



GOVERNMENT OF KENYA

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

STAKEHOLDER ENGAGEMENT PLAN

JUNE 2024

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ACRONYMS AND ABBREVIATIONS

CEA	Child Exploitation and Abuse
CoK	Constitution of Kenya
CSO	Civil Society Organization
CTDs	County Technical Departments
E&S	Environmental and Social
EHS	Environmental Health and Safety
EPRP	Emergency Preparedness Response Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
GDP	Gross Domestic Product
GM	Grievance Mechanism
GRS	Grievance Redress Service
IAs	Implementing Agencies
KAM	Kenya Association of Manufacturers
KEPSA	Kenya Private Sector Association
KNCCI	Kenya National Chamber of Commerce and Industries
KPIs	Key Performance Indicators
KTTCs	Kenya Technical Teachers Colleges
KYEOP	Kenya Youth Employment and Opportunities Program
KYEP	Kenya Youth Empowerment Program
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MSEA	Micro and Small Enterprise Authority
MOYACES	Ministry of Youth Affairs, Creative Economy, and Sports
NEA	National Employment Agency
NEMA	National Environment Management Authority
NGOs	Non-Governmental Organizations
NITA	National Industrial Training Institute
NPCU	National Project Coordination Unit
NSSF	National Social Security Fund
NYOTA	National Youth Opportunities Towards Advancement
OHS	Occupational Health and Safety
OSHA	Occupation Safety and Health Act
PDO	Project Development Objective
PITC	Project Implementation Technical Committee
POs	Project Officers
PSC	Project Steering Committee
PWD	Persons with Disability
SCYDO	Sub-County Youth Development Officer
SDL	State Department of Labour
SD-MSMED	State Department for Micro, Small and Medium Enterprise Development
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation Abuse and Harassment
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender Based Violence
SH	Sexual harassment
SMP	Security Management Plan
SPR	Summary Project Report
STE	Short-Term Expert
TV	Television
TVET	Technical and Vocational Education and Training
TWG	Technical Working Group
UNHCR	United Nations High Commissioner for Refugees
VMG	Vulnerable and Marginalized Group
VMGF	Vulnerable and Marginalized Groups Framework
VMGP	Vulnerable and Marginalized Groups Plan
WB	World Bank
WEF	Women Enterprise Fund
WIBA	Workers Insurance and Benefits Authority
WHR	Window for Host Communities and Refugees
YEDF	Youth Enterprise Development Fund

EXECUTIVE SUMMARY

Background

1. 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), *formerly the Ministry of Youth Affairs, the Arts and Sports (MYAAS)*, the Micro and Small Enterprise Authority (MSEA) and the National Social Security Fund (NSSF) constituting 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).

2. The 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. This stakeholder engagement plan (SEP) has been updated to capture additional stakeholder consultations with targeted refugee and host communities. The targeted youths are 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 labour 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. People 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.

Project description

3. The Project Development Objective (PDO) is to increase employment and opportunities for earnings and savings for vulnerable youth. The PDO will be measured using two key results areas and associated project development indicators aligned to the primary outcomes: (i) increasing employment and increasing earning opportunities among targeted youth; and (ii) increasing savings opportunities among targeted youth in the informal sector. The Project will have four components: (i) improve youth employability; (ii) support youth entrepreneurship; (iii) support youth savings; and (iv) strengthen youth employment and savings systems.

Environment and Social risk rating

4. The environmental risk rating is Moderate since there are no civil works of any kind included in the project activities. The only environmental risks may emanate from occupational, safety and health (OHS) risks and impacts based on the host institutions or the organizations the youth will be assigned to. The social risk rating is Moderate. There are risks related to exclusion of target youths from accessing project benefits and opportunities; exacerbating or potentially giving rise to sexual exploitation, abuse, and sexual harassment (SEA/H), and other forms of gender-based violence (GBV); exploitation and abuse of the apprentices; the limited and developing capacity of MOYACES, NSSF and the other implementing agencies (IAs) to manage social risks and impacts arising from the project. The SEA/H is rated Moderate due to the following factors: (i) project activities may be implemented in counties where SEA is prevalent; (ii) the limited capacity of MOYACES and implementing partners to manage the risks of SEA/H; (iii) risk of either exacerbating and/or potentially giving rise to SEA/H during training, work experience (apprenticeships and gigs) and during the implementation of grants programs; and (iv) the project is likely to engage GBV survivors amongst the target beneficiaries, further exposing them to the risk of SEA/H. These risks and others that emerge during project implementation will be addressed through putting in place appropriate mitigation measures and effective engagement of key stakeholders.

Purpose of stakeholder engagement Plan

5. The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including identifying/mapping the relevant stakeholders for this project and their roles, methodology(ies) and approaches of engaging the stakeholders, the resources required to implement and monitor the SEP implementation. It outlines the ways in which NYOTA, the implementing agencies (IAs), and contractors or primary suppliers will communicate with stakeholders, and it includes a mechanism by which target communities can raise concerns, provide feedback, or make complaints about NYOTA contractors and the subproject(s).

Project stakeholders

6. The key project stakeholders will be the youth who are the main beneficiaries, the implementing and technical agencies, contractors/service providers and sub-national governments. The engagement of key stakeholders was initiated during the preparation of the project documents and will continue throughout the implementation period.

7. NYOTA will pay special attention to individuals and groups of youth who may be missed during enrolment or be disadvantaged during training. The groups identified in this SEP include youth with limited levels of education, vulnerable and marginalization groups (VMGs) and minority groups, youth with disabilities (PWDs), youth living with HIV/AIDS, young mothers, women, single parents, internally displaced persons (IDPs), GBV survivors, the homeless, and youth who reside in remote rural and hard-to-serve areas with limited access to internet and other amenities. Due to the ongoing clashes in some parts of the country, some of the youth in these areas may be inadvertently missed during recruitment. The project will also engage refugees and host community youth in the counties of Garissa, Turkana and Wajir; and those in urban areas.

Policy, legal and institutional framework

8. There are key legislation policies and frameworks of relevance to the implementation of NYOTA that include: the Constitution of Kenya (2010); Kenya Vision 2030; Kenya Youth Development Policy (2019); Empowered Youth for Sustainable Development; Public Participation Policy (2018); Occupational Health and Safety Act (2007); Labor Relations Act (2012); Persons with disabilities Act (2003); Children's Act (2022); Sexual Offenses Act (2006); HIV/AIDS Prevention and Control Act (2000); Access to Information Act (2016); and World Bank's Environment and Social Standards (ESS) 10: Stakeholder Engagement and Information Disclosure. The project team will adhere to any other regulations as necessary during the project implementation.

Proposed strategies for information disclosure

9. Disclosure of information that is accessible is critical for transparency and accountability. It serves as a means of promoting understanding about the project, engendering trust, and contributing towards informed participation. Information will be provided to and widely distributed among all stakeholders in a manner that is culturally appropriate, accessible, and inclusive (considering formats, locations, and languages). Ongoing opportunities will be provided for responding regularly to stakeholders' feedback, for analyzing and addressing comments and concerns.

10. The NPCU will disclose project instruments [1] to affected parties, including vulnerable or disadvantaged groups (e.g., those with literacy, mobility, and disability challenges), and other interested parties, through a variety of methods including (i) displaying graphical posters and summaries of project instruments in public places accessible to all stakeholders such as in chiefs offices, sub-county, and county project offices for MOYACES, NSSF and MSEA, community centers and religious places. The posters and summaries will be written in languages understandable to all (including refugee-friendly languages (French, Kiswahili, Oromo, Somali, and Kinyamulenge) and braille; (ii) through public forums/youth engagements held at the sub-county and county levels by SCYDOs and CDYs; (iii) social media platforms, and (iv) vernacular radio and TV stations (as applicable).

11. The GM will be summarized in simple and easy to understand procedures for submitting grievances in languages understandable to all, indicating the expected length of timelines for acknowledgment, response, and resolution of grievances. Lastly, the implementing agencies will publicly disclose the instruments on their external websites in line with the World Bank Access to Information Policy.

Grievance management

12. The GM that was implemented under the ongoing KYEOP project has been adapted and extended to meet NYOTA requirements and presented as a separate instrument. The National Project Coordination Unit (NPCU) has enhanced the functionality and efficiency of the KYEOP GM system and embedded it across each of NYOTA's components to enable beneficiaries and other parties to lodge complaints and facilitate the tracking and resolution of the complaints in an integrated manner, within an acceptable timeframe. Grievance management committees are proposed at the sub-county, county, and national levels under a three-tier GM, complemented by the Management Information System (MIS).

13. The NPCU will establish a system for the receipt, recording and referral of complaints and grievances. This includes a toll-free line with a provision for WhatsApp and SMS, anonymous boxes, emails, and GM and GBV Focal Persons desks, for each sub-county and counties, and at the national level. NYOTA social media handles will also be utilized as uptake channels, and an online platform through which all the youth and the public can lodge complaints and grievances. The GM process will be overseen by the E&S specialist at the NPCU level.

14. Since NYOTA involves various stakeholders (including implementing and technical agencies, service providers etc.) and multiple activities, the GM will encompass complaints and grievances related to all project activities including the intake of interns and referral processes, training activities, business development services and award of grants, as well as the innovation challenges and the completion of business plans. Specific complaints in these categories will be referred to the respective agency technical officer responsible for managing complaints. In addition, the complaints/grievances will be recorded, analyzed, reported and the reports shared with the relevant offices. The IAs will be expected to develop their charters early.

15. The project will provide for the management of SEAH cases that could be reported through the general Project GM. However, additional channels for reporting SEAH complaints will be identified and integrated into the GM (details to be provided in the SEAH Prevention and Response Plan). The GBV/SEAH survivors will have the opportunity and right to report an incident to anyone including community members; project staff; GBV case manager/service providers; trainers; etc. Given the sensitive nature of GBV/SEAH complaints, the GM will provide different ways to submit grievances such as phone, anonymous boxes, text message and email. All project staff will receive training on handling GBV/SEAH complaints and referral systems, ideally during the project initiation phase and as part of the staff welcome package for the youth, project staff, and service providers

Institutional Arrangements

16. 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. MOYACES 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.

17. The E&S Specialist at the NPCU will be responsible for implementing this SEP working closely with the E&S Specialists at NSSF and MSEA, and communication and monitoring and evaluation (M&E) officers across the implementing and technical agencies. Quarterly and annual reports will be produced by the implementing agencies, channeled through the NPCU, and shared with the World Bank team and other key stakeholders.

Capacity building

18. NYOTA will arrange the necessary training sessions associated with the implementation of this SEP that will be extended to the E&S specialists and staff of implementing and technical agencies on the project.

Budget

19. The cost of implementing the SEP will be approximately **KES 25, 080, 000 (About USD 200, 000)** over the 5 years.

CHAPTER 1: INTRODUCTION

1.1 Background

1. 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), *formerly the Ministry of Youth Affairs, the Arts and Sports (MYAAS)*, the Micro and Small Enterprise Authority (MSEA) and the National Social Security Fund (NSSF) constituting 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).

2. The 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 are those with little or no education, who are unemployed, underemployed, or in low-tier employment with very low earnings. Such youth face exclusions and is 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 labour 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. People 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.

3. Since this project is being implemented under the Bank's Environment and Social Framework (ESF) there are standards to be met based on the project reach. The current risk rating shows that the project has 'Moderate' environmental risk and 'Moderate' for social. This, therefore, requires the project team to develop several instruments to ensure that the risks are identified, and mitigation measures put in place.

4. The project will be implemented over a period of 5 years (June 29, 2023 – December 31, 2028). 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 Labour 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. Service providers will entail the master craftsmen, private sector organizations Kenya Private Sector Alliance (KEPSA), Kenya Association of Manufacturers (KAM), Federation of Kenya Employers (FKE) and Kenya National Chamber of Commerce and Industry (KNCCI), credit institutions, mentors and training institutions, and master craftsmen umbrella organizations, social enterprises as well as sub-national governments, who will have specific deliverables.

1.2 Project Objectives

1. The Project PDO is: To increase employment and opportunities for earnings and savings for vulnerable youth.

1.3 Key Results

2. The PDO will be measured using three key results areas and associated project development indicators aligned to the primary outcomes. **Results Area 1: Increasing employment among targeted youth.** Outcome indicators for results area 1 will include:

- i. Beneficiaries of job-focused interventions (Number)
 - Beneficiaries of job-focused interventions – Female (Number)
 - Youth beneficiaries living with disabilities (Percentage)
- ii. Youth beneficiaries in wage or self-employment at least 6 months after completing the package of project interventions (Percentage)
 - 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)
- iii. Female beneficiaries who are in wage or self-employment in male dominated sectors at least 1 year after training with gender-specific module (Percentage)

3. **Results Area 2: Increasing earnings among targeted youth.** The outcome indicators for results area 2 will include:

- iv. Average earnings among wage and self-employed youth beneficiaries 6 months after completing the package of project interventions (Percentage)
 - Average earnings among wage and self-employed female beneficiaries at least 6 months after completing the package of project interventions (Percentage)

4. **Results Area 3: Promote savings among targeted youth.** Outcome indicators for results area 3 will include:

- v. 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)
- vi. Females with maternity benefits who have had at least 1 post-natal health visit (Percentage)

1.4 Project Components

5. The project will have four components, each with several sub-components as summarized in Table

Table 1: Project components and sub-components

Components	Sub-components
1. Improving youth employability This component will connect targeted youth to wage employment by providing them with training, on the job experience, and access intermediation services.	1.1 Provision of training and work experience to youth in the formal and informal sector.
	1.2 Operationalization of the Kenya labor market observatory and supporting intermediation
2. Expanding employment opportunities This component will expand employment opportunities through entrepreneurship development and support to social enterprises.	2.1 Support for entrepreneurship.
	2.2 Results based financing partnership with social enterprises.
3. Supporting youth savings This component will provide savings opportunities to beneficiaries of components 1 and 2.	3.1 Supporting savings through monetary top-ups and nudges.
	3.2 Enhancing NSSF operations by upgrading processes, systems, and communications.
4. Strengthening youth employment and savings systems This component will strengthen systems and capacity of national and county-level implementing agencies and finance project management activities.	4.1 Build County Government capacity to invest in youth employment.
	4.2 Monitoring and evaluation and delivery systems.
	4.3 Project Management and Coordination.

1.5 Summary of Project Environmental and Social Risks

Environment risks

6. Based on the project activities, the potential adverse risks and impacts on humans and the environment are likely to be minimal or negligible. The proposed activities will provide training and internship opportunities for the targeted youths, in both public and private sectors that include formal and informal internship opportunities and provision of small start-up grants for youth led business. There are no civil works of any kind included in the project activities. Therefore, the environmental risk rating is assessed as Moderate.

7. It is noted that during the internship, the interns may be exposed to occupational, health and safety (OHS) risks and impacts based on the institution or organization they will be assigned. The host institutions or organizations have not been identified at this stage of project preparation. The internship policy and guidelines for the public services requires that the internship program comply with the Work Injury Benefits Act (WIBA), 2007 and the Occupational Safety Health Act (OSHA) 2007. Thus, the Project will ensure that the selected interns have personal accident insurance cover during the internship period facilitated by the Project. Thus, the potential environmental risks and impacts on human population and environment are not likely significant.

Social Risks

8. The social risk rating is Moderate. The potential social risks and impacts include the following:
- i. exclusion of target youths from accessing project benefits and opportunities due to biased identification and selection of beneficiaries, inadequate engagement, project investments rolled out in a context of limited resources against widespread need, elite capture, disability, literacy, refugee status, and mobility challenges;
 - ii. exacerbating or potentially giving rise to SEAH, and other forms of GBV extending from enrolment for project benefits and opportunities such as training, work experience (apprenticeships and gigs) and grants programs;
 - iii. exploitation and abuse of child apprentices;
 - iv. challenges in access to beneficiaries for meaningful stakeholder engagements and grievance redress and monitoring; and
 - v. the limited and developing capacity of the implementing agencies (MOYACES and NSSF) and implementing partners to manage social risks and impacts arising from the project.

Sexual Exploitation and Abuse/Sexual Harassment (SEAH)

9. The SEAH risk rating is Moderate. This is mainly due to the following factors: (i) project activities may be implemented in counties where SEA is prevalent due to cultural or poverty-related reasons; (ii) the capacity of MOYACES and implementing partners to manage the risk of SEAH is unclear at this stage; (iii) while labor influx is unanticipated, there is the potential risk of either exacerbating and/or potentially giving rise to SEAH when implementing training, work experience (apprenticeships and gigs) and grants programs; and (iv) the project is likely to engage GBV survivors amongst the target beneficiaries, further exposing them to the risk of SEAH. In this respect, the Bank will undertake a detailed SEAH risk assessment during project preparation, including assessing the MOYACES's capacity to manage SEAH risks under the project. MOYACES will prepare and implement a SEAH Prevention and Response Action Plan, which will address, among others, aspects of GBV/SEAH and Child Exploitation and Abuse (CEA). Requirements for mitigating SEAH and Child Exploitation and Abuse (CEA) will be reflected in the ESCP to be prepared and disclosed before appraisal, bidding documents, and contracts (as applicable) for proposed project activities.

10. In response to these risks, the project will:
- i. develop and adhere to a transparent and inclusive criterion for identifying and selecting target youths;

- ii. prepare and implement a SEAH Prevention and Response Action Plan (this will outline measures to address, among others, aspects of SEAH and Child Exploitation and Abuse (CEA); including a clear SEAH accountability and response framework, and the requirement for all those with physical presence in project areas to sign and understand the codes of conduct;
- iii. institute labor management procedures that promote fair treatment, non-discrimination, and equal opportunity for target youths, VMGs, women and PWDs, etc.;
- iv. engage all target beneficiaries meaningfully with differentiated engagement approaches for minority Vulnerable and Marginalized Groups (VMGs) who share project benefits and opportunities with dominant communities, other disadvantaged or vulnerable groups such as those in hard- to- serve populations, refugees, and the host communities;
- v. build and/or strengthen the capacity of implementing agencies and partners to manage social risks and impacts on the project effectively; and
- vi. prepare and implement VMGPs for minority VMGs to outline the appropriate mitigation measures and ensure access to project benefits and opportunities that are culturally appropriate.

1.6 Objectives of the Stakeholder Engagement Plan

11. The overall objective of this Stakeholder Engagement Plan (SEP) and Information Disclosure is to define a program for stakeholder engagement, including identifying/mapping the relevant stakeholders for this project and their roles, methodology(ies) and approaches of engaging the stakeholders, the resources required to implement and monitor the SEP implementation. It outlines the ways in which implementing and technical agencies r service providers and beneficiaries will engage throughout the project cycle.

12. The involvement of the beneficiary population is essential to the success of the project to ensure smooth collaboration between project workers and beneficiary communities and institutions; and to minimize and mitigate environmental and social risks related to the proposed project activities. The SEP also describes the applicable, policy, regulatory and other relevant requirements for information disclosure.

CHAPTER 2: STAKEHOLDER IDENTIFICATION AND ANALYSIS

2.1 Stakeholders

13. Project stakeholders are ‘individuals, youth groups, communities, or other entities who:
 - i. are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the project (also known as ‘Project Affected Parties’ (PAPs);
 - ii. those who may have an interest in the project (‘interested parties’) - they include individuals or groups whose interests may be affected by the project and who have the potential to influence the project outcomes in any way; and
 - iii. disadvantaged or vulnerable groups - these include disadvantaged and vulnerable and marginalized groups (VMGs) that will participate in this project. It also covers disadvantaged groups such as PWDs, teenage mothers, refugees and those residing in hard-to-serve areas.

14. Cooperation and negotiation with the stakeholders throughout the project development will often require the identification of persons who act as legitimate representatives of the respective disadvantaged and vulnerable groups, such as association of PWDs, groups/institutions taking care of refugee matters, or any other project group members with the responsibility of advocating for the groups’ interests in the process of engagement with the project.

15. Community representatives and other opinion leaders will provide helpful insights into the local settings and act as main conduits for dissemination of project-related information and as a primary communication/liaison link between the project and targeted youths and their established networks. The legitimacy of such representatives may stem both from their official elected status or their informal and widely supported standing within the community that allows them to act as focal points of contact in the project’s interaction with its stakeholders. Examples of legitimate stakeholder representatives include, but are not limited to:
 - i. elected officials of county and ward levels, and self-governance bodies;
 - ii. administrative officials at the community and county levels including the National Government Administrative Officers (chiefs and assistant chiefs);
 - iii. non-elected leaders that have wide recognition within their communities, such as chairpersons of local initiative groups, committees, local cooperatives, etc.;
 - iv. leaders of community-based organizations, faith-based organizations, local and international non-governmental organizations (NGOs) and youth groups;
 - v. the elders and veterans within the targeted communities; religious leaders; teachers; and other respected persons, etc.; and
 - vi. for refugees, the leadership structure in the camps and host communities.

2.2 Identification of Stakeholders

16. Stakeholder engagement process for NYOTA started from identification, mapping, and analysis. It is notable that most of the beneficiaries have already had engagements on KYEOP. It is anticipated that this SEP will guide NYOTA to facilitate the active engagement of the stakeholders identified. The following criteria are proposed to be used for the identification of stakeholders.
 - i. **Liability:** project implementation or on-going operations may result in legal, financial, or other liabilities of the proponent to a social group;
 - ii. **Influence:** a social group may be able to substantially influence project implementation or ongoing operations;
 - iii. **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or on-going operations;
 - iv. **Dependency:** project implementation may significantly affect a given social group and may affect vital interests of its representatives if they are dependent on the project’s on-going operations in economic or financial terms;

- v. **Representation:** a social group may have a right to represent interests about a project or ongoing operations, and this right is legitimated through legislation, custom and and/or cultural specifics; and
- vi. **Expressed interest:** a social group and/or individual may express interest to a project or ongoing operations, and this group is not necessarily directly affected by the planned or current activities.

2.3 Stakeholder Analysis

17. For the purposes of effective and tailored engagement, stakeholders of NYOTA project are categorized as follows.

- i. **Project Affected Persons (PAPs)** - individuals, groups and other entities that are directly affected (actually or potentially) by the project and/or have been identified as most susceptible, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures, as well as access to project benefits and opportunities. These will include the youth admitted into the internship project and the institutions involved in the implementation of the project.
- ii. **Other Interested Parties** – line ministries and departments, civil society organizations (CSOs), contractors/service providers, development partners in the same sector, media, individuals, entities that may not experience direct impacts from NYOTA but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- iii. **Disadvantaged or vulnerable individuals and groups** – persons and groups who may be disproportionately impacted or further disadvantaged by the project as compared to any other groups due to their disadvantaged and/or vulnerable status¹ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project(s). These may include YWD, young mothers, internally displaced persons (IDPs), refugees, youth with low literacy, and those residing in hard-to-serve areas-remote rural areas with limited access to internet and other amenities; etc.

18. Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties towards the successful implementation of the project and will enable the project to draw on the pre-existing expertise, networks, and agendas. It will also facilitate both the community and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders. A description of the stakeholders and needs is summarized in Table 2.

Table 2: Summary of Project Stakeholder Needs

<i>Category</i>	<i>Stakeholder group</i>	<i>Estimated Membership</i>	<i>Language needs</i>	<i>Preferred notification means</i>	<i>Specific needs</i>
Target beneficiaries – youth.	Vulnerable youth with little or no education, aged 18-29, who are unemployed, underemployed, or in low-tier employment with very low earnings.	Training – 40,000; Online jobs – 40,000; Refugee camps – 5000; Host communities – 5000; Entrepreneurship - 90,000.	English and Kiswahili (it is assumed qualifying youth will have some literacy).	-Phone calls; -WhatsApp; -Radio; -Text Messages; -Social media platforms; -Local leadership offices; -Youth Offices at the Sub-county, county, and national levels.	Resources to access the various communication channels.

¹Disadvantage and vulnerability status may stem from an individual’s or group’s race, national, ethnic, or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

<i>Category</i>	<i>Stakeholder group</i>	<i>Estimated Membership</i>	<i>Language needs</i>	<i>Preferred notification means</i>	<i>Specific needs</i>
Disadvantaged or vulnerable youth.	PWDs aged 18-35, women, young mothers, single parents, youth with low literacy, PWDs, IDPs, youth from rural remote/hard-to-serve areas, homeless, GBV survivors, at-risk-children, youths living with HIV/AIDS, minority VMGs and refugee communities.	Between 30-50% of the numbers indicated above.	English; Kiswahili; French (refugee communities); Braille.	-Phone calls; -WhatsApp; -Radio; -Text Messages; -Social media platforms; -Local leadership offices; -Youth Offices at the Sub-county, county, and national levels.	-Daycare services for young mothers; -Travel support; -Language interpreters; -Psychosocial support for GBV survivors.
Implementing agencies.	The key IAs – MOYACES, NSSF and MSEA.	Ten.	English.	-Workshops; -Email; -Reports.	-Meeting venues; -Trainings; -Facilitation.
Technical Agencies.	NITA, NEA, SDL, DRS, UNHCR and SD-MSMED.				
Service providers.	Master Craftsmen, umbrella organizations, private sector organizations - FKE, KAM, KEPSA, KNCCI, Kenya Teachers Training Colleges (KTTCs), and Social enterprises.	Numerous, spread across the country.	English and Kiswahili.		
Counties and sub-counties.	County and sub-county leadership.	47 counties; 330 sub-counties.	English and Kiswahili.	-Workshops; -Email; -Reports.	-Mobilization; -Meeting venues; -Facilitation.
Community leaders.	All community leaders at the sub-county and county levels.	47 counties; 330 sub-counties.	English, Kiswahili, and applicable local languages.	Strategic meetings (at county and sub-county levels).	
Civil society organizations.	Faith-based organizations (FBOs), community-based organizations (CBOs), local and international NGOs, etc.	Various across the country based on the role assigned to them.	English, Kiswahili, and applicable local languages.	Strategic meetings (at county, sub-county, and national levels).	
Media	Media houses operating at the national, county, and sub-county levels.	Various across the country.	English, Kiswahili, and applicable local languages.	Strategic meetings (at county, sub-county, and national levels).	Press briefings.
General public	Information will reach all people given the national nature of the project.	Everyone across the nation.	English, Kiswahili, and applicable local languages	Radio including those transmitting in local languages; -Social media; - NYOTA Website; -Disclosed progress reports.	Resources to access the various communication channels.

CHAPTER 3: POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

19. Public participation is a constitutional required by the GoK and obligations under international agreements. The Constitution of Kenya (CoK, 2010) entrenches a wide range of social, political, economic, and cultural rights and revolutionizes the entire system of political governance by devolving authority to County Governments and decreeing the need for citizen participation in decision making. It enshrines the right to access of information and makes principles of international laws and treaties ratified by Kenya an integral part of the country's laws, as summarized in Table 3.

Table 3: Policy, Legal, and Institutional Framework Analysis

#	Policy, Legal & Institutional Framework	Relevancy	Application in NYOTA
1.	The Constitution of Kenya, 2010	The Constitution provides for transparency and timely provision to the public accurate information as one of the values and principles of public service (Article 232). It binds all State Agencies at both National and County Government levels and State Corporations to observe these values and principles. Chapter 6 on leadership and integrity will be relevant to the recruitment and support provided to the youth.	The project shall adhere to the CoK, 2010 by ensuring that information is shared in a timely and accessible manner. It will also ensure equitable sharing of project benefits while ensuring equity and equitable distribution particularly for minority VMGs and other disadvantaged or vulnerable groups.
2.	Kenya Vision 2030	Under the Social Pillar of Vision 2030, i.e., the Country's commitment to invest in the people of Kenya, the country's journey towards prosperity is envisioned to involve building of a just and cohesive society, which enjoys equitable social development in a clean and secure environment. The Vision envisages responsible, globally competitive, and prosperous youth. Among the specific interventions identified under the Vision include establishment of youth centers, apprenticeship, mentorship, development of creative industry hubs and youth enterprise financing; and strengthening internships and industrial attachments to enhance employability across public and private sectors.	The project shall accelerate the achievement of the interventions identified in the Vision. It will provide opportunities for mentorship, training, and entrepreneurship for youth across the country.
3.	Kenya Youth Development Policy 2019 Empowered Youth for Sustainable Development	The Policy goal is to promote the holistic empowerment and participation of the youth in socio-economic and political spheres for national development. Some of the policy objectives include: <ul style="list-style-type: none"> • Realize a healthy and productive youth population; • Build qualified and competent youth workforce for sustained development; • Create opportunities for youth to earn decent and sustainable livelihoods; • Develop youth talent, creativity, and innovation for wealth creation; • Nurture value driven, morally upright, ethical generation of patriotic youth for transformative leadership; • Effective civic participation and representation among the youth; • Promote a crime free, secure, peaceful, and united Kenya where no young Kenyan is left behind; • Support youth engagement in environmental management for sustainable development; • Promote and develop an entrepreneurial culture among the youth through access to subsidized loans, training, mentorship, 	The project shall contribute towards the achievement of this goal. The project will ensure equitable distribution of benefits across the country while paying attention to disadvantaged or vulnerable youth.

#	Policy, Legal & Institutional Framework	Relevancy	Application in NYOTA
		<p>internships, attachments, business incubation and partnerships; and</p> <ul style="list-style-type: none"> • Support the development of a wide range of information technology and communication (ICT)-based programs in local languages, as appropriate, with content relevant to different groups of youth. 	
4.	The Public Participation Policy 2018	The GoK has developed this Public Participation Policy as the country's overarching framework for public participation. In this policy, public participation is conceptualized as the process by which citizens, as individuals, groups, or communities (also known as stakeholders), take part in the conduct of public affairs, interact with the state and other non-state actors to influence decisions, policies, programs, legislation and provide oversight in service delivery, development and other matters concerning their governance and public interest, either directly or through freely chosen representatives.	The project recognizes that public participation strengthens and legitimizes project decisions, actions, and development interventions, and that it is an important element of good governance and the foundation for a true democracy. Public participation and information disclosure will be key pillars to this project.
5.	Occupational Health and Safety Act, 2007	<ul style="list-style-type: none"> • Secures safety and health for people legally in all workplaces by minimization of exposure of workers to hazards (gases, fumes and vapors, energies, dangerous machinery/equipment, temperatures, and biological agents) at their workplaces. • Prevents employment of children in workplaces where their safety and health are at risk. • Encourages entrepreneurs to set achievable safety targets for their enterprises. • Promotes reporting of work-place accidents, dangerous occurrences, and ill health with a view to finding out their causes and preventing of similar occurrences in future with attention to youth in the special needs category. • Promotes creation of a safety culture at workplaces through education and training in occupational safety and health. 	This Act will be important in all matters related to human health on all NYOTA activities including work placement.
6.	Labor Relations Act 2012	To provide for the registration, regulation, management and democratization of trade unions and employers organizations or federations, to promote sound labor relations through the protection and promotion of freedom of association, the encouragement of effective collective bargaining and promotion of orderly and expeditious dispute settlement, conducive to social justice and economic development and for connected purposes.	These will be critical considerations for NYOTA when hiring consultants and service providers, and while considering partners for trainee placements.
7.	HIV/AIDS Prevention and Control Act, 2000	The Act criminalizes discrimination against persons living with HIV/AIDS in workplaces, schools, public service, health facilities, insurance, and credit services. It mandates institutions to avail testing and treatment services to those who in need.	The project will provide information on HIV/AIDS targeting the youth and workers. It will ensure access to test and treat. Counselling services will be provided for the beneficiaries and workers needing this service.
8.	Children Act, 2022	This Act is a comprehensive law on all matters to do with children. It provides that the best interests of the child shall be a primary consideration on all actions concerning children including protections related to employment.	The project has made clear restrictions regarding the employment of children. Age verification measures

#	Policy, Legal & Institutional Framework	Relevancy	Application in NYOTA
			will be done for all workers (as guided by the Labour Management Procedures (LMP) for this project)
9.	Access to Information Act, 2016	It allows citizens to seek information "... required for the exercise or protection of any right or fundamental freedom..." The duty to provide such information is borne by the state, public bodies and private bodies which should include those seeking to implement development projects. The Act prohibits the charging of fees for provision of information except for the cost of making copies and, only where necessary.	Project information will be shared and disclosed in line with the provisions of this Act.
10.	Persons with Disabilities Act, 2003	The Act outlines the following entitlements: a legitimate expectation of being able to enjoy accessibility and mobility; a legitimate expectation of being able to access public buildings (that must now be adapted to suit needs of PWDs); and a legitimate expectation of being able to access public service vehicles (that must now be adapted to suit needs of PWDs).	The project has proposed measures to ensure that youth with disability will have a quota during recruitment, facilities will be assessed to ensure they are conducive for PWDs while the instruction during training will be structured to meet the needs of these youth.
11.	Sexual Offences Act, 2006	The Act creates offences such as defilement, rape, gang rape, sexual assault, indecent acts, promotion of sexual offence with a child, incest, administering a substance with the intent to commit a sexual offence, and forcing a person to engage in sexual acts for religious and cultural reasons.	The project shall develop a SEAH Prevention and Response Action Plan that will provide mitigation measures for sexual offenses.
12.	Kenya Refugee Act 2021	These law, among other provisions, commits to addressing: (i) lack of documentation and non-recognition of issues documentation; (ii) legal and policy barriers on access to work opportunities including freedom of movement access to work permits, business licenses and other documents; (ii) inadequate access to skills training; (iv) financial exclusion; and (v) exclusion from development planning at the county level-beyond the 'refugee- hosting' areas ⁵ and at the national level.	It is notable that the consultations with refugee youths identified the five focus areas as the key challenges facing the refugees in Kenya. The project will need to address these gaps even as it seeks to empower the youth in the camps and host communities.
13.	World Bank's ESS10: Stakeholder Engagement and Information Disclosure	Recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.	The project shall employ the tenets of ESS10 in its activities and decision-making affecting stakeholders.

20. NYOTA has identified the key stakeholders and will continue to build on this list as the project rolls out. The has also outlined the engagement needs of the various stakeholders including the appropriate communication channels. The SEP will be disclosed by implementing agencies on their external websites in accordance with the World Bank Access to Information Policy. ESS10 also requires the development and implementation of a GM that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner. The project has prepared a separate GM.

CHAPTER 4: PURPOSE AND TIMING OF STAKEHOLDER ENGAGEMENT

21. NYOTA will engage in meaningful stakeholder consultations that will accord stakeholders opportunities to make an input and express their views and concerns on project risks, impacts, and mitigation measures. It will also allow the project management to process and respond in a timely manner. It is notable that stakeholder engagement and consultation has already been initiated through the preparation of the project documents and will continue during project implementation.

22. All individuals, groups and agencies that have a stake in NYOTA design, implementation, monitoring and evaluation (M&E) will be fully involved through culturally appropriate, gender sensitive and effective participation. Consequently, a process and institutional structure for full and effective participation will be established and operationalized. The governance structures will pay special attention to women, young mothers, PWDs, minority groups, disadvantaged individuals and groups, refugees and VMGs, as appropriate.

4.1 Disadvantaged or Vulnerable Individuals and Groups

23. The project will be implemented nationally, with a focus to increase employment, earnings opportunities, and savings among targeted youth through integrated interventions on skills development, self-employment, entrepreneurship, and savings. Due to the project's national coverage, project interventions will be implemented in areas with Indigenous Peoples/Sub-Saharan Africa Historically Underserved Traditional Local Communities, known in Kenya as VMGs, as well as other traditionally excluded groups. The presence of refugees in various camps in Kenya (including in Turkana, Garissa and Wajir) has necessitated the project to set specific targets for the refugee youth in camps and host communities.

24. The exclusion of target youths - those with limited education, residing in rural and hard-to-serve areas, VMG communities and minority clans, PWDs, youth living with HIV/AIDS, young mothers, women, single parents, the homeless, refugees and other vulnerable and disadvantaged youths, from accessing project benefits and opportunities due to biased identification and selection of beneficiaries, inadequate engagement, project investments rolled out in a context of limited resources against widespread need, elite capture, literacy and mobility challenges is anticipated. It is foreseen that the participating interns may be exposed to potential OHS risks and impacts during their internship roles both in the public and private sectors and will include postings to formal and informal areas.

4.2 Purpose and Timing of Stakeholder Engagement

25. The aim of developing this SEP is to ensure there is an effective engagement process with NYOTA stakeholders throughout the project cycle. The project team will listen, learn, and continue to improve NYOTA performance. The SEP recommends use of 5 principles: purposeful; inclusive; timely, transparent; and respectful approaches that are also culturally acceptable and take into consideration the concerns of all stakeholders.

4.3 Proposed strategies for information disclosure

26. Disclosure of information that is accessible is an aspect of transparency and accountability that serves as a means of promoting understanding about the project, engendering trust, and contributing towards informed participation. Disclosure of information relates to the timing, objectivity, and meaningfulness of shared project related information. Early disclosure of project related information is necessary to provide an overall picture of the project for informed decision-making with regards to next steps. Information will be provided to and widely distributed among all stakeholders in an appropriate format; ongoing opportunities will be provided for responding regularly to stakeholders' feedback, for analyzing and addressing comments and concerns. The disadvantaged individuals/groups, refugees and VMGs will also be consulted regularly using socially and culturally acceptable means.

4.4 Brief Summary of Stakeholder Engagement Consultations

The project engaged several stakeholders, both beneficiaries and non-beneficiaries of the precursor project KYEOP. Challenges experienced under KYEOP regarding stakeholder engagement, grievance management, and inclusion, among other things, were discussed, and recommendations were provided in the below sections.

27. **KYEOP beneficiaries and Service providers in Nairobi.** The NPCU conducted a two-day workshop in Nairobi in December 2022 that brought together about 97 KYEOP beneficiaries and service providers (40 males and 57 females) The workshops' key objective was to deliberate on enhancing the E&S tools and instruments used in the implementation of KYEOP and ensuring effective participation and inclusivity of the youth, teenage mothers, PWDs, VMGs and other vulnerable and disadvantaged groups in all NYOTA activities. They recommended, enhancing community engagement at the grassroots level using community halls, vocational training centers as training venues, enabling access to youths with visual impairments, data collection tools to provide a column for PWDS for inclusivity, providing counselling and psychosocial support to vulnerable youth, understand the needs of youth from minority VMG communities, and providing day-care facilities for mothers with young children. Annex 1 provides detailed findings.

28. **Consultations with KYEOP beneficiaries and service providers in Kilifi.** The team also conducted stakeholder consultations in Kilifi in February, 2022 with KYEOP beneficiaries and service providers. These consultations brought together 71 participants (35 males, 35 females, 1 PWD), including VMGs from the Duruma, Waatha and Bajuni communities. The participants raised similar issues to those aired during the Nairobi meetings. They made several recommendations, including, digital applications to be supported by manual applications through the chiefs; enforce gender and disability affirmative action in youth recruitment; ensure access to interpreters during consultations; frequently asked questions (FAQs) fact sheets, brochures, and pamphlets to be developed and distributed for reference; teenage mothers should be considered during project planning and there should be specific spaces allocated for their use; counties should have their own website pages on the project, and create more changes to allow for feedback from the youth and other stakeholders. Annex 1 provides detailed findings.

29. **Consultations with refugees and host communities in Turkana and urban refugees in Nairobi.** Following the including of the refugees and host communities, the project team conducted key informant interviews and focus group discussions with 38 participants from Nairobi (26 females, 12 males), 35 participants from Kakuma refugee camp (16 females, 11 males, 3 PWDs and 5 key informants) and 35 participants from Kalobeyei settlement (16 females, 12 males, 2 PWDs and 5 key informants) in August 2023. The youth were involved in the discussions that were moderated by youth officers and overseen by MOYACES and representatives from NSSF and MSEA. The key issues included their experience with youth programming, key challenges they face and how they can be best engaged in the project. They recommended, creating awareness on projects among the youth; enabling youth to access first-hand information on opportunities as opposed to through compromised persons/offices to avoid discrimination, nepotism, and corruption; digitalizing information platforms as opposed to purely manual approaches; providing skilled youth with starter kits and tools of work for

them to start their own enterprises; awarding certificates and recommendation letters to the youth; involving youth in public participation forums; leveraging on existing programmes such as food distribution to reach such hard-to-reach youth, and Inclusion of both male and female youth in project implementation (gender equity and equality. Annex 1 provides detailed findings.

30. **Consultations with VMG community representatives and organizations.** Consultations done as part of NYOTA project preparation with representatives of 16 VMG communities (10 males, 6 females) in 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, Iikunono, 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 stakeholders deliberated on the strategies for overcoming barriers to social economic empowerment of VMG youths associated with various causes of vulnerability. They recommended; putting in place mechanisms to handle GBV issues; strengthening youth mentorship and leadership programs; providing childcare units and transport allowances for youth in hard-to-serve areas, and anonymous reporting and handling of sensitive issues. Annex 1 provides detailed findings.

31. **Consultations with youth development officers and technical teams to assess the KYEOP Grievances Mechanism.** The NYOTA project team engaged various stakeholders comprising Sub-County Youth Development Officers (SCYDOs), NPCU, Technical Teams and the World Bank to evaluate the KYEOP GM and recommend measures to enhance it for utilization under NYOTA. The stakeholders were engaged through a virtual workshop held on November 21, 2023 where a total of 71 participants (47 males and 24 females) took part. The participants were drawn from 28 out of 47 counties including 17 counties that implemented KYEOP. 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. Annex 1 provides detailed findings.

CHAPTER 5: PUBLIC CONSULTATION

32. The project will ensure continued consultations and information disclosure throughout the project cycle. Stakeholders shall be informed about their rights, entitlements, project benefits and impacts, mitigation measures and overall project progress.

33. Besides sharing the draft documents with the stakeholders (and the final documents when ready), project brochures and updates will be posted on appropriate sites. An easy-to-understand guide to the terminology used in the social reports or documents will also be posted on the websites of the implementing agencies. In addition, the websites will provide details on the GM and contact details for the project. NYOTA will update and maintain its website regularly during project implementation. In addition, it will work with the other IAs to ensure their websites are up to date.

20. The NPCU will disclose project instruments to affected parties, including vulnerable or disadvantaged groups (e.g., those with literacy, mobility, and disability challenges), and other interested parties, through a variety of methods including (i) displaying graphical posters and summaries of project instruments in public places accessible to all stakeholders such as in chiefs offices, sub-county, and county project offices for MOYACES, NSSF and MSEA, community centers and religious places. The posters and summaries will be written in languages understandable to all (including refugee-friendly languages (**French, Kiswahili, Oromo, Somali, and Kinyamulenge**) and braille; (ii) through public forums/youth engagements held at the sub-county and county levels by SCYDOs and CDYs; (iii) social media platforms, and (v) vernacular radio and TV stations (as applicable).

21. The GM will be summarized in simple and easy to understand procedures for submitting grievances in languages understandable to all, indicating the expected length of timelines for acknowledgment, response, and resolution of grievances. Lastly, the implementing agencies will publicly disclose the instruments on their external websites in line with the World Bank Access to Information Policy.

22. The SEP will remain in the public domain for the entire period of project implementation and will be updated on a regular basis as the project progresses through its various phases, to ensure timely identification of any new stakeholders and interested parties and their involvement in the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

Ongoing Disclosures and Consultations

34. Table 4 provides a description of stakeholder engagement and disclosure methods recommended for implementation during the stakeholder engagement process.

Table 4: Stakeholder Engagement and Disclosure Methods

<i>Category</i>	Project Information Shared	Engagement Methods	Disclosure Methods
Target beneficiaries – youth, including disadvantaged or vulnerable youth, and their leadership.	Summaries of E&S instruments (VMGF, VMGPs, LMP, SEAH Prevention and Response Action Plan, SEP, and GM), displayed in accessible public locations, translated into languages understandable to all-especially refugee communities, and in a format accessible to youth	<ul style="list-style-type: none"> Public forums and Focus Group Discussions. 	<ul style="list-style-type: none"> Public forums and Focus Group Discussions. NYOTA Social media platforms. NYOTA Website.

Category	Project Information Shared	Engagement Methods	Disclosure Methods
	with visual impairment (braille). Regular updates on project benefits, opportunities, their entitlements, rights, mitigation measures, GM and overall project progress.		
Implementing agencies. Technical Agencies. Other government agencies at the national and county levels.	<ul style="list-style-type: none"> • E&S instruments. • Regular updates on project progress and E&S mitigation measures. 	<ul style="list-style-type: none"> • Monitoring and Evaluation meetings. • Regular project meetings. • 	<ul style="list-style-type: none"> • Regular project meetings. • Project monitoring reports. • NYOTA Social media platforms. • NYOTA Website.
Service providers.	<ul style="list-style-type: none"> • E&S instruments. • Regular updates on project progress and E&S mitigation measures. 	<ul style="list-style-type: none"> • Monitoring and Evaluation meetings. • Regular project meetings. 	<ul style="list-style-type: none"> • Regular project meetings. • Project monitoring reports. • NYOTA Social media platforms. • NYOTA Website.
Civil society organizations.	<ul style="list-style-type: none"> • E&S instruments. • Regular updates on project progress and E&S mitigation measures. 	<ul style="list-style-type: none"> • Regular progress meetings. • Monitoring and Evaluation meetings. 	<ul style="list-style-type: none"> • Meetings. • NYOTA Social media platforms. • NYOTA Website.
Media.	<ul style="list-style-type: none"> • Updates on project progress. 	<ul style="list-style-type: none"> • NYOTA Social media platforms. • Press releases. • Media interviews. 	<ul style="list-style-type: none"> • NYOTA Social media platforms. • NYOTA Website. • Press releases. • Media interviews.
General public.	<ul style="list-style-type: none"> • Updates on project progress. 	<ul style="list-style-type: none"> • NYOTA Social media platforms. 	<ul style="list-style-type: none"> • NYOTA Social media platforms. • NYOTA Website.

35. The project will implement continuous stakeholder engagement activities. This process, to be led by E&S specialists, will include regular updates of the stakeholder list, review and refinement of engagement activities based on M&E results. IAs will need to develop their charters early. The SEP will need to be incorporated in the Project Operational Manual (POM) by the implementing and technical agencies.

CHAPTER 6: RESOURCES FOR IMPLEMENTING THE SEP

7.1 Overall Project Management

36. MOYACES will be responsible for the overall implementation and supervision of the project. In addition to coordinating the overall implementation of all the components, MOYACES will lead the implementation of component 1. Further, on Component 1, the State Department of Labor and Skills Development (SDL&SD), NITA and 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. MOYACES and the State Department for Micro, Small and Medium Enterprise Development (SD-MSMED) will lead implementation of Component 4.

37. MOYACES has the overall mandate to address and coordinate with other agencies including the private sector to address youth empowerment issues. MOYACES will be in charge of the intake process of project beneficiaries and will work closely with MSEA and county governments. MOYACES will use framework contracts to engage private sector employers and coordinate with private sector employer organizations on component 1 to support demand driven training, workplace-based training, internship, and placement in employment. NITA is responsible for quality of training, recognition of prior learning, trade testing and certification of youth undergoing and completing the NYOTA program, revision and development of Occupational Testing Standards as well as support pedagogical upskilling of Master Craftsmen. SDL&SD is responsible for the KLMIS and NEA will provide support to Intermediation. MYASS will work closely with DRS and UNHCR on all WHR components implemented in the refugee hosting areas.

38. MSEA will work to design and implement socio-emotional skills, mentorship, entrepreneurship training and provision of grants and linking youth with the credit eco-system. MSEA will adopt and revise the curriculum taking into consideration lessons from KYEOP and make it fit for purpose. MSEA will also work with Social Enterprises to provide employment to youth through a results-based financing agreement. MYASS will also closely coordinate with the DRS and UNHCR on all WHR components implemented in the refugee hosting areas.

39. The NSSF will coordinate with the State Department for Youth Affairs and Creative Economy (SDYACE) and MSEA to ensure that beneficiaries of Components 1 and 2 are automatically enrolled into the Habu scheme. NSSF, SDYACE and MSEA will ensure that their systems are linked for smooth implementation. In addition, NSSF will link to other systems such as the Integrated Population Registration System (IPRS) and NHIF that will be key for the maternity benefits intervention. An NSSF branch officer will work closely with county governments to answer any questions, relay feedback, and troubleshoot.

40. Component 4 on systems, capacity building and project management will be implemented by MOYACES, MSEA and SD-MSMED. MOYACES will lead the broader policy dialogue, advocacy, and communications related to the project and will work closely with DRS on the refugee policy elements. MOYACES will also be responsible for reporting on outcome indicators and will be the lead agency in Kenya for the impact evaluation and tracer studies and the routine monitoring of the project. SD-MSMED will be responsible for development of M&E system for catalytic funds.

41. A National Steering Committee and a Technical Supervision Committee will be set up. A National Steering Committee (NSC) will be established comprising the Cabinet Secretaries from the implementing ministries, Ministry of Interior and National Administration, representatives from the Council of County Governors, representatives from the National Treasury and representatives of private sector employer organizations and chaired by the Cabinet Secretary for MOYACES. A Project Implementation Technical Committee (PITC) will be established comprised of Principal Secretaries responsible for the implementing bodies, as well as the Principal Secretary for Immigration and Citizens Services (Ministry of Interior) and Commissioner for Refugee Services and chaired by the Principal Secretary responsible for Youth Affairs. The NSC would provide the supervisory role for strategic

oversight while the PITC would provide technical know-how, guidance, and integrated logistical support. The PITC will meet quarterly or as need arises while the NSC will meet on a semi-annual basis or as need arises.

7.2 SEP management

41. The E&S Specialist at the NPCU will be responsible for implementing this SEP working closely with the E&S Specialists at NSSF and MSEA, and communication and monitoring and evaluation (M&E) officers across the implementing and technical agencies. Quarterly and annual reports will be produced by the implementing agencies, channeled through the NPCU, and shared with the World Bank team and other key stakeholders.

7.3 Capacity building

42. The project will arrange the necessary training associated with the implementation of this SEP (and GM) that will be extended to the E&S specialists and staff of implementing and technical agencies handling the project. Specialized training will also be provided to the staff appointed to deal with stakeholder grievances as per the project GM. In addition, institutions and establishments implementing project interventions will be trained on the operationalization of the GM.

43. Service providers will also receive necessary instructions for the SEP. In addition, the stakeholder engagement training module may include but not limited to the areas identified in Table 7.

Table 5: Proposed Training Module for Stakeholder Engagement

#	Module	Target
1.	Role of stakeholders	All levels
2.	Managing stakeholder interests	NYOTA Management
3.	Managing stakeholder participation	NYOTA Management
4.	Stakeholder negotiation skills	All levels
5.	Communication skills	All
6.	Building relationships for effective stakeholder engagement	All
7.	Project GM and how it helps stakeholders engage with the project effectively	All

7.4 Budget for implementing the SEP

44. Table 8 presents an estimated budget for implementing the SEP. The budget will include costs related to all capacity building activities, such as training of project staff and service providers and awareness to beneficiaries on the project, and the provisions of the project E&S instruments.

Table 6: SEP Proposed Implementation Budget (5 years)

#	Item	Target	Units	Budget (KES)
	Capacity Building			
1.	Training staff of implementing and technical agencies at the sub-county, county and national levels handling the project on the ESF, and provisions of the E&S instruments.	Implementing and Technical Agencies (MOYACES, NSSF, NITA, MSEA, NEA, SDL, SD-MED, DRS, UNHCR)	1 physical meeting (6 lots) @ 2,000,000	12, 000,000
2.	Training of service providers on the provisions of the E&S instruments.	Service providers.	Lump sum to facilitate YDOs	2, 000,000
3.	Awareness creation on the provisions of the E&S instruments.	Target beneficiaries.	Lump sum to facilitate YDOs	2, 000,000
	Translation			
4.	Translation (and printing) of summaries of SEP, GM, LMP and SEAH Action Plan in languages understood by the refugee community, and braille.	Refugees in Kakuma, Kalobeyei and Dadaab.	10 pages x 5 languages=50 pages x 30 copies @250	375, 000
5.	Printing of translated summaries of SEP, GM, LMP and SEAH Action Plan in braille.	Refugees in Kakuma, Kalobeyei and Dadaab (visually impaired).	10 pages x 5 languages=50 pages x 30 copies @250	375, 000
6.	Writing (and printing) summaries of SEP, GM, LMP, SEAH Action Plan and VMGPs in braille.	Other target beneficiaries (visually impaired).	10 pages x 330 copies (sub-counties), 10 pages x 47 copies (counties) @250 per page	1, 000, 000
7.	Printing of summaries of SEP, GM, LMP, SEAH Action Plan.	Other target beneficiaries.	10 pages x 330 copies (sub-counties), 10 pages x 47 copies (counties) @250 per page	1, 000, 000
8.	Printing of VMGPs.	Minority VMGs.	10 pages x 214 copies (sub-counties), 10 pages x 29 copies (counties) @10 per page	30,000
	Posters			
9.	GM posters for refugee camps in refugee-friendly languages.	Refugees.	30 posters @ 5000	150,000
10.	GM posters for refugee camps in braille.	Refugees.	30 posters @ 5000	150,000
11.	GM posters for sub-county and county youth offices, and Chief Offices.	Other target beneficiaries.	400 @5000	2, 000, 000
12.	GM posters for sub-county and county youth offices, and Chief Office in braille.		350@5000	1, 750, 000
	SEP Monitoring and Update			
13.	Monitoring SEP Implementation	NPCU	5@250, 000	1, 250, 000
	Updating the SEP	Implementing and Technical Agencies.	Lump sum	1, 000,000
	TOTAL			25,080,000

CHAPTER 7: MONITORING, EVALUATION AND REPORTING

45. An important strategy to effectively engage stakeholders and promote transparency is to involve them in monitoring the implementation of mitigation measures. Participatory monitoring also strengthens relationships between the project and its stakeholders. The SEP will be periodically reviewed, revised, and updated as necessary during NYOTA implementation to ensure that the information presented therein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of development. Any major changes to the project related activities and to its schedule will be duly reflected in an updated SEP.

46. Quarterly summaries and internal reports on grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the NYOTA NPCU - the quarterly report will thus be guided by data obtained and reported monthly at county level. The monthly summaries will also provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address these in a timely and effective manner.

47. Information on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders in two possible ways:

- i. Publication of a standalone annual report on project's engagement with the stakeholders;
- ii. Reports from the monitoring activities: several Key Performance Indicators (KPIs) will be monitored by the project on a regular basis, including the following parameters:
 - a) Number of public reviews, consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually);
 - b) Frequency of public engagement activities;
 - c) Geographical coverage of public engagement activities – number of wards, POs and/or MCs covered by the consultation process;
 - d) Number of public grievances and nature received within a reporting period, (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
 - e) Number of press materials published/broadcast in the local, County, and National media in the appropriate form and language; and
 - f) Number of project investments in the beneficiary communities in the project area.

48. The project team will conduct surveys on the entry, mid-point, and end of the project. The results from these surveys will be used to inform the necessary steps to take towards meeting the SEP objectives and project goals.

ANNEXES

Annex 1: Minutes

1. Summary of Consultations with KYEOP beneficiaries in Nairobi and Kilifi Counties

#	Vulnerability mapping	Questions	Responses
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 Ikunono (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.

Themes	Questions	Responses
		<ul style="list-style-type: none"> • Sensitizing on role taking.
	<p>How can the participation, skills acquisition, employment, and job opportunities for teenage mothers be mainstreamed during project design and implementation?</p>	<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	<p>What mechanisms are available to identify, map, consult and engage youths, and their views, concern, and suggestions are systematically considered?</p>	<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.
	<p>Is there an accessible and functional GRM with established procedure for submitting grievances (including several uptake channels, established routine, and standards, grievance logs etc.?)</p>	<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.
	<p>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?</p>	<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

3. Summary of Consultations with Refugees and Host Communities in Kakuma and Kalobeyei in Turkana County

Theme	Questions	Responses
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;

Theme	Questions	Responses
		<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; • <u>Timely disbursement of grants by the grant giving organizations.</u>
	<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; • <u>Organizing meetings and seminars on youth mainstreaming.</u>

Theme	Questions	Responses
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.
Youth Engagement and Grievance Management	What mechanisms are available to identify, map, consult, and	<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;

Theme	Questions	Responses
	engage youths, and that their views, concerns, and suggestions are systematically considered?	<ul style="list-style-type: none"> • Through public participation; • Through seminars and training; • Through registered groups; • Through social media, e.g., WhatsApp groups; • 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?	

4. Summary of Consultations with Urban Refugee in Nairobi County

Theme	Questions	Responses
Awareness and Benefits	Are you aware of projects that support the youth in Kenya?	<ul style="list-style-type: none"> • Kazi Mtaani; • Safaricom; • Hustler fund; • Digital training/ Government in partnership with UNHCR; • Government scholarship; • International rescue committee (IRC); • Ajira benefit; • Youth enterprise development fund; • Higher Education Loans Board (HELB); • KYEOP; • County green Nairobi; • Uwezo fund initiative; • Constituency Development Fund (CDF) kitty; • National Youth Service (NYS); • National Government Affirmative action fund.
	Which of these projects have you benefited from?	<ul style="list-style-type: none"> • None; <ul style="list-style-type: none"> ○ Lack of transport facilitation to access respective offices. ○ Lack of national identification cards (IDs).
	How have you benefited and	<ul style="list-style-type: none"> • Benefitted from digital training/ Government in partnership with UNHCR;
	What are the Lessons learned and best practices?	<ul style="list-style-type: none"> • Discrimination due to lack of IDs since refugee cards not recognized. • Treat all youth equally. • Refugees need to be involved in the systems to fully benefit from the services offered. • Learn the Kenyan national languages to deal with the issue of language barrier. • Lack of information concerning youth project is a barrier to their socio-economic development. • If youth are positively and meaningful engaged there is notable transformation both socially ,politically and economically change • Through creativity and innovative the youth have changed. • Decentralizing funds youth have benefited • Through Ajira digital the youth have utilized technology to earn income e.g., online opportunities –addressing climate change and employment through healthy environment.
	How can we engage youth positively to Increase their economic and occupational status?	<ul style="list-style-type: none"> • Provide documents (permits, IDs)to enable refugees to access services such as opening bank accounts, mobile banking, scholarships, loans etc. • Involve refugees in state and non-state projects, from planning to implementation. • Integrate refugees and host communities to network and exchange ideas. • Provide platforms for the refugees to showcase their talents. • Enhance skill and technical programmes for the youth creating employment.
	How can youth issues be mainstreamed effectively and efficiently	<ul style="list-style-type: none"> • Facilitate the renewal of expired alien cards -delays up to 5 yrs. • Raise awareness to all Kenyans on refugees about the existence of refugees. • Sensitize communities about refugees. • Recognize refugee documents in government offices. • Finance refugees to start businesses. • Engage the media to highlight and discuss refugees' matters. • Encourage collaboration between state and non-state actors on refugee issues. • Allow refugees to proceed with their education and careers. • Enhance representation of refugees in youth related programs.

Theme	Questions	Responses
What are the efforts in place to ensure vulnerable or disadvantaged youth access benefits and opportunities?	<p>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)?</p>	<ul style="list-style-type: none"> • Inclusive design: ensure that project materials and activities are accessible. • Provide transport support. • Establish a partnership with local organizations or community leaders in hard-to-reach areas. • Mobile outreach: utilize mobile technology for communication and information. • Communication workshops: conduct workshops for awareness sessions within the community. • Elect youth leaders who can reach out to youth in hard-to-serve areas. • Decentralize services to the local level
	<p>How can the application process be tailored to benefit all eligible youths even for illiterate youth?</p>	<ul style="list-style-type: none"> • Consider refugees who are up to 35yrs. • Recognize refugee alien cards. • Communicate project activities through the UNHCR, DRS, youth offices, refugee CBOs etc. • Consider manual application process. • Provide assistance to vulnerable youth e.g., at the sub-county youth offices on how to complete the application forms. • Advertise applications in languages understandable to all. • Translate application forms into languages understandable to all. • Sensitize youths on how to fill out the application forms. • Consider the deaf blind and physically challenged youths.
	<p>How can gender be factored in project design and implementation?</p>	<ul style="list-style-type: none"> • Expectant mothers well-tailored completion and friendly timelines for expectant young mothers and bread winners • The timelines to be flexible to give them time • Having equal gender representation (50-50). • Implementing policies that are geared towards mainstreaming gender, third rule gender ,access to government procurement. • Consider intersex youth in public participation.
	<p>How can the participation, skills acquisition, employment, and job opportunities for teenage mothers be mainstreamed during project design and implementation</p>	<ul style="list-style-type: none"> • Actively involve UNHCR, Churches for Congolese, DRS, mosques, embassies on teenage mothers • Have flexible training hours. • Give automatic qualification to teenage mothers. • Provide child care facilities. • Adequate training for youth mothers on technical skill enhancement • Provide startup funds for the young mothers. • Engaged them in public participation • Introduce a special category of teenage mother in project design.
Youth Engagement and Grievance Management	<p>What mechanisms are available to identify, map, consult, and engage youths, and that their views, concerns, and suggestions are systematically considered?</p>	<ul style="list-style-type: none"> • Through UNHCR and DRS.
	<p>Is there an accessible and functional GRM with established procedures for submitting grievances (including several uptake channels, established routines, and</p>	<ul style="list-style-type: none"> • Through their various group chairman who present grievances to the local administration. • Through DRS and UNHCR. • Police, UNHCR, Red Cross, GBV (Toll Free).

Theme	Questions	Responses
	standards, grievance logs, etc.	
	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?	<ul style="list-style-type: none"> • They report to the chiefs and most cases not reported, done only when it becomes severe. • They first report to the elders in the family then Kadhis. • GBV is termed as a shameful act that should not be known beyond the house. • They know where to report at police station gender desk and children department. • They don't know where to report police harassment. • Through government officers.

5. Assessment of the KYEOP GM against the GM principles and recommendations on how best to adapt the KYEOP GM to NYOTA

No	Aspect to be assessed	Feedback	Recommendations
1	Organizational Commitment	<p>The project’s management and staff recognize and value the GM process as a means of enhancing accountability and transparency as evidenced by:</p> <ul style="list-style-type: none"> • Assignment of staff at national level responsible for grievance management. • Development and operationalization of grievance handling procedures. • Recording of received and processed grievances at sub-county, county, and national levels. • Establishment and operationalization of a grievance handling platform within the project MIS. • However, the MIS system was hardly updated, and the resolution of grievances took unnecessarily too long as all complaints were escalated to the national level. 	<ul style="list-style-type: none"> • Have a dedicated team responsible for recording, processing and resolving grievances within the project. • Allow grievances to be resolved at the sub-county and county levels and only escalate those that are difficult to resolve to the national level.
2	Accessibility	<ul style="list-style-type: none"> • The KYEOP GM was accessible to PAPs and other stakeholders at no cost. • The project GM was understood by project beneficiaries and provided various uptake channels and did not restrict access to other grievance redress mechanism. • The GM was accessible to stakeholders with access to smart phones or other social media platforms and could easily connect to the project MIS to either submit or track the process of resolution. However, for VMGs especially those in Kwale county, did not access the project GM as they lacked either smart phones or access to social media platform. Further, those with disabilities especially visual found it difficult to interact with it. • As such, due to the delay in resolving some of their complaints a number of the VMG beneficiaries, dropped out of the program. • The toll-free number only provided at the national level was inactive most of the time. • Some grievances launched on the online platform were never addressed especially for trainers 	<ul style="list-style-type: none"> • Put in place a multi-institutional grievance committee at sub-county and county levels and constituting the relevant entities (implementing institutions, local leadership, community representatives-PWDs, VMGs, women and youth, NGOs, CBOs). • Build the capacity of the staff at the sub- county and county levels on grievance management. • Improve the speed at which grievances are handled at the national level. • The requirement to refer all grievances to the national level is not necessary as some of the grievances can easily be resolved at the county and sub- county level. • Ensure the project toll free line is functioning 24/7. • Create GM Focal Persons Desks for easier access, especially by youths with literacy challenges, analogue phone devices or in areas with poor network connectivity. • Ensure the GM is accessible to PWDs especially those with sight impairment, as well as refugees and VMGs. • Flag, cluster and assign grievances to responsible implementing institution/staff to ensure timely redress. • Provide all GM FPs with access to the MIS platform.

No	Aspect to be assessed	Feedback	Recommendations
		<p>hence forcing them to incur cost of physically going to the head office to seek answers.</p> <ul style="list-style-type: none"> • Some officers treated grievances assigned to them as a nuisance and sat on them or kept on tossing them around. This made most beneficiaries to drop out leading to high attrition. • The GM was based on wrong assumption that all youth were literate, had phones and were tech savvy yet often times the youth were unreachable through phone numbers they provided. • Feedback was rarely given about a grievance raised. • In most of the instances, it took too long to solve a grievance this breeding hopelessness and impatience among youth. • Centralization in making decisions and resolving grievances made youth lose trust in their youth officers. • While the toll-free line was to provide a pathway for ease of access to the GM, it was not active and was most of the time offline hence many of the target beneficiaries could not register their complaints. • Resolution of grievances was also delayed by the continued referral of complaints to different KYEOP implementing institutions for resolution as it was not very clear who was the focal point for grievances management. 	
3	Transparency	<ul style="list-style-type: none"> • The GM processes, principles and procedures were not adequately disclosed to all stakeholders. 	<ul style="list-style-type: none"> • Escalate all grievances vertically and horizontally through the project hierarchy. • All grievances should automatically be received by the top project officials to prevent project officers assigned with the duty of GR from sitting on the grievances lodged or simply trivializing the grievances. • Widespread publicity about the existence and use of the GM. • Devolve the GM undertakings to the sub-county and county levels through grievance management committees.
4	Effectiveness and Efficiency	<ul style="list-style-type: none"> • Grievances involving placement of trainees were delayed for too long which led to most of the youth dropping out of the program. 	<ul style="list-style-type: none"> • There should be flow of information or feedback from one level to the other and to the aggrieved in a timely manner. • GM unit be enhanced in manpower and equipped with resources to address the project grievances along with various outcome areas.

No	Aspect to be assessed	Feedback	Recommendations
		<ul style="list-style-type: none"> • Some grievances related to nonpayment have not been resolved to date. • Rostering grievances especially for the formal category could not be addressed nor verified by YDOs. • MIS downtime sometimes lasted from days to weeks. • The frontline GM service providers (YDOs) were not adequately trained on GM. • Meeting some expectations was below standards and sometimes no answer provided on issues raised. This contributed to attrition as some youths' genuine concerns were not addressed. • Information flow from the field to NPCU and vice versa was not effective as expected, at times it took a lot of time to be acted upon. • No communication to the aggrieved parties on how far the resolution of a grievance had reached. 	<ul style="list-style-type: none"> • Ensure strict adherence to GM timelines. • Decentralize the placement to sub-county level, let the trainees pick their trainer, be allowed to change, if necessary, within a one-week window of placement • Speed up responses. There were a lot of delays • Involve YDOs in addressing formal trainees rostering grievances. • Devolve the payroll preparation to the counties • More time/resources should be allocated for effective handling of grievances • Increase ease of access to GM channels through the MIS (Inter-operability of all GM channels would ensure no grievance is lost in the multiplicity of channels). • Centrality of command and coordination of GM is necessary. • Adequate and periodic review of YDOs GM capacities and building competencies through purposeful training. • Effective and efficient data input, retrieval and analysis system should be procured • Communication of grievance resolution should be improved both to and from the NPCU. • A short and simple messaging method to be employed
5	Confidentiality and Anonymity	<ul style="list-style-type: none"> • There were however incidences where feedback on a SEAH related grievance was shared without adherence to the confidentiality requirement which resulted in further harassment of the victim by the suspected perpetrators. 	<ul style="list-style-type: none"> • Officers or beneficiaries who escalate grievances must be protected from intimidation and vilification as notorious complainers. • Timely sharing of gender and geographically disaggregated data between implementing partners. • The staff were trained on GM, however further capacity training is necessary especially on reporting and on handling SEAH related grievances. • Ensure MCs and youths are able to direct their grievances to the GM officers without being intimidated or coerced.
6	Predictability	<ul style="list-style-type: none"> • The GM was responsive to the needs of the stakeholders, however, the delay in responding to reported grievances reduced the predictability of the GM. • GM offered a clear procedure with time frames for each stage however there was non-compliance with the set timelines leading to delay in resolving grievances. • At times, follow up on complaints by SCYDOs was personalized by the national project team and thus reducing the staff moral in ensuring that all reported grievances are resolved. 	<ul style="list-style-type: none"> • Designate specific staff with responsibility of managing project grievances who will be given the mandate to ensure close follow up of all the reported grievances. • Reduce the turnaround time for escalated grievances to allow prompt feedback to the complainant. • Assign additional responsibilities to field staff so that they can handle issues of transfer of beneficiaries which constituted the bulk of the complaints.

No	Aspect to be assessed	Feedback	Recommendations
		<ul style="list-style-type: none"> • The field staff had minimal interaction with the MIS based GM. In most cases staff would log in the complaint directly to the responsible officer but there was never feedback on whether the complaint was resolved or not. At times the field officers would use WhatsApp group to lodge complaints or even complain about the delays in providing response from the NPCU GM team. • The KYEOP MIS based GM did not candidly handle complaints regarding transfers of beneficiary youth between MC courses and delays in payment of stipend which led to increased grievances. Many of these grievances remain unaddressed to date in spite of having been escalated appropriately. In essence, the transfers were done haphazardly. 	
7	Capability	<ul style="list-style-type: none"> • There were staff responsible for grievance management at NPCU level. However, at the county and sub-county levels, the staff's role was mainly to refer the complaints to NPCU. 	<ul style="list-style-type: none"> • Designate specific staff with responsibility of managing project grievances. • Strengthen the staff capacity in management of grievances and especially those related to SEAH. • Evaluate the volume of work on GM that needs to be handled against the available officers in Nairobi. From this analysis, it will be observed that there is a need to decentralize some of the grievances to the SCYDOs to enhance efficiency and save on time taken to resolve complaints. • Decentralize grievance handling as well as other tasks such as placements, stipend payment etc., which form the bulk of the grievances. • Improve MIS team technical capacity through training and also acquisition of top-notch ICT infrastructure.
8	Acknowledge ment and follow-up	<ul style="list-style-type: none"> • Complaints were acknowledged in writing however, timelines for providing feedback were hardly communicated to the complainants. • There were clear timelines for processing and resolving grievances, however these were hardly adhered to. 	<ul style="list-style-type: none"> • Provide clear timelines for resolving and or escalating grievances within the various tiers. • The NPCU to mandate adherence to the set timelines. • Improve on follow ups to ensure all concerns are addressed (proper grievance Tracking)
9	Monitoring and Evaluation/Analysis	<ul style="list-style-type: none"> • Weekly monitoring of grievances was done at sub-county level. However, reporting of grievances received and resolved at the county and sub county level has been weak. 	<ul style="list-style-type: none"> • Strengthen the monitoring of grievances across all tiers.

No	Aspect to be assessed	Feedback	Recommendations
10	Feedback	<ul style="list-style-type: none"> Though delayed in many instances, feedback was provided to complainants. 	<ul style="list-style-type: none"> Provide timely feedback to the aggrieved. Engage several feedback channels to cater to the needs of all affected parties including vulnerable or disadvantaged groups, and other interested parties. Consistent and accurate communication flow from the NPCU to the field and back should be entrenched in future programs and projects.
11	GBV Responsive	<ul style="list-style-type: none"> The frontline GM officers were not trained to effectively handle GBV-SEAH cases. During KYEOP, most youth went through harassment but were silenced and threatened when they reported. 	<ul style="list-style-type: none"> Design the GM in a way that provides for confidential reporting, recording and referral of SEAH related grievances. Include multiple GM entry points and have clear protocols for recording SEAH complaints and providing referrals to existing quality GBV services. Train GM staff on receiving SEAH complaints: i) to frame questions in a non-accusatory manner, ii) to treat complainants with respect including making the victim aware of the obligations under national law to report certain incidents, consistent with the principle of consent and iii) referring all SEAH complaints to GBV service providers (psycho-social counselling centers, GBV police desks) and facilitating their access. Engage GBV service providers who apply a survivor-centered approach, in which the survivor is treated with dignity and respect, confidentiality and survivor's safety is ensured. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes. Training/capacity building the YDOs and other implementing partners in matters pertaining to SEAH. Make use of peer educators who the youth are free to open up to friendly counselling services that does not seem judgmental Put a toll-free number to report GBV cases. A desk to address GBV cases to be set up and also youths should be sensitized on what comprises GBV.

Annex 2: List of Participants



Kilifi Consultations
Participants.pdf



KYEOP GM
Assessment Participa



Nairobi KYEOP
Participants.pdf



Nairobi Urban
Refugees Participan



Nakuru VMG
Consultations Partic



Refugees and Host
Communities' Partici