

**FINAL AGREEMENT ON THE MOMBASA PORT ACCESS ROAD
MEDIATION**

This agreement is made on 21st August 2018 between:

1. Kenya National Highways Authority

Blueshield Towers, Hosnital Road, Upper Hill, Nairobi,
represented by:

(Hereafter referred to as "KeNHA" or the "project implementing agency"),

And

**2. Group of Complainants who complained about compensation following the evictions
of 17 May 2015**

(Hereafter referred to as "the complainants")

WITNESSES THE FOLLOWING:

Article 1

WHEREAS:

- On 17 May 2015, KeNHA with the assistance of the County Commissioner's office and OCPD Changamwe Police Station, conducted partial demolition of illegal structures at Kwa Jomvu area (Km 10+700 to Km 11+450) that had encroached on the road reserve, in the context of the rehabilitation and expansion of the Mombasa - Mariakani road.

AND

- The project is partly financed by the European Investment Bank.

AND

- In the follow-up of the demolitions, a Corrective Action Plan (CAP) for the evictees was developed and after identification of structures and valuation, compensations were paid to the evictees in May 2016 and February 2017.

AND

- A group of complainants initially addressed the European Investment Bank Complaints Mechanism (EIB-CM) between January and July 2017, alleging that the compensation they had received was not fair and that no information provided on the valuations of their assets or businesses, or that they were excluded from the census.

AND

- In November 2017, the EIB-CM prepared an Initial Assessment Report (IAR) after undertaking a preliminary analysis of the allegations presented. The IAR included proposals on the way forward, amongst which a proposal for dialogue facilitation between the complainants and the Project Implementing Agency. A proposal to establish a Mediation process was made and accepted by the stakeholders (complainants and Project Implementing Agency).

AND

- After the complainants and the Project Implementing Agency accepted to establish a mediation process, EIB-CM received around additional complaints relating to the same issue. After consultation with KeNHA and the complainants, a decision was made to extend the process to all complainants (including those who had complained to other grievance mechanisms).

AND

- On 13 June 2018, the parties signed a partial agreement, on the methodology to analyse the individual complaints and the consequences thereof (annex 1).

AND

- There is an overriding public interest that the mediation process is conducted in an open and transparent manner and the content of the settlement agreement made public.

THE FOLLOWING WAS ALSO AGREED:

Article 2

Annex 2 to this agreement contains commonly agreed best practices in grievance redress processes and that shall be a guide to KeNHA and the community in their future discussions about the re-enforcement of the project Grievance Redress Committee.

Article 3

Annex 3 to this agreement contains a summary of the livelihood measures described in the CAP and RAP, as well as the status of their implementation. This document also includes some agreed recommendations for the improvement of these measures in RAP. They should be considered in the future if needed.

Article 4

The parties have agreed to have a one-day session facilitated by the mediators to start a dialogue between the different stakeholders involved in the project. The aim of that one-day session is to lay the foundations for future improvement of the relationships between the stakeholders involved particularly between government administration, community stakeholders and the project promoter.

Article 5

KeNHA undertakes to :

- Implement fully the results of the partial and final agreements.
- Continue interacting with the community throughout the implementation of these agreements and in the future implementation of the road project.

Article 6

The complainants undertake to:

- Continue collaborating with KeNHA in the implementation of the partial and final agreements and in the future implementation of the road project.

Article 7

The Complainants hereby withdraw and abandon the present complaint and renounce any further claims against KeNHA regarding the compensation following the evictions that took place on 17 May 2015, provided that the terms of the partial and final agreements are complied with; and accordingly, on the basis of the amicable settlement of the dispute achieved by these agreements, the complainants withdraw and abandon the complaints submitted to any other grievance mechanism.

Article 8

The EIB-CM will monitor the implementation of the actions hereby agreed in order to ensure effective implementation of these agreements.

Article 9

This Agreement is made in two identical originals (one in English, one in Kiswahili), copies of which will be provided to the participants. In case of doubt, the English version prevails.

ON BEHALF OF KeNHA

ON BEHALF OF THE COMPLAINANTS

The Mediators

~~PARTIAL AGREEMENT ON THE MOMBASA PORT ACCESS ROAD~~

This agreement is made on 13 June 2018 between:

1. **Kenya National Highways Authority**
Blueshield Towers, Hospital Road, Upper Hill, Nairobi,
represented by

(hereafter referred to as "KeNHA" or the "project implementing agency"),

and

2. **Group of Complainants who complained about compensation following the evictions of 17 May 2015**

(hereafter referred to as "the complainants"),

WITNESSES THE FOLLOWING:

Article 1

WHEREAS:

- On 17 May 2015, KeNHA with the assistance of the County Commissioner's office and OCPD Changamwe Police Station, conducted partial demolition of illegal structures at Kwa Jomvu area (Km 10+700 to Km 11+450) that had encroached on the road reserve, in the context of the rehabilitation and expansion of the Mombasa and Mariakani road.

AND

- The project is partly financed by the European Investment Bank.

AND

- In the follow-up of the demolitions, a Corrective Action Plan (CAP) for the evictees was developed and after identification of structures and valuation, compensation was paid to the evictees in May 2016 and February 2017.

AND

- A group of complainants initially addressed the European Investment Bank Complaints Mechanism (EIB-CM) between January and July 2017, alleging that the compensation they had been paid was not fair and that no information had been provided on the valuations, or that they had been unduly excluded from the census.

AND

- In November 2017, the EIB-CM prepared an Initial Assessment Report (IAR) after undertaking a preliminary analysis of the allegations presented. The IAR included proposals on the way forward, amongst which a proposal for a dialogue facilitation between the complainants and the project implementing agency. The proposed way forward was accepted by the stakeholders (complainants and Project Implementing Agency).

AND

- After the complainants and the Project Implementing Agency accepted the dialogue facilitation process, EIB-CM received around additional complaints relating to the same issue. After consultation with KeNHA and the complainants, it was decided to extend the process to all complainants (including those who had complained to other grievance mechanisms).

AND

- During the mediation sessions it was agreed that there was a need to find a methodology to analyse the individual complaints, but that a discussion should also take place during the mediation about the strengthening of the Grievance Redress Mechanism and the enhancement of the relations between the community and the local authorities as well as livelihood restoration measures. These shall result in recommendations to KeNHA.

AND

- During the mediation session on 12 June 2018, the parties agreed to sign a partial agreement, pending finalisation of the discussions on the remaining items in the agenda.

AND

- There is an overriding public interest that the present mediation process is conducted in a transparent manner and the content of this partial settlement agreement is made publicly available.

IT IS HEREBY AGREED AS FOLLOWS:

Article 2

The parties agree that a clinic process be established to analyse all the individual claims presented to the different grievance mechanisms. Two of the mediators will act as Clinic evaluators during the clinic. The mediators will approach the Commission of Administrative Justice (Ombudsman) office to provide a third Clinic evaluator. In case the Commission of Administrative Justice is unable to do so, the third mediator will become the third Clinic evaluator. The Clinic evaluators will fix the rules and timetable for the clinic process, based on the guidelines in Annex 1.

Article 3

KeNHA will nominate an observer to the clinic process. The representatives of the complainants will also nominate an observer. The two observers will observe the process in order to vouch to its fairness and impartiality.

Article 4

KeNHA undertakes to :

- Collaborate fully and provide all the support and documentation needed by the evaluators so that they can carry out the final evaluation of each claim
- Consider that the results of the clinic are final
- Implement fully the results of the clinic.

Article 5

The complainants undertake to:

- Be truthful in their declarations to the evaluators during the individual hearings
- Provide only authentic documents
- Accept and consider as final the results of the clinic.

Article 6

The Complainants hereby withdraw their complaints and renounce any further claims against KeNHA regarding the compensation following the evictions that took place on 17 May 2015, provided that the terms of this Agreement are complied with. Accordingly, on the basis of the amicable settlement of the dispute achieved by this Agreement, the Complainants withdraw and abandon the complaints submitted to any other grievance mechanism in relation to above mentioned compensation process.

Article 7

The EIB-CM will support the implementation of the clinic and provide logistic arrangements in order to ensure effective implementation.

Article 8

This is a partial agreement relating only to the settlement of the individual claims and the mediation table will continue its works with following items: enhancement of the grievance mechanism and discussion of proposals to enhance the relations between the community and the local authorities, and livelihood restoration measures.

Article 9

This Agreement is made in two identical originals (one in English, one in Kiswahili), copies of which will be provided to the participants. In case of doubt; the English version prevails.

ON BEHALF OF KeNHA

ON BEHALF OF THE COMPLAINANTS

The Mediators

Annex 1: Guidelines for the Clinic Procedures

Part of Mediation Agreement of Mombasa Port – Mariakani Access Road Project

Complaints on the Implementation of CAP

The clinic is a process put in place when there is a conflict involving a great number of individual situations (claims) that need to be analysed and settled. The clinic allows a relatively lean and speedy process of analysis, evaluation and judgement, from an independent party external to the parties involved in the conflict. The process is expected to be completed by Dec. 31 2018. It hence allows closure of the claims since an in-depth analysis, through an accepted procedure, and with decisions made without fear or favour by those so appointed, takes place.

By agreeing to the clinic process, the parties agree to accept and implement the results/recommendations of the clinic process and that the results are binding and final to all

The parties agree through the mediation agreement on the 3-person evaluation team ("Clinic evaluators"). To ensure that the Clinic evaluators follow due process, the parties have appointed, by common agreement, 2 observers that will sit during the clinic sessions and observe the work of the Clinic Evaluators. The observers must not have a stake nor affiliation in/with the conflict (this can be a governmental body, institution, community members – leaders or elders, provided that, they or their families are NOT complainants or they are not affiliated with any party participating in the clinic process). Their role is to observe the process and hold daily meeting with the Clinic evaluators to express their perceptions about the functioning of the clinic, notably its fairness and transparency. It is not for the observers to speak nor influence the Clinic evaluators in any manner during the Clinic process. The observers will not receive any payment or otherwise from EIB-CM.

Given the selection of the Clinic evaluators, the parties acknowledge that they have selected individuals in which both sides have confidence and who are independent, and preferably are familiar with the matters in contestation.

In order for the Clinic to function effectively, the following resources shall be made available as Clinic documents. There shall also be the presence of technical personnel responsible for developing them for consultations whenever needed. The following documents must be provided before the start of the clinic:

- CAP Entitlement Matrix, including e.g. business segment split
- Census Database from GIBB
- NLC valuations
- and any other documents that the Clinic evaluators will deem necessary and are justified when they start evaluating the cases.

The Clinic process starts with advertisement to the targeted population with posters, flyers and/or handouts, indicating the dates for where and when the individuals will have to come and present their individual claims

The Clinic evaluators will interview individually every complainant presenting a claim to them, and who will be present during the dates advertised.

The Clinic evaluators will complement the information obtained during the interviews with information from the census database and any modified versions, the valuation reports, as well as any other information available from the Project Implementing Agency or the consultants involved.

This requires that technical assistance for consultation from GIBB, NLC, Amnesty International and KeNHA is available for the committee members to consult during the clinic process. In fact, the consultants involved in the census, the valuations as well as the Project Implementing Agency and Amnesty International will provide responses and explanations if requested for the purpose of clarifying any issue. The individuals participating in these technical assistance team will not receive any payment or otherwise from EIB-CM.

The Clinic evaluators will also review any information or evidence provided by the complainants themselves as well as actual site visits and interviews with neighbours and community.

If necessary, the Clinic evaluators can request a second round of interviews with some complainants and call on witnesses.

The Clinic evaluators can also seek independent accounts from neighbours and other community members.

The Project Implementing Agency may be requested to provide its views for cases where a more in-depth evaluation is considered necessary. Furthermore, the Clinic evaluators will crosscheck the information received, with multiple sources, to ensure credibility.

The work of the Clinic evaluators focusses on reviewing any inconsistencies between the information contained in the documentation (censuses databases, valuation reports and the entitlement matrix) and the declarations made by complainants and any proof they provide in support.

After having analysed all the cases, the Clinic evaluators will make recommendations and produce a report for every claim analysed. The individual report shall be translated into Kiswahili and handed out as personal information to the individual complainants.

The Clinic evaluators (the 3 members) shall unanimously decide upon all claims without exemption. Any recommendation by the Clinic evaluators shall be binding to both parties. This means that a decision that a claim has no validity must be accepted by the complainant. It also means that a decision that a claim has merit must be accepted by KeNHA. Appropriate action shall be taken to make good the claim where it has been found to have merit.

Once the decisions are made and communicated, all those claims found to have no merit shall be considered resolved. Those found to have merit shall be acted upon by the Project Implementing Agency – KeNHA. Once the claims are settled then the matter shall be considered resolved and closed.

Best practice for designing a grievance mechanism

The three sections below, present some of the best practices for setting up and running a grievance mechanism.

This is not a comprehensive checklist for the design of an effective Grievance Redress Mechanism. It is, however, a list of principles design notes and implementation considerations that are most effective in complaints mechanism. These are therefore inputs from 'best practices' to take into consideration when crafting an effective grievance redress mechanism.

Main principles

- Legitimate (having a clear, transparent and sufficiently independent governance structure enabling trust from the stakeholder groups and being accountable for the fair treatment of the grievances)
- Accessible (being known to all stakeholder groups and providing adequate assistance for those who may face particular barriers to access)
- Predictable (providing a clear and known procedure with an indicative timeframe for each stage as well as means of monitoring implementation)
- Equitable (seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in the process on fair, informed and respectful terms)
- Rights-compatible (ensuring that its outcomes and remedies accord with internationally recognised human rights standards)
- Transparent (keeping the parties to the grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness)
- Based on dialogue and engagement (focusing on processes of direct and/or mediated dialogue to seek solutions and leaving adjudication to an independent third-party or mechanism)
 - A grievance based on dialogue and engagement helps legitimising the process and the trust from all stakeholders in how complaints are handled.
- Gender and diversity sensitive (ensuring that the mechanism has representatives and decision makers from both genders as well as relevant age representation)
- Protection of complainants:
 - Allow protection of a complainant's identity where requested
 - Ensure no retaliation towards a complainant from any members of the mechanism, the company or any other project stakeholders like e.g. local government officials
 - This can be aided by allowing the complainants to access a neutral person directly with their complaint (see later).

Design of the mechanism

- Form a cross-functional design team (in order to build internal support for the mechanism)
 - One might involve a third-party neutral expert to facilitate the design process. A person, which both the local community and the company trusts. Such person or group of persons can also take an oversight role in the grievance mechanism functioning.
- Involve affected stakeholders in the design (balanced group of representatives)
 - Apart from local community representatives, one might include representatives of different civil society and community interest groups, local government representatives, local leaders as well as representatives of the company or relevant contractors
 - Ensure and agree on a clear communication plan and method for all aspects of the areas of the mechanism (to ensure that PAP's continuously get information from the grievance mechanism, and also continuously know how to communicate with the grievance mechanism)
- Understand existing approaches (existing traditional systems, for example)
- Define scope of the mechanism
 - Ensure to communicate both orally and in writing the scope and limits of the mechanism in local and business language.
- Define approaches (company-community, third party, traditional or customary practices, etc.)
- Identify access points (multiple) and methods (self-identified, confidential, anonymous, etc.)
 - Ensure that at least one clearly independent point of access, accepted by the complainants, should be available to complainants.
- Develop management framework (enabling policy, standard operating procedures, personnel, training, supporting systems, communication, follow-up and monitoring, capture learning)
 - Ensure standard procedures.
 - Basic process might be:
 - Step 1: Receive
 - Step 2: Assess and assign
 - Step 3: Acknowledge
 - Step 4: Investigate
 - Step 5: Respond
 - Step 6: Recourse or appeal
 - Step 7: Follow up and close out
 - N.B. after each step, there will be a small communication (in writing and orally) to the complainant
 - Examples of things that needs to be provided for each complainant (not a complete list):
 - Provide written acknowledge of receipt for each complaint (in English and local language)
 - Information about next steps
 - Provide a date for when a result can be expected
 - When a proposal for a course of action is made
 - When an outcome of the complaint is agreed
 - Provide report that clearly specifies the outcome of the complaint including link to e.g. valuation report and entitlement matrix, for understanding.
 - If the complaint is forwarded to the next tier level, the complainant should be informed in writing and orally why, and when a decision can be expected from this level
 - Forms for registering a complaint should be clear and simple, in local language and assistance in completing them should be available for the illiterate
 - Clear criteria concerning complaint types that are to be treated by which tier level.
 - These criteriamust be spelled in the policy. The policy must be translated to local language and distributed in several hundred copies to all community members, and orally explained, at a well in advance called for community meeting.
- Oversight stakeholder body (a representative stakeholder group that can participate in the creation of the mechanism and take an oversight role in its functioning and eventually in reviewing and make adjustments to the functioning)
- Develop Plan to implement changes to the mechanism

- Consult wider community on proposed design

Implement the mechanism

- Develop the grievance mechanism infrastructure
- Communicate and build awareness with the community but also with staff and contractors
 - Communicate internally in the company to relevant management levels and stakeholders, to ensure that the company as a whole buy-in to the mechanism.
 - Ensure to hold regular meetings also with the Financiers and brief them on the status and process of the Grievance mechanism and its functioning.
 - Ensure that the necessary information, training, education and advice on human rights and technical issues are available to potential users of the grievance mechanism.
 - Communicate extensively with the community about the proposed and final infrastructure of the mechanism. Translate all communications into local language. All communication should be written and orally communicated, and in the local language, and handed out in several hundred copies to the community members.
 - When keeping public meetings, ensure that PAPS, CSO's and other relevant stakeholders have sufficient notice period.
 - Communicate clearly and explain important documents like e.g. entitlement matrix in local language.
 - One might craft e.g. a one page layout: with how the grievance mechanism works on one side, and the entitlement matrix, with explanatory notes, on the other side. Print it in local language in several hundred copies and hand it out.
 - On the results of the committee (result of individual complaint), an individual report stating reasoning to the result of the committee should be provided following analysis of each complaint, including links and explanations back to relevant decision making documents like e.g. Entitlement matrix.
 - Regularly (every 3 to 6 months) the committee should produce an aggregated report (without personal information) on the cases status (like e.g. how many received cases. How many cases have been handled and closed, how many cases are open/pending) and these reports should be easily made available to the community
 - One might hire an external, neutral facilitator or mediator to aide in the vital communication work of the grievance mechanism.
- Choice of representatives of the mechanism
 - Ensure to have people with the right capacities (empathic, understanding their role and willing to learn all aspects of the complaint tier system, entitlement matrix etc.)
 - The communities like other stakeholders should appoint their trusted representatives in a fair and documented process
 - Ensure the mechanism have skilled people that can handle the different dimensions of community dynamics
 - Whenever the question on final adjudication the decision should be taken by an independent third party or mechanism trusted by both parties. This person or mechanism would be redressing any remaining imbalances in advice and expertise between the parties.
 - All the members of the mechanism should be subscribe to a code of ethics which will have been prepared in consultation with the community
- Train and support participants to understand the functioning and limitations of the mechanism, and members of the grievance mechanism to ensure understanding of their role
 - As far as the members of the mechanism are concerned, training should focus notably on ensuring full understanding and acceptance of (not a complete list):
 - Confidentiality in regards of individual complainants
 - That each Grievance mechanism member must treat every complainant with respect through a factual and problem-solving approach and non-threatening behaviour.
 - How the complaint escalation process works, tier 1 and 2 ... levels function. What sort of complaint goes where,

- Livelihood and Entitlement matrix, hereunder how e.g. business segments works, how average income boxes has been calculated etc.
- Census mapping of PAPs
- NLC valuation methods and reports.
- Build incentives to ensure that the system is used (demonstrate: non-retaliation, protection of confidentiality, respect for rights of stakeholders, train company staff to a mindset that 'grievances are to be expected and perfectly normal', evaluate the staff on good conducted grievance processes, report benefits back to the community and the company, publicise success stories, engage community leaders on promoting the mechanism, treat every complaint seriously, treat every complainant with respect, etc.)

The most important of all these is openness in the search for solutions. Organizations and individual players must establish dialogue wherever possible in search of solutions.

Livelihood Restoration Measures Under CAP and RAP

Justification:

As the road construction is ongoing persons affected by the forced evictions in 2015 are fully entitled to all livelihood restoration measures as described in RAP.

CAP report notes:

"This plan is cognizant of the RAP update that is currently ongoing and of KeNHA's commitment to include businesses impacted by the evictions of May 2015 under the RAP's definitive livelihood restoration measures. CAP page 1-15"

And further states as follows:

"KeNHA will therefore permit evictees to remain on the road reserve until the updated RAP is implemented, thereby enabling any livelihood restoration measures of the RAP to benefit persons whose livelihoods were affected by the May 2015 evictions. CAP page 2-5"

Livelihood restoration measures proposed in RAP:

I. Business relocation

1. Construction of a market (90 acres) in Miritini lorry park – RAP obliged KenHa to design and construct business stalls with integrated social facilities and infrastructure - RAP executive summary page h, RAP page 75, page 78, CAP page 1-15 (During the mediation it was noted that KeNHA was no longer pursuing this matter since the anticipated land from the Mombasa County Government in Miritini was no longer available. KeNHA shall continue to look for land along the road for such development in the future)
2. Relocation of small businesses to existing markets places within the project area - RAP executive summary page h, RAP page 79 (KeNHA is continuing the process of ensuring that markets developed by the County allocate space for those operating on Road Reserves)
3. Business place for small scale traders in the long distance buses park located in the city centre– RAP executive summary page h, RAP page 79 (KeNHA is working closely with the County Authorities to identify space for a bus park in the City. Such a facility shall be designed to have space for small traders and the intention is to allocate such space to those who were operating on road reserves.)
4. Relocation to the existing markets at Mazeras and Mariakani – RAP page 55, 75 (KeNHA confirms that negotiations and possible re-designing of the road at Mazeras and Mariakani to enable traffic to exit into the market area and easily re enter the highway is on-going. This should make the markets attractive to small traders.)
5. For trading activities such as garages, furniture, hard ware shops appropriate site will be identified – county government in Mombasa will provide Jua Kali shades and open air areas where these traders could relocate their business to – RAP page 55 (Continuing dialogue with City planners)

6. Based on the consultations held with Mombasa County City Planner, two possible sites formarkets were identified that are near the project footprint. These sites are approximately 2km from Kwa Jomvu. KeNHA, in conjunction with NLC, will liaise with Mombasa County Government to identify the most appropriate site where evictees can be relocated in the context of the project's Resettlement Action Plan – CAP page 1-15
7. Involvement of the users in the design and acceptance of the facilities being developed – RAP page 79 (Once land is identified KeNHA is willing to involve traders in conversations with the designers of the road and the market)
8. The resettlement site users will participate in development of design for the site development, RAP page 80 (As in 7 above)
9. Relocation assistance – transportation of goods, transportation of materials for construction (This was factored in the 15% disturbance allowance paid to all the evictees.)
10. Right to salvage of materials, property being affected, fences, trees, crops – RAP page 76

II. Trainings

1. Trainings of youth to equip them with skills in various road construction skills, RAP page 75 (KeNHA has secured scholarships for 300 youths in a variety of disciplines and skills. There are conditions for the selection process which will be in the call for applications. Advertisement for the call shall appear in local newspapers. KeNHA was encouraged to widen its call for applications by including flyers distributed in affected communities)
2. Employment opportunities in the road project – RAP page 75 (This is on-going and KeNHA explained that voluntary removal of all structures as well as peaceful relocations allow for better engagement of locals in employment by the contractors.
3. Money and business management training - RAP executive summary page h, RAP page 75 (These were carried out over the last one year)
4. Linking PAPs with credit facilities (Already done)
5. HIV/AIDS mitigation and education – KeNHA to procure the services of an independent consultant for PAPs, - RAP page 76, page 77 (Already done)

III. Other livelihood restoration measures proposed in RAP

1. Water infrastructure in the project area, additional water points within the road project: drilling of boreholes, water piping to common areas – RAP page 76 (Already drilling a borehole in Mariakani where the needs for water were greatest. The borehole shall be handed over to the community through the Ministry of Water.)

IV. Livelihood restoration measures for vulnerable groups

RAP states: *"the overall concept of measures will reflect a vulnerability analysis and related findings pointing to the specific needs of vulnerable groups."* (RAP executive summary, page m).

The following measures have been considered by KeNHA with the exception of number nine (9) whereby the cost of school fees were factored in the 15% relocation allowance:

1. Monitoring and reporting on spouses access to compensation/bank account – RAP page 20
2. Disclosure of compensation amount to spouses of registered PAPs – RAP page 59
3. Involving spouses in the CAP acceptance of awards and compensation process, RAP page 59

4. Ensuring women and other vulnerable persons access to proposed trainings and jobs, give priority access, monitoring and reporting on the implementation of this measure for vulnerable groups–RAP executive summary page h
5. Organizing meetings with organisations and institutions specializing in women economic empowerment, such as Coastal Women in Development, micro credit institutions – not in RAP
6. HIV/AIDS prevention and mitigation measures for women and girls – RAP page 76
7. Training for prevention of sexual and gender based violence caused among others by the influx of workers along the project construction, RAP page 76
8. Relocation of women led businesses should take into account the resettlement site distance to residential building. Relocation site for women should be placed as close as possible to the residential building (KeNHA does not relocate people but pays for compensation of self - relocation)
9. Ensuring the continuation of schooling for children resettled, such as compensation for the new school fee needed to be paid for the new school (KeNHA stated that the cost of school fees was factored in the 15% relocation allowance)

