borana, Gabbra, and Samburu and Turkana tribes. They (Rendile) they are culturally similar to the Gabbra, having adopted some Borana customs and being related to the Somali people to the east. Rendille are semi-nomadic pastoralists whose most important animal is the camel. The original home of the Rendille people was in Ethiopia. They were forced to migrate southwards into Kenya due to frequent conflicts with the Oromo tribe over pasture and water for their animals. There are about eight or nine sub clans including the Urowen, Dispahai, Rongumo, Lukumai (Nahgan), Tupsha, Garteilan, Matarbah, Otol, and Saale with an estimated population of 63,000.

The Rendille are located in Eastern Province, Marsabit District, between Lake Turkana and Marsabit Mountain. The primary towns include Marsabit, Laisamis, Merille, Logologo, Loyangalani, Korr, Kamboi, Ngurunit, and Kargi.

The Rendille people are traditionally pastoralists keeping goats, sheep, cattle, donkeys, and camels. Being pastoralists, the lifestyle of the Rendille revolves around their livestock. In the northerly areas, camels are their main source of livelihood. Are best adapted to the desert conditions that prevail in the northern Kenya. The camels are an important source of milk and meat. Their nomadic lifestyle is become more prominent in the areas exposed to little urbanization and modernization. In the recent past though, their livelihood has experienced constant competing interests from the Samburu and Gabra leading them to conflicts over land and water resources particularly at the borderline of the boundary districts.

14. Turkana

The Turkana people are the second largest of the pastoral people of Kenya with a population of 1,034,000. They occupy the far northwest corner of the nation, an area of about 67,000 square kilometers. This nomadic community moved to Kenya from Karamojong in eastern Uganda from around 1700. The Turkana tribe occupies the semi-Desert Turkana District in the Rift valley province of Kenya. Turkana warriors today still take pride

in their reputation as the most fearless fighters in East Africa.

The Turkana are mostly found in the Rift Valley Region and specifically in, Turkana, Samburu, Trans-Nzoia, Laikipia, Isiolo Counties, west and south of Lake Turkana; Turkwel and Kerio rivers. Like the Maasai, the Turkana people keep herds of cattle, goats and Camel. Livestock is a very important part of the Turkana people. Their animals are the main source of income and food. Turkana's have also pursued other non-pastoral income-earning activity in both urban and rural environments. This includes various forms of wholesale and retail trade (e.g., selling livestock, milk, hides and skins, honey, and artisan goods etc.), traditional rental property ownership and sales, waged employment (local and non-local, including working as a hired herder, farm worker, and migrant laborer), farming (subsistence and commercial), and the gathering and selling of wild products (e.g., gum Arabic, firewood, or medicinal plants). Fishing in Lake Turkana is another, long standing form of diversification. Fishermen along Lake Turkana migrate to follow the patterns of fish movement. Many of them have also taken up weaving mats and baskets particularly near the lake where weaving material is readily available from the Doum Palm. Other natural resource-based livelihood diversification activities have included the collection and sale of aloe, gum Arabic, honey, wild fruits, firewood, and the production and sale of charcoal and alcohol.

15. Warabeyi

The Warabeyi have community structures consisting of councils of elders and community associations which are generally utilized for mobilizing people around development initiatives. The council of elders are key in running the affairs of the community; overseeing cultural ceremonies, settling disputes and representing them in other social responsibilities. Representatives of the Warabeyi community engaged through one-on-one interviews in Mandera County, recounted that their main source of income is black-smithery. Currently the majority of the Warabeyi are abandoning their blacksmith activities for other livelihood sources such as nomadic pastoralism, sale of firewood and building material, casual labour and petty trade. Warabeyi communities subscribe to the teaching of Islamic religion and their marital statuses are polygamous with average family size of 6 per household. They have chiefs and assistant chiefs and village representatives.

They have a specific language known as Mai Mai which is becoming extinct, and they also speak Somali out of influence of the majority Somali tribe around them. Currently, the majority are abandoning their cultures (blacksmith) and their language is becoming extinct in favor of the dominant Somali language. However, the older generation are still using their traditional language.

The Warabeyi experience food insecurity, limited access to basic social services, and poor economic and livelihood opportunities with high poverty index mostly as a result of historical marginalization, small populations and lack of political representation. Their main source of livelihood is Black smith (TUMAL) which was initially associated with the poor in the society who are referred to as the "CEYR". However, in the last two decades, and probably due to the influence of neighboring majority tribes, there has been a change of attitude amongst the Warabeyi, and an increasing number are now engaging in petty trade, sale of firewood, casual labour and nomadic pastoralism for their sustenance. Recurrent drought is the major risk affecting the community's livelihood leading to massive losses in their numbers of livestock further exacerbated by the lack of livestock insurance cover for the deaths of their animals. As a result, majority are poor and normally suffer discrimination and exclusion by the larger society from development activities due to cultural and traditional beliefs. The community has one primary school located at Harer Hosle with an enrolment of 345 pupils (228 boys, 117 girls). The community has no secondary school facility, major challenge to low transition level to secondary and universities. The county government drilled a borehole but was not equipped. Main source of water is earth pans. Furthermore, the other Somali clan look down upon the Warabeyi as inferior due to their livelihood "Tumal " and even shun from marrying them.

16. Sakuye

The Sakuye community do not have their own distinct norms, culture and dress styles. They share language, culture, religion and dressing style with the Majority Borana. They have a traditional land ownership in Dabel location in Moyale sub-county with a few households in Sololo and Moyale Township. Despite the Sakuye being largely assimilated to the Borana, they are distinctly recognized as Sakuye by other communities, and they want to be referred to as Sakuye.

The Sakuye community occupy the south eastern parts of Moyale sub-county in Marsabit County. They live in Dirdima, Missa, Guyo timo, Dabel and Golla sub-locations in Dabel location with a few households in Moyale township and Sololo towns. They are a distinct community recognized by the national and county government administrations as a minority community. They have a sacred shrine in Dabel centre called Gamo where they say community declarations decided. Dabel hills is the only part of Moyale sub-county where there are natural gold deposits and gold mining is done.

The Sakuye do not have a distinct language and culture, or religion having been assimilated by the majority Borana. However, their songs and dances are distinct from the other tribes living in Marsabit. Before the advent of county governments that brought about merging of electoral areas, the Sakuye used to have political representatives in the county council then but currently represented by the populous Garre in the county assembly of Marsabit. Traditionally there is established a Sakuye council of elders chaired by a Mr. Hussein Intallo Laffa which handles all issues on behalf of the community.

Sakuye do not have a distinct language and they speak the Borana language. The Sakuye community are marginalized because they occupy only Dabel location in Moyale sub-county, and they have no political representation in Marsabit county assembly or the national assembly. They are marginalized due to their historical affiliation for supporting Moyale secession to Somalia while the majority Borana supported annexing of Moyale to Kenya. The Sakuye were also historically part of the shifta hence developing bad blood between the community and the populous Borana. The only secondary school in the location (Dabel mixed) did not have a KCSE class last year, which may further exacerbate their lack of participation in the county development issues. At the time of the assessment, the assessment team had to postpone their visit for the community to travel to Moyale and meet the ACC Moyale to unlock the secondary school stalemate. Most of the community members lack national ID cards denying them access to most of the government social safety nets. The locational chief estimated this number to be about 45 individuals at the time of the assessment.

17. Daasanach

The Daasanach self-identify as an independent community with their own distinct norms, cultures and dress styles. While dressing styles especially among the men may be similar to the Turkana, Pokot and Hamar of Southern Ethiopia, the Daasanach community have no connection with these tribes and in no way identify themselves with them. Additionally, they are recognized as a distinct ethnic group by their neighbours who refer to them by various names. For instance, they are referred to as Galaba by the Gabras, Gelebe by Rendille and Merille by Turkana. The Daasanach are also referred to as Shangilla by the larger Marsabit county, however the name is disliked by the Daasanach people and is deemed very offensive. The Daasanach people occupy the eastern shores of Lake Turkana in Marsabit County and the Omo delta in southern Ethiopia. Most of them live in southern Ethiopia, but those in Marsabit live mainly in the far west isolated area of Illeret, North Horr, more than 400 kms from Marsabit town.

Being an independent ethnic group, the Daasanach are not under any dominant society and hence have their own cultures, for instance the *dimmi* ceremony which happens every 5 years. The Daasanach are governed by a council of elders, known as Karu and Arra. Karu titles are not hereditary and are assumed through age. But for Arra, an induction process is mandatory hence not all Karu are Arra. The Arra have an upper hand in settling disputes as compared to the Karu. They are sort of special clique of elders whose decisions are final. The council of elders is key in running the affairs of the community; overseeing cultural ceremonies, settling disputes et cetera. The Daasanach are predominantly agro-pastoralists. There is also a section of this community known as 'Dies' who are purely fishermen and are known for their crocodile and hippopotamus hunting. However, in recent years due to increased demand for fish in other parts of the country and with ready markets available locally, the community has embraced fishing as an alternative means of livelihood.

The Daasanach people speak Daasanach which is classified as Cushitic and is only spoken by the Daasanach people and is distinct from other languages spoken in the region and by their neighbors. The Daasanach areas have not had the advantage of accessing modern education and services, and they resist outside influence. The HSNP program found that they had low enrolment in schools and ownership of ID cards and had to hire local people as translators to help the Nairobi officials' during vetting in 2018. Over the past fifty years or so, the Daasanach were forced to shift to agro-pastoral instead of their traditional pastoral livelihood. The Daasanach have suffered a massive decrease in the numbers of cattle, goats and sheep. As a result, large numbers of the Daasanach have moved to areas closer to the Omo River, in Ethiopia where they attempt to grow enough crops

to survive. Fishing as a source of livelihood was initially associated with the poor in society who are referred to as the 'Dies' and fish was essentially seen as a poor man's diet. In the last two decades however, there has been a change of attitude with an increase in the number of community members engaging in fishing activities both for consumption and commercial purposes. Those in Illeret are very traditional and a closed community because of ongoing conflict over grazing areas with their neighbours. The HSNP program had to employ translators from the community to be able to enter and assist enumerators register households in Illeret. In 2021 HSNP employed a Programme Officer to be serving the community.

18. Wapare

The Wapare self-identify as a unique cultural group who live in Mata area in Taveta Sub County. They are also commonly known by other communities as Waadhu. The Wapare have a distinct indigenous language that is slightly different in terms of pronunciation in words from the local that is well spoken and used for communicating with the community. The Wapare originally came from Taita Hills on their way to Pare Mountains in Tanzania. They live in the border along Jipe division in Kachero Sub Location and is distributed along Lake Jipe, Kitobo and Kitoghoto areas. The Pare are found in two different wards of Taveta sub county, this are Mata and Mbhoghono wards. The other tribes that relate to them are Wasunya, Warutu, Wazirai, Wakwizi, Wailole, Wambagha and Wamare who also originated from Taita.

The Wapare culture is quite different from Taveta especially on cultural traditional practices, they have a special song that they sing during ceremonies that are unique, different traditions and one of the distinct traditions is a type of dance which is done during circumcision and wedding ceremonies. This dance is known as Ngasu other cultural dances include Indiya- during weddings, Mwelema- for youths and Gongonta- during circumcision. The Wapare have different clans namely the: Wasuya, Wamare, Waruttu, Wakwizu and Wambonyo. The colonial boundaries separated the Wapare leaving some of them in Tanzania. They however still use the same language and traditions. The Wapare have been marginalized since colonial times and were only recognized as Kenyans in the second regime and were issued with Identity cards. Their ancestral land was confiscated by both the colonial and subsequent governments that deprived them their main economic activities which are farming and fishing. A larger percentage of the Pare are squatters in their own ancestral land in the area of Mata, Kachero and Eldoro. The evidence showing that the Pare are a community separated by the colonial border demarcation is found at Lake Jipe, half of which is found both in Kenya and Tanzania. The name Jipe comes from the word 'IPE' which means lake. The lake is shared by the Pare in Kenya and those in Tanzania.

The Wapare have remained marginalized especially due to lack of National IDs for a good number of them. This has resulted in much difficulty accessing services. Other areas of marginalization include lack of title deeds resulting in many of them remaining as squatters in their land. High illiteracy levels, youth unemployment, inability to access credit facilities; increases their marginalization.

During the field visit the officers observed that the Wapare in Challa location, are VMGs while in Mata, the Wapares are a bit well off. Some Pares still lack IDs and Title deeds and have to go to the extent of listing themselves as belonging to the Taita Taveta tribe to gain access to the documents. They share cultural practices and beliefs with the Taveta, and their language is also similar. The economic activity practiced is small scale chicken, duck, livestock keeping and crop (beans and maize) farming.

A minimal percentage of the Wapare in Challa are benefiting from the Inua Jamii programme. They reported to have leaders at the local levels and the biggest challenge is they have no market opportunity to sell off their seed produce. It may be hard for a Mpare to get a job, so they write that they are Taitas. A medical hospital present in Mata Location has not been maintained since the 70s. The water supply to their location was disconnected. Their police post and polytechnic were moved to a different location. A huge piece of land that has been blocked off by an electric fence is preventing them from reaching the main road, which is a gateway to their businesses, schools and essential services. They are rarely included in government programs. Major hindrance to development is isolation from other tribes and the government not acting on things it had promised their community. The Pares in Kitobo location have not had access to proper schooling and financial institutions. The Pares are involved in school committees and boards; and attend school meetings where their children go to school e.g., Elimu scholarship (is a government scholarship through Equity bank). The few who have studied have not secured formal jobs. They desire more political representation and more government sensitization and capacity building. The County Head of PWSA is a member of the Pare community. The PWDs don't involve themselves so much in community development projects though they have their own groups and leaders where they have their own projects not necessarily those that impact the larger community.

19. Wayyu,

The Wayyu have formerly been referred to as known as Waata, a derogatory term meaning the “beggar” because historically, they have had no livestock and culturally not enabled to own any by their neighbors especially the Gabra and Borana and the past government regimes. The community has barely enough to sustain life, making the begging a daily and lifelong culture. Nevertheless, the community has remained culturally distinct and separated from the other the communities. The community is geographically spread in Kenya and Ethiopia. In Kenya, they are found in some northern counties that include: Marsabit, Isiolo, Wajir, and Coastal countries: Tana River, Lamu, Kilifi and Kwale areas. The Wayyu are found in eighteen villages in Marsabit and Wajir: Dirib Gombo, Dub Gobba, Boru Harro, Badassa, WaqoJaldesa, Sololo, Turbi, Maikona, Kalacha, Hurihills, Elgade, North Horr, Balesa, Elhadi, Dukana, Qorga. Somare, and Forole villages. In this villages, there are 9 dominant Wayyu clans that include: Chaqo, Wantho, Tiy’olo, Baches, Kodele, Qochot, Mango and Rogo bl’a. The EI project activities are being implemented in the Turbi, Balesi, Qorga villages and Dirib Gombo in North Horr and Saku Sub County

The Wayyu are classified as traditional hunter-gatherers who took care of wild animals. They are incorporated as a low ranking endogamous ‘Caste’ within the Borana-Gabra framework. Although quite different in other aspects of their culture, the four main ethnic groups still have four things in common: a lifestyle that is nomadic (or semi-nomadic); an economy that is based on raising livestock; a culture closely aware of the passage of time and a religion closely connected to natural phenomena. While herding remains the main occupation of the people, a considerable number have now taken to other activities such as commerce and agriculture, or have become professionals employed in schools, hospitals, administrative offices etc. According to oral history, the Wayyu believe that their poverty, as depicted by lack of livestock, resulted from an act of a mythical god rather than natural calamity. Ancestrally, the Wayyu derived their livelihood from ancestry hunting and gathering in the desert wilderness. This movement around the desert ecosystem led the community being scattered around country. Noting the scarcity of hunting and gathering resources in this harsh desert landscape and cultural beliefs that they cannot own livestock; they live a strenuous lifestyle by clinging around and begging for food from their neighboring communities.

The Wayyu had their own language but now speak Borana with only a little of their distinctive vocabulary. This is also recognized by others. The Wayyu suffer from marginalization including being culturally restrained from owning livestock. As such they have very limited household income and are generally food insecure and rely on food relief. The Wayyu derive their livelihood from socially constructed begging practices and undertaking causal labour such as loading sand on trucks for construction work in Marsabit resulting in their low economic status. Due to their small population and high illiteracy levels, they are hardly represented politically thus limiting their access to essential services provided by the government.

20. Ndorobo

They predominantly live in Burat ward Leparua Location in Isiolo County. Leparua location is 45 kms North of Isiolo Town towards Oldonyiro Division. The Ndorobo community live on hilly landscape with villages scattered apart. Due to their culture and geographical location in remote areas they have not been fully integrated into the development programs of the country and are not well understood or reached. The Ndorobo traditionally do not own livestock and solely depend on the environment for food as gatherers and mainly as beekeepers. As such the Ndorobo mostly live in the mountainous regions of the county although much has changed in the present times given that the larger majority of the Ndorobo have changed their lifestyles and do own and rear livestock and are no longer confined to the mountains and hills. However there still exist sections and pockets of the Ndorobo community who have retained their indigenous lifestyles and therefore are mainly beekeepers and inhabit the mountainous regions and environments especially Ngarandare area. It is important to note that despite some of them embracing normal pastoralism, the Ndorobo continue to occupy their own territories and locations as they maintain their own distinct identity and mainly depend on beekeeping as a source of food and income.

The Ndorobo are socially and culturally alienated among the Samburu as they are not accorded a cultural recognition and cannot squarely fall within the community’s socio-cultural structure. As they congregate in their own territories, the Ndorobo have adopted a value system but are still compelled to comply with the larger Borana social and institutional frameworks. A large majority of the Ndorobo people speak the Maa Samburu language, there exists a section of the Ndorobo whose roots and ancestry emanates from the Laikipia Maasai and hence they do speak a Maa Samburu language that has a dialectical influence from their native Laikipia

Maasai kin or ancestors. The Ndorobo experience food insecurity, limited access to basic social services, and poor economic and livelihood opportunities with high poverty index mostly as a result of historical marginalization, small populations and lack of political representation. The Ndorobo are marginalized in the sense that their low status in the larger Samburu community has alienated them from the mainstream socio-cultural spheres of life and are therefore not consulted or are not involved in decision making on matters affecting their lives. Some sections of the Ndorobo population do not practice pastoralism or livestock keeping and only depend on beekeeping as an economic activity and are thus subjected to extreme levels of poverty. This particular group is further marginalized by the fact that they have no land of their own and are not even enlisted in any group ranch owing to the fact that they leave and inhabit the Government's Forest land.

21. Gabaweyn

The group identifies itself as Gabaweyn, and they are known as such by the other neighboring Somali communities. The larger Somali community perceive and see them as a minority with distinct economic activity farming along the Daua River. They are predominantly Agro-pastoralist and share a lot of Similarities with Somali Bantus in terms of language, physical appearance, economic activities and cultural practices. They associate themselves with the corner Tribes (Corner Tribes) which is composed of amalgamation of nine other Small sub tribes of the Somali community in Mandera County. Majority of the community live in the locations along the river banks of River Daua and have an estimated population of 4,000 persons. Significant 85% of this population live in Neboi Location (Old Neboi, Garba Ado, Hella Shit, and Slaughter) Bur abur Location (Burabor and Sharif Sub locations) while the remaining 15% live in Bulla Central, and Bulla Jamhuria locations of Mandera East Sub County. Neboi is situated about 5kms North of Mandera town and Burabor is 16 kms from Mandera. They live and are located in areas that are along the river and practice farming mostly on a subsistence basis and have poor infrastructure (Canals, Irrigation systems, farm inputs and Machinery). Due to their culture and geographical location in remote areas they have not been fully integrated into the development programs of the country. River Daua is the lifeline of the community. The river provides water both for farming and domestic consumption, sand, fish etc.

They are predominantly small-scale farmers while the dominant society are pastoralists. They associate themselves with the corner Tribes (corner tribe) which is composed of amalgamation of nine other Small sub tribes of the Somali community in Mandera County. They have community structures consisting of councils of elders and community associations which are generally utilized for mobilizing people around development initiatives. The council of elders are key in running the affairs of the community; overseeing cultural ceremonies, settling disputes and representing them in other social responsibilities.

Representatives of the community engaged through one-on-one interviews in Mandera County, averred that their main source of income is small-scale farming. Due to the limited number of people with farms, the majority of them are engaging in other livelihood sources such as nomadic pastoralism, sale of firewood, Sand harvesting, Marram harvesting, casual Labour and petty trade. The communities subscribe to the teaching of Islamic religion and with an average family size of 5 per household. They have One Senior Chief, 3 Assistant Chiefs and village representatives.

They speak Mai Mai, a sub dialect of Somali language. The surrounding Communities speak a different dialect of the Somali Language. They also speak main Somali language out of influence of the majority Somali tribe around them. Currently, the majority are able to speak both dialects of the Somali Language. They experience food insecurity, limited access to basic social services, poor economic and livelihood opportunities with a poverty index of (85.8%) mostly as a result of historical marginalization, small populations and lack of political representation. Their main source of livelihood is Agro-pastoralism. Frequent floods and recurrent drought are the major risks affecting the community's livelihood leading to massive losses in their numbers of livestock and farm yields. As a result, majority of them are poor and normally suffer discrimination and exclusion by the larger society from development activities due to small population.

They are located in areas where the project is implemented and are benefiting from the program with limited targeting in the ending HSNP Phase 2 program. In Phase 3, the community households were registered and targeted. The education institutions in the area include primary schools- Neboi and Burabor Primary. There is one Secondary School- Neboi Secondary School in Neboi, however the majority of students are from other Communities. The area also has two Health Dispensaries that service the local populations. The Community has

a low transition level from Primary to secondary and university education due to economic circumstances. Main sources of water are River Daua, Shallow wells, Water Kiosks and water vendors.

22. Lkunono

The Lkunono commonly referred to as the blacksmith are culturally a distinct group among the Samburu and have historically maintained an identity which has isolated them socio-culturally and therefore live together in their own traditional villages across the County. They have lately reckoned with and accepted their identity and socio-cultural status leading to their stay together as a clan of its own among the Samburu community. Ndikir Nanyekie in Samburu and Lontolio in Marsabit County are traditionally the two main territories occupied by the Lkunono and the larger population continue to inhabit the two areas to date. However, due to their growing numbers, the Lkunono have moved away and have occupied the peri-urban settlements of Maralal like Tamiyoi and Lemsigiyo and the Wamba Peri-urban villages of Sordo in Samburu East Sub-County. The Lkunono are traditionally artisans who make traditional and cultural ornaments and spears, knives or clubs that are traditionally used by the larger Samburu population to protect themselves or for ceremonial and performance of cultural rituals. Although they have recently ventured into pastoralism, they still maintain their artisanship practice as an economic activity and continue to produce spears, ornaments and knives for sale. The Lkunono artisan is a practice that is culturally reserved for them as a lower caste of the society and other clans cannot engage in the practice due to their traditionally ascribed superior socio-cultural status. The Lkunono are part of the larger Samburu tribe and share the same language with other clans. What differentiates them is their low socio-cultural status and artisanship as an economic activity. The Marginalization and vulnerability of the Lkunono is based on cultural beliefs that have placed them in the lower cadre of the Samburu social and cultural set-up. The Samburu are a Kenyan native society where cultural and traditional beliefs solely define the socio-economic placement and success of an individual and households. On this basis, the Lkunono are considered to be of low status socio-culturally and are therefore socially, culturally and economically segregated by the dominant Samburu community.

Although the Lkunono have also indulged in the pastoral and agro pastoral activities, there exists pockets of the Lkunono who still practice their traditional artisan role as blacksmiths and their products are viewed as an activity of the less worthy members of society, a belief that has negatively affected the demand and prices of their commodities. The Lkunono who live in Tamiyoi, Lemsigiyo and Wamba villages typically engage in the traditional artisan activities and are among the poorest and vulnerable members of the community. The failing pastoral economy and the diminishing value of their traditional artisan products in the rural setups has exposed the Lkunono to high levels of poverty and vulnerability, a factor that has forced the Lkunono to move and inhabit the peri-urban settlements of the urban centers and towns where they sell their artisan products and as a source of cheap labor.

23. El molo

The El molo are concentrated in Marsabit County on the southeast shore of Lake Turkana, between El molo bay and Mount Kulal. In the past, they also dwelled in parts of the Northern Frontier. In Marsabit County they live along lake Turkana in Loiyangalani which is over 400 Kms from the County Headquarters. The El molo are organized in 7 sub-clans comprising Morle, Origaya, Origalite, Orikara, Orisayo, Orisole and Origaitito.

Their economy is deeply rooted in fishing at Lake Turkana, although some today have acquired small number of livestock a culture adopted from the Samburu. They practice traditional religion centered on the worship of waaq. The El molo have their arms of Governance Marsara and Korshirr which is headed by men, while women belong to the same system of their husbands. The El Molo community is believed to have migrated from Ethiopia to the Turkana Basin around 1000 BC. The El Molo men were known for making iron objects, fishing boats and woodwork, while the women were known for making beautiful baskets, pots and jewelry.

They historically spoke the El Molo language as a mother tongue, an Afro-Asiatic language of the Cushitic branch, and now most El Molo speak Samburu. The El molo are rather elusive living in the vicinity of other communities and therefore lives in very isolated villages away from the traditional centers such as Loiyangalani in Marsabit. With such tendency of avoidance, coupled with the fact that they live in geographically remote areas with poor infrastructural development, and overreliance on fishing for food and household income, makes the El molo vulnerable and marginalized.

24. Gagabey

They are a Cushitic Borana speaking ethnic group found in Bulla Juu sublocation, Kibilay location Habaswein Division. They identify themselves as such and also by their neighbors especially by the Bulla Kibilay community, Habaswein Town. They live in Kibilay location, Wajir South Sub County. Economically they depend on sale of firewood and making of Somali herios (Somali traditional hut). They also make their livelihood from doing menials work such as porter activities, fencing homesteads, enclosed hedges in homesteads, slats constructions, labour activities in farms and putting up of temporary structures/dwellings using twigs, poles and reeds, grass thatching for makeshifts-the Somali dining hall named 'Dug' or 'dash' where they are meagerly paid. Most of these tasks are considered demeaning in their locale. The Gagabey of Bulla Kibilay of Habaswein are treated as an outcast by the Mohamed Zubeir which is the main Ogaden clan in Habaswein, Wajir South constituency. They have been part of MOHAMED ZUBEIR (MZ) clan decades ago under the sultanate ship of both Abdi Ogle Aden of Wajir and Ahmed Magan of Somalia. Recently, since Gagabey are not given the space for equal representation in leadership, most of them have shifted allegiances to Borana community in the eastern part of Madogashe where they practice their democratic rights as voters during the cycles of Kenya general Elections voting. The council of elders are key in running the affairs of the community; overseeing cultural ceremonies among themselves, settling disputes among other communities they live with. The Gagabey have a distinct language, the Boran which is not spoken by the Somali (Ogaden) community in Habaswein, However, others speak the language of the dominant Somali tribe. The Gagabey are not allowed to take leadership roles for instance chairperson in development projects e.g., borehole, school or dispensary management committees because they are looked down upon. For this reason, they do not participate in decision making on key aspects affecting their life. Due to the high poverty index, they do not take their children to school and thus limiting their possibility of taking active part in development initiatives. The Gagabey are not accepted by the community of Habaswein. They are regarded as people of bad omen due to belief in superstition. They are not allowed to marry from the Ogaden community, and they are equally not married by the Ogaden and are regarded as outcasts.

25. Sanye

Originally, Mpeketoni in mainland Lamu, and its surroundings were inhabited by the Swahili speaking community called Wabajuni and a small hunting and gathering tribe by the name of Wasanye or the Sanye who are almost extinct. In the 1974 Mpeketoni was transformed into a settlement area for landless Kenyans. As a result, the Sanye currently occupy the areas of Mapenya, Mkunumbi, Ndambwe, Witu and Kipini in Mpeketoni. Livelihood: Formerly a hunter/gatherer community, the Sanye currently relies on subsistence farming, fishing at Kizuke beach as well as honey harvesting in the Witu forest. Currently, the community has three young men who have completed form four and a young girl who is now in form two. This community claims to be dominated by the neighboring Bajuni and the settlers from up country who settled in their territory. The Sanye are governed through the CoE known as Gana based on clan lines. The Sanye have two clans and while Sanye village is headed by a Village Elder, the Gana, which is the ultimate cultural court for the Sanye, is composed of 6 elders, 3 from each clan. They are responsible for clan level grievance redress and their decisions are final.

26. Wamakonde

The Makonde community in Kenya arrived in the country in the 1940s mainly as labourers in sugar and sisal plantations at the coast. The fact that many of those plantations have since gone out of business left members of the Makonde community not only without citizenship but also without a livelihood.

There are almost 10,000 members of the Makonde community at the Kenyan coast. The Makonde are not the only people who find themselves at the Kenyan coast which also received the arrival of the Pemba from Zanzibar, and communities from Rwanda and Burundi. However, the Makonde, who number about 10,000 are by far a majority. Half of the population has intermarried heavily with other coastal communities. After a number of engagements with government officials, the Makonde are now recognized as Kenya citizens and have now access to national identity cards paving the way for their access to other essential government services.

Annex 2: List of Minority VMGs and respective county of residence

The table below presents the list of Counties and the minority VMGs that are present and or have a collective attachment to. This list will be validated by the YDOs during the validation of the Draft VMGP.

Table 10: List of Minority VMGs and respective county of residence

No	County	VMGs present and or have a collective attachment to	No. of VMG Communities/ County
1	Baringo	Ogiek, Ilchamus, Endorois	3
2	Bomet	Ogiek	1
3	Bungoma	Ogiek	1
4	Elgeyo Marakwet	Sengwer	1
5	Garissa	Munyoyaya, Wailwana	2
6	Homa Bay	Suba/Basuba	1
7	Isiolo	Waatha, Ndorobo	2
8	Kericho	Ogiek, Talai	2
9	Kiambu	Ogiek	1
10	Kilifi	Waatha	1
11	Kitui	Oromo	1
12	Kwale	Waatha, Wakifundi, Wachwaka	3
13	Laikipia	Yiaaku, Endorois	2
14	Lamu	Aweer, Sanye	2
15	Makueni	Angulia	1
16	Mandera	Waatha	1
17	Mandera	Warabeyi, Gabaweyn	2
18	Marsabit	Waatha, El Molo, Daasanach, Sakuye, Wayyu	5
19	Nakuru	Ogiek	1
21	Nandi	Ogiek, Terik	2
22	Narok	Ogiek, Ilkunono	2
23	Samburu	El Molo, Ndorobo, Lkunono	3
24	Taita Taveta	Waatha, Wapare	2
25	Tana River	Waatha, Munyoyaya, Wailwana	3
26	Trans-Nzoia	Sengwer	1
27	Turkana	Ilmanyang, Elmolo	2
28	Uasin Gishu	Sengwer, Ogiek, Riba	3
29	Wajir	Gagabey	1
30	West Pokot	Sengwer	1

Annex 3: Social Screening Form

To be filled by NPCU Team during verification of VMGs in the counties

SOCIAL SCREENING FORM FOR NYOTA ACTIVITIES	
A. BACKGROUND INFORMATION	
A 1. Type/description/justification of proposed activity	
A 2. Location of activity	
A3. Duration of activity	
A 4. Focal point and person for activity	
B. EXPECTED BENEFITS	
B1. Benefits for local people	
B2. Benefits to Vulnerable and Marginalized Groups (VMGs)	
B3. Total Number of expected beneficiaries	
B4. Total Number of expected Vulnerable and Marginalized Peoples beneficiaries	
B5. Ratio of B4 and B5; Are benefits distributed equitably?	<input type="checkbox"/> YES <input type="checkbox"/> NO If NO state remedial measures
C1. Has VMG orientation to project been done for this group?	<input type="checkbox"/> YES <input type="checkbox"/> NO
C2. Has consultations been done with VMGs in the area	<input type="checkbox"/> YES <input type="checkbox"/> NO

Prepared by: _____ Verified by: _____

Date: _____ Date: _____

Annex 4: Three Point Rank Order System For VMGF and VMGPs (Sample)

To be filled by NPCU and World Bank as part of review and monitoring

To be filled by NYOTA NPCU Team and World Bank as part of review and monitoring of the VMGF/VMGP implementation.

[Country] – [Project ID #] – [Project Name]

Last Update: [11/20/ 2008] A.	PROJECT DATA AND RECOMMENDED ACTIONS
Reviewer:	Date of Mission:
Country:	Project Loan Amount:
Project title:	Total Project Cost:
Project ID:	Appraisal Date:
IPP #:	Effectiveness Date:
Task Manager:	Closing Date:
Environment Spec.	Last PSR/ISR
Social Spec.	
MTR	Last Aide Memoire
REVIEW SUMMARY (Based on Desk and Field Review)	
Issues / Observations	
Proposed Actions (short term / long term, for TTL, SD, etc.)	
B. SAFEGUARD IDENTIFICATION AND COMPLIANCE AT PREPARATION	
1 Environmental Safeguard Classification:	
2 Environmental and Social Standards Relevance Given its Context at the at Preparation According to the PAD:	
Applicable	
Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7)	
Stakeholder Engagement and Information Disclosure (ESS10)	
3 Project Objective and Components	
Project Objectives	
Project Description	
4 Social Safeguard Triggers: Are there any social safeguard policies which should have been triggered but were not?	
C. SOCIAL MANAGEMENT PLANS AT PREPARATION	
This review is based on VMGP PAD SA RAP ISDS (check all that applies)	
SCREENING	
Have all IP groups in project area been identified (is screening by the Bank adequate)?	
SOCIAL ASSESSMENT	
Has a social assessment taken place (is baseline data given)? Provide summary of social assessment.	
Has the legal framework regarding IPs been described?	
Have benefits/ negative impacts to IP groups been identified?	
CONSULTATION, PARTICIPATION, COMMUNITY SUPPORT	
Have IPs been involved in free, prior and informed consultation (at the project's preparation stage)? Are there any records of consultations? Is there a description of steps for increasing IPs participation during the project implementation?	
Does the project have verifiable broad community support (and how has it dealt with the issue of community representation)?	
Is there a framework for consultation with IPs during the project implementation?	
VMG PLAN	
Is there a specific action plan (implementation schedule)?	
Does the VMGP include activities that benefit VMGs?	
Are activities culturally appropriate?	

Have institutional arrangements for VMGP been described?
Is there a separate budget earmarked for VMGP?
Are there specific monitoring indicators? If yes, are these monitoring indicators disaggregated by ethnicity?
Has a complaint/conflict resolution mechanism been outlined?
Disclosure: Were VMGP/VMGF disclosed at the <i>Infoshop</i> ? Y / N
Was VMGP/VMGF disclosed in Country and in a form and language accessible to VMGs? Y / N
What's missing:
SPECIAL CONSIDERATIONS
If applicable, what considerations have been given to the recognition of the rights to lands and natural resources of IPs
If applicable, what considerations have been given to the IP sharing of benefits in the commercial development of natural and cultural resources?
Does the project involve the physical relocation of IPs (and have they formally agreed to it)? If yes, has the project prepared a resettlement instrument (resettlement policy framework, process framework, resettlement action plan)?
D. IMPLEMENTATION AND SUPERVISION (Based on initial desk review and verified by field assessment)
1 Social Safeguards
a. Have issues (anticipated and unexpected) been monitored and reported systematically in Aide Memoires and ISRs? Have appropriate actions been taken?
b. Were social specialists included in supervision missions and how often?
c. What are the project impacts on VMGs culture, livelihoods and social organization?
d. In terms of consultation process, are there ongoing consultations with the IP communities? Are there records of carried out consultations?
e. Have any social risks been identified? Have appropriate risk management strategies/actions been recommended to the Borrower?
f. Are VMGOs (beyond the community level) actively engaged throughout the life of the project?
g. Does the project contribute to the respect of VMG rights as recognized by the country's legal and policy systems?
2. Effectiveness
a. Are VMGF and/or VMGP implemented satisfactorily? Are they effective? Is funding adequate?
b. In relation to the implementation of VMGF/VMGP, were problems identified, if any? If yes, how were they resolved by the Borrower?
Effectiveness of Monitoring Program
3.1 Has the monitoring program been adequately supervised? Are performance indicators effective?
3. Effectiveness of Institutional Responsibilities/Training as outlined in the project documents
4. Effectiveness of relevant Legal Covenants: Is compliance with legal covenants being adequately supervised?
E. SITE VISIT(s)
- Date
- Location
1.1 Activity
1.2 Observations
F. OVERALL ASSESSMENT (including desk and field reviews)
1 Overall Assessment and Risk Rating
1.1 To what extent is the ESS7 relevant in delivering effective development to VMGs?
1.2 To what extent has ESS7 been applied and how?
1.3 To what extent has ESS7 been efficacious (cost effective) in achieving its objectives?
2 Recommendations
3.1 Project specific
3.2 Country / Program specific
3 List of Attachments
- Key People Met

- photos -etc.
G. FEEDBACK FROM TTL / SD - Date of feedback received

Three Point Rank Order System For VMGPs (Sample)

Criterion	Points	Explanation
Screening		
1. Have all VMGs groups in project area been identified (is screening adequate)?	0	Not stated
	0.5	The names of some groups have been mentioned; baseline survey has been proposed; Aggregates all groups together
	1	Detailed description of all indigenous groups is given
Consultation, Participation, Community Support		
Have VMGPs been involved in free, prior and informed consultation at the project implementation stage? Are there any records of consultation?	0	Not determinable
	0.5	Brief mention that consultations have taken place; no details provided
	1	Detailed description of process given; appropriate methods used; interlocutors are representative
7. Is there a framework for consultation with IPs during the project implementation?	0	No
	0.5	Passing mention
	1	Detailed arrangements
VMGP		
8. Is there a specific plan (implementation schedule)?	0	Not stated
	0.5	Flexible time frame (activities need to be proposed); given activity wise; year-wise distribution; mentioned but integrated into another project document (RAP, etc.); no separate treatment; combined with RAP;
	1	Detailed description of agencies involved in implementation of plan, including applicable VMGO's or tribal organizations.
9. Does the VMGP include activities that benefit IP	0	Not stated
	0.5	Activities stated but not detailed
	1	Activities clearly specify
10. Are activities culturally appropriate?	0	Not stated
	0.5	Cultural concerns noted but not explicit
	1	Activities support cultural norms
11. Have institutional arrangements for VMGP been described?	0	Not stated
	0.5	Mentioned but integrated into another project document RAP, etc.); no separate treatment
	1	Detailed description of agencies involved in implementation of plan, including applicable VMGO's or tribal organizations.
12. Is a separate budget earmarked for VMGP?	0	Not stated
	0.5	Mentioned but integrated into another project document (RAP, etc.); not broken-down activity-wise
	1	Detailed description given
Are there specific monitoring indicators?	0	Not mentioned
	0.5	Proposed that monitoring indicators shall be designed later; Project outcomes that need to be monitored are stated
	1	Monitoring indicators disaggregated by ethnicity
Has a complaint/conflict resolution mechanism been outlined?	0	Not mentioned
	0.5	Passing mention of mechanism in document
	1	Detailed description and few concrete steps of mechanism given
Were the VMGF/VMGP disclosed in Info shop and in Country in an appropriate language?	0	No
	0.5	Disclosed in Infoshop
	1	Detailed Summary in appropriate form, manner, and language

Annex 5: Minutes

1. Summary of Consultations with KYEOP beneficiaries in Nairobi County and Kilifi County (VMG county)

#	Vulnerability mapping	Question	Response
1.	Accessibility	How do we enhance inclusivity of youth who are challenged in accessing or being accessed during project implementation?	Enhance community engagement at the grassroots level using community halls, vocational training or TVET centers and during school holidays as training venues. Digital accessibility should be improved by making the KYEOP website accessible to youth with visual impairments.
2.	Literacy	How can we enhance employability skills and employment opportunities for youth who are illiterate?	Strategies proposed include lessening the content, making use of infographics, include literacy sessions and offering more artisan courses that can be offered by TVET institutions
3.	Disability	How can we enhance YWD inclusivity and their involvement in project implementation?	The data collection tools should provide a column for PWDS for inclusivity. These youth need to be given opportunities like the rest. The project should also partner with institutions that have PWD's who have graduated with different skills from TVET institutions.
4.	Gender	How can the gender factor be mainstreamed in project implementation?	Key issues identified include understanding the needs and priorities of both male and female youths, addressing social and gender norms impeding involvement of youth through community engagements, and putting in place mechanisms/safe spaces for handling cases of SGBV.
5.	Economic and occupational status	How can we engage youth positivity to increase their economic and occupational status?	Several strategies were identified including follow-up grants, establishing a revolving fund, social empowerment, community integration and career progression. There was also mention of networking and partnership with business enterprises. The youth also need continuous capacity building.
6.	Minority and indigenous individuals and groups	How can we enhance minority and indigenous people inclusivity and involvement in project implementation?	Community engagement is critical to understand the needs of the youth from minority and marginalized communities. There is a need to contextualize the interaction and listen to them.
7.	IDPs	How can involvement of IDPs, gender parity and grievance redress be done for IDPs?	There is a need to identify their needs and address them even as they seek to learn. There is also need for counselling and psychosocial support.
8.	Youth	How can the youth issues be mainstreamed effectively and efficiently in project Implementation?	The youth need to be heard and communication should be youth friendly. The youth need tailor-made courses to meet the needs of potential employers. There is also need for mentorship.
9.	Teenage mothers	How teenage mother's issues be mainstreamed in participation, skills development, empowerment, employment, and job opportunities be enhanced?	The need to create a conducive environment for young mothers was articulated including providing counselling and psychosocial support for young parents. The need to provide daycare facilities for mothers with young children was also identified.

2. Summary of Consultations with Representatives of Vulnerable and Marginalized Groups and Organizations

Themes	Questions	Responses
Awareness and Benefits	Are you aware of projects that support the youths in Kenya?	<ul style="list-style-type: none"> Youth enterprise fund; Uwezo fund; Kazi kwa Vijana; Kazi Mtaani; KYEOP; Elimu scholarships; County jobs; Health Nursing scholarship.
	Which of these projects have you benefited from and how?	<ul style="list-style-type: none"> Uwezo Funds: YAAKU community -Opening up of businesses, Not aware of KYEOP Ilkunono (Narok),lies mostly on women and few youths. Kazi Kwa Vijana: In Trans-Nzoia the project got to the grassroots It captured male youths because of the nature of work. KYEOP: In Trans-Nzoia Information got to the ground but challenges of internet and electric gadgets limited communication and application. Samburu community are not aware of KYEOP. Elimu Scholarship: Seven (7) youths benefited from Samburu. Health Nursing Scholarship: Six (6) benefited from Trans-Nzoia. Information got to Narok, but marginalized groups never benefited.
	From experiences what could be the lessons learned and best practices?	<ul style="list-style-type: none"> Involvement from the grassroots. Female youths to be sensitized. Engage youth to reduce crime.
	How can we engage youths positively to increase their economic and occupational status?	<ul style="list-style-type: none"> Sensitization. Encourage teamwork regardless of gender. Encourage networking by forming more groups to get information. Capacity building on entrepreneurship skills.
	How can youth issues be mainstreamed effectively and effectively?	<ul style="list-style-type: none"> Involving youth voices in all institutions and committee.
Inclusion i.e., literacy, disability, locational disadvantages, gender, and teenage mothers	How can the implementation process be tailored to benefit all eligible youths even for illiterate youths?	<ul style="list-style-type: none"> Minimal efforts ,we are suggesting to be included in entire policy making process. Creation of alliances and offices. Youth to group themselves to advocate using one voice, since there is power in numbers. Present hard copies to the grassroots for those who have no access to internet. Public participation using local dialect for the illiterates. Forming clubs in the grassroots. Media communication. Youths should learn to share. Use of comics/theatre.

	How can gender be factored in project design and implementation?	<ul style="list-style-type: none"> • Adhere to the constitution ,1/3 gender rule. • Sensitizing both genders to come out for the positions available. • Policies governing the projects should be adhered to. • Sensitizing on role taking.
	How can the participation, skills acquisition, employment, and job opportunities for teenage mothers be mainstreamed during project design and implementation?	<ul style="list-style-type: none"> • Having support services such as child care units, movement finances. • Giving youths skills on child care then take it up as employment opportunities. • Giving youths equipment for starting business rather than financial aids. • One communication channel where they can air their grievances.
Youth Engagement and Grievance Management	What mechanisms are available to identify, map, consult and engage youths, and their views, concern, and suggestions are systematically considered?	<ul style="list-style-type: none"> • Youths taking responsibility for their own grievances. • Use of existing youth caucuses. • Mentorship and leadership programs. • Surveys and questioners specifically targeted at youth populations. • Support environment that values their voice and contributions. • Youth lead organizations – CBOs.
	Is there an accessible and functional GRM with established procedure for submitting grievances (including several uptake channels, established routine ,and standards, grievance logs etc.?)	<ul style="list-style-type: none"> • GMs established with limited functionality. • Youths not aware of channels to air their grievances or the protocols to take up their problems. • Personnel management responsible for grievance redress. • Traditional governance systems (Council of elders). • Bi cultural protocols. • Nyumba Kumi Initiatives. • Peace committees. • Alternative dispute resolutions mechanisms.
	Is the GM responsive to sensitive issues e.g., GBV cases? if yes, what measures are in place to promote confidential reporting and handling GBV complaints?	<ul style="list-style-type: none"> • GM is not responsive to sensitive issues. • There should be separate desk to handle sensitive and emergency issues. • Anonymous identification, complainant should not identify him or herself. • Online counsellors to talk to youths through stressful issues. • Training counsellors to be deployed to the ground to leave the lifetime of the project. • Mechanism put in place to handle GBV issues include; <ul style="list-style-type: none"> ○ GBV desk at the police stations to handle GBV matters ○ Youth office ○ GBV Trained Administrators ○ FIDA Offices ○ Toll free numbers ○ Confidential reporting channels ○ Train sensitive personnel ○ Sensitization and awareness campaigns

		○ Privacy and data protection policies
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3. Summary of Consultations with Refugees and Host Communities in Kakuma and Kalobeyei in Turkana County (VMG County)

Theme	Questions	Responses
a) Awareness and Benefits	Are you aware of projects that support the youth in Kenya?	<p>Kakuma/ Kalobeyei youth said they were aware of projects that support youth in Kenya. Probed by the Field Officers, they mentioned the following projects:</p> <ul style="list-style-type: none"> • Kenya Youth Employment Opportunities Project (KYEOP); • Kenya Development Response to Displacement Impacts Project (KDR DIP); • Uwezo Fund; • Germany Agency for International Cooperation (GIZ); • Adventist Development and Relief Agency (ADRA – K); • SWISS CONTACT; • St. Claire of Assisi – Kakuma; • Don Bosco – Kakuma; • Danish Refugee Council (DRC); • Dun Church Aid (DCA – K); • BOMA Project; • Lodwar Technical Training College, formally Lodwar Youth Polytechnic (LOYOPO); • Lutheran World Federation (LWF); • Red Cross Society of Kenya; • World Vision Kenya.
	Which of these projects have you benefited from?	<ul style="list-style-type: none"> • Kenya Youth Employment Opportunities Project (KYEOP); • Kenya Development Response to Displacement Impacts (KDR DIP); • Germany Agency for International Cooperation (GIZ); • Adventist Development and Relief Agency (ADRA – K); • Dun Church Aid (DCA – K); • Lutheran World Federation (LWF); • Red Cross Society of Kenya; • World Vision Kenya.
	How have you benefited?	<ul style="list-style-type: none"> • KYEOP – skills training, business grants and employment opportunities; • KDR DIP – financial grants; • GIZ – Training/ Capacity building; • Adventist Development and Relief Agency (ADRA – K) – imparting TOT Skills to youth in order to train youth and teenagers; • Dun Church Aid (DCA – K – training youth on entrepreneurship skills and technical skills training; • LWF – financial grants; • Red Cross Society of Kenya – donation of non-food items; • World Vision Kenya – peace-building, education, and skills training.
	What are the Lessons learned and best practices?	<ul style="list-style-type: none"> • Youth issues are recognized by the Government and Non-State organizations in Kakuma and Kalobeyei; • Most organizations encourage youth to form self-help groups for them to benefit from opportunities; • The Youth have learned skills models, for example, decision making and solving problems; • The youth have learned that there are many ways to survive (life skills); • Youth have been trained on Sexual and Gender Based Violence (SGBV); • Youth have learned TOT skills;

		<ul style="list-style-type: none"> • Most organizations in Kakuma and Kalobeyei benefit more the girl-child and women than boys and men during implementation of their programmes or projects; • Economic empowerment uplifts living standards. <p>The youth mentioned the following as the best practices:</p> <ul style="list-style-type: none"> • Youth participation in planning and implementation of youth projects is key to the success of youth projects; • Strong monitoring and evaluation are important for project success; • Timely disbursement of grants by the grant giving organizations.
	<p>How can we engage youth positively to increase their economic and occupational status?</p>	<ul style="list-style-type: none"> • Increasing the pay among the employed youth; • Youth being given loans and grants with strict monitoring and supervision; • Training of youth in business skills, technical skills, life skills, etc.; • Creation of awareness on projects among the youth; • Youth accessing firsthand information on opportunities as opposed to through compromised persons/ offices to avoid discrimination, nepotism, and corruption; • Digitalization of opportunities information as opposed to purely manual approaches; • Providing skilled youth with starter kits and tools of work for them to start their own enterprises; • Provision of certificates and recommendation letters to the youth; • Involving youth public participation forums; • Encouraging formation of youth groups; • Use of media to sensitize and train youth; • Diversified youth selection during public participation as opposed to using the same youth in all public participation exercises; • Increasing the number of youths during public participation in order to tap into diversified views; • Engaging youth in sports and games; • Encouraging youth to venture into political leadership for their voices being heard.
	<p>How can youth issues be mainstreamed effectively and efficiently?</p>	<ul style="list-style-type: none"> • Passing or enacting laws that encourage youth mainstreaming; • Increasing funds targeted specifically to youth; • Government's ministries and organizations employing more youth on affirmative basis; • Including youth in all decision-making bodies/ boards / committees in the National and County Government; • Equal gender representation in government and organizations; • Training youth on technical and mechanical skills, such as plant operator skills, to the youth; • Awareness creation; • Group formation among the youth; • Engagement of youth in sports; • Organizing meetings and seminars on youth mainstreaming.

b) What are the efforts in place to ensure vulnerable or disadvantaged youth access benefits and opportunities?	How can we enhance the participation of Youth who are challenged in accessing or being accessed during project implementation (E.g., those in hard-to serve areas)?	<ul style="list-style-type: none"> • Having a data base of youth who are challenged in accessing or being accessed and such data being maintained by chiefs; • Employing representatives of the youth who are challenged in accessing or being accessed, to act as the link between the challenged-to-reach youth and organizations; • Enhancing public awareness through public barazas/ meetings; • Use of random selection so as to be fair to the hard-to-access youth; • Leveraging on existing programmes such as food distribution to reach such hard-to-reach youth; • Through awareness campaigns; • Use of social media; • Use of notice boards to disseminate information; • Through youth groups; • Through village leaders reach-out; • Broadcasts through radio.
	How can the application process be tailored to benefit all eligible youths even for illiterate youth?	<ul style="list-style-type: none"> • Use of language that is easy for the targeted youth to understand; • Customize the application process to fit individuals with low education levels; • Advertising through public notice-boards; • Deploying youth to reach out to the youth; • Through Chiefs/village elders/ village administrator’s public barazas; • Announcing in churches; • Use of mainstream and local radio; • Use of online application processes; • Use of posters; • Through social media; • Lowering the qualifications to benefit illiterate youth.
	How can gender be factored in project design and implementation?	<ul style="list-style-type: none"> • Inclusion of both male and female youth in project implementation (gender equity and equality); • Door to door reach out to youth, especially female youth who are mostly found at home; • Sensitization of parents on liberating of the female youth to access opportunities; • Through awareness creation and training.
	How can the participation, skills acquisition, employment, and job opportunities for teenage mothers be mainstreamed during project design and implementation?	<ul style="list-style-type: none"> • Inclusion of both male and female youth in project design and implementation; • Door to door reach out to youth, especially female youth who are mostly found at home; • Sensitization of parents on liberating of the female youth; • Through awareness creation and training; • Providing scholarship opportunities to teenage mothers; • Provision of caregivers to teenage mothers; • Providing basic needs to the teenage mothers’ children, such as food, diapers, etc.; • Meeting health needs of the mothers and their children; • Giving employment opportunities to teenage mothers and training on life skills; • Entrepreneurship training of teenage mothers and giving them business grants.
c) Youth Engagement and Grievance Management	What mechanisms are available to identify, map, consult, and engage youths, and that their views, concerns, and suggestions are systematically considered?	<ul style="list-style-type: none"> • Use of platforms such as Turkana College and University Students Association for college going youth; • Use of local and national radio and TVs; • Use of public meetings and Chief’s barazas; • Use of Film Aid – Kakuma platform; • Through public participation; • Through seminars and training; • Through registered groups; • Through social media, e.g., WhatsApp groups;

		<ul style="list-style-type: none"> • Through youth leaders engagement; • Through local leaders.
	Is there an accessible and functional GRM with established procedures for submitting grievances (including several uptake channels, established routines, and standards, grievance logs, etc.	<ul style="list-style-type: none"> • Through available toll numbers; • Through government officers deployed to handle GBV cases; • Through reporting to the police stations then seeking treatment at the health facilities; • Through interventions by Non-State Organizations such as ADRA – K, UNHCR, World Vision officers; • Through Chiefs and local administrators; • Through Welfare organizations such as Kenya Red Cross. • Calling office telephone numbers; • Through controlled WhatsApp groups.
	Is the GRM responsive to sensitive issues, e.g., GBV cases? If yes, what measures are in place to promote confidential reporting and handling GBV complaints?	

Annex 6: List of Participants



Nairobi KYEOP
Participants.pdf



Kilifi Consultations
Participants.pdf



Refugees and Host
Communities' Partici



Nakuru VMG
Consultations Partic

