


**National Treasury**

**Kenya Mortgage Refinance Company**

**State Department for Lands and Physical Planning**

# Housing Finance, Lands and Sustainable Investments Project

**(P513352)**

# Stakeholder Engagement Strategy

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## ACRONYMS

| | |
|---|---|
| AHP | Affordable Housing Program |
| HFLSIP | Housing Finance, Land A & Sustainable Investments Project (HFLSIP) |
| ASALs | Arid and Semi-Arid Lands |
| E&S | Environmental and Social |
| FGD | Focus Group Discussion |
| GoK | Government of Kenya |
| IBRD | International Bank for Reconstruction and Development |
| ICT | Information and Communication Technology |
| IDA | International Development Association |
| IFMIS | Integrated Financial Management and Information Systems |
| IT | Information Technology |
| KSH. | Kenya Shillings |
| KII | Key Informant Interview |
| KMGT | Kenya Mortgage Guarantee Trust |
| KMRC | Kenya Mortgage Refinance Company |
| M&E | Monitoring and Evaluation |
| MSME | Micro Small and Medium Enterprises |
| PMLSs | Primary Mortgage Lenders |
| SACCOs | Savings And Credit Cooperative Organizations |
| SDLPP | State Department for Lands and Physical Planning |
| SES | Stakeholder Engagement Strategy |
| TA | Technical Assistance |
| KGRS | Kenya Gender Reporting Standard |
| VMGs | Vulnerable and Marginalized Groups |
| PWDs | People with Disabilities |
| ESS7 | Environmental and Social Standard 7 |
| SEA/SH | Sexual Exploitation and Abuse / Sexual Harassment |
| GBV | Gender-Based Violence |
| SEP | Stakeholder Engagement Plan |
| LMP | Labor Management Procedures |
| ESCP | Environmental and Social Commitment Plan |
| FGD | Focus Group Discussion |

# 1 INTRODUCTION

The Kenya Affordable Housing Finance Project (KAHFP)-(P165034) closed on June 30, 2025, made significant strides in expanding access to affordable housing finance in Kenya, primarily through the support and operationalization of the Kenya Mortgage Refinance Company (KMRC). As of September 2025, KMRC had refinanced approximately KES 23 billion in mortgages, representing 4,915 loans. Repayment tenor lengthened from 8.3 (2021) to 14.4 years (2024) signaling enhanced affordability. Notably, nearly 48 percent of KMRC-refinanced mortgages were issued to women, highlighting significant progress in gender inclusion. KMRC's portfolio now accounts for about 5.0 percent of the banking sector's mortgage book by value and 12.8 percent by number of loans. Additionally, the share of refinancing through SACCOs within KMRC's portfolio grew from 7 percent in 2022 to 13 percent by August 2025, indicating a strengthened role for non-bank lenders in the affordable housing finance sector, and growing financial inclusion.

KAHFP implemented by the State Department for Lands and Physical Planning (SDLPP) focused on assessing the land sector and developing a comprehensive Land Reform Plan and Capacity Building Plan to enhance land governance, service delivery, and support affordable housing objectives. Conducted through extensive stakeholder engagement and institutional analysis, the study found that while Kenya has a strong constitutional and policy foundation for land reform, the sector is constrained by outdated legal frameworks, fragmented and manual land records, weak inter-agency coordination, capacity gaps in human resources and infrastructure, and slow digitization processes. These challenges contribute to inefficiencies, tenure insecurity, bureaucratic delays, and limited public access to land services. The project therefore recommended targeted legal reforms, full digitization of land administration systems, institutional strengthening, and sustained capacity building as critical pathways to achieving efficient, transparent, and modern land management systems aligned with national development goals.

Building on the strong foundation and lessons learned from the first phase, the follow-on Housing Finance, Lands, and Sustainable Investments (**HOFLASI**) Project is both timely and essential to address the persistent gaps in access to housing finance for low- and middle-income households. To truly expand financial inclusion and meet the GoK's ambitious goal of delivering 250,000 affordable housing units annually, Phase 2 must innovate beyond conventional mortgage financing. This means developing and scaling products that make homeownership more accessible, addresses affordability and improves property transactions, and can de-risk lending to lower-income and informal sector borrowers. Innovative housing finance solutions, while critical for expanding access and affordability, can only be effective if households can build or improve homes on land that is titled and legally secured and connected to basic services.

The project also seeks to support the State Department of Lands and Physical Planning (SDLPP) in making property registration faster, cheaper, and more reliable as a precondition for mortgage market development. The component focuses on enabling a harmonized, digitally enabled legal and regulatory framework to support end-to-end digital land transactions, advancing the digitization of spatial and alpha-numeric land records alongside improvements to the Kenya Geodetic Reference System (KGRS), and strengthening the Ardhi Sasa land administration management system through business process reengineering, automation, and enhanced functionality. Collectively, these interventions are intended to reduce transaction inefficiencies, strengthen tenure security, and create a more efficient and transparent land administration system that supports the functioning of land and mortgage markets and accelerates affordable housing delivery.

The overall Environmental and Social (E&S) risk of the project is assessed as Moderate for both dimensions. Project activities are anticipated to produce positive E&S outcomes. While no significant risks are expected, there remains a potential concern: key stakeholders such as civil society organizations and community groups that represent vulnerable and marginalized groups (VMGs) and other disadvantaged populations may not be sufficiently engaged during consultations. Should their

involvement be inadequate, their perspectives and concerns might not be fully addressed, potentially reducing the inclusiveness and effectiveness of the interventions, particularly regarding land administration reforms.

The Stakeholder Engagement Strategy (SES) outlines the necessity of adopting a participatory and consultative approach, ensuring meaningful engagement with all stakeholders across the project. The SES aims to establish a systematic framework for stakeholder engagement, maintain constructive relationships, and incorporate stakeholder perspectives throughout the project cycle. It promotes effective and inclusive engagement by: (i) ensuring stakeholders receive timely, relevant, understandable, and accessible information; (ii)facilitating consultations in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination, or intimidation, and (iii)providing mechanisms for stakeholders to raise concerns, offer feedback, or submit complaints regarding project activities. The SES has been developed to guide the HOFLASI project in fulfilling these objectives, thereby fostering transparency, accountability, and trust among all stakeholders.

Stakeholders for the HOFLASI project include beneficiaries of mortgages, individuals and groups affected benefiting from the line of credit/mortgages and the proposed land administration reforms, such as vulnerable and marginalized groups (VMGs) and other disadvantaged populations, as well as relevant state departments, Government Agencies, Land Sector Directorates, Professional and Regulatory bodies (TA) service providers, and civil society organizations (CSOs) and special interest groups (VMG, PDWs). Initial identification and engagement of these stakeholders began during project preparation and will be maintained as a continuous process throughout the project cycle.

The HOFLASI project will operates within robust legal and regulatory architecture that makes stakeholder engagement a binding requirement. At the international level, the World Bank's Environmental and Social Standard 10 (ESS10) mandates the implementing agencies to identify and engage with all project-affected parties including vulnerable and marginalized groups (VMGs), women, persons with disabilities, and older generations in a timely, accessible, and culturally appropriate manner throughout the project lifecycle. SDLPP & KMRC's external communication strategy has been expanded to function as the overarching Stakeholder Engagement Strategy (SES) for the entire project, and it aligns with ESS10 provisions.

Domestically, Kenya's Constitution of Kenya, 2010 (Article 10) enshrines public participation as a national value and principle of governance, while the Public Participation Policy (2018), the National Gender and Equality Commission Act (2012), the Disability Act (2025), and the Access to Information Act (2016) and the Affordable Housing Act, 2024 and its 2025 regulations establish structured community-level consultation mechanisms for housing allocation, eligibility, and tenant-purchase terms. These legal instruments collectively make stakeholder engagement not merely good practice but a statutory obligation that directly governs how the project is designed, delivered, and monitored.

Meaningful stakeholder engagement is particularly critical to the HOFLASI project given the breadth of populations it affects and the complexity of reforms it pursues. Key social risks identified include the potential exclusion of target beneficiaries and groups that meet the ESS7 criteria — particularly vulnerable and marginalized groups — where the Ardhi Sasa land administration platform is concerned, as well as risks of gender-based violence (GBV), sexual exploitation and abuse/sexual harassment (SEA/SH), and inadequate public participation and engagement.

To mitigate these risks, the project's legal framework requires that a Stakeholder Engagement Strategy (SES), Labor Management Procedures (LMP), and a GBV-SEA/SH Prevention and Response Action Plan be prepared, publicly disclosed, and implemented within 90 days of project effectiveness all overseen under the Environmental and Social Commitment Plan (ESCP).

### 1.1 Objective/Description of SES

The overall objective of this SES is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SES outlines the ways

in which NT, KMRC and SDLPP will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

# 2 PROJECT DESCRIPTION

## 2.1 Project Development Objective

The Project Development Objective is to expand access to affordable and sustainable housing finance for underserved households, improve the efficiency and transparency of land and property registration systems, and strengthen the institutional and market foundations of Kenya's housing finance ecosystem, while supporting climate-resilient housing development and inclusive economic growth.

The project addresses a deeply interconnected set of gaps that collectively hinder affordable housing delivery in Kenya. These include a housing deficit driven by rapid urbanization, extremely low mortgage penetration, unaffordable housing finance for the majority of low- and middle-income earners, insufficient land registration process, weak legal and regulatory frameworks governing land transactions, liquidity constraints in the mortgage market, and the exclusion of informal-income earners who lack the formal documentation required to access housing finance. Cutting across all these is the additional challenge of building climate-resilient housing infrastructure and ensuring fiscal sustainability in a constrained public finance environment making the HOFLASI project a comprehensive intervention designed to simultaneously unlock supply, stimulate demand, and modernize the systems that underpin Kenya's affordable housing ecosystem.

## 2.2 Project Structure

The project is organized into four (4) components with related activities as outlined in the table below.

**Table 1: Project Components and Key Activities**

| Component | Key Activities |
|---|---|
| Component 1: Support to KMRC: Line of Credit for Mortgage Refinancing | This component will provide a line of credit to the KMRC and ensure continuity and enhanced uptake of the company's current product offering while innovating to serve unmet market needs. IBRD will provide a credit line to KMRC through NT to refinance affordable housing loans. As in the first phase of the project, KMRC will extend loans to banks and SACCOs (Primary Mortgage Lenders (PMLSs)) that meet strict eligibility criteria (as already documented in the earlier Project Operations Manual), and such loans will be secured against eligible mortgage/housing loans. To encourage market growth, PMLs will be able to pledge other collateral (government securities) for a limited time while they convert their portfolio into mortgage loans. The line of credit will be blended with KMRC's own funding raised through bond issuances on the capital markets, to ensure leverage of the IBRD resources and the overall sustainability of the mortgage market. Gender targets will also be actively pursued to ensure that efforts to promote gender equality are integrated into project implementation. The project aims to deliver additionality by consolidating existing gains while moving beyond conventional mortgage financing to pilot innovative products tailored to underserved market segments. |
| Component 2: Support to land administration reforms to accelerate affordable housing | This component would support the State Department of Lands and Physical Planning (SDLPP) in its reforms to make property registration faster, cheaper and more reliable, which is a precondition to develop the mortgage market. Building off the technical assistance completed under KAFHP1, the Project support will be structured into three sub-components:<br>(i) Enabling the environment for property and mortgage registration through legal and regulatory reforms. |

| Component | Key Activities |
|---|---|
| | (ii) Digitization modernization densification of the Kenya Geodetic Reference System (KGRS) through the establishment of Continuously Operating Reference Stations (CORS) and equipment of geodetic control centre, which collectively provide the authoritative reference framework for accurate cadastral mapping and data interoperability<br>(iii) Enhancing the *Ardhi Sasa* land administration management system by addressing systemic issues. |
| | 2.2.1 Sub-Component 2.1: Legal and regulatory reforms<br>While the current legal framework does not present any immediate impediments to the Component's proposed activities, there is scope for modernizing and harmonizing the legal framework for land. Based on the analysis already done during KAFHP1, this component would support the SDLPP to review, harmonize, and enact legislation to support end-to-end digital land transactions and promote consistency across land administration statutes, such as modernizing the Survey Act and improving the Sectional Properties Act (critical for housing development). |
| | 2.2.2 Sub-Component 2.2: Digitization of spatial and alpha-numeric land records<br>For Ardhi Sasa to function fully it is necessary to digitize existing property rights data (titles, deeds, transfer documents, etc.) and graphical spatial data (survey plans, development plans, part development plans) so that it is fully available in the digital system. This has already been done for Nairobi County and parts of Mombasa, and the SDLPP has a solid system in place for the digitizing including records organization, bar-coding and management, indexing and data capture, quality control and assurance, and archiving of the paper records when digitized. The Project supported digitization activities will focus on land registries in the Nairobi metro area whose digitization would support affordable housing (Machakos, Ruiru, Thika, Kiambu, Kajiado Central, Ngong, Kisamis and Kajiado South) and potentially some secondary cities. These registries sit within the most active land market corridor in the country, with high transaction volumes, intense development pressure, and a large concentration of GoK's Affordable Housing Program projects.<br>Additional pilot activities will be explored to consider how best to incorporate Physical Planning and development control data layers, and what is the scope of data improvement required |
| | 2.2.3 Sub-Component 2.3: Enhancements to Ardhi Sasa land administration management system.<br>While Ardhi Sasa provides a good platform for digital transactions with a unique property identifier linking alpha-numeric and spatial data, data security and audit functions for all changes to the data, and separation of front office and back-office functions, there is room for improvement. These include business process reengineering to simplify processes, automatic data checks, e-signature and other functionalities. The work under this Sub-component will begin with an assessment of Ardhisasa from the security, technical and business perspectives and will propose additional functionality and other improvements to be implemented during the Project. |

| Component | Key Activities |
|---|---|
| Component 3: Sustainability-Linked Financing Instrument | Subcomponent 3.1: Sovereign Sustainability-Linked Loan<br><br>The project will support the GoK, via the National Treasury (NT), in launching a sovereign SLL vis the capitalization of a sinking fund. Blending World Bank financing and other concessional lending will be used to support a credit enhancement for SLL. The innovative instrument ties the cost of borrowing to national sustainability targets, aligning Kenya's financing needs with measurable environmental and development outcomes. The SLL is designed to diversify Kenya's financing sources, reduce borrowing costs and demonstrate how sovereign debt can be structured to drive development impact. |
| | Subcomponent 3.2: Sustainability-Linked Bond Issuance<br><br>This component will support the issuance of a sustainability-linked finance instrument by KMRC. KMRC seeks to diversify its financing sources and raise private sector financing. The project can enable access to more affordable financing by credit enhancing a portion of the loan, thus reducing borrowing costs, leveraging financing sources, and enhancing KMRC sustainability ambitions. |
| Component 4: Technical Assistance | The TA will support Component 1 and overall project management. Activities will cover the development of new product offerings and assess market readiness. It will help define the program/product characteristics and support the development and implementation of roll out plans. The TA will also help operationalize KMGT, including capacity building (including for its staff, trustee, regulators and primary mortgage lenders) and procurement of relevant IT systems. Additionally, the TA will support preparations for future bond issuances (including the potential issuance of a sustainability-linked bond), through transaction advisory services and consultancy support. This component will also finance project management, including related capacity building. |

## 2.3 Key Project Outputs

- Number of affordable mortgage/ housing loans refinanced by KMRC.
- Percentage of property sale transactions processed within the agreed service standard.
- People provided access to electricity through new connections in rural areas (Number).
- Level of Carbon Dioxide Abatement (Metric tons/year).
- Number of direct and indirect jobs created via the project.

## 2.4 Implementation Arrangements

The National Treasury (NT) will oversee the overall coordination, implementation, and supervision of E&S risk management for the project. E&S specialists within implementing agencies are tasked with executing the SES and updating it as needed throughout the project cycle. These specialists will collaborate closely with the Gender-Based Violence (GBV) specialists, communications officers, Monitoring and Evaluation (M&E) officers, and other key stakeholders, including those within PMLs.

NT, KMRC, and the SDLPP will organize and deliver all relevant training for effective implementation of SES (and the Grievance Mechanism), including for PMLs and other key project stakeholders. Specialized training will also address grievance management and GBV, specifically Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). Institutions engaged in project activities will be trained on operationalizing the GM, and service providers (including consultants) and primary suppliers will receive inductions on the SES and GM requirements.

## 2.5 Project Beneficiaries

Table 2: Project beneficiaries

| Stakeholders | Benefits |
|---|---|
| **Kenyans who are unable to access long-term housing finance.** | This new operation targets underserved market segments by expanding access for low- and middle-income households that struggle to obtain long tenor finance due to limited collateral, irregular incomes, and high upfront construction costs. The project introduces refinancing products that focus on micro-housing loans and incremental construction finance to help these households build, improve, or purchase homes. It also develops a green mortgage segment designed to support climate resilient and energy efficient housing for lower income borrowers. |
| **Primary Mortgage Lenders (PMLs) and SACCOs receiving refinancing from a strengthened KMRC.** | KMRC will work with PMLs and SACCOs to diversify products and improve affordability. Technical assistance to the newly established KMGT will help lenders manage risk and lend responsibly to lower income and informal borrowers. |
| **Users of land administration services.** | The primary beneficiaries of the project are individual property owners and land buyers who gain from enhanced security of tenure.<br><br>Others include Kenyans transacting on land, land developers, land professionals, users of land data, county registries, and commercial / microfinance banks and SACCOs, the Public (home owners) through efficient processing of Ownership documents (titles)<br><br>The SDLPP will benefit directly through support for legal reforms, digitization of land records, and enhancements to the Ardhi Sasa system, improving the efficiency and integrity of property registration.<br><br>Kenyans engaging in land and property transactions benefit from land administration reforms including faster, more affordable, and digitized property registration through the enhanced Ardhi Sasa platform giving them greater legal certainty and reduced transaction costs.<br><br>Beyond the digital interface, the project drives a comprehensive physical and institutional modernization of land administration through the upgrading of land offices and registry infrastructure across the country. By deploying enterprise ICT hardware, secure network controls, and reliable power backups, SDLPP is transforming regional registries into modern service centers capable of sustaining high-volume application and protecting the sanctity of records. |
| **Private investors, capital market participants, and the National Treasury** | They will benefit from the introduction of a sustainability-linked financing instrument. This will diversify funding sources, reduce borrowing costs, and align financing with measurable climate and development outcomes. They also strengthen market confidence and create fiscal space for priority housing investments. |

# 3 STAKEHOLDER ENGAGEMENT

Stakeholder engagement refers to the systematic, inclusive, and ongoing process through which KMRC (Kenya Mortgage Refinance Company), State Department for Lands and Physical Planning (SDLPP), and the National Treasury (NT) as joint implementing partners identify, inform, consult, involve, and collaborate with all individuals, groups, institutions, and communities who have an interest in, or may be affected by, or can influence the outcomes of the project.

This encompasses both internal stakeholders (the three implementing entities and their staff, governance structures, and oversight bodies) and external stakeholders (beneficiaries, partner financial institutions, regulatory authorities, development partners, civil society organizations, and the public).

The implementing agencies will ensure that stakeholder engagement begins as early as possible in project preparation to allow stakeholders' views and concerns to be considered in the project implementation and operation. They will also consider the different information access and communication needs of various stakeholder groups and individuals, including consideration of literacy, mobility and disability challenges, especially with vulnerable individuals and groups.

This strategy will be implemented in a way that promotes monitoring of E&S risks while also setting mutual expectations, clarifying the extent of the government's commitments and resources, and obtaining feedback on activities. This strategy includes a grievance Mechanism (GM) to allow the government to act upon complaints and suggestions for improvements in a timely fashion.

Effective public participation strengthens and legitimizes state decisions, actions, and development intervention. It is an important element of good governance and the foundation for a true democracy.

## 3.1 Policy, Legal and Regulatory Framework for Stakeholder Engagement

Stakeholder engagement under the Housing Finance, Lands and Sustainable Investments (HOFLASI) Project is governed by a comprehensive framework of national constitutional, legal, and policy instruments, complemented by the World Bank Environmental and Social Framework (ESF), specifically Environmental and Social Standard 10 (ESS10).This chapter outlines the policy, legal, and regulatory frameworks guiding stakeholder engagement in Kenya, describes how these frameworks apply to the HOFLASI project, and highlights key gaps between national requirements and ESS10, together with the measures adopted by the Project to address those gaps.

## 3.2 National Policy, Legal and Regulatory Framework

### 3.2.1 Constitution of Kenya (2010)

The Constitution establishes public participation as a **core national value and principle of governance**. It requires state organs and public entities to involve the public in policy formulation, legislation, and implementation processes, thereby embedding stakeholder engagement as a constitutional obligation rather than a discretionary practice.

### 3.2.2 Public Participation Policy (2018)

The Public Participation Policy provides structured guidance on how public participation should be conducted, including:

- Identification of affected stakeholders
- Timely information disclosure
- Inclusive consultation approaches
- Documentation and feedback mechanisms

This policy operationalizes constitutional requirements and applies directly to housing, land administration, and public investment projects such as HOFLASI project.

### 3.2.3 Access to Information Act (2016)

The Access to Information Act (2016) guarantees the public's right to access information held by public entities. For the HOFLASI project, this Act underpins transparency obligations relating to:

- Project objectives and scope
- Land administration reforms
- Housing eligibility criteria and allocation processes

The Act supports informed participation but does not prescribe structured engagement across the full project lifecycle.

### 3.2.4 National Gender and Equality Commission Act (2012)

The National Gender and Equality Commission Act (2012) mandate the promotion of equality and freedom from discrimination. It requires public programmes to integrate gender and social inclusion considerations, particularly for women, youth, persons with disabilities, and other disadvantaged groups. This Act informs the HOFLASI project's approach to inclusive stakeholder identification and engagement.

### 3.2.5 Disability Act (2025)

The Disability Act (2025) strengthens legal protections for people with disabilities (PWDs) and requires accessibility in information disclosure, consultation venues, and communication formats. While the Act addresses accessibility, it does not provide detailed guidance on sustained engagement throughout project implementation.

This Strategy outlines ways in which the implementing partners will ensure meaningful stakeholder engagement, consultation and information disclosure throughout the project cycle. Specifically, the strategy outlines a systematic process for:

- Identifying and mapping project stakeholders at different levels.
- Planning engagement modalities through effective communication, consultations, and disclosure.
- Outlining platforms for stakeholders to influence decisions regarding the project.
- Defining roles and responsibilities for the implementation of the strategy.
- Defining reporting and monitoring measures to ensure the effectiveness of the strategy and periodic reviews of the strategy based on monitoring findings.
- Elaborate the project Grievance Mechanism (GM) that will facilitate prompt resolution of project related complaints.
- Outlining the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setting up of a project website.
- Documenting stakeholder consultations on proposed project design, environmental and social risks (E&S) and impacts, mitigation measures, the strategy, and draft E&S risk management instruments.

## 3.1 World Bank Requirements for Stakeholder Engagement

Consistent with the requirements stipulated under the World Bank's (WB) ESF and specifically the Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, the implementing agency is required to engage with stakeholders throughout the project life cycle. Such engagement is to commence as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design.

Consistent with ESS10, a Project with a Moderate E&S risk rating such as the HOFLASI project is required to include several points of engagement prior to approval by the WB and ideally more than one point of engagement during project implementation. In practical terms, the engagement should include:

- meaningful consultations with all stakeholders. Borrowers will provide stakeholders with

timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

- Dissemination of relevant project material, including explanations of intended project benefits and, where appropriate, the setting up of a project website.
- Stakeholder consultations on proposed project design, E&S risks and impacts, mitigation measures, the proposed strategy, and draft E&S risk management instruments.

The Stakeholder engagement process as defined in ESS 10 Includes.

(i) Stakeholder identification and analysis.
(ii) Planning how the engagement with stakeholders will take place.
(iii) Disclosure of information.
(iv) Consultation with stakeholders.
(v) Addressing and responding to grievances; and
(vi) Reporting to stakeholders.

The project stakeholder engagement will include:

- Disclosure of information on how stakeholder feedback was incorporated into project design and E&S management instruments.
- Consultations on implementation and supervision, on any new project characteristics or E&S risks, and on progress of E&S risk mitigation measures.
- Regular efforts to keep stakeholders informed on project implementation and review the adequacy of stakeholder identification considering project implementation and related revisions to the strategy.

To comply with this requirement the implementing agencies will:

- Establish a systematic approach to stakeholder engagement that helps the entities to identify stakeholders and maintain a constructive relationship with them.
- Assess stakeholder interests and support for the project and enable stakeholders' views to be considered in project design.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle; and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

As a standard practice and as guided by ESS10, the disclosure of project E&S instruments including this strategy will be made by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. The disclosure process associated with the release of project E&S instruments will be implemented as follows:

- Disclosure of all E&S instruments in the public domain will take place after clearance by the World Bank. As per the World Bank Policy, the instruments will be disclosed on the external websites of KMRC, NT and SDLPP.

## 3.2 Stakeholder Identification and Analysis

The HOFLASI project is designed to engage a diverse range of stakeholders throughout its implementation. These stakeholders will include both state and non-state actors. According to the preliminary stakeholder analysis, the groups involved encompass project beneficiaries such as Kenyans who are unable to access long-term housing finance, access for low- and middle-income households that struggle to obtain long tenor finance due to limited collateral, irregular incomes, and high upfront construction costs, Vulnerable and Marginalized Groups (VMGs), women, youth, older persons, and persons with disabilities (PWDs). In addition, Civil Society Organizations (CSOs), organizations advocating for VMGs, and private sector entities will also be engaged. The implementing agencies are

committed to ensuring that all relevant stakeholders are identified and actively involved during the entire project cycle.

### 3.2.1 Project-Affected Parties

According to ESS10, Project-Affected Parties (PAPs) include individuals or groups that are affected or likely to be affected by the project. PAPs are influenced (actual or potential) by the project and/or have been identified as most susceptible to change associated with the project. PAPs need to be closely engaged in identifying potential E&S risks and impacts including appropriate mitigation measures. Under the HOFLASI project, PAPs include the individuals and groups identified under Table 3 below.

### 3.2.2 Other Interested Parties

The projects' stakeholders also include parties other than the PAPs. They include key stakeholders within the implementing agencies, other relevant government agencies, who may have an interest in the project as listed under Table 3 below.

**Table 3: Categories of Stakeholders**

| Category | Sub-category | Relationship to the HOFLASI Project |
|---|---|---|
| **Project-Affected Parties** | • Lower-income and middle-income borrowers/home buyers in underserved market segments.<br>• Vulnerable and Marginalized Groups (VMGs).<br>Other vulnerable groups such as youths, women, PWDs, older persons, female-headed households, child-headed households and the urban poor. | • Beneficiaries of mortgage facilities under component1. Households struggle to obtain long-term finance due to limited collateral, irregular incomes, and high upfront construction costs.<br>• Beneficiaries of the proposed land reforms, under component 2. |
| **Other Interested Parties** | • Kenya Mortgage Refinance Company.<br>• National Treasury.<br>• State Department of Land and Physical Planning.<br>• Project workers (including TA providers). | • Implementing entities, and technical assistance providers. |
| | **Other state agencies, e.g. regulatory bodies**.<br>• Attorney General's Office<br>• National Environmental Management Authority<br>• National Land Commission<br>• Council of Governors<br>• Parliamentary Committee on Lands<br>• Attorney General's Office<br>• State Department for Youth<br>• State Department for Gender Affairs and Affirmative Action<br>• State Department for Housing and Urban Development<br>• Kenya Space Agency<br>Environment and Land Court | • Offer Regulatory advisory, approvals and requisite recommendations. |

| Category | Sub-category | Relationship to the HOFLASI Project |
|---|---|---|
| | **Primary Mortgage Lenders (PMLs)** in the Banking sector, Savings and Credit Cooperative Organizations and microfinance e.g. banks, saccos.<br>• Imarisha SACCO.<br>• Tower SACCO.<br>• Safaricom SACCO.<br>• Unaitas SACCO.<br>• ABSA Bank of Kenya.<br>• Stanbic Bank.<br>• Cooperative Bank.<br>• NCBA<br>• Diamond Trust Bank<br>• Other private sector entities. | • Private sector financial institutions. |
| | • African Development Bank (AfDB).<br>• The World Bank.<br>• International Finance Cooperation. | Development partners. |
| | **Civil society groups.**<br>• National Council for Persons with Disabilities.<br>• Kenya National Human Rights Commission.<br>• The Institute for Social Accountability.<br>• Haki Jamii<br>• Kenya Property Developer Association<br>• Ogiek Peoples' Development Program.<br>• Sengwer Indigenous Community Trust. Hunters and Gatherers Forum Kenya.\<br>• Pastoralist parliamentary group<br>• Land development and governance institute<br>• Katiba Institute<br>• Community Land Action Now (CLAN)<br>• Federation of Women Lawyers Kenya (FIDA Kenya) | Organizations that represent the interests of vulnerable groups, including minority VMGs.<br>Offer Advocacy and community rights representation. |
| | **Professional bodies**<br>• Law society of Kenya<br>• Architectural association of Kenya<br>• Institutions of surveyors of Kenya | Offer advice |
| | • Academia | Offer advice |

## 3.3 Stakeholder Engagement Principles

Stakeholder analysis generates information on the perceptions, interests, needs, and influence of actors on the project. Identifying the appropriate consultation approach for each stakeholder throughout the project lifecycle is necessary. To meet the best practice, the project will apply the following principles (but not limited to) for stakeholder engagement.

a. **Openness and life-cycle approach:** public consultations for the project will be open and transparent throughout the project lifecycle from preparation through implementation to closure. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
b. **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate and accessible format; conducted based on timely, relevant, understandable and accessible information related to the project; their rights and entitlements fully disclosed, and opportunities provided to raise concerns and ensure that

stakeholder feedback is taken into consideration during decision making.

c. **Inclusivity and sensitivity:** stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive, and all stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods and ensuring that special attention is given to vulnerable groups.

## 3.4 Summary of Stakeholder Engagement Undertaken During Project Preparation

The implementing agencies (NT, SDLPP and KMRC) undertook preliminary consultations during project preparation. Below is a summary of meetings conducted by KMRC in February 2026 and a joint meeting by all the implementing agencies on March 05, 2026: A sample stakeholder consultation guide tool is provided under ***Annex 4.***

### i. Stakeholder Engagement Session held by KMRC in February 2026

KMRC conducted stakeholder consultations with the Primary Mortgage Lenders (PMLs) during the month of February 2026 to launch the Kenya Mortgage Guarantee Trust ("KMGT") a Risk Sharing Facility (RSF) aimed at addressing Kenya's housing finance challenges, particularly for underserved and lower-income groups through support to lenders in expanding access to affordable mortgages and advancing financial inclusion. After the presentation, participants engaged in a lively and interactive Q&A session. A diverse array of questions was raised. These included: -

**Table 4: Issues raised by PMLs**

| Organization | Question/concern/comment | Response |
|---|---|---|
| KCB/NCBA | When the financier realizes the collateral by exercising the chargee's right to sale and fully recovers the loan, what should the financer do with the funds received | The financer should apply the funds received to fully settle the outstanding loan. If there is any balance the funds should be applied to refund the 40% received from KMGT and the remaining to the Borrower pursuant to the law. The aim is for the financier to recover fully the loan but not realize a profit out of the guarantee process. |
| DTB | What's the definition of Low Income and is there income limit? | The focus is on irregular or informal income (self-employed or undocumented income). There is no income limit at the moment. |
| I&M | Does the guarantee only apply to the KMRC rate loans | The guarantee applies to "Eligible Mortgage Loans" that meet the Scheme's eligibility criteria and are submitted under a Guarantee Cover Agreement. The Manual does not restrict guarantee cover to loans priced specifically at the KMRC rate. |
| NCBA | Who bears the cost of the Agreement (1.25% premium fee) and can it be transferred to the customer? | This is a business case- looking at the intended impact the PML should take this cost, but a PML can pass it to the borrower over a period of time. This is left to the businesses to decide. |
| KINGDOM SACCO | Clarifications on the 3 missed installments | It means the borrower has failed to pay three consecutive scheduled |

| Organization | Question/concern/comment | Response |
|---|---|---|
| | | instalments. At that point, the mortgage loan is treated as non-performing/past due, subject to the applicable CBK/SASRA prudential rules and the foreclosure processes can be commenced by the financier |
| Cooperative Bank | Why should claims be launched quarterly? Can claims be made earlier subject to eligibility criteria | That's meant to reduce that administrative cost, Monthly claims will make operations cumbersome-it's a way to simplify the process through aggregation. |
| HFC & KCB | What happens in a situation where upon completion of construction the value of the house surpasses 4.6M due to the value adds | If the valuation that was done at origination was 4.6M, the loan qualifies. Value is taken as at time of origination of the loan. |
| DTB | Is the cover limit of 4.6M Property Value sufficient? | This is the criteria the Trust will be implementing at the moment. Any future changes will be informed by market factors documented over time. |
| NCBA & APSTAR | At what point do the PMLs claim for the guarantee | The guarantee kicks in when the institution has commenced the foreclosure processes as provided for in Law including the issuance of the requisite notices and appointment of the Auctioneer. |
| COOP BANK | What is the maximum Loan tenor? and termination of guarantee after 8 years vs the 25yrs loan tenor? | The guarantee claim period ends on the 9th anniversary (12-month lock-in plus 8 years) on the assumption that, by this stage, a significant portion of the loan would typically have been repaid through regular instalments. In addition, any remaining outstanding amount can generally be pursued and recovered through the normal foreclosure and recovery process, even though the underlying mortgage tenor may extend e.g. 20 years |
| Unaitas | What happens in a situation where the property value is within the limit, but the income is on the higher end? | Yes, provided the loan meets the Scheme's eligibility criteria, it can still qualify. However, RSF is primarily intended to support low-/middle-income borrowers, especially those with informal and irregular income, so underwriting should focus on repayment capacity and income regularity/stability rather than a single income cut-off |
| NCBA | Whether the PML offer letter can be revised to disclose the provision of guarantee by KMGT and subsequent sharing of personal data with KMGT? | Yes, this is encouraged especially to achieve compliance with the data protection laws |

This robust dialogue highlighted the keen interest of attendees in understanding the mechanisms and potential impacts of the Trust. The summary of consultations and the list of attendance have been attached as ***Annex 5*** to this report.

### ii. Stakeholder Engagement Session held Jointly by SDLPP NT and KMRC in 5th March 2026

The State Department of Lands and Physical Planning (SDLPP), the National Treasury (NT), and Kenya Mortgage Refinance Company (KMRC) held a Joint Stakeholder Engagement meeting on 5th March 2026 at Kenya School of Monetary Studies, a significant milestone bringing together a total of Fifty-Six (56) key stakeholders across the housing sector. The engagement provided a structured platform for open dialogue, alignment of priorities, and collaborative decision-making among the three institutions, each playing a distinct yet complementary role in advancing affordable housing, land administration, and mortgage finance in Kenya.

The table below captures all issues, concerns, and recommendations raised by stakeholders during the Plenary Session together with the corresponding responses provided by project leaders and government representatives

**Table 5: Issues raised during the joint consultation**

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| **1. Access to Housing Finance for Marginalized & Informal Sector Groups** | **NGEC**<br>• Concerns about how mortgage products and housing finance would be made accessible to individuals in the informal sector, unemployed populations, pastoralist communities, and other marginalized groups.<br>• Questioned whether the project was addressing financial capability or the availability of houses.<br>• Asked how people in informal settlements would access the capital required for housing. | • The project has been designed to include marginalized and special interest groups, ensuring equitable access to project benefits.<br>• The establishment of the Kenya Mortgage Guarantee Trust will support mortgage accessibility for individuals in the informal sector by reducing lending risks for financial institutions.<br>• Products such as micro-housing loans, incremental construction financing, and green housing will be delivered through lender refinancing and guarantees. |
| **2. Pastoralist & Hunter-Gatherer Communities** | **Hunters and Gatherers Forum***:*<br>• Queried how pastoral communities can access mortgages using livestock as collateral.<br>• The Wildlife Act prohibits construction in parks or forests; communities that have lived in forests for generations need assurance of minimal disruption.<br>• Concerns about the impact of urban expansion on agricultural land and the livelihoods of communities displaced by development projects.<br>• Emphasized the need for flexible or semi-permanent housing models that support mobility rather than permanent settlement.<br>• Noted that current housing finance policies lack repayment mechanisms suited to pastoralists, such as payments | • Environmental and social safeguards in the project include measures to restore livelihoods for communities affected by relocation or redevelopment.<br>• The project will incorporate social safeguards focusing on equitable access for underserved groups including low-income households, women-headed households, youth, and vulnerable and marginalized groups.<br>• Government is committed to ensuring robust stakeholder engagement throughout implementation, including engagement with pastoralist |

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| | derived from livestock sales or seasonal income.<br>• Observed that existing policies largely focus on formal economic actors and lack explicit provisions for pastoralist or informal livelihood groups.<br>• Referenced the African Union Charter provision safeguarding indigenous peoples living in forests. | and indigenous communities. |
| **3. Land Tenure Security & Cadastral Accuracy** | **NGEC**<br>• Questions regarding the accuracy of land boundaries and the need to strengthen cadastral mapping to prevent disputes.<br>• Suggestions to utilize satellite imagery, geospatial data, and digital mapping systems to improve land administration.<br><br>**Institution of Surveyors of Kenya***:*<br>• Proposed 159 GNSS Continuously Operating Reference Stations (CORS) may be insufficient for nationwide geospatial coverage.<br>• Approximately 25% of land parcels are recorded under the general boundary system, where boundaries are not mathematically computed — a major accuracy concern.<br><br>**Architectural Association of Kenya (AAK):**<br>• Securing land tenure was highlighted as a critical prerequisite for successful housing development.<br>• Land databases across institutions create inconsistencies and confusion regarding true land ownership and development rights.<br>• Some counties approve development projects without records of relevant scheme plans; a centralized database for all approved plans is needed. | • Phase II of the project includes deploying a uniform geodetic reference network (CORS) nationwide to provide accurate positioning for all land surveys and mapping.<br>• The project will support modernization of land administration through digitization of records, improving cadastral mapping, and strengthening land governance institutions.<br>• Physical planning reforms and legal adjustments will be implemented alongside digitization efforts to ensure coherent and sustainable land management. |
| **4. Technology, Digitization & Geospatial Data** | **Kenya Space Agency:**<br>• Queried the cost implications and purpose of satellite imagery in the actual digitization process.<br>• Asked how long it would take to acquire orthorectified imagery and the implications for project delivery timelines.<br><br>**Architectural Association of Kenya (AAK):** | • The project will accelerate mapping initiatives and the development of digital land records to support planning, transparency, and data-driven decision-making.<br>• The Ardhi Sasa platform will be deployed and integrated to transform manual, paper-based land |

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| | • Recommended exploring blockchain technology to enhance transparency and security in land registration systems.<br>• Recommended establishing a centralized one-stop, development control platform.<br><br>**Institution of Surveyors of Kenya (ISK):**<br>• Concerns about limited accessibility of geospatial maps and land information even where digitization has occurred, critical datasets remain inaccessible to professionals.<br><br>**Technical University of Kenya**<br>• Concerns about the availability and accessibility of spatial planning data developed by county governments; datasets should be centralized, accessible, and reusable.<br>• Challenges related to urban zoning clarity and planning transparency, particularly in emerging municipalities. | administration into efficient digital workflows.<br>• National spatial data infrastructure will be updated and standardized to ensure accurate, current, and accessible geospatial information. |
| **5. Legal, Policy & Institutional Reforms** | , **Institution of Surveyors of Kenya**<br>• Calls to fast-track legislation supporting housing finance markets, land registration reforms, and digital land systems.<br>• Suggestion for establishment of a semi-autonomous government agency for land administration.<br><br>**Law Society of Kenya**<br>• Clarification sought on whether the 10-year legal reform and capacity-building plans were part of the feasibility study or project outcomes.<br>• Raised the scope and targeting of the project — whether it accommodates community groups, registered societies, and cooperatives, not only individuals.<br>• Concerns about the phased implementation of digital systems and how areas relying on manual registries will be incorporated.<br><br>**Kenya Institute of Planners**<br>• The National Land Commission must be formally integrated into the project& stakeholder framework.<br>• Physical planning, land ownership, and land allocation processes should be | • Land laws, policies, and institutional arrangements will be reviewed, harmonized, and modernized to create a coherent governance structure.<br>• Government is committed to robust stakeholder engagement throughout implementation to achieve project objectives.<br>• Physical planning reforms will be implemented alongside digitization efforts to ensure coherent and sustainable land management systems. |

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| | finalized before development of housing units.<br>• Mortgage providers must ensure that financed properties are located within properly planned and regulated urban environments. | |
| **6. Integrated & Holistic Planning Approach** | **Kenya Institute of Planners**<br>• Housing must be understood as a broader system encompassing land use planning, infrastructure provision, social amenities, and environmental considerations not merely construction of shelter units.<br><br>**Town and County Planners Association of Kenya**<br>• Land surveying should lead the land administration process, as accurate surveys and clear boundaries are fundamental.<br>• Strong collaboration among planners, engineers, and surveyors is needed to effectively address land administration challenges.<br>• References were made to developed countries where strong cadastral systems support effective land governance.<br><br>**Architectural Association of Kenya (AAK)**<br>• Need for greater clarity on how the project will be implemented regarding institutional coordination and operational structures.<br>• The State Department for Lands and Physical Planning was urged to take a leading role in resolving institutional gaps. | • Physical planning reforms and legal adjustments will be implemented alongside digitization efforts for coherent land management.<br>• The project framework supports multi-stakeholder collaboration between government agencies, financial institutions, development partners, and civil society. |
| **7. County Government Engagement & Infrastructure** | **Council of Governors**<br>• County planning authorities should be fully engaged in the project from the outset.<br>• When housing projects are developed, counties are left responsible for providing essential services such as sewerage, water supply, and supporting infrastructure; collaboration with county governments in infrastructure planning is essential.<br><br>**Town and County Planners Association of** | • Technical assistance and training will be provided to County Governments to effectively implement planning and land administration reforms.<br>• Continued multi-stakeholder collaboration encourages sustained engagement between government agencies, including county governments, financial institutions, development partners, and civil society. |

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| | **Kenya**<br>• County governments must be integral partners, not merely occasional stakeholders, since planning and development control are largely implemented at the county level.<br><br>**Architectural Association of Kenya (AAK):**<br>• Concern raised about inefficiency of development control systems in county governments. | |
| **8. Project Feasibility, Climate Proofing & Food Security** | **Technical University of Kenya**<br>• The feasibility study underpinning the project was not clearly presented; large-scale national initiatives such as HFLSIP require comprehensive feasibility assessments.<br>• Need for robust climate-proofing mechanisms — a key challenge is sustainably accommodating growing populations while protecting natural resources.<br>• Concerns about food security implications arising from rapid urban development and expansion. | • The project incorporates environmental and social safeguards, including environmental impact assessments to manage climate-related risks such as flooding.<br>• Housing projects supported through refinancing will comply with environmental standards, promote green and sustainable building practices, and minimize negative environmental impacts.<br>• The project will promote climate resilience and inclusive access to finance. |
| **9. Stakeholder Consultation, Public Awareness & Governance** | **Law Society of Kenya**<br>• Relevant documents should be shared with stakeholders in advance of meetings to enable meaningful engagement and informed feedback.<br>• Many citizens may not fully understand digital systems; broader public sensitization is necessary for successful implementation.<br><br>**Institution of Surveyors of Kenya (ISK)**<br>• Given the scale and complexity of the project, ongoing dialogue with professional bodies is essential to ensure informed decision-making.<br>• Establishment of a Technical Committee to continuously receive feedback from stakeholders was recommended.<br>• Need to strengthen alternative dispute resolution (ADR) mechanisms for land and boundary disputes. | • A technical committee will be formed to facilitate ongoing stakeholder engagement and provide structured feedback on project activities.<br>• The project implementation team will organize periodic stakeholder briefings to share updates, progress reports, and lessons learned.<br>• Public awareness campaigns will be launched to educate citizens on land reforms, housing finance options, and the benefits of digitized land services.<br>• Government is committed to robust and inclusive stakeholder engagement throughout the project lifecycle. |

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| | • Need to support homeowners throughout the entire mortgage lifecycle, not only at the point of access.<br><br>**Town and County Planners Association of Kenya**<br>• Establishing a technical committee is important to guide implementation and ensure discussions are translated into practical action. | |

## 3.5 Project Stakeholder Engagement Tools and Techniques

The implementing agencies will apply some of the most effective mechanisms to reach identified stakeholders including vulnerable and disadvantaged groups. To be effective, the implementing agencies have adopted various communication and participatory methods designed to inform, consult, involve, collaborate or empower. Communication methods include Focus Group Discussions (FGDs), public meetings, social media, print and other media, etc. Due to obstacles such as literacy, disability mobility, cost implication etc., impeding effective participation by the vulnerable individuals and groups, the project will work closely with organizations that advocate interests of such groups to ensure their concerns are addressed and their views taken into consideration. Further, the project is to ensure that engagement sessions are held at venues closer to communities.

Meaningful stakeholder engagement is based on the prior disclosure and dissemination of relevant, transparent, objective, and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format. The implementing agencies need to ensure that relevant project related information is available as early as possible and throughout the project life cycle in a manner, format, and language appropriate for each stakeholder group. This way, stakeholders will have an opportunity to influence the project in ways that do not present risks to those raising critical and sensitive issues regarding the project.

- The project team will utilize accessible and preferred methods for disseminating project-related information through public meetings, formal letters, emails, local mainstream media, information/service centers domiciled in counties and sub-counties, websites of implementing agencies and social media platforms, among others.
- Conduct periodic community feedback sessions and use of printed materials such as brochures and flyers containing relevant project information.
- Provide regular feedback mechanisms, such as surveys and grievance management platforms.
- Engage national, county and ward-level administrators, women's representatives, disability rights organizations, and organizations championing the interest of marginalized individuals and groups.
- Establish a clear and accessible grievance mechanism, as well as confidential reporting channels such as toll-free lines.

**Table 6: Proposed Engagement Strategy**

| Method/Tool | Description and Use | Content | Dissemination Method | Target Group | Frequency of Stakeholder Engagement |
|---|---|---|---|---|---|
| **For disclosure of project Information** | | | | | |
| Print media such as leaflets, brochures, newsletters etc. and social media platforms. | Used to convey information on project activities and to provide regular updates on progress. | Printed materials present illustrative and written information on project activities.<br><br>The contents presented are concise, clear, and easy to understand by a layperson. Graphics and pictorials are widely used to describe technical aspects and aid understanding. Social media platforms are widely used. | Distribution of print media and disclosure of social media handles as part of consultation meetings, awareness campaigns, discussions, and meetings with stakeholders. | Affected parties including VMGs and other disadvantaged or vulnerable individuals and groups that can read and access social media platforms.<br><br>Other interestin g parties. | At inception of project activities.<br><br>Print media: quarterly basis to provide regular updates on project activities. Social media platforms; updated regularly<br><br>(daily/weekly basis). |

| Method/Tool | Description and Use | Content | Dissemination Method | Target Group | Frequency of Stakeholder Engagement |
|---|---|---|---|---|---|
| Public forums with visual presentations. | Engage and present on the project. | Create awareness on the project's objectives, expected results, activities, target beneficiaries and project timelines.<br><br>Raise awareness on potential E&S risks, impacts, opportunities, benefits, rights and entitlements and measures to mitigate risks and negative impacts, as well as enhancepositive impacts.<br><br>Understand the perceptions of beneficiaries on the planned activities and how best to design the project to ensure inclusivity. | Public forums with visual presentations are used widely during consultation with the public and allow for oral interaction, especially when Q&A sessions are provided at the end of the presentation.<br><br>If a large audience is expected to attend a necessary arrangement will be made to ensure audibility and visibility of the presentations. This includes provision of a microphone, proper lighting, projector, and places allocated for wheelchair users.<br><br>Engage sign language interpreters, s appropriate and use language Understandable to all. | All affected parties including VMGs and other disadvantaged or vulnerable individuals and groups.<br><br>Applicable to those who cannot read or access project website/social media platforms due to limited network/phone connectivity.<br><br>Other interesting parties. | At inception of project activities.<br><br>This can be applied on quarterly basis to affected parties or when need arises. |
| Use of mainstream media such as local TV/radio stations. | | | Engage diverse radio/TV stations including those in vernacular languages to ensure wide dissemination ofproject information. | | |
| **For provision of feedback to project Implementing Agencies** | | | | | |
| Dedicated toll-free telephone line. | The Project will set up a dedicated toll-free telephone line for use by the public for purposes of making inquiries, providing<br><br>Feedback or obtaining project | Information that is of interest or interest to the direct project beneficiaries and other stakeholders. Receive feedback from beneficiaries about their concerns, issues and perceptions of the overall project implementation, as well as complaints. | Telephone numbers are printed on published materials and distributed to project stakeholders during public meetings, provided on social media platforms and project website. | All affected parties including VMGs and other disadvantaged or vulnerable Individuals and groups.<br><br>Other interested parties. | A toll – free telephone line will be made available throughout the project cycle to allow for ease of Recording of complaints and grievances relating to the project. |

| Method/Tool | Description and Use | Content | Dissemination Method | Target Group | Frequency of Stakeholder Engagement |
|---|---|---|---|---|---|
| | information. | | | | |
| Project website and social media platforms. | Use of implementing agencies' websites, social media platforms to engage the public on the project.<br>Websites to have a built-in feature that allow viewers to leave comments or ask questions about project activities.<br>Websites to be available in both English and Kiswahili | Information such as procedures / criteria for accessing mortgages, status on mortgage application process etc., | A link to the project website, and social media handles should be specified on the printed materials distributed to stakeholders and shared during public forums. | All affected parties. including VMGs and other disadvantaged or vulnerable individuals and Groups with internet/phone connectivity.<br><br>Other interested parties. | The websites/social media platforms will be regularly updated with information on activities and stakeholders, especially those with access to internet can be able to access such information throughout the project cycle. |
| Information Centre or open office located within the Project Implementation Unit (PIU), Huduma 'service' centers existing within counties and sub-counties. | The centers are already in place and can be manned by designated project staff available to respond to queries or provide clarifications on project activities where needed. | Queries on the proposed land administration reforms, benefits, gaps etc., | Information about the information Centre with opening hours for the public, together with contact details, is provided on the project's printed materials distributed to stakeholders, websites, social media platforms, as well as shared during public meetings.<br>Beneficiaries in far-flung areas, with limited internet and phone connectivity can walk into these centers and access project information. | All affected parties. including VMGs and other disadvantaged or vulnerable individuals and groups<br><br>Other interested parties. | Stakeholders are free to always provide feedback or suggestions on project activities. |
| Feedback & Suggestion Box. | A suggestion box can be used to encourage stakeholders to leave written feedback and comments about the project activities.<br><br>Contents of the suggestion box should be Checked by | Any questions, queries, or concerns, especially from stakeholders who may find it difficult to express their views or concerns verbally during public meetings. | Appropriate location for the suggestion box should be selected in a safe public place to make it readily accessible to the stakeholders.<br><br>Information about the availability of the suggestion box should be communicated as | All affected parties, including VMGs and other disadvantaged or vulnerable individuals and groups.<br><br>Other interested parties. | Stakeholders are free to always provide feedback or suggestions on project activities. The project needs to ensure that the feedback/suggestion Box is checked on daily basis to provide timely response to the issue raised within 7 days. |

| Method/Tool | Description and Use | Content | Dissemination Method | Target Group | Frequency of Stakeholder Engagement |
|---|---|---|---|---|---|
| | designated staff on a regular basis to ensure timely collection of Input and provision of response/action, as necessary. | | part of project Team's regular interaction with stakeholders on project activities. | | |

## 3.6 Strategies for the Inclusion of Vulnerable or Disadvantaged Individuals or Groups

Consistent with ESS10, vulnerable or disadvantaged groups within the project are the stakeholders who may be disproportionately impacted or further disadvantaged by the project as compared with other groups due to their vulnerable status. They are more likely to be excluded from or are unable to fully participate in the mainstream consultation process. It is therefore important to put in place targeted measures/interventions to ensure that they can effectively participate in project consultations processes free of coercion and duress. In the case of the HOFLASI project and according to the preliminary assessment, such individuals or groups include persons with disabilities, women, older persons, youth, orphans and VMGs, among others. As such, this strategy and the Environmental and Social Commitment Plan (ESCP) include measures, to ensure their meaningful consultation, inclusion of all beneficiaries in the engagement process and access to project benefits and opportunities that are culturally appropriate-in the case of VMGs.

Special sessions will be held with such groups to ensure their needs are captured and voices heard including where necessary conducting separate Focus Group Discussions for women and youths amongst them. The project has endeavored to enhance women and youth participation by engaging their respective organizations and gather their insights on priorities and concerns.

Further the project has undertaken the following to ensure effective participation of vulnerable or disadvantaged individuals or groups.

- Identified organizations championing the interest of these groups and their legitimate leaders, as appropriate. KMRC, SDLPP and National Treasury have made and will continue to make reasonable efforts to verify that the respective legitimate leaders do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner.
- Ensure continued involvement and engagement of the identified organizations in all the project processes including targeting and engaging project beneficiaries.
- Seek input/feedback from the identified organizations and other stakeholders to avoid or minimize the potential E&S risks and impacts associated with the planned interventions on these groups.
- Address the barriers that are likely to impede their access to project benefits and opportunities.

Initial consultations with the above group of stakeholders were held in February and March 2026.The minutes of discussion have been annexed to this strategy. (*See annex 5 and 6).* Consultations will continue throughout the project implementation, with continuous stakeholder engagement that will ensure the active involvement of vulnerable or disadvantaged individuals or groups. In this regard, the project teams will:

- Disclose all relevant project information including potential E&S risks and impacts, as well as their rights and entitlements in a timely and culturally appropriate manner ensuring meaningful consultations and provision of feedback. All project E&S plans will be disclosed and made publicly available on the websites of implementing agencies.
- Conduct meetings in a language(s) understood by these groups and where necessary language,

translation will be provided.

- PWDs will be provided with information in accessible formats.
- Announce public meetings in a timely manner (a minimum of 7 days in advance).
- Facilitate their broad participation with adequate gender and intergenerational representation.
- Ensure adequate and ongoing consultation based on a pre-agreed consultation plan (and in line with this SES) with them in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation.
- The project team shall consider and respond to feedback promptly and, document and disclose all consultations held, clearly providing minutes and signed list of attendance. Further, the project shall provide regular updates on project progress and organize feedback sessions and /or mechanisms to effectively provide input to the project as implementation continues.
- Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
- Document details of all consultation meetings on their perceptions towards the project activities and the associated impacts, especially adverse ones.
- Share any input/feedback offered by them and provide an account of the conditions agreed with the people consulted.

To help ensure that the process does not marginalize vulnerable groups, the following issues will be addressed during the implementation stage of the project:

- Establish an effective mechanism for monitoring implementation of the project activities by the implementing agencies, including the E&S team.
- Ensure adequate representation of the vulnerable individuals and groups in all project governance structures if any.
- Design and publicly disclose the project grievance mechanism that is SEA/SH-responsive. The E&S Specialists will be instrumental in sensitizing vulnerable individuals and groups on the project GM including the grievance management structures, escalation tiers and uptake channels. Feedback on reported grievances will be provided to all the vulnerable individuals and groups in a timely manner as described in the project GM. The E&S teams will ensure that all concerns/conflicts are addressed promptly and effectively, in a transparent manner that is culturally appropriate. All received grievances including those reported anonymously shall be logged, dated; processed, resolved, and closed out.
- For effective engagement and participation of vulnerable individuals and groups, the implementing agencies E&S focal points will ensure that relevant project information disclosed is:
    - Accurate, up-to-date, and easily accessible.
    - Articulates the principle and rationale for the various strategies being used by the project at different levels.
    - Includes an indicative timeline and phasing of the project activities in the respective project areas.
    - Includes explanation of measures that will be used in the selection of workers and how the effects on the public and communities will be minimized.
    - Includes information on where target communities and other stakeholders can go for more information, ask questions, channel their complaints and grievances, and provide feedback (and contact persons as appropriate) and acts on their feedback appropriately and confidentially.

The Project Implementation Teams will continue to undertake structured stakeholder mapping exercise to identify vulnerable and marginalized groups, underserved beneficiaries, and other stakeholders who may face barriers in accessing project information, services, benefits, and opportunities.

This mapping will assess stakeholder characteristics, preferred communication channels, accessibility needs, and potential risks of exclusion during project implementation. Based on the results, targeted engagement approaches will be designed and implemented to ensure that stakeholder needs and

concerns are identified early and addressed in a timely and inclusive manner.

In parallel, the Project will engage organizations, community-based groups, and civil society organizations that work with or represent the interests of these groups within the respective areas of operation, to inform the design of appropriate engagement methods and mitigation measures.

The findings of the stakeholder mapping and engagement exercise, including identified risks, agreed actions, and feedback received, will be documented and used to update, finalize, and publicly disclose this Stakeholder Engagement Strategy which is a live document. The Strategy will be implemented and periodically reviewed throughout the project lifecycle.

# 4. GRIEVANCE REDRESS MECHANISM

KMRC has an existing Grievance Mechanism (GM) as part of the Environmental and Social Management System (ESMS), and which was utilized under the first phase of the project. In line with the ESS10 requirements, the other two implementing agencies (SDLPP and NT) will establish and operate a GM to ensure effective management of grievances that may arise during project implementation. The GM shall be readily accessible to all project-stakeholders, at no cost and without retribution. The GM is also expected to address project related concerns promptly and effectively, in a transparent and culturally appropriate manner. Further, the implementing agencies will ensure that the GM is well documented, and all its processes publicly disclosed to enhance its accessibility by all stakeholders including target communities.

The E&S specialists at KMRC, NT and SDLPP in close cooperation with the Project Coordinator (PC) will assume the lead responsibility for resolution of all projects related grievances in accordance with the WB ESSs. Grievance Committees (GC) will be established at the national level and chaired by the Project Coordinator (PC) while the SDLPP, NT and KMRC E&S specialists will serve as the key focal points in charge of grievance management for their respective entities. The main task of the committee is to review progress on complaints resolution and assess overall effectiveness of the GM. Membership to the GC will include staff responsible for procurement, finance, Monitoring and Evaluation (M&E), and communication, among others. In addition, staff from other government agencies will be invited as required.

For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the E&S specialists should immediately inform the World Bank within 48 hours as per the Environmental and Social Incident Response Toolkit (ESIRT).

The E&S specialists at KMRC, NT and SDLPP in close cooperation with the Project Coordinator will be charged with the following responsibilities.

- Serve as the main focal person for grievance management within their respective entity.
- Register, categorize, analyze, invite the others E&S specialists for resolution, and provide feedback to the aggrieved.
- Maintain the GM log in both soft and hard copies.
- Follow up on pending issues with the community, and national level grievance committees.
- Identify gaps and recommend actions for improving the GM.
- Prepare monthly/quarterly reports on all grievances received and processed and submit to WB, as one consolidated report.
- Build the capacity of the project staff on grievance management.
- Monitor performance of the project GM by taking periodic audits of all GM activities.

## 4.1 Grievance Redress Process Steps

**Step 1: Reporting and Receiving Grievances**

The implementing agencies, E&S specialists and close cooperation with the Project coordinator will sensitize all project staff and stakeholders on the project GM including where and how to submit grievances. They will ensure that various grievance uptake channels are provided at all tiers of grievance resolution before commencement of project activities. Grievances can be submitted by email, publicized toll-free phone lines managed by the E&S specialists, letters, walk-ins to implementing agencies offices, verbally through project E&S specialists or use of anonymous/suggestion boxes. The project GM will not prevent access to judicial or administrative remedies. The project team will inform all stakeholders about the grievance process during its stakeholder engagement activities and will make publicly available a record documenting the responses to all grievances received. The project GM will also allow receipt and resolution of anonymous complaints and will incorporate existing traditional grievance mechanisms.

**Step 2: Recording and processing of grievances**
Documentation of complaints and grievances is important, including those that are communicated informally and orally. Records provide a way of understanding patterns and trends in complaints, disputes, and grievances over time. While transparency should be maintained, for example, through regular reports on issues raised and rates of resolution, provision should also be made for confidentiality of information or anonymity of the complainant(s) especially where SEA/SH cases are involved. All submitted complaints and grievances will be entered into the grievance log/register and archived including all scanned documents received or related to the case along the process. Once logged, the grievance should be assessed, assigned to an individual for management, tracked and closed out or "signed off" when resolved, ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution.

The project will maintain grievances log in which complaints received by the project, either in written or verbal form, are entered. A grievance log should capture the following information:

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

**Step 3: Reviewing and Investigating and Resolution of Grievances**
All grievances will need to undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances. Once the grievance is well understood, resolution options can be developed taking into consideration stakeholders' preferences, project policy, past experiences, current issues, and potential outcomes.

**Step 4: Feedback mechanism**
One of the most important steps of the project GM is to provide clear feedback on the outcome to the complainants. The E&S specialists are responsible for giving feedback to the complainants via email, message, phone call or verbal. The complainants must know that their complaints were recorded by the GC's and that the issue is being investigated. In case of anonymous complaints, acknowledgement will not be possible. The complainants shall receive acknowledgement feedback within 7 working days after the issue is reported. The resolutions agreed upon must also be recorded in the grievance log for purposes of tracking grievance management and reporting.

The project GM will use various approaches for acknowledgment and communicating the grievance outcome and this includes:

a. **Email/messaging**: Either an automatic or manual reply will be sent to the complainants confirming receipt of their complaints and getting back to them after analyzing them. The complainant, who has sent his /her grievance through email, will receive the final feedback through email.
b. **Grievance resolution form**: A printed, or soft copy grievance resolution form will be used. The form and other GM related templates (grievance acknowledgement form, grievance log template, GC meeting format, and grievance resolution form) are annexed to this strategy.
c. **Phone call:** The complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by the E&S specialist or verbally.

**Step 6: Monitoring and Reporting of Grievance Mechanism**

Monitoring and reporting can be a useful tool for measuring the effectiveness of the GM and for determining broad trends and recurring problems so that they can be resolved proactively before they become points of contention. Monitoring and reporting create a base level of information that can be used to report to communities. To ensure smooth operation of GM, the E&S specialists at all levels will conduct frequent supervisions and monitoring missions on GM to ensure that it is functioning as anticipated, and GM aspects are included in regular reporting mechanism. The status of grievances received and resolved or escalated will be reported by the E&S specialists on a quarterly basis. The GM reports will be submitted to WB in consultation with the project coordinator.

## 4.2 Workers Grievance Mechanism

Typical workplace grievances include fair and equal opportunities for employment; discrimination, labor wages rates and delays in payment; disagreements over working conditions; and health and safety concerns in work environment. Therefore, in line with the ESS2 requirements, a separate GM will be provided for SDLPP and NT to cater to all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the GM at the time of recruitment and the measures put in place to protect them against any reprisal for its use.

## 4.3 Grievances related to Gender Based Violence (GBV)

The preliminary assessment of the project-related GBV SEA and SH risk is moderate. The GBV specialist will be responsible for ensuring GBV related complaints are addressed. Further, the project will provide various avenues for reporting GBV-SEA/SH cases, and the GBV Specialist will have a dedicated telephone line, SMS service and email address where such complaints can be raised.

In line with the survivor-centered approach, the grievance recipient to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, and compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor. Once a case has been taken in by a GM operator or via the identified focal points, informed consent of the survivor is obtained to proceed with the case, the case file/information will be submitted to the project E&S and GBV Specialists, who will ensure that the survivor has been provided with all necessary GBV referral services, and he/she is safe.

Complaints relating to GBV- SEA/SH will be addressed immediately by referring the SEA/SH survivors to support services as per the GBV Referral Pathways. A comprehensive GBV -SEA/SH Prevention and Response Action Plan shall be prepared and publicly disclosed. This plan shall contain a map of GBV referral pathways.

# 5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

## 5.1 Responsibilities

### 5.1.1 Overall Oversight

Overall oversight of stakeholder engagement under the HOFLASI project will rest with the Project Implementing Agencies (NT, KMRC & SDLPP), working in close coordination with relevant government entities and project partners. Oversight responsibilities include:

- Ensuring alignment of stakeholder engagement activities with the approved SES and ESCP
- Providing strategic direction and resolving escalated stakeholder issues
- Ensuring compliance with national laws and ESS10 requirements

### 5.1.2 Project Implementation Teams

The Project Implementation Teams (PITs) will have primary responsibility for day-to-day implementation of the SES. Their responsibilities will include:

- Conducting stakeholder mapping and analysis prior to Project Effectiveness and updating it periodically
- Planning and implementing stakeholder engagement activities throughout the project lifecycle
- Ensuring inclusive engagement of vulnerable and marginalized groups, women, persons with disabilities, and informal-income earners
- Coordinating consultations at national and sub-national levels
- Maintaining records of stakeholder engagement activities, feedback received, and responses provided

### 5.1.3 Environmental and Social Specialists

Dedicated Environmental and Social (E&S) Specialists within the Project Implementation Teams will provide technical leadership on stakeholder engagement. Their responsibilities will include:

- Ensuring that stakeholder engagement activities comply with ESS10 and relevant national frameworks
- Advising on appropriate engagement methods and communication approaches
- Supporting the identification and mitigation of stakeholder-related risks, including risks of exclusion, GBV, SEA/SH, and elite capture
- Preparing periodic stakeholder engagement monitoring reports

### 5.1.4 Grievance Redress Mechanism (GRM) Focal Points

Designated **GRM Focal Points** will be responsible for the operationalization of the project-level Grievance Redress Mechanism. Their responsibilities will include:

- Receiving, registering, and tracking grievances from project stakeholders
- Ensuring grievances are addressed in a timely, fair, and transparent manner
- Escalating unresolved grievances in line with established procedures
- Ensuring confidential and survivor-centered handling of GBV/SEA/SH-related grievances
- Periodic reporting on grievance trends and resolution status

## 5.2 Budget

The implementing agencies will ensure that adequate funds are allocated from the overall project cost, for implementation of this strategy. The budget will be used to cater for costs related to capacity building and awareness creation activities. The strategy will also include resources for implementing the project GM and will be referenced when developing the detailed work plan. Table 7 below provides an itemized budget of USD 84,000.

**Table 7: Estimated Budget for Implementing the SES for 5 Years**

| Item | Budget basis and Assumption | Total Cost USD |
|---|---|---|
| **1. Capacity Building: (awareness creation, induction and training on E&S provisions)** | | |
| Undertake stakeholder consultations to inform the assessment of the Ardhi Sasa platform's functionality and areas of improvement to ensure an inclusive design. | One-off | 50,000 |
| Prepare information awareness materials for beneficiaries. | Once per year | 5,000 |
| Train project workers on E&S provisions. | Once per year | 5,000 |
| **2. Monitoring on Implementation of E&S Provisions** | | |
| Monitoring compliance and extent of implementation of ESF instruments including the SES. | Quarterly | 10,000 |
| **3. Grievance Management** | | |
| Develop and operationalize the project and worker GMs including a separate GM for handling SEAH related grievances. | 0 | 5,000 |
| Maintain a toll-free line. | | 5,000 |
| | **Total Estimated Budget** | **80,000** |
| | **Contingency (5%)** | **4000** |
| | **Grand Total (USD)** | **84,000** |

# 6. MONITORING AND REPORTING

The E&S specialists at KMRC, SDLPP and NT will monitor the implementation of this strategy in accordance with the requirements of the Legal Agreement and the Environmental and Social Commitment Plan (ESCP), including changes resulting from the implementation of any project activity. The extent and mode of stakeholder monitoring with respect to environmental and social performance of the project activities will be proportionate to the potential environmental and social performance risks and impacts of the project activities and their effect on the various stakeholder interests. The entities will allocate the necessary resources for successful implementation of this strategy and ensure that the objectives are met.

The implementing agencies will compile a report summarizing SES results on an ongoing basis throughout the project implementation period. The SES will be periodically reviewed and updated as necessary during project 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 the updated SES.

The SEP reporting will include the following:

- Progress reporting on the ESS10 -Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP).
- Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, or SEA/SH Action Plan or LMP if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.

The table below summarizes the quantitative monitoring indicators.

Table 8: Monitoring indicators

| **Potential Indicators** | **Means of Verification** |
|---|---|
| Number of project stakeholders accessing project information, benefits and opportunities. | Quarterly E&S reports. |
| Percentage of stakeholders who are aware of the GM mechanism report that they trust the mechanism to resolve complaints satisfactorily. | Stakeholder meetings type of stakeholder and gender. |
| Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential E&S risks and impacts including associated mitigation measures. | Quarterly E&S reports. |
| Number of government agencies, civil society organizations, private sector and other stakeholder groups that have been involved in consultations on the project implementation phase on a quarterly basis. | Minutes and reports of consultations disaggregated according to e.g., gender. |
| Number of engagements (e.g. meeting, workshops, consultations participants sex and age disaggregated) with stakeholders during the project implementation phase (on an annual basis). | Minutes reports and other documentation of consultations. |

| Potential Indicators | Means of Verification |
|---|---|
| Percentage of SEP activities implemented, key barriers to participation identified with stakeholder representatives and number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. | Quarterly reports. |
| Percentage of complaints that are satisfactorily resolved and not resolved within timelines disaggregated by e.g., gender (according to the complainants (during stakeholder surveys and evaluation). | Stakeholder meetings by type of stakeholder and gender. |

## ANNEXES

### Annex 1: Template to capture minutes/records of consultation meetings

| Stakeholder (Group or Individual) | Summary of Feedback | Response of Project Implementation Team | Follow-up Action/Next Steps |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

## Annex 2: List of Participants during Stakeholder Mapping and Consultations

The list of participants is not publicly disclosed to align with data protection provisions.

## Annex 3: Grievance Management Related Templates

### a. Grievance Documentation and Acknowledgement Form

State: …… Institution: …….

Name of Complainant:

Contacts: Phone…….
Email address ……

Date of Complaint:.....(dd-mm-yyyy)

Documents comprising the complaint: (petition, supporting documents etc.)
1)
2)

Summary of Complaint:

Name and Signature of the Complainant:
……

Name and Signature of Officer receiving the complaint:

**b. Grievance Redress Log**

| | | | |
|---|---|---|---|
| **GRIEVANCE LOG** | | **Person Completing** | |
| **Project** | | **Contact** | |
| **Geographical Location** | | | |

| Serial No | Name/or Ref | Contact | Date received | Channe l | Description of complaint | Referred to (Name& Position) | Tel no | Date | Action taken/greed resolution | Outcome | Feedback Given Y/N | Date resolve d |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | | | | | | | | | | | |
| 2 | | | | | | | | | | | | |
| 3 | | | | | | | | | | | | |

### c. Grievance Committee Meeting Recording Format

State:

Date of the Meeting: _____; Complaint Register No. _____

Venue of meeting: _____

Details of Participants:

| Complainant(s) if present | Committee Members |
|---|---|
| 1)<br>2) | 1)<br>2)<br>3) |

Summary of Grievance:

Summary of key discussions:

Decisions taken in the meeting / Recommendations of GRC:

Issue solved / Unsolved _____

Signature of Chairperson of the meeting: _____

Name of Chairperson: _____

Date: dd-mm-yyyy

### d. Grievance Resolution Form

State:

1. Name of Complainant…….…….

2. Date of Complaint…….…….

3. Summary of the Complaint:

4. Summary of Resolution

5. Date of Redress of the Grievance: (dd-mm-yyyy)

Signature of the grievance committee chairperson

Name: _____

Date: dd-mm-yyyy

Signature of the Complainant in acceptance of the resolution to his /her grievance _____

Name: _____

## Annex 4: Stakeholder Consultations Guiding Questions

| # | Thematic Areas | Objectives | Questions |
|---|---|---|---|
| 1 | Stakeholder consultation | How to make engagements meaningful and inclusive. | • What is your take about the project that we have explained to you?<br>• How do you wish to be involved throughout the project cycle?<br>• How often do you want to be engaged/communicated to?<br>• What engagement method/tools do you propose the project utilize to convey information to you?<br>• How can the project ensure that stakeholder engagement is meaningful and inclusive? |
| 2 | Grievance management | Ensuring functional mechanisms for effective and timely grievance resolution. | • What are some of the areas of the project that will raise complaints?<br>• What is your view regarding the capacity of the project grievance mechanism to resolve grievances effectively and in a timely manner?<br>• What recommendations do you have for enhancing the project's grievance mechanism?<br>• |
| 3 | Targeting and inclusion | Enabling access to project benefits and opportunities especially for those considered vulnerable. | • What barriers are anticipated to affect the potential beneficiaries from accessing project benefits and opportunities?<br>• Which groups of the population are likely to be at risk of being affected by the barriers mentioned?<br>• What suggestions do you propose for overcoming the said barriers to ensure that vulnerable groups access project benefits and opportunities? |
| 4 | GBV-SEA/SH | Ensuring SEA/SH cases are prevented and responded to. | • What situations, locations, or project activities could expose women, children, or other vulnerable groups to risks of sexual exploitation, abuse, or harassment (SEA/SH)?<br>• What preventive measures should be in place from the start?<br>• What reporting and survivor-centered response mechanisms would project stakeholders trust to safely report SEA/SH incidents without fear of retaliation, stigma, or loss of benefits? |

**Annex 5: Attendance list of the Stakeholder Consultations Workshops Held**

**Summary of Engagement on the Launch of Kenya Mortgage Guarantee Trust.**

The Kenya Mortgage Guarantee Trust ("KMGT") was officially launched on 17th February 2026 at an event held at Radisson Blu Upper hill, Nairobi. The event started at 8:30 a.m. and was attended by representatives from Ten Banks and six SACCOs with a total attendance of thirty-nine (Attendance List attached).

The event began with Opening Remarks from the C.E.O, KMRC who pointed out that The Risk Sharing Facility (RSF) aims to address Kenya's housing finance challenges, particularly for underserved and lower-income groups. By sharing risk, RSF supports lenders in expanding access to affordable mortgages and advancing financial inclusion. Success stories from India, Morocco, and Malaysia demonstrate that guarantees and risk-sharing mechanisms can effectively catalyze market growth and increase homeownership. The RSF represents a strategic partnership to transform Kenya's housing finance landscape, and partners are encouraged to take a leading role in this initiative.

Mr. Nyale Yanga, the CFO KMRC, took the participants through a presentation and highlighted that KMGT was established as a risk-sharing mechanism to provide partial, first-loss default guarantees to Primary Mortgage Lenders (PMLs), particularly to encourage home ownership among those in the informal sector with uneven or periodic income. It was explained that the Trust's policy objectives include reducing lenders' risk by transferring it outside the banking system and stimulating economic growth by strengthening the real estate sector. The presentation noted that governance of KMGT is to be managed through a three-tier structure with a Board of Trustees for oversight, a Trust Committee for operational approvals, and a Head of Trust for daily administration. Furthermore, it was emphasized that the Trust will maintain separate books of accounts from KMRC and undergo independent annual external audits.

Mr. Yanga further outlined that the Trust is funded through Kes 608 million in seed capital, upfront guarantee premiums of 1.25%, and income from investments in government papers and fixed deposits. It was detailed that the maximum loan size is Kes 4 million for properties valued up to Kes 4.6 million, with the guarantee providing a 40% cover ratio while requiring PMLs to retain 60% of the risk. The presentation mentioned that there is a 12-month lock-in period to ensure quality mortgage origination and a claim period of 8 years. Finally, it was reported that PMLs must adhere to quarterly reporting obligations and follow the procedures established in the Master Mortgage Guarantee Agreement and the RSF Manual.

**Questions Raised**

After the presentation, participants engaged in a lively and interactive Q&A session. A diverse array of questions were raised. These included: -

- When the financier releases the collateral and fully recovers the loan, what should the financer do with the funds received?
- What's the definition of Low Income and is there income limit?
- Does the guarantee only apply to the KMRC rate loans?
- who bears the cost of the Agreement (1.25% premium fee) and can it be transferred to the customer?
- Clarifications on the 3 missed installments
- Why should claims be launched quarterly? Can claims be made earlier subject to eligibility criteria.
- What happens in a situation where upon completion of the property the value of the house surpasses 4.6M due to the value adds.
- Is the cover limit of 4.6M sufficient?
- At what point do the PMLs claim for the guarantee?

- What is the maximum Loan tenor? and termination of guarantee after 8 years vs the 25yrs loan tenor?
- What happens in a situation where the property value is within the limit, but the income is on the higher end?
- Whether the PML offer letter can be revised to disclose the provision of guarantee by KMGT and subsequent sharing of personal data with KMGT?

This robust dialogue highlighted the keen interest of attendees in understanding the mechanisms and potential impacts of the Trust.

**Way Forward.**
It was agreed that the RSF manual and the Master Mortgage Guarantee Agreement would be shared with all relevant parties for their review and execution to promote transparency and deepen understanding of the Trust's operations.
**KMGT was to provide feedback to the participants on the following issues: -**

- What happens if the property value surpasses 4.6M upon completion due to value adds?
- Whether the PML offer letter can be revised to disclose the provision of guarantee by KMGT and subsequent sharing of personal data with KMGT.

## Annex 6: Minutes of the Meeting the Joint Stakeholder Engagement by SDLPP, NT & KMRC

**Minutes of the Housing Finance, Land and Sustainable Investments Project (HFLSIP) Stakeholders Forum Held on Thursday, 5th March 2026 at the CBK Institute of Monetary Studies**
**Attendance List:** Attached
**Agenda**

1. Opening Session
2. Welcome Remarks and Self-Introductions
3. Presentations
    - The Kenya Housing Finance, Land and Sustainable Investments Project (KHFLSIP)
    - Sustainable Financial Instruments
    - Credit for Mortgage Refinancing
    - Environmental and Social Safeguards
4. Plenary
5. Way Forward
6. Closing Remarks

**MIN 1/05/03/2026: Opening Session**
The stakeholder forum commenced at 9.30 am with the singing of the Kenya National Anthem, followed by an opening prayer delivered by Mr. Paul Ndungu. The opening session set the tone for a collaborative dialogue among stakeholders drawn from MDACs, development partners, financial institutions, and the private sector.
The forum was organized under Housing Finance, Lands and Sustainable Investments (HOFLASI) Project, aimed at strengthening coordination and ensuring inclusive participation in the project's implementation.
**MIN 2/05/03/2026: Welcome Remarks and Self-Introduction**
Participants were welcomed to the forum and provided with an overview of the purpose of the stakeholder engagement followed by self-introductions of the participants. The meeting sought to:

- Provide an update on the progress and implementation framework of the HOFLASI project.
- Facilitate dialogue among stakeholders involved in housing finance, land administration, and

financial sector development.
- Gather stakeholder feedback to inform project design and execution.
- Strengthen partnerships that support the government's affordable housing and land reform agenda.

Further, the project aimed to enhance access to housing finance, modernize and digitize land services, and promote sustainable investment mechanisms to support inclusive, sustainable urban development across Kenya.

Madam Sarah Maina, Secretary, Lands, on behalf of the Principal Secretary for Lands and Physical Planning, delivered the opening remarks. She welcomed participants and expressed appreciation for the strong stakeholder turnout and for the continued partnership among the Government of Kenya, the World Bank, and the National Treasury of Kenya in advancing reforms in the housing and land sectors.

In her remarks, she emphasized that:

- Digitization of land administration systems was a priority reform area for the government.
- Although digitization was capital-intensive, it was a necessary investment to improve the transparency, efficiency, and reliability of land records.
- Modernizing land services would reduce disputes, improve tenure security, and facilitate investment in land and housing development.
- Stakeholder collaboration was essential to ensuring that reforms are sustainable and responsive to public needs.

She encouraged participants to engage actively during discussions and contribute practical ideas to strengthen the project's implementation.

**MIN 3/05/03/2026: Presentations**

**a) The Housing Finance, Lands, and Sustainable Investments (HOFLASI) Project**

A presentation was made outlining the structure and scope of the Project. It was reported that the project was a five-year initiative scheduled to run from 2026 to 2031 and was structured around four (4) core components.

- **Housing Finance**

This component aimed to improve access to affordable housing finance by strengthening mortgage markets, expanding financing mechanisms, and reducing barriers for low- and middle-income households.

- **Land Administration Reforms**

The project would support modernization of land systems through digitization of records, improved cadastral mapping, and strengthening land governance institutions.

- **Sustainable Financing**

This component focused on developing financial mechanisms and investment frameworks that support long-term financing for housing and urban infrastructure.

- **Technical Assistance and Capacity Building**

Technical support would be provided to National and County Governments to enhance institutional capacity, policy formulation, and implementation of reforms.

The Government of Kenya, in collaboration with the World Bank, would also modernize, digitize, and harmonize land services as part of broader efforts to support the national affordable housing agenda and improve the efficiency of land administration.

Key issues raised:

- Kenya faced a significant shortage of affordable housing, with an estimated deficit of approximately 2 million housing units.
- Housing supply stood at 50,000 units per year, which fell short significantly of demand.
- Approximately 60% of urban residents lived in informal settlements, highlighting the urgent need for affordable housing solutions and improved urban planning.

The presenter also explained the project financing structure:

- International Development Association (IDA) – USD 350 million
- International Bank for Reconstruction and Development (IBRD) – USD 125 million

The project financing totaling to USD 475 million, aimed at supporting reforms in housing finance, land administration, and sustainable investments.
A review of Phase 1 achievement was made where an Assessment of the Land Sector and Development of a Land Reform and Capacity Building Plan Project was done to Comprehensively assess Kenya's land sector to identify gaps, challenges, and opportunities for reform. An assessment of the Kenya Geodetic Reference System & Large-Scale Mapping Project was also done to Modernize Kenya's geodetic infrastructure and create accurate, up-to-date national maps for land management.
With a Total Project Investment of USD 125 Million, the objectives for Phase II aligned with the mission to "Support the Kenya Affordable Housing Project (AHP) through comprehensive land sector transformation" which included to:

- Review, harmonize, and modernize land laws, policies, and institutional arrangements to create coherent governance structure.
- Update and standardize national spatial data infrastructure with accurate, current, and accessible geospatial information.
- Deploy uniform geodetic reference network (CORS) nationwide to provide accurate positioning for all land surveys and mapping.
- Transform manual, paper-based land administration into efficient digital workflows through Ardhisasa platform deployment and integration.
- Strengthen land administration institutions through training, recruitment, equipment, and modern management systems.
- Improve citizen access to land services and awareness of rights through digital platforms, outreach, and education programs.

**b) Sustainable Financial Instruments**

A presentation by a representative of The National Treasury highlighted the adoption of a Sustainability-Linked Financing to mobilize funds as an innovative mechanism to mobilize resources for national development priorities. The presentation noted that concessional financing from development partners had been gradually declining, necessitating the exploration of alternative and innovative financing options to support government programmes and operations.
With support from partners such as the World Bank and African Development Bank among others, Kenya had developed a sustainability framework where Key Performance Indicators (KPIs) were tied to borrowing costs. Some of the KPIs mentioned include; accumulation of natural forest coverage and percentage of rural household with electricity connection. If these KPIs were met or exceeded, borrowing costs would go down, incentivizing environmental protection and improved energy access while financing government priorities.

**c) Credit for Mortgage Refinancing**

The presenter stated that prior to the establishment of the Kenya Mortgage Refinance Company (KMRC), access to affordable mortgages in Kenya was limited due to the lack of long-term financing, since lenders relied on short-term deposits, resulting in mortgages of about eight (8) years. KMRC was created to provide liquidity to primary mortgage lenders, enabling long-term and more affordable home loans, including refinancing through banks and SACCOs.
The project, therefore, aimed to expand affordable housing finance particularly for underserved groups through products such as micro-housing loans, incremental construction financing, and green housing, delivered through lender refinancing and guarantees from the Kenya Mortgage Guarantee Trust. With funding of about USD 210 million (KSh 26 billion), it was expected to create approximately 20,860 jobs, while implementing environmental and social safeguards to address risks related to environmental impacts, social inclusion, worker safety, and climate vulnerability.

**d) Environmental and Social Safeguards**

The presentation outlined that the Environmental and social risks would be managed through strong safeguards that promoted responsible housing development, climate resilience, and inclusive access to

finance. Additionally, Housing projects supported through refinancing complied with environmental standards, promoted green and sustainable building practices, and minimized negative environmental impacts.

Social safeguards would also focus on equitable access to housing finance, particularly for underserved groups such as low-income households and women, women headed houses youth and Vulnerable and Marginalized groups, while preventing discrimination or exclusion in loan access. Measures would also address worker safety during housing construction through adherence to labor and occupational health standards and zero tolerance to Gender Based Violence throughout the project cycle. In addition, Environmental Impact assessment will be conducted to manage climate-related risks such as flooding and other disasters would be considered to enhance resilience and long-term sustainability.

**MIN 4/05/03/2026: Plenary**

During the plenary session, stakeholders raised a range of concerns and suggestions regarding the project's design and implementation.

Key issues raised included;

| Thematic Area | Concerns/Issue Raised | Response |
|---|---|---|
| **1. Access to Housing Finance for Marginalized & Informal Sector Groups** | **NGEC**<br>• Concerns about how mortgage products and housing finance would be made accessible to individuals in the informal sector, unemployed populations, pastoralist communities, and other marginalized groups.<br>• Questioned whether the project was addressing financial capability or the availability of houses.<br>• Asked how people in informal settlements would access the capital required for housing. | • The project has been designed to include marginalized and special interest groups, ensuring equitable access to project benefits.<br>• The establishment of the Kenya Mortgage Guarantee Trust will support mortgage accessibility for individuals in the informal sector by reducing lending risks for financial institutions.<br>• Products such as micro-housing loans, incremental construction financing, and green housing will be delivered through lender refinancing and guarantees. |
| **2. Pastoralist & Hunter-Gatherer Communities** | **Hunters and Gatherers Forum***:*<br>• Queried how pastoral communities can access mortgages using livestock as collateral.<br>• The Wildlife Act prohibits construction in parks or forests; communities that have lived in forests for generations need assurance of minimal disruption.<br>• Concerns about the impact of urban expansion on agricultural land and the livelihoods of communities displaced by development projects.<br>• Emphasized the need for flexible or semi-permanent housing models that support mobility rather than permanent settlement.<br>• Noted that current housing finance policies lack repayment mechanisms suited to pastoralists, such as payments derived from livestock sales or seasonal income.<br>• Observed that existing policies largely focus on formal economic actors and lack explicit provisions for pastoralist or informal livelihood groups.<br>• Referenced the African Union Charter provision safeguarding indigenous peoples living in forests. | • Environmental and social safeguards in the project include measures to restore livelihoods for communities affected by relocation or redevelopment.<br>• The project will incorporate social safeguards focusing on equitable access for underserved groups including low-income households, women-headed households, youth, and vulnerable and marginalized groups.<br>• Government is committed to ensuring robust stakeholder engagement throughout implementation, including engagement with pastoralist and indigenous communities. |

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| **3. Land Tenure Security & Cadastral Accuracy** | **NGEC**<br>• Questions regarding the accuracy of land boundaries and the need to strengthen cadastral mapping to prevent disputes.<br>• Suggestions to utilize satellite imagery, geospatial data, and digital mapping systems to improve land administration.<br><br>**Institution of Surveyors of Kenya***:*<br>• Proposed 159 GNSS Continuously Operating Reference Stations (CORS) may be insufficient for nationwide geospatial coverage.<br>• Approximately 25% of land parcels are recorded under the general boundary system, where boundaries are not mathematically computed — a major accuracy concern.<br><br>**Architectural Association of Kenya (AAK):**<br>• Securing land tenure was highlighted as a critical prerequisite for successful housing development.<br>• Land databases across institutions create inconsistencies and confusion regarding true land ownership and development rights.<br>• Some counties approve development projects without records of relevant scheme plans; a centralized database for all approved plans is needed. | • Phase II of the project includes deploying a uniform geodetic reference network (CORS) nationwide to provide accurate positioning for all land surveys and mapping.<br>• The project will support modernization of land administration through digitization of records, improving cadastral mapping, and strengthening land governance institutions.<br>• Physical planning reforms and legal adjustments will be implemented alongside digitization efforts to ensure coherent and sustainable land management. |
| **4. Technology, Digitization & Geospatial Data** | **Kenya Space Agency:**<br>• Queried the cost implications and purpose of satellite imagery in the actual digitization process.<br>• Asked how long it would take to acquire orthorectified imagery and the implications for project delivery timelines.<br><br>**Architectural Association of Kenya (AAK):**<br>• Recommended exploring blockchain technology to enhance transparency and security in land | • The project will accelerate mapping initiatives and the development of digital land records to support planning, transparency, and data-driven decision-making.<br>• The Ardhi Sasa platform will be deployed and integrated to transform manual, paper-based land administration into efficient digital workflows.<br>• National spatial data infrastructure will be updated and standardized to ensure accurate, current, and accessible geospatial information. |

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| | registration systems.<br>• Recommended establishing a centralized one-stop, development control platform.<br><br>**Institution of Surveyors of Kenya (ISK):**<br>• Concerns about limited accessibility of geospatial maps and land information even where digitization has occurred, critical datasets remain inaccessible to professionals.<br><br>**Technical University of Kenya**<br>• Concerns about the availability and accessibility of spatial planning data developed by county governments; datasets should be centralized, accessible, and reusable.<br>• Challenges related to urban zoning clarity and planning transparency, particularly in emerging municipalities. | |
| **5. Legal, Policy & Institutional Reforms** | , **Institution of Surveyors of Kenya**<br>• Calls to fast-track legislation supporting housing finance markets, land registration reforms, and digital land systems.<br>• Suggestion for establishment of a semi-autonomous government agency for land administration.<br><br>**Law Society of Kenya**<br>• Clarification sought on whether the 10-year legal reform and capacity-building plans were part of the feasibility study or project outcomes.<br>• Raised the scope and targeting of the project — whether it accommodates community groups, registered societies, and cooperatives, not only individuals.<br>• Concerns about the phased implementation of digital systems and how areas relying on manual registries will be incorporated.<br><br>**Kenya Institute of Planners** | • Land laws, policies, and institutional arrangements will be reviewed, harmonized, and modernized to create a coherent governance structure.<br>• Government is committed to robust stakeholder engagement throughout implementation to achieve project objectives.<br>• Physical planning reforms will be implemented alongside digitization efforts to ensure coherent and sustainable land management systems. |

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| | • The National Land Commission must be formally integrated into the project& stakeholder framework.<br>• Physical planning, land ownership, and land allocation processes should be finalized before development of housing units.<br>• Mortgage providers must ensure that financed properties are located within properly planned and regulated urban environments. | |
| **6. Integrated & Holistic Planning Approach** | **Kenya Institute of Planners**<br>• Housing must be understood as a broader system encompassing land use planning, infrastructure provision, social amenities, and environmental considerations not merely construction of shelter units.<br><br>**Town and County Planners Association of Kenya**<br>• Land surveying should lead the land administration process, as accurate surveys and clear boundaries are fundamental.<br>• Strong collaboration among planners, engineers, and surveyors is needed to effectively address land administration challenges.<br>• References were made to developed countries where strong cadastral systems support effective land governance.<br><br>**Architectural Association of Kenya (AAK)**<br>• Need for greater clarity on how the project will be implemented regarding institutional coordination and operational structures.<br>• The State Department for Lands and Physical Planning was urged to take a leading role in resolving institutional gaps. | • Physical planning reforms and legal adjustments will be implemented alongside digitization efforts for coherent land management.<br>• The project framework supports multi-stakeholder collaboration between government agencies, financial institutions, development partners, and civil society. |
| **7. County Government Engagement & Infrastructure** | **Council of Governors**<br>• County planning authorities should be fully engaged in the project from the outset.<br>• When housing projects are developed, counties | • Technical assistance and training will be provided to County Governments to effectively implement planning and land administration reforms. |

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| | are left responsible for providing essential services such as sewerage, water supply, and supporting infrastructure; collaboration with county governments in infrastructure planning is essential.<br><br>**Town and County Planners Association of Kenya**<br>• County governments must be integral partners, not merely occasional stakeholders, since planning and development control are largely implemented at the county level.<br><br>**Architectural Association of Kenya (AAK):**<br>• Concern raised about inefficiency of development control systems in county governments. | • Continued multi-stakeholder collaboration encourages sustained engagement between government agencies, including county governments, financial institutions, development partners, and civil society. |
| **8. Project Feasibility, Climate Proofing & Food Security** | **Technical University of Kenya**<br>• The feasibility study underpinning the project was not clearly presented; large-scale national initiatives such as HFLSIP require comprehensive feasibility assessments.<br>• Need for robust climate-proofing mechanisms — a key challenge is sustainably accommodating growing populations while protecting natural resources.<br>• Concerns about food security implications arising from rapid urban development and expansion. | • The project incorporates environmental and social safeguards, including environmental impact assessments to manage climate-related risks such as flooding.<br>• Housing projects supported through refinancing will comply with environmental standards, promote green and sustainable building practices, and minimize negative environmental impacts.<br>• The project will promote climate resilience and inclusive access to finance. |
| **9. Stakeholder Consultation, Public Awareness & Governance** | **Law Society of Kenya**<br>• Relevant documents should be shared with stakeholders in advance of meetings to enable meaningful engagement and informed feedback.<br>• Many citizens may not fully understand digital systems; broader public sensitization is necessary for successful implementation. | • A technical committee will be formed to facilitate ongoing stakeholder engagement and provide structured feedback on project activities.<br>• The project implementation team will organize periodic stakeholder briefings to share updates, progress reports, and lessons learned.<br>• Public awareness campaigns will be launched to educate citizens on land reforms, housing finance |

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| | **Institution of Surveyors of Kenya (ISK)**<br>• Given the scale and complexity of the project, ongoing dialogue with professional bodies is essential to ensure informed decision-making.<br>• Establishment of a Technical Committee to continuously receive feedback from stakeholders was recommended.<br>• Need to strengthen alternative dispute resolution (ADR) mechanisms for land and boundary disputes.<br>• Need to support homeowners throughout the entire mortgage lifecycle, not only at the point of access.<br><br>**Town and County Planners Association of Kenya**<br>• Establishing a technical committee is important to guide implementation and ensure discussions are translated into practical action. | options, and the benefits of digitized land services.<br>• Government is committed to robust and inclusive stakeholder engagement throughout the project lifecycle. |

**Responses by the Project Leaders**

Project leaders and government representatives responded to stakeholder concerns and clarified several aspects of the project.

Key responses included:

- The project had been designed to include marginalized and special interest groups, ensuring equitable access to benefits.
- The establishment of the Kenya Mortgage Guarantee Trust would support mortgage accessibility for individuals in the informal sector by reducing lending risks for financial institutions.
- The project would incorporate environmental and social safeguards, including measures to restore livelihoods for communities affected by relocation or redevelopment initiatives.
- Physical planning reforms and legal adjustments would be implemented alongside digitization efforts to ensure coherent and sustainable land management systems.

**MIN 5/05/03/2026: Way Forward**

Following the discussions, several recommendations were made to guide the next phase of project implementation:

a) **Establishment of a Technical Committee**
   A technical committee should be formed to facilitate ongoing stakeholder engagement and provide structured feedback on project activities.

b) **Regular Stakeholder Updates**
   The project implementation team should organize periodic stakeholder briefings to share updates, progress reports, and lessons learned.

c) **Expansion of Digital Land Systems**
   Accelerate mapping initiatives and the development of digital land records to support planning, transparency, and data-driven decision-making.

d) **Strengthening Capacity at County Level**
   Provide technical assistance and training for County Governments to effectively implement planning and land administration reforms.

e) **Enhanced Public Awareness**
   Launch public awareness campaigns to educate citizens on land reforms, housing finance options, and the benefits of digitized land services.

f) **Continued Multi-Stakeholder Collaboration**
   Encourage sustained collaboration between government agencies, financial institutions, development partners, and civil society.

**MIN 6/05/03/2026: Closing Remarks**

In closing, participants were thanked for their active participation and valuable contributions to the discussions. Emphasis was placed on the importance of strong collaboration, transparency, and sustained stakeholder engagement in ensuring the successful implementation of the Housing Finance, Lands and Sustainable Investments (HOFLASI) Project throughout its lifecycle.

Participants were assured that the feedback and recommendations provided during the forum would be carefully considered and incorporated into the project's implementation framework.

The forum adjourned at 3:30 pm with a word of prayer.