

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

GRIEVANCE REDRESS MECHANISM

2026

TITLE:	GRIEVANCE REDRESS MECHANISM		
	DOCUMENT NO.:	KBI-POL-012	
	VERSION:	01	
	EFFECTIVE DATE:	03/09/2026	
	REVIEW DATE:	02/09/2029	

APPROVAL PAGE

	Name	Designation	Signature	Date
Prepared By:	Risper Njue	Safety, Health and Environment Officer		20/08/2026
Reviewed By:	Ferdinand Milliano	Manager, Safety, Health & Environment		20/08/2026
Reviewed By:	Dr. Serah Muteru	General Manager, Regulatory Affairs, Quality and Safety		20/08/2026
Approved By:	Dr. Wesley Ronoh	Chief Executive Officer		20/08/2026

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

TABLE OF CONTENTS

LIST OF TABLES	iv
LIST OF FIGURES	iv
ACRONYMS	v
1 INTRODUCTION	9
2 PURPOSE	11
2.1 Scope	11
3 ROLE AND RESPONSIBILITIES	12
4 CATEGORIES OF COMPLAINTS AND ELIGIBILITY	15
4.1 Objectives of the GRM	16
4.2 Guiding Principles	17
4.3 Disclosure and Awareness of GRM	18
5 GRM PROCESS	19
5.1 Overview of the GRM Process	19
The GRM for the Project shall operate at two levels;	19
5.2 Process of the General Complaint - GRM	19
5.2.1 Step 1 – Receiving And Registering Grievance	19
5.2.2 Step 2 – Acknowledging, Assessing and Assigning Grievance	24
5.2.3 Step 3: Investigating and Development of Resolutions	27
5.2.4 Step 4: Communicating Response and Seeking Agreement	27
5.2.5 Step 5: Implementing Response	30
5.2.6 Step 6: Reviewing Resolution	31
5.2.7 Step 7: Closing Out or Referring Request	32
5.2.8 Step 8: Monitoring and Evaluation	33
5.2.9 Level One: Internal Appeal at Project Implementation Level	40
5.2.10 Level Two: Escalation to the Project Coordination Team (PCT)	41
5.2.11 Level Three: Escalation to the World Bank Group	41
5.2.12 Principles of the Appeal Process	42

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

5.3	Sexual Harassment, Exploitation and Abuse, Gender-Based Violence, and Violence Against Children.....	42
6	DATA PROTECTION	43
7	POLICY REVIEW AND IMPROVEMENT	44

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

LIST OF TABLES

Table 1. Grievance record	20
Table 2. Grievance Database	23
Table 3. Grievance Receipt Acknowledgement Form	24
Table 4. Grievance responsibility assignment	25
Table 5. Grievance Resolution Response form	29
Table 6. Grievance Actions Form	32
Table 7. Grievance close out form	33
Table 8: GRM Process & Description	36

LIST OF FIGURES

Figure 1:GRM flow diagram	39
---------------------------	----

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

ACRONYMS

E&S-Environmental & Social

ESIA-Environmental and Social Impact Assessment

ESMF-Environmental and Social Management Framework

ESMP-Environmental and Social Management Plan

ESS-Environmental Social Standards

GBV-Gender Based Violence

GBVIMS-Gender Based Violence Information Management System

GM-Grievance Mechanism

GRC-Grievance Redress Committee

GRM-Grievance Redress Mechanism

HEPRR-Health Emergency Preparedness, Response and Resilience

PCT-Project Coordinating Team

RP-Responsible Party

SEA-Sexual Exploitation & Abuse

SEP-Stakeholder Engagement Plan

SESP-Social and Environmental Screening Procedure

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

SH-Sexual Harassment

SRM-Stakeholder-Response Mechanism

SMS-Short Message Service

VAC-Violence Against Children

WB-World Bank

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Executive Summary

The Republic of Kenya (the borrower), through the Ministry of Health, is implementing the Health Emergency Preparedness, Response and Resilience Project for Eastern and Southern Africa under Phase I of the Multiphase Programmatic Approach (the Project). The Project is financed by the World Bank (WB) under Financing Agreement No. P180127 and is being implemented with the involvement of the Kenya BioVax Institute Limited (BioVax). Kenya BioVax Institute was incorporated in 2021 with a mandate to manufacture and commercialize specialized health products and technologies, including vaccines and biotherapeutics.

In accordance with the World Bank Environmental and Social Framework (ESF), BioVax is expected to develop a Grievances Redress Mechanism to comply with Environmental and Social Standard 2 (ESS2, ESS4 & ESS 10). BioVax Institute Grievance Redress Mechanism (GRM) has been established to provide a structured and transparent process for receiving, managing, and resolving concerns and complaints that may arise during implementation of the BioVax project and related institutional activities. The project aims to strengthen local vaccine and pharmaceutical manufacturing capacity in Kenya by enhancing infrastructure, technology transfer, institutional systems, and operational capabilities to support sustainable production and access to quality health products. Through these activities, the project interacts with various stakeholders, including employees, contractors, consultants, suppliers, visitors, government agencies, and surrounding communities.

The GRM serves as a formal platform through which stakeholders can raise concerns related to environmental and social issues, labor and working conditions, occupational safety and health matters, project activities, service delivery, and other operational issues. The mechanism ensures that grievances are addressed in a timely, fair, and effective manner while promoting transparency and accountability throughout project implementation. The mechanism is guided by key principles including accessibility, confidentiality, fairness, responsiveness, impartiality, and protection against retaliation. Stakeholders can submit grievances through established channels such as emails, written submissions, telephone communication, suggestion boxes, or direct reporting to designated focal persons. Reported grievances

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

are documented, reviewed, investigated where necessary, and resolved within defined timelines to ensure effective management and

Through this mechanism, Kenya BioVax Institute demonstrates its commitment to responsible institutional governance and effective management of stakeholder concerns while ensuring successful and sustainable project outcomes.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

1 INTRODUCTION

The United Nations Children's Emergency Fund Supply Division (UNICEF-SD) procurement services, through the support of the Global Alliance for Vaccines and Immunization (GAVI), is currently the predominant procurement mechanism of human vaccines for 45 of the 54 countries in Africa, Kenya included. However, since graduating to become a lower-middle income nation in 2017, Kenya is consequently expected to graduate from GAVI support program by 2035. In response, the government, through the Ministry of Health has found it critically important to implement a national strategy that will assure ensure Kenya's long-term sufficiency and sustainability of its immunization program. This eventuality calls for the country to be prepared to either procure or manufacture its own vaccines.

As part of component 1(ii) of the Eastern and Southern Africa (AFE) region Health Emergency Preparedness, Response and Resilience Program (HEPRR) and which is implemented by the Ministry of Health and financed by World Bank, Kenya BioVax Institute Ltd [BioVax] a Kenyan state corporation, incorporated in 2021 with a mandate to manufacture and commercialize specialized health products and technologies, including vaccines and biotherapeutics is developing a 3,024.5m² (32,555.45 sf) 'state-of-the-art' Aseptic "Fill and Finish" Vaccines Manufacturing facility at its existing warehouse at Embakasi, Nairobi, Kenya.

The Project is key in enabling BioVax achieve its overall goal of building its internal capacity for the production and commercialization of human as well as other routine and emergency vaccines, pharmaceutical diagnostics, health products and technologies (HPTs) to ensure Kenya's and East African region long-term sufficiency and sustainability of its immunization agenda and programme.

The proposed Aseptic "Fill and Finish" vaccines manufacturing facility shall be product agnostic, medium sized and shall have the capacity 72 Million vaccines annually with Pentavalent Vaccine (DTwP-HepB-Hib), Pneumococcal conjugate vaccine (PCV13) and Typhoid Conjugate Vaccine

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

(TCV) as the three priority vaccines to be initially manufactured in this proposed facility followed by other vaccines, such as Human Papillomavirus (HPV) and Rotavirus and eventually graduate to other vaccines such as mRNA based vaccines and other Biologicals.

Project implementation may occasionally give rise to concerns, complaints, or grievances related to environmental, social, labor, procurement, and operational matters. A Grievance Redress Mechanism (GRM) is therefore established to provide a structured, transparent, and accessible process for receiving, recording, addressing, and resolving grievances in a timely and fair manner. The GRM serves as an important accountability and risk management tool that promotes transparency, builds trust among stakeholders, and supports effective project implementation.

This document is aligned to the HEPRR project's enhanced GRM that was prepared by the Project Coordination Team at Ministry of Health which is in line with World Bank Environmental and Social Framework (ESF) requirements and shall be implemented throughout the project cycle.

The mechanism does not replace judicial or administrative remedies. Complainants retain the right to access formal legal or administrative channels at any stage of the grievance process.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

2 PURPOSE

2.1 Scope

The GRM applies to all Project activities, and all stakeholders who may be affected by, or have an interest in, BioVax project activities. These stakeholders include project-affected communities and local residents living within or near project areas, as well as BioVax employees, contract workers, consultants, and other individuals engaged directly or indirectly in project implementation. The GRM also applies to suppliers and vendors providing goods and services, government agencies involved in oversight or collaboration, civil society organizations, community leaders, vulnerable and marginalized groups, and members of the public who may raise concerns related to project activities. The mechanism is designed to ensure that all stakeholders, regardless of their role or level of engagement, have access to a fair, transparent, and accessible process for submitting grievances and receiving timely resolutions.

The GRM will address a broad range of grievances that may arise during project implementation. These include environmental concerns such as noise and dust pollution, improper waste management, water contamination, and air quality issues that may affect surrounding communities or project workers. The mechanism will also address social issues, including community disturbances, traffic disruptions, restricted access to public facilities, and concerns related to community health and safety. In addition, Grievances related to labour and working conditions, occupational health and safety, procurement and governance matters, and gender-based violence, including sexual exploitation and abuse and sexual harassment (SEA/SH), may be reported through the established GRM uptake channels. However, once a complaint is identified as relating to SEA/SH, it will be immediately treated as a sensitive grievance and managed through the established SEA/SH Grievance Mechanism (SEA/SH GM) and referral pathway rather than through the standard grievance resolution process.

The case will be assigned a unique reference code and recorded using secure and confidential

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

procedures, with access to identifying information strictly limited to authorized personnel on a need-to-know basis. The identity and personal information of the survivor will not be disclosed without informed consent, except where disclosure is required by applicable law.

The primary response to an SEA/SH complaint will be the safe and confidential referral of the survivor to appropriate medical, psychosocial, legal, and other support services, based on the survivor's needs, wishes, and informed consent.

3 ROLE AND RESPONSIBILITIES

Implementation of the GRM for the Project will be the ultimate responsibility of the E&S focal person and will be supported by the organization and other resource persons. The various roles and responsibilities are as follows:

Responsible person	Roles
E&S Focal Person	i. Coordinate the GRM procedure, management system and recording as per the steps described in the procedure ii. Providing guidance on solutions to complaints and grievances in consultation with the relevant departments and ensure consistency of redress for all grievances received in relation to the Project. iii. Refer SEA/SH cases to the SEA/SH GM system iv. Coordinate the work of investigation of the GRC v. Promote awareness about the GRM to all stakeholders in the project vi. Coordinate with the PCT & WB in the investigation of grievances and the agreement of redress that were directly received or referred.
GRC	GRC Members will be appointed by the BioVax Chief Executive Officer

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Responsible person	Roles
	through an appointment letter attached as an annexure to this document with their roles and responsibilities being to; - Provide summary reports to the PCT (both those received by the Implementation level GRM and directly by WB) with any recommended actions. - Disclose the GRM's work (including case registry, summary reports on individual cases, reports on trends or patterns, and actions taken in response to trends and patterns) to the PCT and to project stakeholders, through periodic reporting (quarterly)
All Responsible Partners and Contractors	- Receive and acknowledge any issue, concern, complaint or grievance from the community, verbally or in writing. They will record the issue and report it to the E&S focal person in compliance with the GRM - Involvement in the investigation of grievances as required depending on the nature and severity of the grievance and as directed by the GRM.
Project Coordinating Team	- Ensure that this GRM procedure is applied through all Project and its Responsible Partners and Contractors' operations and activities - Apply necessary controls to minimise risks that could result in stakeholder grievances. - Review complaints received by the GRM and their outcomes, work with the E&S focal person to identify successes, lessons learned, challenges and trends, and report its assessments to the management.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Responsible person	Roles
	iv. Receive quarterly reports on complaints from the Project Implementation level of the GRM, and collaborate with BioVax to identify successes, challenges, trends and lessons learned in responding to complaints.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

4 CATEGORIES OF COMPLAINTS AND ELIGIBILITY

The management of complaints will follow different paths depending on the type of complaint. There are different categories of complaints, including:

- i. Employment and Labour Issues
- ii. Occupational Safety and Health Complaints
- iii. Sexual Exploitation
- iv. Community Health and Safety Concerns
- v. Environmental Complaints
- vi. Contractor and Supplier Complaints
- vii. Stakeholder Engagement and Communication Issues
- viii. Security Related Complaints
- ix. Corruption and Fraud Allegation
- x. Discrimination and Human Rights Issues
- xi. Administrative and Service Delivery Issues
- xii. Product Complaints

GBV/SHE-A. complaints relate to sexual exploitation and abuse (SEA/SH), sexual violence and violence against children. For this category of complaints, users need to be assured that they will be handled confidentially and without risk to themselves through the project's SEA/SH, GBV VAC action plan reserved to preserve the confidentiality of data processing.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

4.1 Objectives of the GRM

BioVax (GRM) is established to provide a structured, transparent, and accessible process for receiving, assessing, and resolving grievances arising from project implementation. The GRM aims to ensure that stakeholder concerns are addressed in a timely and fair manner while strengthening accountability, improving stakeholder relationships, and enhancing overall project performance. The mechanism also serves as a risk management tool to identify and address potential issues before they escalate into conflicts or disrupt project activities.

The specific objectives of the GRM are to:

- i. Provide accessible, inclusive, and transparent channels for stakeholders to raise concerns, complaints, and feedback related to project activities.
- ii. Ensure timely, fair, and consistent resolution of grievances while protecting complainants from retaliation or discrimination.
- iii. Promote accountability and transparency in project implementation through proper documentation, tracking, and reporting of grievances and their resolution.
- iv. Strengthen stakeholder engagement and trust by facilitating effective communication between project implementers and affected stakeholders, including vulnerable and marginalized groups.
- v. Improve project performance and risk management by identifying recurring issues, preventing escalation of disputes, and ensuring compliance with applicable World Bank requirements, national & international regulations, and institutional policies.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

4.2 Guiding Principles

The guiding principles for GRM are the following:

- i. **Legitimate:** Enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes.
- ii. **Accessible and inclusivity:** Being known to all stakeholder groups for whose use they are intended and providing adequate assistance for those who may face barriers to access.
- iii. **Predictable:** Providing a clear and known procedure with an indicative timeframe for each stage, and clarity on the types of process and outcome available and means of monitoring implementation.
- iv. **Equitable:** Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms.
- v. **Confidentiality:** Commitment to protect the identity, personal information and details shared by individuals who submit grievances
- vi. **Transparent:** Keeping parties to a grievance informed about its progress and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake.
- vii. **Rights compatible:** Outcomes are consistent with applicable national and internationally recognized rights.
- viii. **Efficiency:** This GRM will have the ability to handle and resolve grievances in a timely, organized and resource efficient manner while ensuring fair and quality outcomes.
- ix. **Feedback:** This GRM is obliged to keep complainants informed throughout the grievance handling process, communicate outcomes clearly and respectfully.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

4.3 Disclosure and Awareness of GRM

BioVax shall implement a structured communication strategy to ensure that the GRM is widely known, easily understood, and accessible to all stakeholders throughout the project lifecycle as stipulated in the Stakeholder Engagement Plan (SEP). Information about the GRM will be disclosed through multiple channels to reach diverse stakeholder groups. These will include community meetings, stakeholder engagement forums, public barazas, project launch events, and routine engagement activities. Printed materials such as posters, brochures, and flyers will be displayed at strategic locations including project site, local administration offices, health facilities, and other public areas. In addition, the GRM details will be published on the BioVax website and shared through digital platforms where applicable.

To ensure inclusiveness, GRM information will be communicated in languages that are easily understood by local communities, and where literacy levels are low, information will be disseminated through oral communication and community sensitization forums. Special attention will be given to ensuring that vulnerable and marginalized groups, including persons with disabilities, women, and minority communities, are adequately reached through tailored communication approaches.

All project workers, including contractors and subcontractors, will be sensitized on the GRM during induction and periodic training sessions to ensure they understand how to report grievances and their responsibilities within the mechanism.

The effectiveness of GRM awareness activities will be periodically assessed through stakeholder feedback and monitoring of grievance uptake levels, and improvements will be made where necessary.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

5 GRM PROCESS

5.1 Overview of the GRM Process

The GRM for the Project shall operate at two levels;

- i. Project Coordination Team (PCT) level, which shall provide oversight, review, and escalation support for grievances that are not satisfactorily resolved at the Project Management level. The PCT shall also monitor the effectiveness of the GRM, identify recurring issues, and ensure that corrective actions are implemented to prevent future occurrences.
- ii. Project Implementing level, under the overall direction and oversight of the Chief Executive Officer (CEO) of BioVax. This level shall be responsible for receiving, recording, assessing, and resolving grievances raised by stakeholders in relation to project activities, contractors, workers, and community interactions.

As a result of this two-tier grievance management structure, complainants may raise grievances at any time through the following channels:

- i. The PCT, particularly in cases requiring escalation, review, or additional intervention.
- ii. The Project GRM managed by BioVax or the Ministry of Health (MoH).

5.2 Process of the General Complaint - GRM

The following process will be followed to address and resolve a grievance:

5.2.1 Step 1 – Receiving And Registering Grievance

A grievance shall be received at BioVax and shall be forwarded to the E&S focal person. Grievances will be submitted through:

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

The contact details for logging in the GRM are as shown below:

Kenya BioVax Institute,

KWFT Center, Upperhill

OR

Rd.to KQ Pride Centre

P.O. Box 40779-00100 Nairobi.

Telephone: +254775751639

Email: grievances@biovox.go.ke

All grievances shall be logged using the Grievance Form below:

Table 1. Grievance record (To be filled by complainant or on behalf of complainant)

Grievance Record			
Reference No:			
(Official Use Only)			
Anonymous	☐ Yes	☐ No	
Full Name			
Gender	☐ Male	☐ Female	☐ Other
Age			

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Contact Information:	Area of Residence		
	Telephone:		
	Email:		
Preferred contact method	☐ Letter	☐ Telephone	☐ Email
Preferred language for communication			
Grievance Description			
Description of Grievance or Incident <i>(What happened? Where did it happen? Who did it happen to? What is the result of the problem?)</i>			
Date of Incident/ Grievance			
Nature of Incident/ Grievance (tick one and include date)	☐ One time incident/ grievance (Date _____)		
	☐ Incident/ grievance happened more than once (Date _____)		
	☐ On-going incident/ grievance (Date _____)		

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

What would you like to see happen to resolve the problem?	
Additional Comments:	

The ES focal person will log, document and track all responses received within the secure grievances database below. Grievances shall be assigned a case number and records of communication/consultation shall all be attached with the relevant entry and filed. The database shall be monitored regularly for recurring responses so that appropriate mitigation can be developed. As a minimum, the following information shall be recorded:

- i. Case number.
- ii. Complainant's name and contact details.
- iii. Date of complaint.
- iv. Details of complaint.
- v. Resolutions discussed and agreed with the party(ies) in question.
- vi. Actions implemented (including dates); and

Outcome of the actions implemented.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	
	REVIEW DATE:	

Table 2. Grievance Database

Case Number	Date Complaint	Recipient	Complainant (Name and Contacts)	Description of Grievance	Priority	Resolution Discussed	Actions Implemented (with dates)	Person Responsible	Status (open/closed) Outcome actions	Finding	Resolution	Date of Sign-off	Additional Comments / Follow up

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

5.2.2 Step 2 – Acknowledging, Assessing and Assigning Grievance

i. Acknowledgement of the grievance

The ES focal person shall acknowledge receipt of any grievance as soon as possible, but within 48 hrs (2 days) from the date it was submitted. Once received and acknowledged the grievances will be categorized based on the categories outlined in section (4) of this document. The complainant whose address is known shall be informed about the timeframe in which a response can be expected. A Response Receipt Form below shall be signed and a copy provided to the complainant.

Table 3. Grievance Receipt Acknowledgement Form

(To be sent/delivered to complainant to acknowledge grievance received)

Grievance Receipt Form	
Grievance Number:	
Date Submitted:	
Target Date for initial meeting to address grievance:	
Name:	
Address and Contact Details:	
Grievance Received by:	
Name of Grievance Responsible Person	
Contact Details of Grievance Responsible Person	Telephone: Email:

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

	Address:
Comments	

Additional considerations on acknowledging grievances: Literacy levels should be taken into consideration when providing the complainant with the acknowledgement of receipt, and verbal acknowledgement should accompany a written acknowledgement.

ii. Assigning grievances

The GRC chairperson will convene a Grievance Redress Committee which shall be composed of the Project focal person, E&S focal person, Human Resource personnel and any other person that is deemed necessary. The team will assign organisational responsibility for formulating a response. The ES focal person has the responsibility for coordinating the Project's response to a grievance.

Table 4. Grievance responsibility assignment

Grievance Record (Official Use)			
Grievance Number			
Date Submitted			
Target Date for Resolution			
Full Name:			
Address and contact			

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

details:		
Grievance received by:		
Name of Grievance Responsible Person:		
Description of Grievance:		
Assessment of Grievance Level:		
Assign Responsibility		
Notification to PCT	☐ Yes	☐ No

The progress on process should be logged in the Grievance Database.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

5.2.3 Step 3: Investigating and Development of Resolutions

The Grievance Redress Committee will, within two (2) working days of commencing the investigation, obtain as much information as possible from the person who received the complaint and, where appropriate, from the complainant, to gain a first-hand understanding of the grievance. Where the grievance is complex and requires additional time to investigate, the complainant will be informed of the progress and the expected timeframe for completion. The committee will:

- i. Analyse the problem.
- ii. Conduct necessary investigations and evaluations.
- iii. Undertake a site visit, if required, to clarify the parties and issues involved.
- iv. Gather the views of other stakeholders, including project employees, if necessary and identify initial options for settlement that parties have considered.

If the grievance concerns physical damage (e.g., crops, house, community asset) take a photograph of the damage and record the exact location as accurately as possible.

The GRC will explore potential solutions and mobilize additional resource persons as necessary to propose a resolution to the grievance. The Chairperson to the GRC will be responsible for coordinating the process and convening meetings.

5.2.4 Step 4: Communicating Response and Seeking Agreement

The ES Focal Person shall provide feedback to the complainant at each stage of the grievance resolution process and keep the complainant informed of the progress of the grievance. Following the investigation, the E&S Focal Person shall develop a proposed resolution and communicate it to all relevant parties, including through a written response to the complainant. The proposed resolution and written response shall be provided within a maximum of twenty-one (21) working days from receipt of the complaint, unless the grievance is complex and requires additional time.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

In such cases, the complainant shall be informed of the reasons for the delay and the expected timeframe for resolution.

Upon receipt of the proposed resolution, the complainant will be asked to approve or disapprove the suggested actions, so that the complaint can be closed or considered for further investigation/mediation.

The response shall be in writing, in language that is easily accessible to the complainant. The ES focal person may also contact the complainant by telephone or set up a meeting to review and discuss the proposed response.

The proposed response shall include:

- i. A clear restatement of the complainants' concerns.
- ii. A detailed description of the proposed response, with an explanation of why it has been proposed so.
- iii. A listing of the complainant's choices, given the proposed response. (Those choices may include, among others: agreement to proceed; a referral decision, or a plan for compliance review; further dialogue on a proposed action; or participation in a proposed assessment and engagement process or any other) Referral channels may include escalation to BioVax management, the Project Coordination Team (PCT), the World Bank, the established SEA/SH Grievance Mechanism and referral pathway for SEA/SH-related complaints, or the relevant government regulatory, administrative, or judicial authority where the matter falls within its mandate or requires external intervention.
- iv. The expected timeframe for resolution aiming to resolve any grievances within 21 days.

The following template is populated by the ES focal person and sent to the complainant to seek agreement and continue with resolution.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Table 5. Grievance Resolution Response form

Grievance Resolution Response	
Grievance Number:	
Date of Communication:	
Name of Complainant:	
Restatement of Grievance/ Concern	
Proposed Solution/Response	Proposed Solution:
	Explanation:
List of choices for moving forward	1. Agreement to proceed with above solution. 2. Request for a review of a decision,

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

	3. A referral decision, or 4. A plan for compliance review. 5. Further dialogue on a proposed action. 6. Request participation in a proposed assessment and engagement process 7. Other to be suggested by complainant
Target Date for Resolution	(28 days from receipt of grievance)
Grievance Received by:	
Name of Grievance Responsible Person	
Contact Details of Grievance Responsible	Telephone: Email: Address:

5.2.5 Step 5: Implementing Response

The complainant may or may not agree with the proposed response. If there is agreement, then the E&S focal person will proceed with the proposed response. Actions agreed upon during mediation will be implemented in a timely manner.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

The progress shall be logged in the Grievance Database **Table 2**. E&S focal person is responsible for overseeing the implementation of agreed actions to resolve the complaint.

5.2.6 Step 6: Reviewing Resolution

The E&S focal person and the stakeholders shall monitor implementation jointly. Where implementation of agreements reached is a multi-step process, and there is some implementation risk, the E&S focal person shall seek commitments from all stakeholders to “come back to the table” when needed to deal with challenges during implementation.

The E&S focal person shall populate the template below, in line with agreed response on a given grievance and monitor progress.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Table 6. Grievance Actions Form

Actions to Resolve Grievance (Official Use)			
Delegated to:			
Action	Who	When	Completed (Y/N)
Strategy to communicate response:			
Response/ Resolution:			
Sign-Off:			
Date:			

5.2.7 Step 7: Closing Out or Referring Request

If the response is successfully implemented, the E&S focal person shall document the satisfactory resolution. In cases where there have been major risks, impacts and/or negative publicity, it may be appropriate to include written documentation from the complainant indicating satisfaction with the response. In others, the E&S focal person shall note the action taken and that the response was satisfactory to the complainant and the organization. Once sign-off has occurred, this shall be recorded in the Grievance database Log.

If the grievance has not been resolved, the E&S focal person shall document steps taken, communication with the complainant (and other stakeholders if there has been substantial effort to initiate or complete a multi-stakeholder process), and refer the grievance to the PCT. The E&S focal person shall document the outcome of the discussions with the complainant in a way that makes clear what options were offered through the GRM and why the complainant chose not to

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

pursue them.

To be completed by the E&S focal person once all actions agreed upon have been completed

Table 7. Grievance close out form

Conclusion					
Is complainant Satisfied?	☐ Yes	☐ No	Comments from GRC Chairperson:		
Is Grievance Closed?	☐ Yes	☐ No	Grievance Resubmitted?	☐ Yes	☐ No
Time Taken	☐ Within 28 Days	☐ Beyond 28 Days	Comments		
Signature of GRC Chairperson			Date:		
New Grievance Number:			Date:		

5.2.8 Step 8: Monitoring and Evaluation

BioVax will monitor grievances routinely as part of the broader management of the Project. Monitoring may be as simple as a telephone call and discussions with the complainant to confirm that a relatively straightforward response has been fully implemented. Effective monitoring of the GRM may require periodic meetings involving relevant BioVax representatives, the Project

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Coordination Team (PCT), and other relevant stakeholders, as appropriate, to review the implementation of grievance management commitments, assess emerging issues, and identify areas for improvement. Where a grievance relates to a specific stakeholder group or requires their participation in monitoring or resolution, appropriate representatives of that group may be involved, subject to the nature of the grievance and the principles of confidentiality and informed participation. Grievance records will be always made available to the PCT.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Quarterly internal reports will be compiled by the E&S focal person and forwarded to the Senior management team. These grievance reports will also be included in the quarterly progress reports and will include:

- i. The number of grievances logged.
- ii. The number of grievances of the same or similar issue.
- iii. Number and percentage of complaints resolved within the stipulated time frame
- iv. Number and percentage of complainant satisfied with complaint handling process
- v. Number and percentage of complainants satisfied with actions taken

These reports and other records will be made available for external review if required. Grievance reporting will be part of the annual reporting.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Table 8: GRM Process & Description

Process	Description	Time Limit
Step 1: Receive grievance	i. Email: grievances@biovax.go.ke ii. Telephone- SMS, Calls, WhatsApp: +254775751639 iii. Postal box: 40779-00100 Nairobi. iv. Presented verbally Complaints box located at Kenya BioVax Institute, KWFT Center, Upperhill OR Rd.to KQ Pride Centre v. Website: www.biovax.go.ke vi. Social Media: X(Twitter): @BioVaxInstitute Instagram: @kenyabiovaxinstitutelimited Facebook: Kenya BioVax Institute Limited	7 working days

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Process	Description	Time Limit
	vii. QR codes viii. Client feedback forms ix. Completed and Submitted Complaint Form (online or in person or on behalf of complainant) x. Community complaints or protests (verbal and non-verbal), including signs or road blocks.	
Step 2: Acknowledge, Assess and Assign Grievance Significance	i. Register grievance ii. Assess eligibility iii. Log grievance on system with a number for tracking iv. Communicate receipt of grievance	
Step 3: Develop a Response	i. Develop an appropriate response and identify resolution depending on the significance	
Step 4: Communicate Response and Seek Agreement	i. Investigate and consult with relevant parties to fully understand issues and implement actions agreed upon ii. Communicate response back to the complainant	21 days (from acknowledgement of receipt)

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Process	Description	Time Limit
	iii. Agree on the proposed way forward to resolve grievance	
Step 5: Implement Resolution	i. Where agreement is met, move forward with proposed action ii. Monitor success of resolution	
Step 6: Review Response	i. Communicate results of the resolution to the stakeholders ii. Identify if further action is required	
Step 7: Close Out or Refer Request	i. Close out the grievance if the response is successful ii. Where unsuccessful, refer the grievance to the Project Assurance	
Step 8: Monitoring and Evaluation	i. Monitor ongoing success of the resolution ii. Results and to be included in project monitoring processes	ongoing

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Grievance management process flow

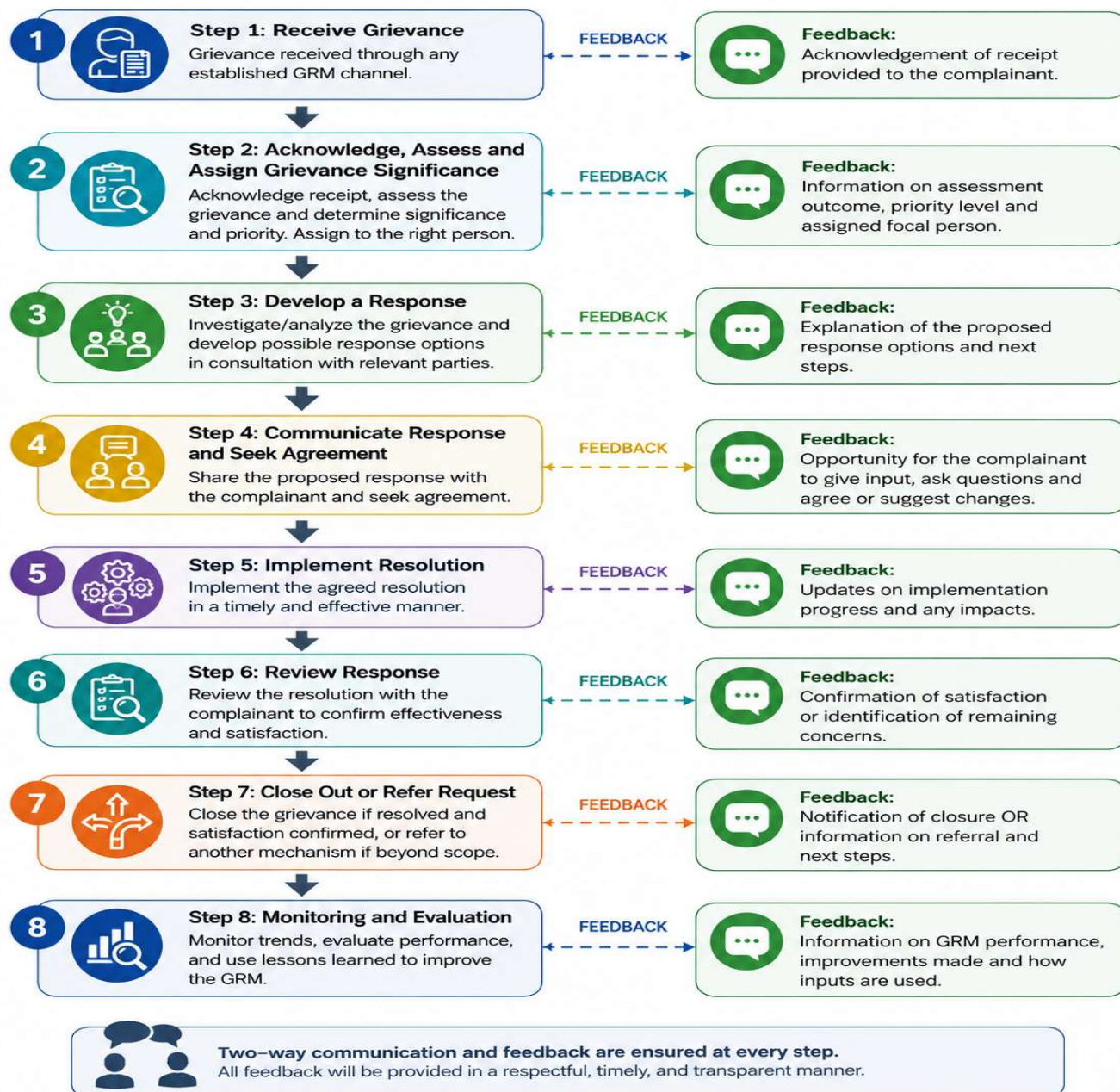


Figure 1: GRM flow diagram

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

The GRM provides complainants with the right to appeal or escalate their grievance where they are not satisfied with the response provided at the Project Implementation level, or where they believe that the grievance has not been handled fairly, adequately, or within the established timelines. The appeal process ensures transparency, accountability, and fairness while providing complainants with additional avenues for redress.

5.2.9 Level One: Internal Appeal at Project Implementation Level

Where a complainant is dissatisfied with the initial response, proposed resolution, or outcome of the grievance, they may submit an appeal at the Project Implementation level for review. The appeal shall clearly state the reasons for dissatisfaction and may provide additional information or evidence to support reconsideration of the complaint.

Upon receipt of the appeal, the E&S focal person shall review the case together with the GRC and relevant departments to reassess the grievance and determine whether further action, investigation, or adjustment of the proposed resolution is necessary. The complainant shall be informed of the outcome of the appeal within a reasonable timeframe, not exceeding fourteen (14) working days.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

5.2.10 Level Two: Escalation to the Project Coordination Team (PCT)

If the complainant remains dissatisfied after the internal appeal at the Project Implementation level, the grievance may be escalated to the PCT. The PCT shall serve as the second level of review and provide independent oversight of the grievance handling process.

The PCT shall review all documentation related to the grievance, assess whether due process was followed, and determine whether the response provided was fair, reasonable, and in compliance with project procedures and applicable safeguards requirements. The PCT may engage with the complainant, project management, contractors, and other relevant stakeholders to facilitate resolution. Where necessary, the PCT may recommend corrective actions, mediation, additional investigations, or referral to specialized bodies depending on the nature of the complaint.

5.2.11 Level Three: Escalation to the World Bank Group

Complainants who are not satisfied with the outcome of the Project Implementation GRM and the Project Coordination Team review, or who are concerned about an adverse response, may further escalate their complaint to the World Bank Group through the World Bank's corporate grievance mechanisms.

Complaints may be submitted to the World Bank Grievance Redress Service (GRS), which ensures that project-related complaints are promptly reviewed and addressed by the World Bank. The GRS provides an avenue for communities and individuals who believe they are adversely affected by a World Bank-supported project to raise their concerns directly with the Bank.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

Complainants may also submit their concerns to the World Bank for people who believe they have been or are likely to be adversely affected by a World Bank-funded project due to non-compliance with the operational policies and procedures. Complaints submitted to the World Bank Group shall be handled in accordance with the Bank's established procedures, policies, and timelines. Submission of a complaint to the World Bank does not prevent the complainant from pursuing available national legal or administrative remedies.

5.2.12 Principles of the Appeal Process

The appeal and escalation process shall be guided by the principles of fairness, confidentiality, transparency, non-retaliation, and accessibility. All complainants shall be informed of their right to appeal and the available escalation channels at every stage of grievance handling. The process shall ensure that no complainant is disadvantaged or victimized for seeking further review of their grievance.

5.3 Sexual Harassment, Exploitation and Abuse, Gender-Based Violence, and Violence Against Children

Grievances relating to Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV), and Violence Against Children (VAC) may be received through any of the established GRM channels. Such grievances shall be handled with strict confidentiality, sensitivity, and in accordance with a survivor-centred and child-sensitive approach. Upon receipt, the grievance shall be promptly referred to the designated focal person(s) and managed in accordance with the applicable SH/SEA/GBV and VAC Action Plans, including appropriate referral to available support and response services where required. The GRM shall not undertake investigations or mediation that could compromise the safety, privacy, dignity, or rights of the survivor or child. Information relating to such cases shall be restricted to authorized personnel and reported only in a manner that protects the identity and confidentiality of the affected person.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

6 DATA PROTECTION

BioVax recognizes the importance of protecting personal and sensitive information collected through the GRM. All grievance-related data shall be handled with strict confidentiality and in compliance with the applicable legal and regulatory framework, including the Kenya Data Protection Act 2019.

Personal information collected during the grievance process, including names, contact details, and details of the complaint, shall only be used for the purpose of grievance resolution. Such information will not be disclosed to unauthorized persons without the consent of the complainant, except where required by law.

All grievance records shall be stored securely in both electronic and, where necessary, physical formats. Access to grievance data will be restricted to authorized personnel such as the E&S focal person and designated members of the GRC. Appropriate security measures, including password protection, controlled access systems, and secure storage facilities, will be implemented to prevent unauthorized access, loss, or misuse of information.

For sensitive grievances, particularly those related to GBV/SEA/SH, additional confidentiality safeguards will be applied. Information related to such cases will be handled on a strictly need-to-know basis and managed in a manner that protects the dignity, privacy, and safety of the complainant.

In reporting GRM performance, all data will be anonymized to ensure that individual complainants cannot be identified. Aggregated data will be used for monitoring, evaluation, and reporting purposes.

TITLE:	GRIEVANCE REDRESS MECHANISM	
	DOCUMENT NO.:	KBI-POL-012
	VERSION:	01
	EFFECTIVE DATE:	03/09/2026
	REVIEW DATE:	02/09/2029

7 POLICY REVIEW AND IMPROVEMENT

This policy shall be reviewed every 3 years and updated as necessary to incorporate changes in regulations, operations, and best practices.

Document Version No.	Current status	Proposed changes	Effective date of the changes
01	New document	New document	03/09/2026