

INSTITUTIONAL ASSESSMENT REPORT

of

Kenya Forest Service (KFS) & Kenya Wildlife Service (KWS)

for

Kenya Watershed Services Improvement Project (KEWASIP)

Date: 24 October 2025

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Changelog

V1.0	02 September 2025	First draft Inception Report submitted.
V1.1	08 September 2025	Feedback incorporated. Submitted final Inception Report for submission to NPCU.
V1.0	16 September 2025	Submission of work plan to share with NPCU
V1.0	08 October 2025	Submission of first draft report
V1.2	24 October 2025	Submission of second draft report incorporating feedback.
V1.3	01 December 2025	Submission of third draft report incorporating feedback

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Acronyms & Abbreviations

AAR	After-Action Review
CBO	Community-Based Organisation
CCF	Chief Conservator of Forests
CFA	Community Forest Association
CHS	Community Health and Safety
CIDP	County Integrated Development Plan
CIG	Common Interest Group
CoC	Code of Conduct
CoG	Council of Governors
CPCU	County Project Coordination Unit
CPSC	County Project Steering Committee
CPTAC	County Project Technical and Advisory Committee
DCI	Directorate of Criminal Investigations
DRSRS	Directorate of Resource Surveys and Remote Sensing
DG	Director General
E&S	Environmental and Social
EACC	Ethics and Anti-Corruption Commission
ECMA	Environmental Management and Co-ordination Act
EIDO	Essential / Important / Desirable / Optional
EMCA	Environmental Management and Co-Ordination Act
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework

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ESMP	Environmental and Social Management Plan
ESRS	Environmental and Social Review Summary
FCMA	Forest Conservation and Management Act
FGD	Focus Group Discussion
FOLEA	Forest Law Enforcement Academy
FPIC	Free, Prior and Informed Consent
FPPR	Forest Protection Patrol Register
GBV	Gender-Based Violence
GHG	Greenhouse Gas
GoK	Government of Kenya
GRM	Grievance Redress Mechanism
GPS	Global Positioning System
GRM	Grievance Redress Mechanism
HRBA	Human Rights-Based Approach
HRW	Human Rights Watch
HWC	Human-Wildlife Conflict
IPs	Indigenous Peoples
IPOA	Independent Policing Oversight Authority
IPPF	Indigenous Peoples Planning Framework
IPT	Investment Prioritization Tool
IRF	International Ranger Federation
IUCN	International Union for Conservation of Nature
KCCA	Kenya Civil Aviation Authority
KDF	Kenya Defence Forces
KEFRI	Kenya Forestry Research Institute

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KEWASIP	Kenya Watershed Services Improvement Project
KFS	Kenya Forest Service
KII	Key Informant Interview
KURA	Kenya Urban Roads Authority
KWS	Kenya Wildlife Service
LE	Law Enforcement
M&E	Monitoring and Evaluation
MIS	Management Information System
MoECCF	Ministry of Environment, Climate Change and Forestry
MoU	Memorandum of Understanding
MRV	Monitoring, Reporting and Verification
NEMA	National Environment Management Authority
NETFUND	National Environment Trust Fund
NIS	National Intelligence Service
NLERS	National Landscape and Ecosystems Restoration Strategy
NPCU	National Project Coordination Unit
NPS	National Police Service
NPSC	National Project Steering Committee
NTAC	National Project Technical Advisory Committee
OB	Occurrence Book
ODPP	Office of the Director of Public Prosecutions
OHS	Occupational Health and Safety
PA	Protected Area
PAC	Problem Animal Control
PAD	Project Appraisal Document

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PDO	Project Development Objective
PELIS	Plantation Establishment and Livelihood Improvement Scheme
PFMP	Participatory Forest Management Plan
PPE	Personal Protective Equipment
PWDs	Persons with Disabilities
ROE	Rules of Engagement
SCMP	Sub-Catchment Management Plan
SDF	State Department for Forestry
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SLA	Service Level Agreement
SLWM	Sustainable Land and Watershed Management
SMART	Spatial Monitoring and Reporting Tool
SMP	Security Management Plan
SOP	Standard Operating Procedure
SRA	Security Risk Assessment
TECC	Tactical Emergency Casualty Care
TELIS	Tree Establishment and Livelihood Improvement Scheme
ToR	Terms of Reference
UN	United Nations
UoF	Use of Force
USSD	Unstructured Supplementary Service Data
VMGs	Vulnerable and Marginalized Groups
VGMF	Vulnerable and Marginalised Groups Framework
WB	World Bank

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WCMA Wildlife Conservation and Management Act

WRA Water Resources Authority

WRUA Water Resource Users Association

Executive Summary

- 1. Purpose & scope.** This institutional assessment reviews the Kenya Wildlife Service (KWS) and Kenya Forest Service (KFS) as implementing partners for KEWASIP. It examines mandate and chain of command, law-enforcement practice and use of force (UoF), the interface with community livelihoods, grievance redress mechanisms (GRM)¹³, human resources and training, and alignment with World Bank ESF and international good practice. Field evidence draws on key-informant interviews and focus groups in Nyambene/Meru, Kibwezi–Chyulu Hills, and Marsabit, complemented by a targeted media scan (2014–2025) and document review.
- 2. How enforcement affects livelihoods.** Rules on access (fees, zones, timings) are generally clear on paper, but uneven in practice. Where stations publish fee calendars, map grazing/water zones, and co-manage access with Community Forest Associations (CFAs), livelihoods stabilise, and conflict falls. Where information is ambiguous or changes abruptly, especially during droughts, households face income shocks (e.g., firewood collections, night-time cultural access, medicinal harvesting). Insecurity (notably Marsabit) hardens postures and heightens escalation risk despite stated Human Rights-Based Approach (HRBA) intent.
- 3. Mandate, governance, and capacity.** Both Services operate disciplined, uniformed cadres with clear command lines and lawful powers for patrol, arrest, and seizure. Joint operations with the National Police Service (NPS) are common because of the combination of the legal requirements for charge and detention that lie exclusively with the National Police Service and the close coordination between the NPS and KWS and KFS¹⁴. However, refresher training (HRBA/de-escalation, evidence handling, firearms) is irregular; after-action learning is inconsistent; and first-mile interactions are variable because CFA scouts which are often the public's first contact, rarely receive standard HRBA/GRM intake training. Remote posts experience thin coverage and uneven duty-of-care (PPE, radios, trauma kits), with gendered facility gaps affecting deployment.

Grievance Redress Mechanism: current state and gap. Communities use many “front doors” (chiefs, boxes, phone/WhatsApp, CFA committees), but there is no single,

trackable system. Many stations lack custody controls for boxes, unique ticket IDs, service levels, or feedback loops. Awareness of a KEWASIP-specific mechanism is low; fear of retaliation depresses reporting in high-risk areas. A minimum-viable GRM is proposed: multi-channel intake (toll-free/USSD, WhatsApp/SMS, dual-key boxes, desk), unique case IDs, and time-bound SLAs that acknowledge $\leq 72h$, investigate $\leq 14d$, decide $\leq 30d$, plus quarterly dashboards.

Media and social-media signals. Historic forest evictions (Embobut, Mau) show serious rights concerns and reputational risk; wildlife–pastoralist flashpoints occasionally turn fatal (e.g., Tsavo East 2024). Positive systems are also visible: statutory Human Wildlife Conflict compensation and the National Human-Wildlife Coexistence Strategy. These underscore the need for predictable prevention, remedy, and transparent communication.

Gap to ESF and international standards. Compared with the UN Basic Principles^{11,12}, the World Bank ESF (ESS1/4/5/7/10) the WB Good Practice Note on Security Personnel¹¹ and International Ranger Federation code of conduct¹⁸, material gaps are: (i) no single public UoF policy and pocket rules-of-engagement card; (ii) uneven refresher cadence and firearms re-qualification; (iii) non-standard force-incident reporting and weak central data; (iv) fragmented, low-trust GRM with multiple entry points, limited tracking and weak feedback to complainants without IDs/SLAs/appeals¹³; and (v) incomplete MoUs/ROE for joint operations.¹

Material risks (ESF lens).

- **ESS1 – Assessment & Management:** High. Incomplete security risk management and inconsistent UoF controls; fragmented HR/training data.
- **ESS4 – Community Health & Safety:** High. Escalation and injury risks in operations²; HWC tensions when Problem Animal Control (PAC) response is unpredictable.
- **ESS5 – Land & Restrictions on Land Use:** High. Access restrictions/evictions related to infringements around agreed harvesting restrictions inside protected areas or forest management zones without robust safeguards⁶ generate livelihood shocks.
- **ESS7 – IPs/VMGs:** High. Cultural and subsistence access (shrines/medicinal plants, pastoral mobility) constrained without tailored protocols that are clearly communicated to the community.
- **ESS10 – Stakeholder Engagement & Disclosure:** High. Dispersed channels, low feedback; limited transparency on security arrangements. There is a high level of awareness around the importance and benefits of effective stakeholder

engagement among both KWS and KFS management, but this not always translate into effective action,

What KEWASIP should do now (EIDO).

Essential (0–90 days):

1. Launch the KEWASIP-branded, multi-channel GRM with ticket IDs and SLAs; publish quarterly “you said—we did” dashboards.
2. Issue a single UoF policy and pocket card aligned to UN principles; require first aid and standard force-incident forms after any use of force.
3. Begin annual HRBA/de-escalation refreshers for field supervisors and CFA scouts; restart 6–12-month firearms re-qualification.
4. Complete site SRAs and short Security Management Plans; sign MoUs with police on ROE, vetting, and incident follow-up.
5. Ensure every post meets a basic duty-of-care standard (minimum PPE, radios, trauma kits), with clear minimum coverage levels and back-up plans when equipment is unavailable.

Important (≤6 months):

- Define PAC (HWC) service levels; target fence repairs and ensure corridors are functional accelerate compensation clinics for resolving currently slow resolution of HWC.
- Publish user-rights calendars (fees, zones, timings) and VMG waiver guidance at stations/barazas; participatory forest management zone maps.
- Standardise after-action reviews and a central incident database; pilot event-ID/body-worn capture for high-risk arrests.

Desirable/Optional:

- Conflict-sensitive patrol scheduling and third-party hotlines for reporting HWC and supporting the GRM process in high-risk zones; gendered facility upgrades to enable mixed deployments.

Results to expect. Implementing these measures will reduce escalation and livelihood friction, improve procedural trust, and move KWS/KFS toward ESF and international good practice. In the first 90 days, success should be visible in SLA-compliant GRM performance, published access calendars, re-established training recency, and signed

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joint-ops MoUs—laying a credible foundation for KEWASIP delivery in sensitive landscapes.

1.0 Introduction & Background

1.1 Project context and PDO

Project context. The Kenya Watershed Services Improvement Project (KEWASIP) is a national, investment-project-financed operation led by the Ministry of Environment, Climate Change and Forestry (MoECCF) to restore degraded landscapes, improve watershed services, and strengthen climate resilience and livelihoods. It supports a subset of the Government’s National Landscape and Ecosystems Restoration Strategy (NLERS) through three results areas: (i) strengthened watershed planning, governance and monitoring; (ii) watershed services and landscape restoration on private/communal lands; and (iii) public land management and restoration (including protected areas).

KEWASIP prioritizes five watershed landscapes: Mount Marsabit, Marmanet, Nyambene, Chyulu Hills, and Shimba Hills. These areas cover 12 counties (Garissa, Isiolo, Kitui, Kwale, Laikipia, Marsabit, Makueni, Meru, Baringo, Tharaka Nithi, Samburu, and Tana River). Site selection is guided by land-degradation and erosion risk, vegetation condition, potential beneficiaries, conservation priorities, and implementation cost-effectiveness.

The project uses a watershed approach for integrated planning and management, narrowing from national water towers to priority sub-basins. An initial list of ~90 candidate watersheds and 44 gazetted forests has been identified. The final investment list will be confirmed after baseline assessment and application of an Investment Prioritization Tool (IPT). The design emphasizes participatory planning and local capacity, leveraging community knowledge to manage Sustainable Land and Watershed Management (SLWM) trade-offs and diversify livelihoods, with improved information sharing and local financing to sustain results.

Implementation is anchored in MoECCF with coordination across technical agencies, including the State Departments of Forestry, Environment, Water, Agriculture, Irrigation and Wildlife, KFS, KWS, WRA and others. Total project cost is US\$200 million.

The Project Development Objective (PDO) is to expand the area under sustainable land and watershed management and to improve livelihoods of communities in the project areas.

Key expected results (PDO indicators).

- **Improved watershed management:** Hectares of terrestrial and aquatic areas under enhanced conservation and management, including private/community lands under SLWM and rehabilitation of degraded public lands.
- **Climate co-benefits:** Net reduction in annual GHG emissions.
- **Livelihoods and resilience:** Beneficiaries—especially women—demonstrate improved climate resilience by adopting SLWM practices and taking part in diversified livelihood activities.

1.2 Institutional arrangements

Executing and coordinating agencies (national level). The Ministry of Environment, Climate Change and Forestry (MoECCF), through the State Department for Forestry (SDF), is the executing agency. A National Project Coordination Unit (NPCU) housed in SDF manages day-to-day coordination, national-level implementation, and monitoring, reporting and verification (MRV). Strategic oversight is provided by a National Project Steering Committee (NPSC), with technical guidance from a National Project Technical Advisory Committee (NTAC).

NPCU core functions. The NPCU leads fiduciary management, safeguards coordination, and M&E reporting; it reviews and approves county workplans and consolidates results. It also: (i) provides E&S oversight and quality control; (ii) reviews E&S screening and instruments (ESMPs/ESIAs); (iii) compiles E&S progress and reports to the World Bank; (iv) trains national/county staff and contractors; (v) embeds E&S provisions in bidding/contract documents; (vi) manages the project GRM and incident reporting (incl. SEA/SH); and (vii) commissions mid-term and closeout E&S audits. Capacity is being strengthened through seconded specialists (environment and social) and planned recruitment (GBV and OHS), with dedicated budget for national and county focal points.

County-level structures. In each participating county, a County Project Steering Committee (CPSC) provides oversight and policy direction; a County Project Technical and Advisory Committee (CPTAC) provides technical advice; and a County Project Coordination Unit (CPCU) which is staffed mainly by county officers and leads day-to-day execution, consolidation of plans, and county-level monitoring. CPTACs comprise technical officers from KFS, KWS, NEMA, WRA, KEFRI, and county departments. The NPCU

reviews CPCU workplans and coordinates across counties to ensure participatory plans are integrated and complementary.

Community-level delivery and platforms. Implementation at the grassroots is undertaken with Common Interest Groups (CIGs) and other CBOs, working alongside existing structures like Community Forest Associations (CFAs), Water Resource Users Associations (WRUAs), and conservancies. Community planning instruments (integrated SLM plans, hydroshed and micro-catchment action plans) are aligned with statutory county plans (CIDPs, spatial plans) and sector plans (e.g., Participatory Forest Management Plans (PFMPs) ¹⁵, Sub-Catchment Management Plan (SCMPs)).

Implementing agencies with enforcement mandates. KFS and KWS are key implementing agencies for public land restoration and protected area management. Given their law-enforcement roles, KEWASIP includes institutional assessments and targeted capacity measures to align codes of conduct, use-of-force protocols, human-rights training, and community engagement with international good practice and the World Bank ESF.

Cross-agency coordination. The project coordinates with national technical entities including the State Departments for Environment and Climate Change and for Wildlife, the Water Resources Authority (WRA), Kenya Forestry Research Institute (KEFRI), Kenya Wildlife Service (KWS), National Environment Management Authority (NEMA), National Environment Trust Fund (NETFUND), and the Directorate of Remote Surveys and Resource Sensing (DRSRS) as well as the Council of Governors (CoG) and participating county governments.

Security management interface. The ESMF's Security Management Plan (SMP) sets out the security governance architecture. National Project Coordinating Unit ensures security procedures are in place; KFS/KWS undertake routine patrols as part of their mandates; and public security (NPS/KDF) may be engaged ad hoc for elevated threats under principles consistent with human-rights due diligence.

Stakeholder engagement and GRM. The NPCU develops and manages the project GRM and ensures accessibility through county/community mechanisms, while CPCUs coordinate local SEP implementation and reporting.

These arrangements ensure vertical integration from national policy and fiduciary control to county execution and community delivery while embedding E&S risk management and security diligence across all tiers.

Table 1.1. Summary of institutional roles and responsibilities for KEWASIP.

Level	Agency / Body	Mandate & legal footing (summary)	Core functions in KEWASIP	Key deliverables / outputs	E&S risk management duties	Coordination & reporting lines
National oversight	NPSC	High-level inter-ministerial oversight & policy alignment	Approves annual workplans/budgets (AWPB); resolves escalated issues; ensures alignment with national strategies (e.g., NLEERS)	Approved annual work plan budgets; decisions/minutes; policy guidance notes	Champions ESF compliance; requests corrective actions where needed	Receives briefs from NPCU; provides guidance to MoECCF
National technical	NTAC	Cross-agency technical guidance	Reviews technical designs, manuals, screening tools, and M&E; advises on prioritization	Reviewed guidance docs; technical opinions; quality-assurance notes	Reviews adequacy of ES instruments and monitoring approach	Advises NPSC and NPCU; liaises with sector agencies
Executing ministry	MoECCF / SDF	Executing & policy lead for landscape restoration	Sets policy direction; signs off on fiduciary and safeguards frameworks; inter-governmental liaison	Ministerial circulars; policy letters; consolidated reports	Ensures ESF mainstreaming across ministries; endorses SMP approach	Supervises NPCU; coordinates with Treasury/CoG
National coordination	NPCU (in SDF)	Day-to-day national management	Fiduciary (procurement/FM), M&E/MRV, safeguards coordination; reviews county plans; reports to WB	Consolidated quarterly/annual progress; procurement plans; M&E dashboards	Screens & tracks ES instruments; runs project-level GRM; incident logging (incl. SEA/SH); mid-term & closeout E&S audits	Coordinates CPCUs & IA focal points; reports to NPSC/WB

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County oversight	CPSC	County-level policy oversight	Endorses county AWPBs; aligns with CIDP/spatial plans; unlocks county resources	Endorsed AWPBs; resolutions/minutes	Monitors county ESF adherence; elevates issues to NPCU	Receives CPCU reports; coordinates with county executive
County technical	CPTAC	Multi-agency technical backstopping	Reviews micro-catchment plans; screens proposals; advises on restoration packages	Technical review notes; cleared activities; BoQs	Checks activity-level ES screening; advises on mitigation	Works with CPCU; links to KFS/KWS/WRA/NEMA
County delivery	CPCU	County implementation coordination	Day-to-day execution; supervision of service providers; data entry; local M&E	Site registers; supervision reports; county progress updates	Implements GRM locally; ensures ESMPs/CHS/SEA-SH measures on contracts	Reports to NPCU; coordinates CPTAC/CPSC
Implementing agency	KFS	Public forest management & enforcement	Restoration on gazetted forests; community forestry (CFAs); patrols; fire management	Reforestation/assisted natural regeneration hectares; PFMPs; patrol/incident logs	Applies use-of-force SOPs; weapons audits; HR/training on rights & de-escalation; GRM referrals	Coordinates with CPCU, NTAC; MoUs with NPS/KWS
Implementing agency	KWS	Wildlife & PA management & enforcement	PA restoration; human-wildlife coexistence; patrols; joint ops	Habitat rehabilitated hectares; HWC response logs; PA plans	Same as KFS: use-of-force SOPs, training, audits; community engagement	Coordinates with CPCU/KFS/NPS; MoUs
Regulator	WRA	Regulation of water resources	Hydrologic planning; sub-catchment approvals; WRUA support	Abstraction permits; SCMPs; monitoring data	Screens water activities for CHS risks; supports ES monitoring	Works with CPCU/WRUAs; reports to NPCU on water metrics
Regulator	NEMA	Environmental regulation	ESIA/ESMP review & licensing; compliance monitoring	Licenses; compliance reports; enforcement notices	Oversight of ES instruments;	Coordinates with NPCU/CPCU and sector agencies

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Research	KEFRI	Forestry research & extension	Species/ecology advice; monitoring protocols; restoration trials	Technical notes; trial results; monitoring manuals	incident investigations Advises on biodiversity safeguards; data QA/QC	Works with KFS/CPC
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1.3 Purpose and scope of the assessment

Purpose. The assessment examined the institutional capacities, governance arrangements, legal and regulatory frameworks, and recent performance of the Kenya Forest Service (KFS) and Kenya Wildlife Service (KWS), to identify the extent and risks of law-enforcement involvement in KEWASIP's focal regions, and propose mitigation and capacity-enhancement measures aligned with the World Bank Environmental and Social Framework (ESF)¹ and good international practice.

Scope. This assessment covers both enforcement and non-enforcement functions of KFS and KWS across the five KEWASIP regions, with a differentiated analysis where armed law-enforcement is directly involved versus where mandates intersect with community resource access and management. The scope includes the following actions: (i) a review of applicable policies, procedures, and institutional frameworks; (ii) an assessment of capacities, governance structures, operational performance and inter-agency coordination for effective E&S management including social conflict management, grievance handling, and community health and safety; (iii) the development a typology of livelihood restrictions and associated enforcement activities, identifying who is at risk; and (iv) formulation of practical recommendations.

Lines of inquiry and evidence. This review draws on documentary and operational evidence including: Codes of Conduct, Standard Operating Procedures, protected area management plans, MoUs, training manuals and records (human rights, de-escalation, community engagement), patrolling/operational protocols (patrol, arrest, detention, search), incident management systems and weapons management. It includes a review of accessibility and performance of KFS/KWS grievance redress mechanisms (including anti-retaliation measures) and the results of stakeholder engagement with Indigenous Peoples and Vulnerable/Marginalised Groups.

Methods. Evidence was gathered through desk review (including targeted media/social-media scans), key-informant interviews, focus group discussions, and field visits to sampled sites to complement secondary data^{3,17}. Sites visited were Chyulu Hills National Park, Nyambene Forest, Meru KFS and KWS offices, Marsabit KFS Offices and both KFS and KWS head offices in Nairobi.

Outputs and use. This report (with findings and recommendations disaggregated by KFS and KWS) proposes time-bound measures that assign responsibility to KFS and KWS. Recommendations are classified as Essential, Important, Desirable, or Optional (EIDO) to guide sequencing and implementation by KEWASIP. The assignment was conducted over

40 person-days and implementation is assigned to the NPCU under the State Department for Forestry.

Linkage to KEWASIP safeguards and due diligence. The scope is aligned with the project's ESF risk management approach which complements ESCP, SEP and ESMF gap-filling measures and the ESRS due-diligence focus on institutional capacity, enforcement mandates, and strengthening codes of conduct and grievance systems for KFS/KWS.

In particular, the assignment delivers on ESCP Action 1.1(ii), which commits the Borrower to undertake an institutional assessment and social conflict analysis of KFS and KWS in the KEWASIP focal landscapes. The institutional assessment is reflected primarily in Sections 3.1 and 3.4, while the social conflict analysis is integrated into Sections 3.1.2, 3.2, 3.3 and 4.0 and further synthesised in Section 7.0 and Annex B. Together these sections provide the evidence base for updating the ESMF, preparing site-level Security Management Plans and strengthening GRM and community-engagement measures under the ESCP. A detailed review of KFS and KWS codes of conduct, standard operating procedures, management plans and MoUs, and their alignment with Kenyan law and international good practice, is provided in Annex C (Analytical review of institutional documents).

1.4 Objectives of the Assessment

- Identify policies, procedures, legal, regulatory and institutional frameworks governing PA management.
- Assess institutional capacities, governance structures, and operational performance/track record (social conflict; community health & safety).
- Evaluate extent and risks of law enforcement involvement in the five project regions.
- Identify main risks of conflict or livelihood restrictions to communities, PA personnel, and others.
- Propose mitigation and capacity enhancement measures aligned to ESF (**ESS1, ESS4, ESS5, ESS7, ESS10**) and other established and documented international practice.

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Collectively, these objectives operationalise ESCP Action 1.1(ii) by combining an institutional assessment of KFS and KWS with an area-based social conflict analysis, and by generating concrete measures to be taken forward through the ESMF, Security Management Plans and other ESF instruments.

2.0 Methodology

2.1 Data sources

Design. We use a mixed-methods approach with four workstreams. Desk review, stakeholder engagement, field verification, and synthesis, which when combined, allow institutional, operational, and community perspectives to be captured and cross-checked.

2.1.1 Desk review.

We analyse KEWASIP core documents (PAD/ESRS/ESCP/ESMF/SEP) plus KFS/KWS materials (Codes of Conduct, SOPs, PA plans, MoUs, training records, patrol/search/detention protocols, weapons management). We also conduct a targeted media/social-media scan. The following categories of documents were reviewed:

- i) Internal:** KFS and KWS codes of conduct, standing orders, SOP's (patrols, arrest, detention, firearms, armoury), internal complaint/discipline guidance, MOU's with NPS, PFMP's and PA management plans (e.g. Kibwezi Forest Plan 2023-2028³, Marsabit PFMP 2024-2029¹⁷).
- ii) Domestic legal framework:**
 - (1) Constitution of Kenya 2010 (Bill of Rights; due process; non-discrimination).
 - (2) National Police Service Act (use of firearms, arrest, accountability).
 - (3) Forest Conservation and Management Act 2016 (KFS mandate; PFMPs, CFAs).
 - (4) Wildlife Conservation and Management Act 2013 (KWS mandate; HWC, conservancies)
 - (5) National Land Commission Act (oversight on land, evictions, resettlement).
 - (6) Environmental Management and Co-ordination Act, No. 8 of 1999.
- iii) International / "good practice":**
 - (1) UN Basic Principles on the Use of Force and Firearms (1990)
 - (2) World Bank ESF (2017) and ESS4 Guidance Note (2018)
 - (3) World Bank Good Practice Note on Projects Involving Protected Areas (2025)
 - (4) Voluntary Principles on Security and Human Rights
 - (5) IRF Ranger Code of Conduct (2021)
 - (6) CAO Guide to Designing and Implementing Grievance Mechanisms (2008)
 - (7) IUCN Green List Standard (for PA governance/effectiveness).

2.1.2 Stakeholder engagement.

Use KIIs and FGDs, national, county, and site levels. The data collection approach is designed for inclusion (IPs/VMGs, women, youth, PWDs).

2.1.3 Field verification.

We took a sampling-based approach to visit sites across 3 of the 5 focal regions to observe practices, inspect facilities/equipment, and gather evidence. We sample purposively by risk, geography, and stakeholder salience, differentiating enforcement from non-enforcement functions. The regions selected for sampling were Marsabit, Nyambene and Chyulu Hills.

2.1.4 Analysis & triangulation.

We cross-check documents, interviews, and observations against ESF, ESCP, and ESMF requirements which allows for data verification using triangulation. This is aimed at providing recommendations using the **EIDO** scheme (Essential/Important/Desirable/Optional) with timelines and responsibilities.

2.2 Sampling Framework

We use a stratified purposive design centred on the five focal regions, with primary fieldwork limited to three. These include Nyambene forest, Chyulu Hills and Kibwezi forest, and the Marsabit focal area in order to keep effort feasible while preserving representativeness. Strata are defined by stakeholder category (national/county agencies, KFS/KWS, community/VMGs) and function (policy, enforcement, resource use/service delivery). Within each stratum, respondents are drawn from official lists and complemented by controlled snowballing to capture hard-to-reach groups, with minimum targets per stratum and attention to gender and role diversity. Key-informant interviews at KFS and KWS offices in Nairobi, Kibwezi, Chyulu Hills, Meru and Marsabit provide institutional triangulation. The two non-visited regions are covered via desk review and remote interviews. Bias is mitigated through mixed methods, standardised instruments, and cross-checking across sources.

2.3 Data Sources

We combine primary and secondary datasets including site-specific management plans (e.g., Kibwezi Forest Management Plan, 2023–2028³). Primary sources include semi-structured key-informant interviews with KFS, KWS, county authorities. Focus group

discussions were conducted with community forest associations in small-group discussions and structured site-observation checklists in Nyambene, Chyulu Hills, and the Marsabit focal area. Secondary sources include legal/policy frameworks (e.g., Wildlife Conservation and Management Act ¹⁶), KEWASIP ToR/inception materials, agency SOPs and MOUs. Findings are triangulated across at least two independent sources, with basic quality checks (completeness, internal consistency, plausibility). Personally identifiable information is minimised, anonymised, and stored securely.

2.4 Analysis

We use a mixed-methods strategy that combines framework-based thematic coding with light descriptive statistics. Interview and FGD transcripts are coded to a structured codebook aligned to the ToR domains (mandate/command, HR & training, discipline/use-of-force/SOPs, inter-agency coordination, GRM & stakeholder engagement). Document abstraction tables feed an evidence matrix where each finding is triangulated and assigned a confidence rating (high/medium/low) and a traffic-light status (green/amber/red) against legal/policy standards. Cross-case matrices compare agencies and regions and simple network maps illustrate coordination pathways. Given purposive sampling, results are descriptive, not statistically inferential, and feed a prioritised gap/risks-to-actions table.

3.0 Results

3.1 Analysis of Mandate, Governance, and Chain of Command: KFS and KWS

The analysis in this sub-section is grounded primarily in a documentary review of the Constitution of Kenya (2010), the Wildlife Conservation and Management Act (2013) ¹⁶, the Forest Conservation and Management Act (2016) ¹⁴, the National Police Service Act ⁴, the Environmental Management and Co-ordination Act (1999) ²⁰ and related regulations, as well as selected management plans (for example for Kibwezi Forest Reserve ³), organisational charts and standing orders from KWS and KFS. These sources are triangulated with key-informant interviews at national and field level and with the synthesis of law-enforcement protocols in Annex B. Taken together, they provide the basis for answering Research Questions 1 and 2 on mandates, governance, chain of command and their implications for social conflict and community health and safety in KEWASIP focal areas.

3.1.1 Cross-statute safeguards and dispute resolution

Core statutes and planning duties

KWS is established by the Wildlife Conservation and Management Act, 2013 ¹⁶. It must develop and implement a national wildlife conservation and management strategy, and it regulates protected areas, licensing, user rights, and compliance mechanisms (Part II & IV). The Act also embeds public participation and Parliamentary approval in declaring or varying protected areas and requires management plans for every park/reserve/conservancy, with community consultation and publication in the Gazette.

KFS is established by the Forest Conservation and Management Act, 2016 ¹⁵. The Service prepares management plans for all public forests, maintains national forest information systems, supports counties, sets and enforces rules on sustainable use/trade, and leads benefit-sharing and community participation arrangements. The Act prescribes public consultation procedures (Second Schedule) for major decisions and requires Parliamentary involvement for boundary changes to public forests.

Hierarchy of protected areas and decision rules

Under WCMA ¹⁶, the Cabinet Secretary (CS) may declare national parks, marine protected areas, and protected wetlands (with EIA, public participation, and, for certain cases,

National Assembly approval). Variations to park boundaries or status also need Parliamentary approval and documented safeguards for biodiversity and ecosystem services.

Under FCMA ¹⁴, variation of public forest boundaries or revocation requires petitioning Parliament, an EIA, and public consultation per the Second Schedule before a Gazette notice issues. The CS may also declare nature reserves in any forest class after prior public notice.

Devolution & local institutions

WCMA ¹⁶ creates County Wildlife Conservation and Compensation Committees, anchors community wildlife associations, and stipulates a Wildlife Compensation Scheme for human-wildlife conflict (HWC).

FCMA ¹⁴ empowers KFS to establish conservancy areas and forest conservation committees, and to assist county governments to build forestry capacity, including creation of county arboreta/green zones and technical support.

Kenyan legislative safeguards and dispute resolution

The Environmental Management and Co-ordination Act (EMCA) ²⁰ is built into the Wildlife Conservation and Management Act (WCMA) ¹⁶ in three key ways that matter for KEWASIP: environmental assessment, non-exemption from environmental law, and dispute resolution.

1. Integration on environmental assessment

EMCA is the framework law that requires an environmental impact assessment (EIA) for listed projects “*notwithstanding any approval, permit or licence granted under this Act or any other law in force in Kenya*”; proponents must submit a project report and, where directed, undertake an EIA before starting a scheduled undertaking and obtain an EIA licence from NEMA.

WCMA then plugs into this framework:

- Section 26(1) states that all provisions of WCMA on conservation, protection and management of the environment must be in conformity with EMCA.

- Section 27(2) goes further and says that no user right or related right may be granted under WCMA if the requirement for a “strategic environmental, cultural, economic and social impact assessment” licence under EMCA has not been complied with, i.e. EMCA’s assessment obligations are a precondition for wildlife-sector rights and licences.
- Section 31(1)–(2) also ties the declaration of new national parks, marine protected areas or priority wildlife areas to prior compliance with EMCA’s requirements, plus public participation and absence of an active legal challenge.

In practice, this means that WCMA cannot be used to create new PAs or grant wildlife user rights that do not comply with the EMCA. Those actions sit downstream of EMCA’s EIA/SEA system.

2. Explicit bar on exemptions from environmental law

WCMA then makes the non-exemption principle explicit:

- Section 27(1) says no user rights, licence or permit under WCMA may exempt a person from compliance with any other written law on environmental conservation and protection.
- Section 28 likewise clarifies that nothing in WCMA exempts anyone from the Water Act’s requirements on water use.

So even if KWS or the Cabinet Secretary grant a wildlife-sector right, the holder still has to comply with EMCA (and other environmental laws). WCMA cannot be invoked as a shield against EIA obligations, environmental standards or other permits.

3. Dispute-resolution process

On disputes, EMCA itself sets up a dedicated National Environment Tribunal (NET) to hear appeals on decisions made under the Act (e.g. licensing, fees, restoration orders). The Tribunal is established in Part XII, with powers to hold hearings, take evidence, and make orders or awards.

Any person aggrieved by key NEMA decisions (refusal of a licence, conditions, revocation, restoration orders, etc.) may appeal to the NET, which can confirm, vary or set aside the decision. During the appeal, the status quo of the activity is maintained. A further appeal then lies from the NET to the High Court, whose decision is final.

WCMA imports this mechanism directly: section 26(2) states that the EMCA provisions on reference to the Tribunal apply to appeals arising from decisions made under WCMA. In other words, if a person is dissatisfied with certain wildlife-sector decisions that raise environmental issues (e.g. licensing or PA declarations), they follow EMCA's route—first to the National Environment Tribunal, then (where applicable) on appeal to the High Court rather than a separate, wildlife-only appeal system.

3.1.2 Institutional capacities, governance structures, and operational performance/track record (social conflict; community health & safety)

Kenya Wildlife Service (KWS)

Mandate & core functions.

KWS conserves and manages wildlife, enforces the Act, and coordinates wildlife security across national parks/reserves “with other law enforcement agencies.” It maintains assets, provides visitor services, and collects fees.

Governance & chain of command.

KWS is overseen by a Board of Trustees; a Director-General (DG) heads the Service. Officers are a uniformed and disciplined cadre organized by rank (e.g., Chief Warden, Wardens, Rangers). Critically, officers must conform to the DG's lawful instructions, and the DG may issue standing orders, establishing a clear operational chain of command.

Security capability & inter-agency link.

For security operations, overarching powers are vested in the President may, in consultation with the Inspector-General (IG), ensure availability of firearms for KWS operations, reinforcing interoperability with the National Police Service (NPS) ⁵. In practice KWS maintains regional armoury's that are managed according to strict guidelines and recording procedures for issuing firearms and ammunition.

At the same time, the IG exercises overall and independent command of NPS, coordinates all police operations, and issues Service Standing Orders that shape joint operations with KWS or KFS when police support is engaged ⁴.

Procedural strength in PA management.

KWS's planning and decision-making is formalized: Gazetted declarations, EIA, public participation, and Parliamentary approval for key notices; management plans are mandatory and must be developed with county committees and neighbouring communities, then published. This embeds transparency and shared accountability.

Social conflict & community health/safety.

The Act provides a compensation scheme for death (KSh 5 million) and injury (up to KSh 3 million) from wildlife, administered through county committees. This is an institutional response to HWC that can reduce social tension and incentivize reporting. It also enables community wildlife scouts to assist in problem animal control, improving community safety at the interface with PAs. The CS's regulatory powers extend to visitor safety/indemnity rules inside PAs.

Performance implications.

Taken together the uniformed ranks, a DG-led command framework, inter-agency firearms support via the IG, and codified planning/consultation rules means that KWS has strong institutional levers to enforce rules, deter poaching, and manage visitor and community risk around parks.

Kenya Forest Service (KFS)

Mandate & core functions.

KFS manages all public forests, prepares management plans, maintains a forest information system/GIS, monitors & enforces rules on forest produce/trade, and supports county forestry capacity, all of which are foundational capacities for PA oversight in forested landscapes.

Governance & chain of command. KFS is governed by a Board combining public officials and independent experts, with community and county (Council of Governors) representation. The Chief Conservator of Forests is chief executive and Secretary to the Board and is responsible for day-to-day operations and implementing Board directives that establishing a managerial line of authority from Board to Chief Conservator and forestry staff.

Enforcement capability & disciplined cadre. The Act may designate a uniformed and disciplined cadre within KFS and establishes a Forestry Training College, both of which are relevant to operational capacity. Critically, authorized KFS officers can search, seize and arrest for forest offences; designated officers (after training/licensing) may use firearms; and staff of or above Sergeant Forest Ranger have the powers and privileges of a police officer under the Criminal Procedure Code and NPS Act ⁴, enabling coordinated law-enforcement in forest PAs.

Procedural strength in PA management. Major forest decisions like the purchase/exchange of forest land, declaration of nature reserves, and variation of public forest boundaries require public consultation and (for boundary changes) Parliamentary processes, mirroring the transparent safeguards seen in wildlife law.

Social conflict & community health/safety. FCMA ¹⁴ encourages community participation and benefit sharing (through functions assigned to KFS), and it tasks KFS to assist counties to create green zones/recreational parks which provides for human–forest interfaces in urbanizing areas. Enforcement powers and the option to field a disciplined cadre support ranger and visitor safety in forest PAs.

Role of the National Police Service (NPS) in both regimes

Where policing support is needed in PAs (anti-poaching, public order, serious crime), the IG commands and coordinates all police operations, sets the command structure and Standing Orders, and the Kenya Police Service is charged with law and order, protection of life and property, investigation and enforcement of laws, providing the legal basis for joint operations with KWS/KFS ⁴. Control of arms and ammunition and record keeping are the delegated responsibility of KWS and KFS who ultimately report to the IG with these records.

3.1.3 Conclusions aligned to the research questions

- **Frameworks:** Both Acts embed strategy documents, management plans, Gazettement and public participation as pre-conditions for creating, varying, or managing protected areas consistent with global PA effectiveness frameworks ⁹ and provide a robust, procedurally-defensible framework that links national policy to site-level plans with community input.
- **Governance & command:** KWS runs a DG-led disciplined cadre with explicit rank structure and lawful-orders regime; KFS operates a Board–Chief Conservator–staff chain supported by a potential uniformed cadre, training college, and police-

equivalent powers for senior rangers with clear lines for accountability and field command. Rangers may arrest suspects and hold them only briefly at posts; detention beyond initial custody is regulated by general criminal law and National Police Service procedures, which require prompt handover to a recognised police station, where suspects are formally booked, investigated and charged through the normal criminal process.

- **Capacities & performance levers:** Both agencies have explicit enforcement powers, inter-agency links with NPS, and compulsory planning/consultation that facilitate compliance, transparency, and conflict management. KWS’s compensation scheme and county committees directly target social conflict and community safety from HWC; KFS’s community/benefit-sharing functions and county green-space mandates help reduce conflict at forest interfaces.

Overall, the statutes provide clear mandates, strong governance, and enforceable chains of command for both KWS and KFS, with embedded mechanisms (planning, consultation, compensation, and inter-agency coordination) that directly address institutional capacity, community conflict, and health/safety in and around protected areas.

Table 3.1 Summary of mandates, governance and chain of command for KWS and KFS.

Dimension	Kenya Wildlife Service (KWS)	Kenya Forest Service (KFS)*
RQ1: Policies, procedures, legal, regulatory and institutional frameworks governing PA management		
Foundational statute & scope	Wildlife Conservation and Management Act, 2013 (WCMA) ¹⁶ : establishes KWS; national wildlife strategy; declaration/variation of parks, reserves, and MPAs via Gazette; mandatory management plans with consultation.	Forest Conservation and Management Act, 2016 (FCMA) ¹⁴ : establishes KFS; management of public forests; declaration of nature reserves; mandatory forest management plans; national forest information system.
Planning & gazettement rules	Statutory Park/forest management plans PA creation/variation requires EIA, public participation, and for key actions oversight/approval via National Assembly; publication in Gazette.	Statutory Park/forest management plans ; public forest boundary changes require EIA, public consultation (Second Schedule) and Parliamentary process; Gazette notices for major decisions.

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Devolution & local institutions	County Wildlife Conservation & Compensation Committees; recognition of community wildlife associations and conservancies; structured consultation with counties and neighbours of PAs.	Forest Conservation Committees; participatory forest management ¹⁵ via Community Forest Associations (CFAs); KFS supports county forestry capacity and urban green zones/arboreta.
Environmental safeguards & dispute resolution	EMCA compliance embedded; CS empowered to make regulations on access, fees, safety; recourse through devolved structures and environmental tribunals/courts.	EMCA compliance embedded; rules on sustainable use/trade of forest produce; public participation procedures codified for significant decisions.
RQ2: Institutional capacities, governance structures, and operational performance/track record (social conflict; community health & safety)		
Governance & chain of command	Board of Trustees → Director-General (DG) (issues standing orders) → HQ directorates → regional/park/warden commands → ranger units (uniformed, disciplined cadre).	Board of the Service → Chief Conservator of Forests (CCF; CEO & Board Secretary) → HQ directorates (incl. GIS/Inventory) → regional/conservancy → county/division → forest stations → rangers/authorized officers.
Enforcement capability	Lawful enforcement mandate within PAs; DG's standing orders; inter-agency wildlife security coordination; firearms availability enabled through national security arrangements.	Authorized officers empowered to search, seize, arrest for forest offences; certain ranks granted police-equivalent powers under CPC/NPS Act ⁴ ; option for a uniformed disciplined cadre; dedicated training college.
Inter-agency coordination	Operates jointly with National Police Service (NPS) when engaged (e.g., anti-poaching, serious crime, public order).	Joint operations with NPS for forest crime/public order; technical support to counties on forestry governance and enforcement.
Social conflict, community health & safety	Statutory Human–Wildlife Conflict (HWC) compensation (via county committees); community scouts can support problem-animal control; visitor safety/indemnity regulated.	Participatory forest management ¹⁵ (CFAs) & benefit sharing to reduce interface conflicts; urban/recreational green spaces to diffuse pressure; enforcement powers bolster staff/visitor safety in forest PAs.

Operational levers & assurance

Transparent decision rules (EIA, participation, Gazette, Parliamentary checks) plus a disciplined rank structure and DG command enable deterrence, compliance, and risk management in parks.

Transparent decision rules (consultation, Parliamentary oversight) plus enforcement powers, structured hierarchy, and information systems (inventory/GIS) enable compliance and conflict reduction in forests.

*KFS process flow charts are show in Annex C.

3.2 Law enforcement and livelihoods: pathways, risks, mitigations

3.2.1 How enforcement affects livelihoods

Across the project sites, livelihoods and enforcement meet in the ordinary day to day activities of rural life : at the forest gate when a woman shoulders a head-load of firewood; at a water point when herders need to water their livestock; at the shrine when elders ask to enter after dusk. Rules exist in the form of permits, timetables and levies but when things go wrong it can lead to arrests. In many stations, user rights are spelled out in management plans and agreements with Community Forest Associations (CFAs). In principle, “everything needs a permit,” and traditional practices are allowed within defined hours and species-specific safeguards (for example, medicinal harvesting without bark stripping, and shrine access from 06:00 to 18:00). Where these rules are clearly communicated and jointly managed, livelihoods tend to stabilize: communities describe “very good working relations,” and CFAs help identify vulnerable and marginalized groups for preferential access or fee relief.

Pressure points emerge when enforcement meets ambiguity or scarcity. Firewood is a prime example. Stations note that collectors without receipts are apprehended, and in Marsabit an individual pay for a head-load at KSh121 per month, which is a small sum on paper but it can become material in drought years or when cashflow is problematic. Grazing follows the same logic. Grazing zones are mapped and, in some forests, access requires payment. However, outside those zones, arrests can follow. During droughts, temporary access to forest grazing can be negotiated, but if this is not clearly communicated (through notification or signage), herders experience the change as a sudden shock rather than part of a known system, and their livelihoods bear the cost. Water access is protected at source, yet, paradoxically, the same enforcement that keeps people out of springs can secure livelihoods downstream. In Chyulu, fencing and strict protection have been credited with stabilizing rivers and irrigation supply after 2019 which

is a benefit community themselves emphasize even as they worry that every park fire might cut their water off.

Security conditions shape how “hard” or “soft” enforcement feels. In Marsabit, interviewees describe a landscape where inter-communal conflict, arms, and politically driven encroachment raise the stakes. Rangers report that, under standard operating procedures, **plastic rounds** may be used as an intermediate, crowd-control or warning measure once verbal instructions and other non-violent options have failed, whereas **live rounds** may only be used as a last resort in situations of imminent threat to life or serious injury, and any discharge of either type must be formally reported and reviewed. Community leaders speak of banditry that deters lawful forest use. In such places, right-holders who want to exercise lawful access rights (for example, to graze, collect firewood or cross the forest) are often told they should only do so **with a ranger escort**, usually arranged in advance through the station or via the CFA/chief once permits or user rights are confirmed. When every routine visit requires this kind of security escort, the system of permits, patrols and escorts can feel less like co-management and more like a basic survival strategy. Officers and wardens repeatedly assert a human-rights-based approach and a preference for defensive, proportionate force; many also acknowledge that practice is sustained by meetings, reminders, and discipline rather than continuous, resourced training cycles.

Notably, official narratives sometimes insist livelihoods will be unaffected “as long as people follow the law” or because SOPs exist. The community perspective is more conditional: where fees, zones, and timings are predictable and where CFAs can vouch for members and mediate access, enforcement underwrites livelihoods. Where communication is uneven, or insecurity intrudes, the same enforcement tools produce income shocks because the community may not be aware of changes and access days are lost, and resentment. In short, livelihoods fare best when enforcement is legible. Livelihoods benefit from clearly communicated fee calendars, visible zone maps, clear drought protocols, and reliable grievance pathways so that the boundary between protection and punishment remains knowable before a ranger ever has to say “no”.

Table 3.2. Law enforcement and livelihoods across focal sites: rules-in-use, impacts, risks, and quick-win mitigations.

Context / activity	How enforcement	Livelihood impact when clear & fair	Where it goes wrong (risk to livelihoods)	Practical fixes (quick wins)
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Institutional Analysis of KFS and KWS for KEWASIP

	shows up (typical rules)			
Firewood collection	Permits, head-load fees, seizure of green poles	Predictable, low-friction access; women/VMGs plan around known costs	Confusion on fees/receipts; ad-hoc seizures resulting in income shocks	Publish fee calendars; VMG waivers; mobile receipts; CFA–ranger joint patrols
Grazing access	Zoned areas; drought exceptions; arrests outside zones	Herd mobility maintained; rangeland protected	Poor notice of zone openings/closures; drought delays resulting in fines, conflict	Co-signed drought MOUs (chief+CFA+station); SMS/baraza alerts; maps at gates
Water access near protected areas	Source protection; time windows; fencing	More reliable downstream supply; crop stability	Perceived denial of essential use; unannounced closures	Off-forest water points/micro-dams; posted timetables; escort for sensitive sites
Medicinal plants / NTFPs	Species lists; no bark stripping; pre-notification	Cultural use continues with low ecological harm	Permit ambiguity; inconsistent field decisions	Laminated species guides; hotline/SMS pre-approval; logbook at station
Shrines & cultural access	Daylight hours; permits; escorts	Predictable ceremonies; fewer conflicts	Night-time arrests when rules unclear	Public shrine timetables; simple exception process; elder liaison
PELIS/TELIS plots	Ballots; agronomic limits; lists	Transparent access to livelihood plots	Alleged favouritism; opaque beneficiary lists	Publish lists; 7-day grievance window*; CFA observation of ballots
HWC around corridors	PAC operations; fencing; response protocols	Reduced crop loss; safer movement	Slow or unpredictable PAC response	PAC SLAs on noticeboards; targeted fence repair; corridor underpass studies
Illegal logging / chainsawing	Arrests; joint ops; evidence chain	Deterrence; clearer market signals	Escalation risk; weak chain-of-custody	HRBA arrest drills; joint ops with police; SMART/body-cam event IDs
Security-stressed areas (e.g., Marsabit)	Defensive postures; stricter controls	Safer field conditions for all	Fear deters lawful access; livelihoods paused	Conflict-sensitive patrols; third-party hotlines; scheduled community dialogues
Cross-cutting: HRBA & training	SOPs, refreshers, supervision	Professional, proportionate enforcement	Infrequent refreshers; practice drifts	Annual HRBA/UoF refreshers (rangers+scouts); incident debrief templates
Cross-cutting: communication & GRM	Posters, barazas, radio; complaint channels	Issues resolved early; trust increases	Low awareness; fragmented complaints; no feedback	KEWASIP-branded multi-channel GRM with ticket IDs, 72h/14d/30d SLAs; quarterly dashboards

* The “7-day grievance window” means that once PELIS/TELIS beneficiary or plot-allocation lists are posted, there is a minimum period of seven calendar days during which community members can challenge or correct the lists. During this window, people can lodge complaints (e.g. exclusion, errors, favouritism) through agreed channels – such as the KEWASIP GRM, CFA or chief/station complaint log – before the allocations are confirmed and planting goes ahead.

3.2.2 Conclusions: Enforcement can either support or undermine livelihoods. It supports households when access rules (fees, zones, timings) are clear, predictable, and co-managed with CFAs, and when officers apply a human-rights-based approach. It harms when ambiguity, abrupt changes, or insecurity create shocks and lost access. KEWASIP should anchor practice in transparency and a human rights-based approach. There needs to be clear communication about local access calendars, pre-agreement of drought/corridor protocols, and there is a need for a simple, more consistent, time-bound GRM. These mitigations turn enforcement from a flashpoint into a platform for trust and shared stewardship.

Table 3.3: Livelihood risk & mitigation matrix

Use/right	Typical restriction or trigger	Who is most affected	Observed/required mitigation	Residual risk & quick win
Firewood	Permit & fee (e.g., KSh 116/headload); seizure for green poles	Women, VMGs	Fee waiver windows for VMGs; mobile pay & receipts; allow legal non-forest charcoal only	Publish fee calendars & waiver criteria at stations & via radio; joint patrols w/ CFA monitors.
Grazing	Zoned; drought exceptions; arrests outside zones	Pastoralists, youth herders	Drought contingency MOUs; SMS alerts when zones open; buffer fodder plots	Co-sign drought opening/closure with chiefs & CFA; map zones at barazas.
Water access	Protection of sources; entry limits	Whole community/livestock	Water points outside forests, small dams; schedule access	Prioritize off-forest water infra in hotspots (Marsabit).
Medicinal plants	Species-specific rules; notification	Traditional healers/elders	Itinerary pre-notification; bark-stripping bans	Issue laminated species rules via CFA; hotline for approvals.
Shrines & cultural use	Time limits (e.g., 6am–6pm)	Elders/faith groups	Permit windows; escort if needed	Post shrine-access

				timetables at stations.
PELIS/TELIS	Balloted plots; agronomic limits	Smallholders, VMGs	Transparent ballots; fertilizer/pesticide rules; VMG priority	Publish beneficiary lists & grievance window after every ballot.
Illegal logging/NTFP	Arrests, ambushes by KFS or KWS; evidence chain	Youth/men engaged in chain sawing/transport	HRBA arrest drills; joint ops with police; chain-of-custody	SMART event IDs for arrests where feasible (GoK financed)
HWC around parks	PAC operations; fencing	Smallholders near corridors	Fences, water for wildlife, elephant collars, new outposts	Add underpass at Nanyuki corridor; publish PAC response SLAs.

*balloted plots are cultivation or PELIS/TELIS plots that are allocated by a public ballot (lottery) rather than by an individual official's choice. Eligible applicants' names are put into a draw, plots are assigned through this random ballot in a meeting (usually with CFA, KFS and community representatives present), and the outcome is recorded so that allocation is seen as transparent and fair.

3.3 GRM & Complaints Procedures: Current State, Gaps, and Priority Fixes

3.3.1 Current state

Across focal sites, grievance channels exist but function unevenly. Communities raise concerns through multiple “front doors” like station suggestion boxes, chiefs and other local leaders, CFA committees, phone/WhatsApp to individual officers and social media. Some stations keep complaint registers and conduct ad-hoc reviews; a few escalate serious allegations to statutory bodies (e.g., Ombudsman, IPOA, EACC). However, these pathways are not integrated into a single, trackable process for KEWASIP. In several locations, suggestion boxes lack clear custody and oversight, complainants are uncertain about what happens after submission, and community awareness of a formal KEWASIP mechanism is limited. First-contact personnel, including CFA scouts who often receive complaints in the field, rarely have standardized scripts, referral trees, or human-rights-based approach (HRBA) intake training. Time-bound service standards (acknowledgement, investigation, decision) are not consistently applied, and feedback to complainants is irregular. In security-stressed areas, fear of retaliation further suppresses reporting and undermines trust.

3.3.2 Key gaps

- **Fragmented intake and tracking.** Cases enter through many channels but are not consolidated into a single ledger with unique IDs, making follow-up, oversight, and learning difficult.
- **Weak anonymity protections.** Physical boxes are sometimes unsecured or controlled by a single party; phone-based reporting exposes identities; there is no standard option for sensitive, third-party handling.
- **No service-level guarantees.** Acknowledgement, investigation, and decision timeframes are undefined or inconsistently enforced, and complainants seldom receive outcome notifications.
- **First-mile capacity constraints.** Rangers and CFA scouts lack common intake procedures, HRBA refreshers, and simple referral tools, resulting in variable quality and tone of initial response.
- **Limited community awareness and branding.** KEWASIP’s specific GRM is not widely understood; rights, fees, and access calendars are not consistently displayed alongside grievance information.
- **Inadequate governance and audit.** Routine, minuted reviews by mixed committees (CFA–Station–Chief) are rare; data are not aggregated into dashboards for transparency and accountability.
- **Context sensitivity.** The current system does not explicitly account for high-risk contexts (e.g., Marsabit), where retaliation risks and conflict dynamics require adjusted procedures.

3.3.3 Recommendations for a minimum-viable KEWASIP GRM.

Design principle: multiple front doors, one system. All intake channels converge on a single case-tracking ledger with unique Ticket IDs and time-stamped entries.

Standardized intake & ticketing. Enable USSD/SMS and WhatsApp reporting, supervised dual-key suggestion boxes (CFA + Station), chiefs’ offices, station desks, and CFA committees. Every entry, whether digital or paper must generate a printed/SMS Ticket ID cross-referenced to station Occurrence Book/formal registers. This will enable traceability which is currently difficult with records not cross referenced.

Service levels (SLAs). Acknowledge within 72 hours; commence and complete fact-finding within 14 days; communicate and record a decision within 30 days. The “clock” starts at the intake timestamp. Exceptions (e.g., complex or criminal matters) must be formally noted and escalated.

Anonymity & anti-retaliation. Secure, dual-custody boxes; optional routing of sensitive cases to an independent hotline/partner. Clear protocols to engage IPOA/EACC/Ombudsman where applicable. Identities for anonymous cases are protected from operational staff.

First-mile capacity. One-day HRBA + GRM intake training for rangers and CFA scouts (scripts, do/don't language, referral trees, incident logging). Annual refreshers and brief, post-incident debrief templates to reinforce practice.

Community communications. KEWASIP-branded posters at stations, chiefs' offices, markets, and places of worship; vernacular radio spots explaining rights, fees, zone calendars, and how to lodge complaints. Publish the SLAs and the expected evidence for common case types to set clear expectations.

Oversight & learning. Monthly site-level GRM committee meetings (CFA–Station–Chief) with signed minutes and a short action log; quarterly anonymized dashboards posted locally and shared to county/HQ. Use trend analysis (categories, hotspots, VMG flags, resolution times) to adapt management responses.

Data protection & ethics. Minimal-necessary personal data; restricted access to the tracker; periodic integrity checks on box openings, ticket issuance, and closure notes.

3.3.4 Governance and assurance

- **Station GRM Focal Point:** maintains the ledger, issues Ticket IDs, coordinates acknowledgements, and ensures SLA compliance.
- **Site GRM Committee (CFA–Station–Chief):** reviews cases monthly, endorses remedies, and escalates unresolved or sensitive matters.
- **County/Conservancy Coordinator:** consolidates site data, verifies adherence to protocols, and liaises with independent oversight (e.g., Ombudsman/IPOA/EACC) as required.
- **HQ GRM Cell:** produces quarterly “trust dashboards,” conducts random audits (box integrity, sample case back-checks), and commissions targeted training.

Key performance indicators: percentage acknowledgements within 72h; percentage investigations completed within 14 days; percentage decisions within 30 days; complainant notification rate; reopen/appeal rate; share of cases flagged VMG; training coverage for rangers/scouts; integrity audit pass rate.

3.3.5 Suggested implementation roadmap

Days 0–30: Approve a joint KWS/KFS GRM SOP which may evolve into an institutional GRM; assign focal points; co-sign dual-key box custody; deploy the tracker; print posters and fee/zone calendars; run first-mile HRBA/intake training.

Days 31–60: Launch USSD/SMS and WhatsApp intake; begin monthly committee reviews; publish the first station-level dashboard; initiate independent hotline for sensitive cases.

Days 61–90: Conduct the first compliance audit; refine scripts and forms; integrate lessons into station briefings; publish the first consolidated county/HQ dashboard and action note.

3.3.6 Risk management

- **Security and retaliation risks:** use third-party channels, anonymization, and scheduled community dialogues in high-risk areas; never require in-person follow-up for anonymous cases unless safety is assured.
- **Instrumentalization of the GRM:** track repeat, bad-faith submissions via pattern analysis while preserving access for genuine complainants; require evidence standards proportional to the allegation.
- **Capacity drift over time:** embed refreshers in annual plans; maintain simple debriefs after high-salience incidents; use dashboards to trigger targeted coaching where SLAs slip.

Conclusion. By consolidating multiple entry points into a single, time-bound, and trusted process—with clear anonymity safeguards, visible service standards, and routine oversight—the KEWASIP GRM can move from ad-hoc complaint handling to a predictable system that resolves issues early, protects rights, and improves overall relationships between communities and enforcement personnel. For the duration of KEWASIP, a single project-wide Grievance Redress Mechanism (GRM) will serve both KFS and KWS, so that communities and other stakeholders have one clear entry point for raising concerns about any KEWASIP-supported activity, regardless of which agency is implementing it. Complaints will be logged in a shared system, screened and referred to the relevant agency focal point, with agreed timelines, feedback to complainants, and escalation routes for sensitive or unresolved cases.

In the longer term, once KEWASIP closes, the preferred strategy is to gradually absorb the project GRM into strengthened KFS and KWS institutional mechanisms. This will harmonise procedures and service standards, maintain community-facing channels established under KEWASIP, and link them more systematically to statutory oversight and sector-wide feedback systems. This allows the project GRM to act as a pilot and capacity-building platform, leaving behind a more coherent, permanent GRM framework inside both agencies rather than a stand-alone project structure that disappears at completion.

3.3.7 Summary of draft objectives for addressing gaps

1. **Operationalize lawful user-rights access** (firewood, grazing, water, medicinal plants) with site-specific calendars, fee transparency and VMG waivers, reducing livelihood friction during KEWASIP.
2. **Deploy a KEWASIP-branded GRM** with multi-channel intake, ticketing, SLAs and quarterly public reporting across all focal stations.
3. **Close the rules-in-use gap** via annual HRBA/UoF refreshers (rangers + scouts), incident debrief templates, and random compliance checks.
4. **Reduce HWC and water-pressure drivers** with off-forest water points, selected fencing, and PAC response standards in hotspots.
5. **Finish/refresh PFMPs and fund CFA execution** (nurseries, M&E, beekeeping, value addition) to convert compliance into co-benefits.
6. **Codify drought contingency agreements** (temporary grazing access, timing, routes) using baraza co-signatures and SMS alerts.
7. **Integrate customary institutions** (e.g., Njuri Njeke) into access decisions and conflict resolution protocols at Nyambene.

3.3.8 Priority actions (E-I-D-O)

- **Essential (now):** Stand-up KEWASIP GRM; publish user-rights fee/timetable sheets; launch HRBA refresher & scout training; announce HWC/Water hotspot plan.
- **Important (next 6 months):** Complete PFMPs; finance CFA nurseries/beekeeping/value-add; agree drought MOUs and corridor fixes (e.g., Nanyuki underpass).
- **Desirable:** Body-cams/SMART event IDs for arrests; expand drone pilots; publish quarterly “trust dashboards”.
- **Optional:** Community stipends for baraza attendance (as suggested by field commanders) where it unlocks participation.

3.3.9 Synthesis: what does the data tell us?

- **Rules vs. practice gap.** SOPs, standing orders and HRBA exist, but compliance is largely complaint-driven and refreshers are irregular; several officers acknowledge they “assume” SOPs are followed until a complaint surfaces. Legislation is aligned with international best practice so if the rules vs practice gap is closed there is a reduced risk of non-compliance.

- **Livelihoods hinge on clearly administered user rights** (firewood, grazing zones, water points, medicinal plants, PELIS/TELIS). Where these are predictable and participatory, friction drops; where permits/fees, drought exceptions, or timing are unclear, conflict rises.
- **Community capacity and communication are uneven.** Some CFAs patrol and co-manage effectively but scouts often lack HRBA training and PFMPs are incomplete or under-resourced, especially in Marsabit/Kibwezi³.
- **Security context matters.** In Marsabit, inter-communal conflict and arms change the risk potential. Even with HRBA intent, officers cite defensive postures and exceptional measures (e.g., plastic vs. live rounds).
- **GRM exists but is not operationalized for KEWASIP.** Channels are fragmented (suggestion boxes, chiefs, social media, direct calls), some with no oversight, and communities in places are unaware of KEWASIP or how to use formal pathways.

3.4 Human Resources, Deployment and Training

3.4.1 Organisational structure and staffing by cadre and location

Both Services operate uniformed, disciplined organisations with clear command lines from headquarters to regional/area commands and site stations (parks and forest stations). KWS is led by a Director-General and KFS by the Chief Conservator of Forests. Each is supported by HQ directorates covering operations/compliance, conservation/management, corporate services, and information systems. At field level, staffing typically spans four functional groupings:

- **Command & supervision:** regional/area commanders, station wardens/foresters, platoon or post leaders.
- **Operations/enforcement:** rangers/authorised officers (uniformed field staff, with firearms issued only to those who have completed the required training, hold a current firearms authorisation, and are formally assigned a weapon for that patrol), investigations/intelligence, control-room and dispatch.
- **Conservation & community:** ecologists/foresters, HWC/PAC teams, community liaison and extension officers.
- **Specialist/support:** legal and prosecutions, HR/finance/procurement, logistics/transport, ICT/GIS, training college/faculty (notably KFS), and research/monitoring.

Interviews indicate command clarity is generally strong, but coverage at remote outposts is fragile where vacancies, long rotations, or insecurity (e.g., Marsabit) drive intermittent presence. Community Forest Associations (CFAs) frequently act as first contact for users and complaints but CFA scouts are outside the formal establishment and seldom receive the same level of HRBA or incident training as rangers, creating variability at the “first mile” interactions with the community members. However, CFA scouts are not law-enforcement

officers and their powers are the same as any other member of the public unless they have been separately appointed as KFS/KWS or police officers. In practice, their mandate is to observe, guide and report, not to enforce. They patrol with KFS/KWS as local guides, report suspected illegal activities, help explain rules and grievance channels to community members, and relay concerns back to station staff. They are not authorised to carry service firearms or independently stop, search, arrest, detain, question or sanction people. Any coercive actions (searches, seizures, arrests, use of force) must be performed by duly mandated KFS, KWS or National Police Service officers, with scouts acting only in a supporting, non-coercive role. Female representation remains lower in field cadres, with facilities at remote posts uneven, which affects recruitment and retention.

For KEWASIP purposes, these CFA-linked community scouts are treated as community-based auxiliaries rather than law-enforcement officers: they are unarmed, have no independent powers of arrest or detention, and are expected to confine their role to observation, community liaison and referral of incidents and complaints to KFS/KWS or the National Police Service in line with PFMPs and station-level agreements.

3.4.2 Deployment logic and workload

Deployment is, and should remain explicitly risk and workload weighted. Drivers to be considered around deployment include protected area size and access points, known wildlife-crime/forest-offence hotspots and trade corridors, HWC incidence and proximity to corridors, the extent of co-management/CFAs and the need for joint operations with the National Police Service. Sites such as Chyulu (water-source protection and HWC) and Marsabit (security) require surge capacity and multi-agency operations. Rotations must ensure 24/7 coverage for control rooms and relief for hardship posts, with backfill plans to prevent gaps during training, leave, or operations.

Data for implementation of workload considerations can be extracted from current records of staff deployment and the factors mentioned above. A useful method of analysis to maximise the efficiency of workload considerations would be to plot deployment numbers against the criteria mentioned above and to redeploy according to the results that show a need for higher staff numbers relative to the multiple different criteria that determine deployment.

3.4.3 Recruitment and placement

Recruitment follows public-service and agency standing orders, with fitness, vetting and firearms prerequisites for armed roles. Recruitment follows general public-service and KFS/KWS standing orders: all shortlisted candidates undergo standard fitness tests (e.g. medical screening and physical endurance assessments to confirm they can safely

perform field duties) and are vetted through the Directorate of Criminal Investigations (DCI), which runs criminal-record and integrity checks before appointment. For positions that may be armed, there are additional prerequisites – successful completion of firearms and safety training, a clean vetting outcome and formal authorisation before a weapon can be issued. Final posting and transfer decisions are cleared through the DG (KWS) or CCF (KFS) within Board-approved frameworks. A good-practice baseline includes transparent adverts and standardized screening; gender-balanced shortlists and reasonable accommodation; competency-based placement that matches site risks (e.g., investigators to trade corridors; community officers to HWC/CFAs); time-bound rotations and documented handovers for hardship stations; and integrity safeguards (panel interviews, reference/disciplinary checks, conflict-of-interest declarations).

3.4.4 Training system and coverage

Induction and recurrent in-service training are delivered by agency academies (e.g., Kenya Forestry College for KFS), HQ directorates, and accredited partners (including joint tactics with NPS). Field feedback shows refreshers are irregular and practice can be “complaint-driven,” with limited HRBA preparation for CFA scouts. A centralized, version-controlled training log linked to individual HR records is required to manage recency and compliance.

Core curriculum and recency targets to be assessed.

- Human rights & constitutional policing (lawful arrest/detention, non-discrimination, proportionality): induction + **annual refresher using the International Ranger Federation code as a benchmark** ^{5, 7, 18}.
- De-escalation & negotiation (verbal tactics, crowd management, trauma-informed approaches): induction + **annual scenario re-cert.**
- Community engagement (FPIC, GRM intake, GBV/child-protection safeguards, working with CFAs/community wildlife associations): induction + **18–24-month refresher.**
- Firearms safety & use-of-force continuum (weapons handling, safe storage, range qualification, after-action review): induction + **6–12-month re-qualification** for armed cadres.
- Wildlife/forest-crime procedures (crime scene, evidence chain, intel handling, prosecutions): induction + **24-month refresher.**
- Operational safety (first aid/TECC, off-road/boat/rope, radio/ICT, navigation): role-specific + **24-month refresher.**
- Wellbeing & psychosocial support (stress/post traumatic stress disorder screening, peer support, referral pathways): induction + **annual check-ins** for field units.

Training KPIs

% of staff with valid HR/De-escalation certificate (<12 months); % of armed staff with current firearms re-qual (<12 months); % of community-facing staff trained in FPIC/GBV

(<24 months); average training hours per ranger per year; joint-exercise days with NPS per region; corrective actions from after-action reviews closed within 90 days.

3.4.5 Current gaps and risks.

- **Refreshers and practice drift:** Based on interview data HRBA and de-escalation refreshers are uneven for both KWS and KFS; some supervisors report reliance on post-incident reminders rather than programmed training cycles.
- **Fragmented records:** HR, posting and training logs are kept in separate systems, impeding recency management and backfill planning.
- **First-mile variation:** CFA scouts act as de facto intake and co-patrol personnel in several sites but lack standard scripts, referral trees and HRBA training.
- **Hardship coverage:** Relief and backfill for remote posts are inconsistent, leading to thin coverage during leave/training and during security incidents.
- **Gender and facilities:** Women remain under-represented in field ranks; remote posts often lack appropriate facilities, affecting deployment options and retention.
- **Duty-of-care:** PPE, first-aid kits and reliable comms are not yet universal at all posts; psychosocial support after critical incidents is ad hoc and mostly provided informally by supervisors, peers and, in some cases, ad-hoc referrals to chaplains, county health staff or NGO counsellors, rather than through a structured, agency-wide trauma counselling programme.

3.4.6 Immediate strengthening actions

1. **Single source of truth:** Merge HR, posting rosters and training logs into one register; automate expiry flags at T-60 days; require stations to update weekly.
2. **Coverage floors and backfill:** Define establishment and patrol-coverage minimums per site; ring-fence backfill for hardship rotations and training absences.
3. **Targeted upskilling:** Fast-track de-escalation and community-engagement refreshers for all field supervisors; pair with scenario-based HWC/PAC drills in hotspots.
4. **Firearms discipline:** Standardize 6–12-month re-qualification cycles; conduct quarterly secure-storage audits for both KFS and KWS; use brief, templated after-action reviews.
5. **Duty-of-care baseline:** Achieve 100% PPE, first-aid and radio coverage at field posts; introduce structured peer-support and referral after major incidents.
6. **CFA integration:** Provide a one-day HRBA + GRM-intake package for CFA scouts; issue simple referral scripts and station contact cards; include scouts in quarterly joint exercises.
7. **Gender pipeline:** Set intake and promotion targets for women and under-represented groups; upgrade facilities at remote posts to enable mixed deployments.

3.4.7 Reporting cadence

Stations submit a **monthly HR Deployment & Training return** (headcount, vacancies, patrol coverage, training recency, PPE/comms status), rolled up at county/conservancy level and consolidated quarterly at HQ. A simple dashboard should track KPIs, highlight posts below coverage floors, and trigger targeted training or backfill decisions.

Table 3.4. Organisational Capacity Snapshot: Structure, Coverage, Training Gaps, and KPIs.

Domain	Evidence-based finding (current state)	Key risk/impact	Priority fix (0–6 months)	Measures / KPIs
Structure & command	Clear HQ to region to station command; four functional groupings (command, ops, conservation/community, specialist/support).	Remote outposts overstretched when vacancies or insecurity spike.	Confirm establishment per site; publish organograms at station level.	Posts meeting coverage floors; vacancy rate by cadre.
Deployment & coverage	Deployment broadly risk/workload led (size, access points, hotspots, HWC, tourism, CFA footprint).	Thin 24/7 coverage at hardship posts; surge capacity ad hoc.	Set coverage floors and surge rosters; joint-ops plans for hotspots.	Patrol km/day vs establishment; HWC/PAC tasking rate; missed shifts.
Recruitment & placement	Public-service process with fitness/vetting for armed roles.	Mis-match of skills to site risks; slow backfill.	Competency mapping for placements; time-bound rotations and documented handovers.	% roles filled with required competencies; average time-to-backfill.
First mile (CFA scouts)	CFA scouts act as de facto intake/co-patrol in many sites.	Variable tone/quality; weak HRBA/GRM intake; reputational risk.	1-day HRBA + GRM-intake package; referral scripts; include scouts in quarterly drills.	% scouts trained; referral completeness rate; community satisfaction.
Training system & recency	Induction exists; refreshers uneven and “complaint-driven”.	Practice drift in HRBA, de-escalation, evidence handling.	Annual HRBA/de-escalation refreshers; 24-month crime-procedure refreshers.	% staff with <12-month HRBA/De-escalation certificates; average training hours.

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Firearms discipline	Armed cadres trained; re-training cycles inconsistent.	Safety incidents; weak after-action learning.	Standardize 6–12-month re-qualification; secure-storage audits; templated AARs.	% armed staff in re-qual window; audit pass rate; AAR corrective actions closed <90d.
Duty-of-care (PPE/comms (e.g. radios)/psychosocial)	PPE and comms not universal; psychosocial support ad hoc.	Higher field risk; burnout/attrition after incidents.	Achieve 100% PPE, first-aid, radios at posts; structured peer support and referral.	% posts with full kits; critical-incident debrief coverage; staff retention.
Gender & facilities	Female representation low in field cadres; facilities uneven at remote posts.	Constrained deployment options; recruitment/retention losses.	Intake/promotion targets; facilities upgrades (privacy/sanitation).	% women by cadre; promotion rate; facility compliance checks.
Records & data integration	HR, rosters, training logs stored separately.	Missed expiries; poor planning for backfill and training.	Merge into single register; auto T-60 expiry alerts; weekly station updates.	% records linked to staff ID; number of overdue certifications
Governance & reporting cadence	Returns exist but are inconsistent across sites.	HQ lacks timely view of gaps and risks.	Monthly station HR/Training return; quarterly consolidated dashboard.	On-time return rate; sites below coverage floors; trend of KPIs.

Minimum deployment dataset to track: headcount by cadre/grade and station; vacancies/acting posts; staff-to-area and staff-to-visitor ratios; patrol coverage (km/day) vs establishment; HWC/PAC tasking; female representation; accommodation/PPE/comms status by post; training recency by domain.

3.4.8 Status and mandate of community scouts

In several KEWASIP focal areas, PFMPs and site interviews confirm the presence of community scouts recruited through Community Forest Associations or similar community structures and endorsed by KFS and county governments. These scouts support surveillance, reporting of illegal activities, basic resource-use monitoring and community sensitisation, and may accompany KFS/KWS patrols as guides or interlocutors.

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They are not part of the formal KFS or KWS establishment, are not issued firearms, and do not hold independent powers of arrest, search or detention; any enforcement action is undertaken by authorised officers from KFS, KWS or the National Police Service.

From an ESF perspective, community scouts who participate in KEWASIP-related patrolling or who act as first-line recipients of complaints are treated as “associated security personnel” in the sense of ESS4 and the World Bank Good Practice Note on the Use of Security Personnel. This implies proportionate vetting, a written description of their roles and limitations (focusing on observe–report–refer), and targeted training on human-rights-based approaches, GRM intake, non-retaliation and safeguarding, without expanding their mandate into coercive law-enforcement functions. The recommendations in Sections 3.3, 3.4 and 7.0 propose to codify these role boundaries in PFMPs, station-level SOPs and KEWASIP Security Management Plans.

4.0 Media & Social Media Scan: (2014–2025)

4.1 Scope and method

We conducted a targeted scan of mainstream media, human-rights reports, official agency statements, and selected social posts for incidents at the interface of law enforcement and natural resources involving KWS and KFS. Sources included Nation, People Daily, The Standard, Human Rights Watch (HRW), Amnesty International, EU communications, KWS/KFS official pages, and representative social media posts. Items were screened for relevance (wildlife/forest enforcement), agency linkage (KWS/KFS named or reasonably implicated), and outcome (allegations, investigations, remedies, or policy actions). Where items originated on social channels, we flag them as signals pending official corroboration.

4.2 Limitations

- Social posts are leads, not confirmations; we included only those with public visibility and relevance and clearly marked them as signals pending verification.
- Some historic allegations are under dispute or subject to ongoing legal processes; we rely on reputable outlets and rights organizations, noting official responses where available.
- Where KEWASIP target areas are not included in the reporting below, it means that no previous incidents have been reported from these areas.

4.3 Patterns and implications

1. **Forest-rights evictions remain the highest-risk enforcement context.** Embobut and Mau yielded multiple, consistent reports of excessive force and property destruction; funding partners responded with program suspensions, indicating material governance risk.
2. **Wildlife conflict flashpoints occur when herders or wildlife enter protected zones.** Where graduated, non-lethal measures and community liaison fail, or when armed groups enter parks, fatalities can occur, triggering reputational and legal exposure.
3. **Remedies and prevention are scaling, but uneven.** Compensation disbursements, coexistence strategy roll-out, and CFA planning strengthen a

human-rights-consistent approach; however, payout backlogs and awareness gaps persist, muting impact on community trust.

4. **Competing narratives increase volatility.** Investigative exposés and official rebuttals coexist; the presence of active court cases involving KWS personnel underscores the need for transparent GRM, external oversight, and timely communication.

Table 4.1 Notable incidents and outcomes (2014–2025).

Date	Location	Agency	What happened	Conduct assessment	Outcome/Status	Sources
Jan 2014–Jan 2018 (key events)	Embobut Forest (Cherangany Hills)	KFS	Evictions of Sengwer: burning of homes despite court orders; on 16 Jan 2018, one man shot dead and another injured during KFS operation.	Serious HR concerns (use of force, property destruction)	EU suspended a major Water Towers program; international calls for safeguards/consultation.	(Amnesty International)
2019–2020	Mau Forest Complex (Narok/Nakuru)	KFS (multi-agency)	Evictions affecting Ogiek and others; reports of violence, looting, deaths and injuries; humanitarian impacts.	Serious HR concerns	Ongoing advocacy; authorities disputed some findings; continued tensions and sporadic violence.	(Human Rights Watch)
Dec 30, 2024	Tsavo East NP	KWS	Confrontation with armed herders inside park; one herder fatally shot; KWS statement referenced poisoned arrows and ongoing investigations.	Disputed use of force in operational context	Public statement; inquiry referenced.	(Nation)
2019 (context)	National	KWS	KWS rebutted allegations circulating online about torture/disappearances near parks.	Contest of narratives	Official denial/clarification by KWS.	(Kenya Wildlife Service)
Nov 2023–2025 (policy/remedy)	National	KWS / Ministry	HWC compensation drives: multi-county payouts; scheme grounded in WCMA 2013 ¹⁶ and Compensation Regulations.	HRBA-consistent remedy (recognition of harm & restitution)	Ongoing disbursements; backlog reduction.	(Kenya Law)

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2024	National	KWS	Launch of National Human-Wildlife Coexistence Strategy (2024–2033) focusing on prevention, community engagement and non-lethal tools.	Preventive/HRBA-aligned policy	Strategy active; implementation rolling.	(Kenya Wildlife Service)
2025	Kiambu (court)	Multi-agency incl. KWS	13 police, 1 NIS officer and a KWS warden charged with murder of two Indian nationals and a Kenyan driver (2022 case).	Accountability process	Case before High Court; pleas entered.	(Insider Bits News)

Related signal (contextual): June 2022 protests in Kajiado over dangerous wildlife turned deadly when police fired on protesters (police, not KWS led response), highlighting how HWC can escalate without effective civilian-security coordination. ([Africanews](#))

Table 4.2 Positive HRBA/coexistence practice signals

Measure / Practice	Evidence of adoption	Relevance to risk reduction
Statutory HWC compensation (WCMA 2013 ¹⁶ ; Compensation Regulations) with county committees	Legal basis and KWS communiqués; multiple county payout events (2019–2025). (Kenya Law)	Provides remedy and reduces incentives for violent retaliation during HWC.
National Human-Wildlife Coexistence Strategy (2024–2033)	KWS strategy launch (2024). (Kenya Wildlife Service)	Emphasizes prevention, community engagement, and non-lethal approaches consistent with HRBA.
Non-lethal deterrents (beehive fences)	Peer-reviewed/academic communications and NGO reports noting effectiveness (70–86%). (biology.ox.ac.uk)	Demonstrated reduction in crop raiding; strengthens coexistence options for KWS/community programs.
CFA-based co-management	Nature Kenya and independent coverage of CFA planning and protection efforts. (BirdLife International)	Improves local participation and reduces enforcement flashpoints.

Table 4.3. Social media indicators (require verification)

Signal	Platform	Initial claim	Why it matters
Tensions in Amboseli after confrontation between KWS officers and community over stray livestock	Facebook group (public)	Reported evening clash; limited corroboration in mainstream press at time of capture. (Facebook)	Early-warning of potential park–pastoralist friction; should be cross-checked with station/County reports.
“KWS officers arrested ... after killing of Abdisalan”	Facebook video by a lawyer/activist	Arrests reported; details unclear, not yet traced to official communiqué. (Facebook)	If verified, indicates accountability action; needs triangulation with DCI/ODPP.

Note: Social posts are included as leads; they should not be treated as verified incidents without cross-checks.

4.4 Summary

This summary distils the main signals emerging from a targeted media and social-media scan covering roughly 2014–2025 and focusing on KFS and KWS operations in KEWASIP relevant landscapes. Items were screened for relevance to law enforcement, evictions, human–wildlife conflict, grievances and accountability, and where possible, cross-checked against court records (available at <https://new.kenyalaw.org/>), official statements, NGO reports and key-informant perspectives. The intent is not to adjudicate individual cases, but to understand the pattern of concerns and positive practice that shapes institutional and ESF-relevant risk for KEWASIP.

- **KFS:** Multiple well-documented eviction operations—especially in Embobut (Sengwer) and the Mau Forest Complex (Ogiek) feature allegations of violence, house burnings and at least one fatal shooting; the EU suspended funding in 2018 citing rights concerns. These cases anchor the “high-risk” profile for forest law enforcement and community relations.
- **KWS:** Incidents include fatal confrontations between rangers and herders in or near parks (e.g., Tsavo East, Dec-2024) and community protests around HWC. KWS has also issued public statements and investigations following fatalities.
- **HRBA-aligned practice** is visible in policy and remedy measures: the Wildlife Act (2013) and Compensation Regulations (2019) establish a statutory Human-Wildlife Conflict (HWC) compensation scheme. KWS and the Ministry have run nationwide compensation payouts and launched a National Human-Wildlife Coexistence Strategy (2024–2033). Community-coexistence tools (e.g., beehive fences) and CFA-based co-management have independent evidence of reducing conflict pressure.
- **Narratives contesting conduct** also exist: investigative reporting has alleged killings and disappearances linked to KWS/KFS (disputed by KWS in some cases); one high-profile multi-agency murder case brought charges that included a KWS warden (Kiambu High Court, 2025). These underscore the need for robust grievance redress and independent oversight.

Taken together with the statutory and institutional mapping in Section 3.1 and the practice summary in Annex B, these media and social-media signals support treating KFS/KWS law-enforcement as high-risk but improvable. Serious rights-related allegations cluster around a relatively small number of historic forest evictions and high-profile wildlife incidents, while there is also evidence of positive institutional responses (statutory compensation,

coexistence strategies, disciplinary processes and prosecutions). This combination underpins the gap analysis in Section 5 and the ESF-aligned risk ratings in Section 6.

4.5 Recommendations for this project

- **Codify “HRBA in the field”:** require graduated-force SOP refreshers, pre-operation community briefings, and body-worn event IDs for high-risk arrests (where feasible), with after-action reviews published in quarterly trust dashboards. (Aligns with national HWC strategy.) ([Kenya Wildlife Service](#))
- **Scale preventive coexistence measures:** support beehive fences, early-warning SMS for elephant movement, and liaison teams drawn from CFAs and local administration in hotspots. ([biology.ox.ac.uk](#))
- **Strengthen remedy pathways:** accelerate pending HWC compensation through the statutory scheme; post service levels and claims steps at stations and barazas. ([Kenya Law](#))
- **Independent oversight for evictions:** for any forest clearance or boundary enforcement, use third-party observers, fixed-point video, and prohibition on home burnings; ensure resettlement/consultation consistent with World bank and UN rights guidance ^{5,19} and guidance stemming from Embobut/Mau lessons and with the mandates of the National Land Commission and applicable land laws ^{6,8}. ([Amnesty International](#))
- **Active rumour control:** rapid “fact sheets” within 24–72 hours of any critical incident (what happened, who is investigating, how to lodge a complaint) to reduce misinformation and maintain procedural trust. (Linked to GRM roll-out.)

References (selected)

Amnesty International on Sengwer evictions; EU suspension note (2018); HRW on Mau (2019–2020); Nation & People Daily on Tsavo (2024); KWS policy pages and coexistence strategy; Kenya Law on WCMA 2013 ¹⁶ and Compensation Regulations; Nature Kenya and Mongabay on CFA practice; Oxford/BIEA & Save the Elephants on beehive fences effectiveness. ([Amnesty International](#))

5.0 Gap analysis: KWS/KFS enforcement practice vs. World Bank & international standards

Interviews and FGDs indicate that KWS/KFS have disciplined, uniformed structures and operational SOPs, but practice around the use of force, incident reporting, and grievance redress is uneven across sites. Compared with World Bank ESF and recognized international standards ¹², the principal gaps are:

- (i) No single, public, use-of-force policy aligned to the UN principles (necessity, proportionality, precaution, medical aid, reporting).
- (ii) Irregular de-escalation and human-rights refreshers and firearms re-qualification.
- (iii) Weak, non-standardized after-action reviews and incident databases.
- (iv) Ad-hoc community grievance routes with limited accessibility, tracking and feedback; and
- (v) Incomplete arrangements (e.g., MoUs) for joint operations with police.

These gaps are material to livelihood risks and social license.

5.1 What “good” looks like (benchmarks used)

- **Use of force:** non-violent means first; force only when other means ineffective; if unavoidable, use proportionate force, minimize harm, give warnings where feasible, render medical aid, and report promptly; firearms only in defence of life and when strictly unavoidable; robust training, screening and review systems aligned with professional ranger codes of conduct (e.g. International Ranger Federation ^{7, 18})
- **World Bank ESF/ESS4** (Security Personnel): borrower guided by proportionality & GIIP; will not sanction force except for preventive/defensive purposes proportional to threat; must vet, train, and review all allegations; ensure similar standards for public security.²Given KEWASIP’s support to KWS and KFS in operating within and around protected areas, the Interim Guidance Note on Managing the Risks of Projects Involving Protected Areas is also applicable ¹⁹.
- **Security management** (WB Good Practice Note): conduct a Security Risk Assessment (SRA), prepare a Security Management Plan (SMP), and use binding

MoUs with public security covering CoC, proportional force, training, incident follow-up, and vetting ¹¹.

- **Protected Areas guidance** ⁸: ensure process framework operational manuals include guardrails, use-of-force protocols, de-escalation training, and adoption before field activities and global benchmarks for effective, equitable PA management such as the IUCN Green List Standard ⁹ and World Bank interim guidance note on managing risks in protected areas ¹⁹; agree gap-filling measures where institutional assessments find weaknesses.
- **Grievance redress (ESS10)**: accessible, inclusive, culturally appropriate, anonymous option, time-bound service standards, multiple entry channels, logging/tracking, appeals, and feedback/learning loops ¹³; co-designed early with communities.
- **Voluntary Principles** (public/private security): vet out individuals credibly implicated in abuses and maintain structured engagement with authorities and communities ¹⁰; force only when strictly necessary and proportionate; investigate/report incidents and provide medical aid; maintain structured engagement with authorities and communities.

Table 5.1. Gap matrix (findings vs. benchmarks)

Domain	Benchmark (WB/International)	What interviews/FGDs say happens now (KWS/KFS)	Gap/Risk	Priority fixes
Use-of-force rules & continuum	Written policy aligned to UN Basic Principles ^{11, 12} ; non-violence first; warnings; proportionality; medical aid; prompt reporting & review.	Officers rely on internal SOPs and experience; continuum and warning protocols not uniformly codified; warning shots practices vary; first-aid capacity at posts uneven; incident reporting largely through OBs without standardized forms.	Inconsistent application increases risk of excessive force, harm, and weak accountability.	Issue a single, service-wide Use-of-Force Policy and pocket card; standardize incident/force reporting (incl. medical aid rendered); roll out trauma first-aid kits and drills to 100% of posts.
Security personnel management (incl. joint ops)	SRA→SMP; proportionality & GIIP; vetting, training; MoUs with public security specifying CoC,	Joint patrols with NPS/police common; formal MoUs/ROE not consistently in place at station level; firearms re-	Ambiguity in joint ROE and weak vetting/documentation create legal and safety exposure.	Prepare SRAs per region and an SMP; sign standardized MoUs with police for joint

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	proportional force, discipline, and incident follow-up.	qualification cycles vary; limited documentation of joint incident follow-up.		ops (CoC, ROE, vetting, training, investigations).
Training & re-certification	Regular HR/human-rights, de-escalation, rules on force & firearms, record-keeping; periodic proficiency reviews.	Training exists but refreshers are irregular; de-escalation/negotiation not universal for field supervisors; firearms re-qualification frequency inconsistent.	Skills atrophy and uneven practice; higher likelihood of escalation and procedural error.	Institute annual HR/de-escalation refreshers and 6–12-month firearms re-qualification, tracked in a single training registry.
Incident capture, review & learning	Immediate reporting, independent review of allegations; lessons integrated into SOPs; public-facing summaries.	Force incidents recorded, but no uniform form, unique case ID, or central database; after-action reviews vary; limited public reporting.	Weak institutional learning; diminished community trust.	Adopt a force-incident form and central database; mandate after-action reviews; publish quarterly anonymized stats.
Community engagement around security	Stakeholder engagement & disclosure; communities can feed back on security arrangements via GM.	Engagement happens, but security protocols and community feedback loops are not systematically disclosed/collected.	Perceived opacity raises tensions and rumour-driven conflict.	Include security topics in SEPs; share non-sensitive SMP/CoC summaries; schedule community brief-backs.
Grievance redress mechanism (GRM) design	Accessible, inclusive, anonymous; multiple channels; clear timelines; logging & appeals; co-designed early; feedback & learning.	Complaints typically via chiefs, station offices, or phone; limited awareness of routes; no unique tracking numbers; timelines and appeals unclear; feedback to complainants sporadic; limited use of data for learning.	Low uptake and satisfaction; risks of escalation to conflict or media; missed early-warning signals.	Stand up a unified PA/forest-level GM (toll-free, WhatsApp/SMS, boxes, in-person); standardize case IDs, SLAs, and appeals; publish dashboards and “you said—we did.”
Sensitive harms & referrals (SEA/SH, child	Rights-compatible GMs, confidentiality, safe channels,	Referral pathways exist in places but not consistently integrated into GM	Under-reporting and harm to survivors; Bank non-compliance risk.	Embed survivor-centred protocols and anonymized

protection, GBV)	survivor-centred referral pathways.	SOPs; anonymity not always available.		channels in GM SOPs; train focal points and partners.
Transparency & accountability	Public disclosure (non-sensitive) of security arrangements and GM performance; structured dialogue with public security.	Limited public summaries of security arrangements or GM outcomes; dialogue mostly reactive.	Trust deficit and rumor cycles.	Regular structured meetings with communities and authorities; quarterly GM/incident summaries.

5.2 Practical next steps.

1. **Approve a single Use-of-Force Policy & pocket ROE** aligned to UN principles; train all field supervisors and embed medical-aid and reporting requirements.
2. **Complete SRAs** per region and publish SMP extracts; sign MoUs with police covering CoC, proportional force, vetting, training, and incident investigation.
3. **Stand up a unified, multi-channel GM** with unique IDs, time-bound SLAs, appeals and feedback loops; co-design and socialize it with communities.
4. **Training refreshers & certification:** annual human-rights/de-escalation; 6–12-month firearms re-qualification; record in a single registry.
5. **Centralize incident data & learning:** standardized force-incident form, independent review of allegations, and quarterly anonymized summaries.

Taken together, these actions will move KWS/KFS materially closer to World Bank ESF and international good practice on security and grievance handling while reducing livelihood and rights-related risks in protected and forest areas.

5.3 Basis for the gap analysis and link to Annex B

The gap analysis in this section is built from two complementary evidence streams. The “benchmark” column in Table 5.1 consolidates core requirements and good-practice expectations drawn from the World Bank ESF (especially ESS1, ESS4, ESS5, ESS7 and ESS10), the World Bank Good Practice Note on the Use of Security Personnel, the UN Basic Principles on the Use of Force and Firearms, the Voluntary Principles on Security and Human Rights, the IUCN guidance on protected areas, and relevant internal standards such as the IRF Ranger Code of Conduct. These sources provide a practical picture of what

proportionate, rights-compatible security management and grievance handling should look like where public security services are involved in Bank-financed operations.

The “current practice” column draws on the structured documentary review and the qualitative synthesis presented in Annex B: service statutes, codes of conduct and standing orders; use-of-force and firearms SOPs; patrol and incident registers; grievance and complaints procedures; training curricula and records; and operational descriptions from KFS/KWS staff and community respondents in Nyambene/Meru, Kibwezi–Chyulu Hills and Marsabit. The aim is to reflect typical practice, not isolated incidents, with attention to variation across regions and units.

The “gap/risk” and “priority fixes” columns are interpretive, but they are anchored in recurring patterns observed across interviews, field observations, the media scan (Section 4) and the annexed protocol summary, rather than in any single allegation or case. The analysis is not a forensic compliance audit. Rather, it identifies material weaknesses that are most likely to generate ESF-relevant harm or non-compliance if unaddressed, and translates them into focused institutional actions that KEWASIP can support through its ESCP, ESMF, security management planning and GRM roll-out.

6.0. Risk Assessment (ESF Lens) ¹

This section consolidates the preceding institutional, livelihood, grievance and security findings into a concise ESF-aligned risk view for KEWASIP. Risk statements are organised under the most relevant Environmental and Social Standards (ESS1, ESS4, ESS5, ESS7 and ESS10) and focus on those aspects of KFS and KWS mandate and practice that are most likely to affect community health and safety, land and access, Indigenous Peoples/VMGs, and stakeholder engagement in KEWASIP focal areas.

Ratings and justifications are derived by triangulating: (i) the legal and governance mapping in Section 3.1; (ii) livelihood and enforcement pathways in Section 3.2; (iii) the current state and gaps in grievance handling and HR/training (Sections 3.3–3.4); (iv) the media and social-media patterns in Section 4; and (v) the standards-based gap analysis in Section 5 and the protocol summary in Annex B. The resulting risk profile is therefore an institutional and operational screen to inform the KEWASIP ESCP, ESMF, Security Management Plan(s) and GRM design, rather than a substitute for activity-level ESIA/ESMPs.

6.1 ESS2 – Labour and Working Conditions

Risk 1 (Medium): Fragmented HR/training/roster data undermines oversight and timely corrective action.

Justification: Separate registers for HR, postings, and training allow expiries and coverage gaps at hardship posts.

Key controls: Unified register linking staff ID → posting → training recency; T-60 expiry alerts; establishment floors and backfill plans per site.

6.2 ESS4² – Community Health & Safety

Risk 2 (High): Incomplete security risk management and inconsistent UoF controls lead to harm and non-compliance.

Justification: Practice is “complaint-driven” in places; refresher training and firearms re-qualification cycles are irregular; joint operations with police lack consistent MoUs/ROE; incident reporting is not standardized beyond OB/FPPR entries.

Key controls: Regional Security Risk Assessments (SRAs); a single UoF policy & pocket ROE aligned to UN principles; Security Management Plans (SMPs) per site; standard force-incident form + after-action reviews; quarterly anonymized incident dashboards.

Risk 3 (High): Excessive or poorly documented force during anti-poaching/forest operations causes injuries/fatalities and reputational damage.

Justification: Variability in warning protocols (e.g., warning shots), first-aid capacity at posts, and incident capture; security context (e.g., Marsabit) increases escalation probability.

Key controls: Annual HRBA/de-escalation refreshers; 6–12-month firearms re-qualification; trauma first-aid kits & drills at 100% posts; body-worn/SMART event IDs for high-risk arrests (where feasible); joint ROE with police.

Risk 4 (Medium–High): Human–wildlife conflict (HWC) injuries and property damage escalate to confrontation.

Justification: Unpredictable PAC response and fencing gaps drive community frustration.

Key controls: PAC service-level standards (acknowledge/respond/close); targeted fence

repairs and corridor remedies (e.g., underpass studies); early-warning/SMS; non-lethal deterrents (e.g., beehive fences); accelerated compensation processing.

6.3 ESS5 – Land & Restrictions on Land Use

Risk 5 (High): Evictions or operational closures restrict access to land/resources without safeguards.

Justification: Historic evictions and ongoing user-rights frictions (firewood fees, grazing zones, shrine/medicinal access timings) create exposure to involuntary resettlement-type risks^{6,8} and livelihood shocks.

Key controls: Restriction of Access Framework/Livelihoods Restoration Plan where closures are contemplated; participatory mapping of zones; transparent fee calendars and VMG waivers; drought contingency MoUs (co-signed with chiefs/CFA); no-burn/no-demolition policy for structures; documented alternatives (off-forest water points).

6.4 ESS7 – Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (VMGs)

Risk 6 (High): VMGs' cultural practices and subsistence use are constrained without meaningful participation or culturally appropriate mitigation.

Justification: Access to shrines and medicinal plants is time-limited and permit-dependent; VMGs and pastoralists risk exclusion when rules shift fast or are unevenly communicated.

Key controls: IPPF/VMGF with free, prior and informed consultation; co-designed protocols for shrine/medicinal access (posted timetables, laminated species guides, hotline approvals); VMG targeting for fee waivers and PELIS/TELIS; culturally appropriate, anonymous GRM routes; elders' liaison roles formalised.

6.5 ESS10 – Stakeholder Engagement & Information Disclosure

Risk 7 (High): Fragmented, low-trust engagement and weak GRM reduce early-warning and escalate disputes.

Justification: Multiple ad-hoc complaint channels (boxes, chiefs, phone) with uneven custody, no ticket IDs, unclear SLAs/appeals, and limited feedback.

Key controls: KEWASIP-branded, multi-channel GM (toll-free, WhatsApp/SMS, supervised

dual-key boxes, in-person) with unique ticket IDs; SLAs (≤ 72 h acknowledge/ ≤ 14 d investigate/ ≤ 30 d decision); appeals path; quarterly “you said—we did” dashboards; vernacular radio and baraza roadshows; publish fee/zone calendars alongside GM information.

Table 6.1. Summary of risks.

ESS	Key risk (short)	Rating	Primary controls (headline)	Residual risk target
ESS1	Weak security/UoF system	High	SRAs + SMPs; single UoF policy; force-incident form & AARs; unified HR/training register	Medium
ESS4	Excessive force / HWC escalation	High	HRBA/de-escalation; firearms re-qual; PAC SLAs; first-aid kits/drills; non-lethal deterrents	Medium
ESS5	Unmitigated access restrictions	High	Restriction Framework/LRP; participatory zoning; drought MoUs; no-burn policy; off-forest water points	Medium
ESS7	VMG cultural/livelihood exclusion	High	IPPF/VMGF; shrine/medicinal protocols; VMG fee waivers; elders’ liaison; culturally safe GRM	Medium
ESS10	Weak engagement/GRM	High	Multi-channel GM with IDs/SLAs/appeals; dashboards; fee/zone disclosure; radio/barazas	Medium–Low

Implementation note: These controls dovetail with the recommended GRM rollout and the HR/Deployment actions already proposed (coverage floors, refresher cadence, MoUs for joint operations).

7.0 Recommendations & Action Plan (EIDO)

The recommendations in this section are not intended to stand alone, but to be taken up within KEWASIP’s existing ESF instrument set. In practice, actions that relate to stakeholder engagement, complaints handling and communication will be reflected in the SEP and its GRM. Measures on security risk assessment, use of force, joint operations, training and incident management will populate the ESMF and its Security Management Plan(s) and be summarised in site-level ESMPs. Time-bound commitments (including completion of this institutional assessment and the social conflict analysis under ESCP Action 1.1(ii)) will be captured or refined in the ESCP. The EIDO-tagged items below should therefore be read as inputs to those instruments, rather than as a parallel implementation plan.

Ref #	Recommendation	E/I/D/O	Responsible	Timeline	Dependencies	Verification/Indicator
1	Create a KEWASIP-branded multi-channel GRM (toll-free, WhatsApp/SMS, dual-key boxes, station desk) with ticket IDs and SLAs (72h/14d/30d). Roll out tracker provided.	E	HQ GRM Cell; Station Commanders; County/Conservancy Coordinators	0–90 days	Approval of GRM SOP; short vendor contract for toll-free/USSD	% tickets acknowledged ≤72h; % investigations ≤14d; quarterly dashboard posted
2	Publish user-rights calendars and fee schedules (firewood, grazing, shrine/medicinal access) at stations/barazas; include VMG waiver rules.	E	Station Commanders; Community Liaison; CFA Chairs	0–60 days	Content approval by County Conservator/Warden	Visible posters; # barazas held; community spot checks
3	Issue a single pocket Use-of-Force (UoF) & arrest card aligned to UN principles; require first-aid after any force and immediate incident logging.	E	HQ Operations/Legal; Training Dept.	0–60 days	DG/CCF circular; print and distribution	100% officers/scouts issued; supervisor spot checks; incident forms attached to OB
4	Complete Security Risk Assessments (SRA) and a short Security Management Plan (SMP) per site; sign MoUs with NPS/police on ROE, vetting, and incident follow-up.	E	HQ Ops; County Security Committees	0–120 days	Legal review; County Commissioner engagement	# SRAs/SMPs approved; # MoUs signed; joint AARs on record

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5	Annual HRBA + de-escalation refresher for all field supervisors and CFA scouts; add scenario-based HWC modules.	E	Training Dept.; Station Commanders	Start ≤90 days; then annual	Training provider scheduling	% staff certified <12 months; pre/post test scores
6	6–12-month firearms re-qualification cycle and quarterly armoury audits; maintain ammo-expenditure and AAR forms.	E	Armoury Officers; HQ Ops; County Conservator	Start ≤90 days; ongoing	Range access; ammunition allocation	% armed staff in window; audit pass rate; AARs filed ≤72h
7	Equip all field posts with trauma first-aid kits, radios, and PPE; run quarterly drills.	E	Logistics; Station Commanders	0–120 days	Procurement	% posts fully equipped; drill completion logs
8	Define PAC (HWC) service-level standards and publish locally; schedule targeted fence repairs and corridor remedies (e.g., Nanyuki underpass prefeasibility).	I	PAC Coordinator; Engineering; Community Liaison	0–6 months	Engineering survey; KURA/County engagement	PAC response time medians; # fence fixes; # incidents/month
9	Launch compensation acceleration clinics with counties; publish claim steps and timelines at stations.	I	KWS HWC/Legal; County Committees	0–4 months	Treasury/County payment calendars	% claims processed ≤90 days; backlog reduction
10	Integrate HR, posting rosters, and training recency into one register with T-60 alerts; set coverage floors and backfill plans for hardship posts.	I	HR; Training; HQ Ops	0–90 days	Data consolidation; simple MIS	% posts meeting coverage floors; overdue training count
11	One-day HRBA/GRM intake package for CFA scouts; issue referral scripts and station contact cards; include scouts in quarterly joint exercises.	I	Training Dept.; Community Liaison	0–90 days	Materials adapted from GRM/UoF	% scouts trained; referral completeness rate
12	Standardize force-incident form and central database; publish quarterly anonymized “trust dashboards.”	I	HQ GRM/Legal; ICT	2–4 months	Data policy; simple DB or enhanced Excel	# incidents logged with IDs; dashboards published; trend analyses used in briefs
13	Drought contingency MoUs: co-sign temporary grazing routes/openings (Chief+CFA+Station) with SMS/baraza alerts.	D	County Conservator/Warden; Chiefs; CFA Chairs	2–6 months	Seasonal forecasts; county admin	Signed MoUs; # alerts issued; conflict incidents during drought
14	Participatory zone maps (grazing/water/shrines/medicinal plants) posted at gates and online;	D	GIS/ICT; Station Commanders; CFA	2–5 months	GIS data; review by elders	Maps displayed; hotline approvals logged

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	laminated species rules for medicinal access.					
15	Body-worn/SMART event-ID pilot for high-risk arrests (Marsabit + one comparator site).	○	HQ Ops; ICT	3–6 months	Procurement; data protocol	% high-risk ops with footage/event IDs; complaints resolved faster
16	Gender & facility upgrades at remote posts (privacy/sanitation) to improve female deployment and retention.	○	Logistics; HR	6–12 months	Minor works contracts	% women deployed by cadre; facility compliance checklist
17	Community communications plan: vernacular radio, baraza roadshows, “You said—We did” GRM feedback each quarter.	○	Community Liaison; Station Commanders	0–6 months	Content approvals	# broadcasts/barazas; community awareness survey

8.0 References

1. World Bank. (2017). *Environmental and social framework*. World Bank.
2. World Bank. (2018). *Environmental & social framework for IPF operations: ESS4 – Community health and safety: Guidance note for borrowers*. World Bank.
3. Kenya Forest Service. (2023). *Kibwezi Forest Management Plan, 2023–2028*. Kenya Forest Service.
4. Kenya. (2011). *National Police Service Act (No. 11A of 2011)*. National Council for Law Reporting.
5. Kenya. (2010). *The Constitution of Kenya, 2010*. National Council for Law Reporting.
6. Kenya. (2012). *National Land Commission Act (No. 5 of 2012)*. National Council for Law Reporting.
7. International Ranger Federation. (2021). *Ranger code of conduct (Version 1.0)*. International Ranger Federation.
8. World Bank. (2025). *Interim guidance note: Managing the risks of projects involving protected areas*. World Bank.
9. International Union for Conservation of Nature. (2017). *The IUCN Green List of Protected and Conserved Areas: Global standard (Version 1.1)*. IUCN.
10. Voluntary Principles on Security and Human Rights. (n.d.). *Voluntary principles on security and human rights*. Author.
11. World Bank. (2018). *Good practice note: Assessing and managing the risks and impacts of the use of security personnel*. World Bank.
12. United Nations. (1990). *Basic principles on the use of force and firearms by law enforcement officials*. United Nations.
13. Office of the Compliance Advisor/Ombudsman (CAO). (2008). *A guide to designing and implementing grievance mechanisms for development projects*. International Finance Corporation.

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14. Republic of Kenya. (2016). *Forest Conservation and Management Act, No. 34 of 2016*. Nairobi, Kenya: National Council for Law Reporting.
16. Republic of Kenya. (2013). *Wildlife Conservation and Management Act, No. 47 of 2013*. National Council for Law Reporting.
17. Kenya Forest Service & County Government of Marsabit. (2024). *Marsabit forest participatory forest management plan (PFMP), 2024–2028 (Draft)*. Kenya Forest Service.
18. International Ranger Federation. (2021). *Ranger code of conduct (Version 1.0)*. International Ranger Federation.
19. World Bank. (2025). *Interim guidance note: Managing the risks of projects involving protected areas*. World Bank.
20. Kenya. (1999). *Environmental Management and Co-ordination Act, No. 8 of 1999*. Nairobi, Kenya: National Council for Law Reporting.

Annex A: Notes on data analysis

Notes tying specific insights to KII and FG discussion transcripts

- **KEWASIP GRM not yet implemented; complaint box oversight concerns:** KFS HQ & Adjutant.
- **Training gaps/irregular refreshers; verification by complaints:** KWS COO & field teams.
- **PELIS/TELIS & transparent ballots; customary law (Njuri Njeke):** Meru KFS.
- **Fence for better water reliability:** Senior Warden, Chyulu.
- **CFA scouts untrained in HRBA (Kibwezi); PFMP & funding constraints (Marsabit)**¹⁷: CFA FGDs.
- **Graduated force narrative vs. assurance limits:** Nyambene KFS Commander.

Tables to include in the HR appendix (for quick population)

- **Table A:** Headcount by cadre/grade and duty station (establishment vs filled; vacancies; female %).
- **Table B:** Deployment metrics (patrol km/day; incidents/HWC per 100 km²; joint-ops days with NPS).
- **Table C:** Training coverage/recency by cadre (HR, de-escalation, community engagement, firearms, first aid).
- **Table D:** Recruitment pipeline (applications, shortlisted, appointed; diversity; time-to-fill; hardship transfers completed).

Annex A — Incident table (detail)

#	Incident (short title)	Key facts	Risk type	Program takeaway
A1	Embobut (Sengwer) evictions (2014–2018)	Burned homes; fatal shooting 16-Jan-2018; EU suspended funding. (Amnesty International)	Severe (lethal force; livelihood loss; reputational)	Forest operations must have independent oversight, FPIC-style engagement, and no-burn policy.
A2	Mau evictions (2019–2020)	HRW reports of violence, deaths, injuries; competing official narratives. (Human Rights Watch)	High (force, displacement)	Use grievance windows, third-party monitors, and post-operation audits.

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A3	Tsavo East herder fatality (Dec-2024)	Herders inside park; one killed; KWS cites poisoned arrow threat; investigation referenced. (Nation)	High (operational force)	Reinforce graduated response and joint command for livestock incursions; publish incident debrief.
A4	Accountability case (Kiambu, 2025)	13 police + 1 KWS warden charged in 2022 killings of 3 people (multi-agency). (Insider Bits News)	Governance	Demonstrates prosecutorial pathway; publicize cooperation & lessons learned.

Annex B: Summary of Use-of-Force (UoF) & Law-Enforcement Protocols — KWS and KFS

(Synthesised from KIIs and FGDs: HQ, Meru/Nyambene, Kibwezi/Chyulu Hills, Marsabit; community CFAs.)

B.1 Legal and command framework

Both Kenya Wildlife Service (KWS) and Kenya Forest Service (KFS) are uniformed, disciplined services with clear command hierarchies from HQ through regional/area commands to stations and beats. Officers act under the Wildlife Conservation and Management Act ¹⁶ for KWS and the Forest Conservation and Management Act ¹⁴ for KFS, alongside public-service standing orders and criminal law. Interviewees referenced agency standing orders on firearms and, in KFS, training aligned with the UN Basic Principles on the Use of Force ^{11,12}. In Marsabit, commanders also referenced the applicable “use of firearms” section of the Act when describing on-the-ground decisions. The summary below highlights where current practice is aligned with, or diverges from global ranger standards such as the International Ranger Federation Code of Conduct ^{7,18}.

B.2 Use-of-Force continuum (as described in practice)

While written SOPs exist, field officers described a practical, stepwise escalation that is broadly consistent across sites ¹², with KFS articulating the sequence most concretely:

1. **Presence and verbal commands** (identify, instruct to comply).
2. **Warn of arrest**; if resistance persists, **warning shot in the air** (KFS).
3. **Second verbal warning with explicit consequence**.
4. **Targeted force to immobilise** where a credible threat exists (e.g., knives, axes, poisoned arrows, or firearms).
5. **Post-incident care** (first aid) and **transfer to police custody**; KWS and KFS emphasised that **detention is at recognised police stations**.

Supervisors highlighted that officers are trained to exercise “reasonable judgment,” and that proportionality and defensive posture apply, particularly in high-risk contexts (e.g., Marsabit). KWS emphasised that “standard rules apply to anyone carrying a government-issued firearm,” with disciplinary investigation where complaints indicate breach.

B.3 Arrest, detention, and case handling

- **First response & booking.** Beat/shift leaders document incidents immediately in an **Occurrence Book (OB)** and station registers; KFS uses the Forest Protection Patrol Register (FPPR) to record patrols, contacts, and seizures.
- **Handover to police.** Both Services stated that suspects are transferred to the National Police Service; the Service remains a witness in prosecutions⁴.
- **Chain of custody.** Evidence and seized property follow station and county registers with supervisor sign-off; weekly checks and supervisory comments were described as routine.

B.4 Weapons, armouries and sensitive technology

- **Issuance & returns.** Stations maintain Arms Movement Books recording officer, firearm, rounds issued/returned, date, and purpose; ammunition expenditure forms are completed where rounds are discharged.
- **Storage.** Arms are stored in armouries; where permanent armouries are weak (KFS), **armoury boxes** and designated armourers (corporal level or above) are used. Monthly returns on firearms are submitted to the police.
- **Drones/GPS/SMART.** Deployment is logged; KCAA clearance was cited for drones; surveillance data feed operational planning.

B.5 Training and refresher coverage

- **Academies.** KWS training is centred at Manyani; KFS cited Forest Law Enforcement Academy (FOLEA) and Kenya Forestry College, with joint modules supported by NPS.
- **Content.** Induction covers law, HRBA, de-escalation/negotiation, evidence handling, and firearms safety.
- **Recency.** Refresher cycles are irregular and resource-dependent; some field units reported last full refreshers 4–5 years ago. Community Forest Association (CFA) scouts, who often act as first contact and rarely receive formal HRBA/intake training.

B.6 Inter-agency operations and incident learning

- **Coordination.** Joint operations are tasked through county security committees; national intelligence and police support is common in hotspots ¹⁴.
- **Debriefs.** After-action reviews occur but are inconsistently documented; supervisors noted reliance on meetings and reminders rather than programmed lessons-learned cycles.

B.7 Community interface, complaints and safeguards

- **Intake.** Community complaints reach stations via suggestion boxes, chiefs, direct calls, CFA committees, or county offices. Some stations keep complaints register; others rely on OB entries.
- **Oversight.** KWS referenced internal disciplinary processes, the Wildlife Investigations Department, and external routes (IPOA, EACC). KFS HQ flagged toll-free lines/letters and acknowledged weak oversight of some station complaint boxes.
- **Practice variation.** CFAs report generally cooperative relations, but also occasional excessive-force incidents resolved through reconciliation; insecurity (banditry/arms) was consistently cited as a driver of precautionary postures. In Marsabit and Kibwezi, CFAs maintain community scouts who often act as the first point of contact for local users, accompany KFS or KWS patrols as guides, and relay information or complaints from villages to station staff. These scouts are unarmed and do not exercise independent enforcement powers; their proper role is to observe, advise and refer cases to authorised officers, not to arrest, question or sanction community members. Given their proximity to patrols and complaint pathways, KEWASIP will apply the same HRBA, GRM-intake and non-retaliation standards to community scouts as to agency staff involved in community interface, and will clarify these expectations in PFMPs, station-level SOPs and the Security Management Plans.

B.8 Side-by-side protocol summary (as reported)

Domain	KWS	KFS
Legal basis & mandate	WCMA 2013 ¹⁶ ; agency standing orders; disciplinary code; IPOA/EACC channels for complaints.	FCMA 2016 ¹⁴ ; UN Basic Principles ^{11,12} referenced in training; internal standing orders.
UoF continuum (practice)	Presence → verbal commands → escalation based on threat; firearms under strict rules for government weapons; investigation if complaints arise.	Structured sequence described: verbal warning → warning shot → second warning → shoot to immobilise if necessary → first aid → handover to police.
Arrest & detention	Immediate report to next level; temporary KWS custody only or handover to police; Wildlife Investigations Department supports casework.	OB + FPPR entries; suspects booked at police station; KFS acts as state witness.

Records & chain of custody	Incident reports; OB; evidence handed to police; internal enquiry on SOP breach.	Station/county registers; weekly supervisory checks; chain-of-custody emphasised.
Weapons control	Issue/return logs; armoury procedures; negligence triggers charge/dismissal.	Arms Movement Book, ammo expenditure forms; designated armourer; monthly firearms return to NPS; armoury boxes where infrastructure is weak.
Training & recency	Manyani academy; promotions tied to courses; HRBA/de-escalation included refreshers need strengthening.	FOLEA/Kenya Forestry College; HRBA noted; refresher cycles uneven due to funding; CFA scouts largely untrained in HRBA.
Inter-agency ops	Multi-agency with NPS, intelligence; county security committees.	Multi-agency approach; approvals via security committees; AARs conducted but not standardised.
Community/GRM	Call centre for HWC; chiefs and local offices; disciplinary/oversight options (IPOA/EACC).	Suggestion boxes, complaint registers, county conservator; toll-free and letters; some boxes lack clear custody/oversight.

B.9 Observed gaps and risk implications

- **Irregular refreshers and practice drift.** HRBA, de-escalation and evidence-handling competencies lapse without predictable cycles.
- **First-mile variation.** CFA scouts commonly act as intake/co-patrol but lack standard HRBA scripts and referral trees, raising tone and proportionality risks.
- **Armoury infrastructure.** Several stations reported non-permanent armouries; reliance on boxes increases dependency on process discipline.
- **Complaint-driven assurance.** Verification of SOP adherence is often triggered after a complaint, rather than through routine compliance checks.
- **High-risk operating context.** Insecurity (banditry/arms) elevates reliance on officer judgment and increases the likelihood of precautionary force.

B.10 Minimum standards recommended for KEWASIP sites

1. **Codify a common UoF card** (wallet-size) for KWS/KFS field teams and CFA scouts: steps, do/don't language, first-aid & handover.

Institutional Analysis of KFS and KWS for KEWASIP

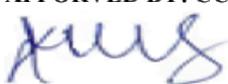
2. **Refresher cadence:** HRBA/de-escalation annually; firearms 6–12 months; evidence/chain-of-custody 24 months; log recency against each officer ID.
3. **Records discipline:** OB + FPPR entries compulsory for every contact leading to seizure, force, or arrest; ammunition expenditure and AAR templates filed within 72 hours.
4. **Armoury assurance:** Quarterly checks; designate armourer at every station; remedial plan for sub-standard armouries.
5. **First-mile training for CFAs:** 1-day HRBA + GRM intake and referral scripts; co-patrol briefings; inclusion in quarterly joint exercises.
6. **Independent touchpoints:** Publicise IPOA/EACC routes and establish a KEWASIP GRM ticket process with 72h/14d/30d SLAs; post station-level “trust dashboards.”

Annex C: KFS security process flow charts.

	KENYA FOREST SERVICE		DOCUMENT TITLE: INTELLIGENCE SECTION
	REF NO:KFS-ENCOM-002	ISSUE NO: 2	REVISION NO:1

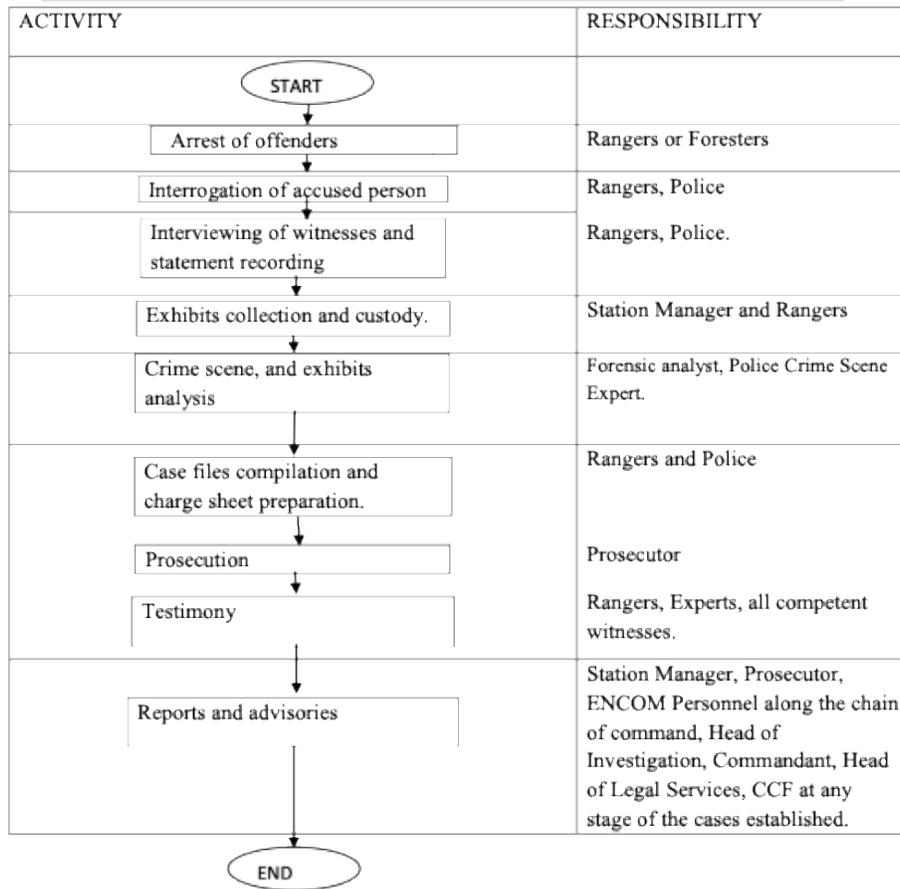
11.PROCESS FLOW CHART

ACTIVITY	RESPONSIBILITY
 ↓	
Rangers/ staff gather information through routine duties	Rangers /Staff
↓	
Information collected and collated by collection officer	Collection officer
↓	
Information analysed by analyst	Analyst
↓	
Deductions made and intelligence report generated and forwarded to Commandant	Head intelligence
↓	
CCF receives Intelligence from Commandant and Forwards to action officers	CCF
↓	
	

PREPARED BY: COMMANDANT	APPROVED BY: CCF 
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	KENYA FOREST SERVICE		DOCUMENT TITLE INVESTIGATION AND PROSECUTION
	REF NO:KFS-ENCOM-003	ISSUE NO: 2	REVISION NO:1

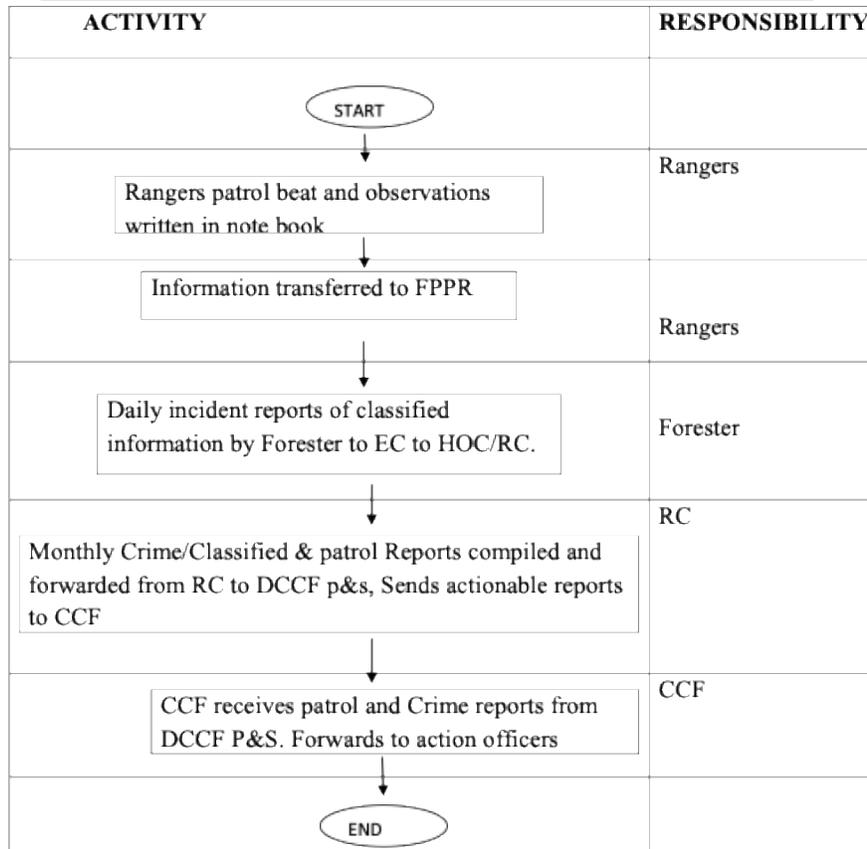
11.PROCESS FLOW CHART



PREPARED BY: COMMANDANT	APPROVED BY: CCF 
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	KENYA FOREST SERVICE		DOCUMENT TITLE: CRIME REPORTING
	REF NO:KFS-ENCOM-007	ISSUE NO: 1	REVISION NO:1

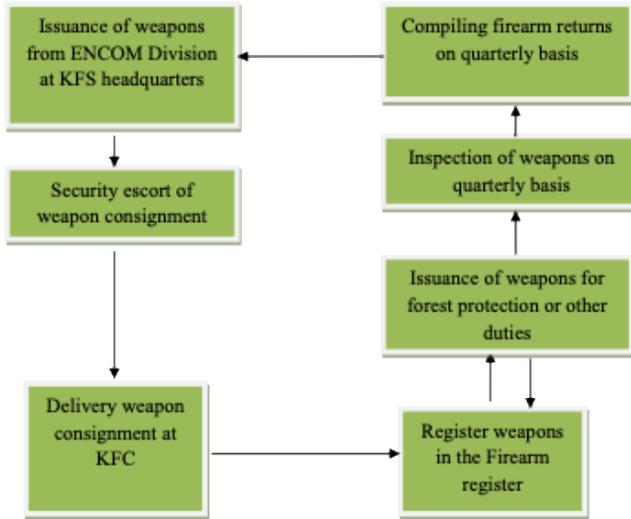
11.PROCESS FLOW CHART



PREPARED BY: COMMANDANT	APPROVED BY: CCF 
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 KENYA FORESTRY COLLEGE		DOCUMENT TITLE: PARAMILITARY TRAINING AND WEAPON HANDLING	
REF NO:KFS-KFC-008	ISSUE NO: 2	REVISION NO: 1	PAGE:9 of 9

11.2. Weapon Handling

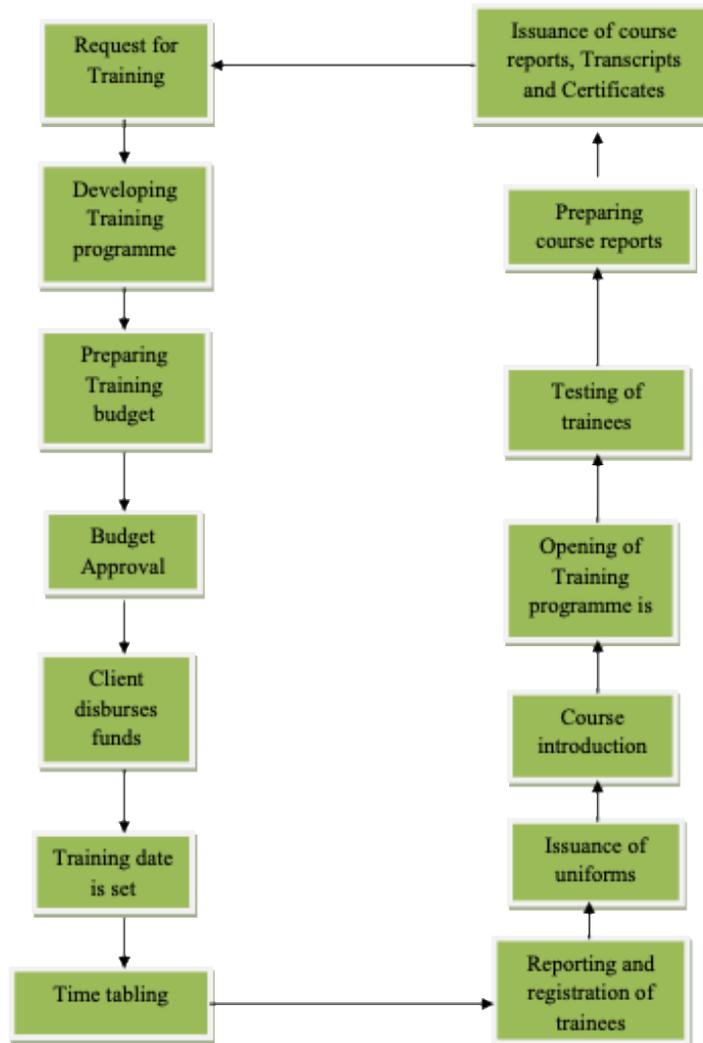


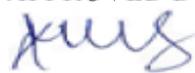
PREPARED BY: PRINCIPAL	APPROVED BY: CCF 
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	KENYA FORESTRY COLLEGE		DOCUMENT TITLE: PARAMILITARY TRAINING AND WEAPON HANDLING	
			REF NO:KFS-KFC-008	ISSUE NO: 2

11. PROCESS FLOW CHART

11.1. Training



PREPARED BY: PRINCIPAL	APPROVED BY: CCF 
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Annex C. Analytical review of KFS/KWS Codes of Conduct, SOPs and MOUs.

C.1 Purpose and scope

This annex summarises the documentary review referred to in Section 1.3 of the main report. It focuses on internal rules and procedures that govern how Kenya Forest Service (KFS) and Kenya Wildlife Service (KWS) staff exercise law-enforcement mandates, interact with communities, and manage land and resources in and around protected and forest areas.

The review covers:

- Codes of conduct and staff regulations for uniformed and non-uniformed personnel;
- Standard operating procedures (SOPs) on patrols, searches, arrests, detention and incident management;
- SOPs and standing orders on weapons, ammunition and use of force;
- Protected area and forest management plans and related community/participation frameworks;
- Memoranda of understanding (MoUs) and other agreements regulating joint operations with the National Police Service (NPS) and county governments; and
- Training curricula and manuals relating to human rights, community engagement, conflict management and use of force.

These documents are assessed against (i) the Kenyan legal framework (Constitution, sectoral laws, National Police Service Act, National Land Commission Act), and (ii) applicable international standards, including the World Bank Environmental and Social Framework (especially ESS1, ESS4, ESS5, ESS7, ESS10), the Good Practice Note on Security Personnel, the Protected Areas Interim Guidance Note, the UN Basic Principles on the Use of Force and Firearms, the Voluntary Principles on Security and Human Rights, the International Ranger Federation (IRF) Ranger Code of Conduct, and good practice on grievance mechanisms.

The objective is to identify where KFS/KWS documentary frameworks already support safe, rights-compatible enforcement and where targeted revisions, supplements or MoUs are required under KEWASIP.

C.2 Documents reviewed

Table C.1 summarises the main categories of institutional documents reviewed and their relevance to KEWASIP.

Table C.1: Summary of institutional documents reviewed

Category	Examples (KFS / KWS / joint)	Primary focus	Relevance for KEWASIP
Codes of Conduct and staff regulations	KFS internal Code of Conduct for uniformed staff; KWS Staff Regulations and Code of Conduct; disciplinary regulations and standing orders	Expected behaviour of staff, integrity standards, treatment of communities, disciplinary processes	Foundation for (i) use-of-force discipline, (ii) non-discrimination, (iii) anti-retaliation for complainants and witnesses, and (iv) enforcement of revised SOPs and MoUs
Patrol, arrest and detention SOPs	Field patrol SOPs; arrest and search SOPs; custody and handover protocols; occurrence book (OB) and station diary instructions	How patrols are planned, suspects are apprehended, searches are conducted and incidents are recorded	Central to operationalising ESS4 requirements, UN Basic Principles, and joint arrangements with NPS; basis for defining “rules of engagement” in KEWASIP sites
Weapons and use-of-force procedures	Firearms and ammunition SOPs; armoury and stock control procedures; standing orders on warning shots and discharge of firearms; incident reporting requirements	Control of firearms and ammunition, authorisation procedures, reporting and review of discharges, links to training and re-qualification	Directly linked to World Bank ESF expectations on security personnel, UN Basic Principles and Voluntary Principles; key to managing high-risk interactions and reputational risk
Incident management and investigations	SOPs for incident reporting, preliminary inquiries and internal investigations; forms for serious incidents and casualties; links to national investigative bodies	Classification, escalation and investigation of incidents, including alleged abuse, accidents and fatalities	Determines how quickly and credibly use-of-force events, allegations of abuse and accidents are captured, reviewed and remedied
Community engagement and grievance procedures	Elements in PA/forest management plans on CFAs, community rangers, conflict resolution committees and barazas; any written complaints procedures; interfaces with statutory compensation mechanisms	Routine community engagement; receiving, recording and resolving complaints; management of human-wildlife conflict and livelihood restrictions	Critical for delivering ESS10-compatible grievance mechanisms and for reducing escalation of disputes into conflict or media crises
Protected/forest area management plans and PFMPs	Park management plans (e.g. for Chyulu Hills); Forest Management Plans; Participatory Forest Management Plans (PFMPs)	Zoning, resource-use rules, participation arrangements, benefit-sharing, conflict-management provisions	Define the “rules of the game” for communities and staff; key for understanding livelihood restrictions, legacy issues and opportunities for co-management
Training curricula and manuals	Training syllabi for recruits and in-service staff (use of force, human rights, community engagement, first aid); range qualification requirements	Content and frequency of training, including de-escalation and weapons handling	Determines whether SOPs are understood and applied in practice; underpins KEWASIP capacity-building measures
MoUs and letters of agreement	MoUs between KFS/KWS and NPS/police; agreements with	Roles and responsibilities in joint operations, command	Essential for meeting World Bank expectations on public

Category	Examples (KFS / KWS / joint)	Primary focus	Relevance for KEWASIP
	county governments and CFAs; joint patrol arrangements	and control, coordination of investigations, complaint handling	security and for clarifying accountability where agencies patrol together

C.3 Analytical framework

The documents were assessed along six cross-cutting themes which correspond to the Protected Areas Interim Guidance Note and the benchmarks set out in Section 5.1 of the main report:

1. **Mandate, roles and chain-of-command:** clarity of legal authority, internal command structures, and division of roles with NPS and other agencies.
2. **Use of force, firearms and arrest/detention:** how far written procedures embody necessity, proportionality, precaution, reporting and medical-aid obligations.
3. **Community engagement, access and grievance handling:** provisions for consultation, information disclosure, grievance mechanisms and human-wildlife conflict (HWC) response.
4. **Land, resettlement and livelihood restrictions:** treatment of evictions, boundary enforcement, access restrictions and resettlement, and alignment with constitutional and NLC requirements.
5. **Accountability, discipline and oversight:** internal disciplinary systems, links to external oversight bodies, protection from retaliation.
6. **Joint operations and coordination with security forces:** content and coverage of MoUs, including rules of engagement (ROE), vetting, training and incident follow-up.

The analysis below synthesises patterns across KFS and KWS documents rather than commenting on each document individually. It should be read together with the practice-based gap analysis in Section 5.0 and the recommendations matrix in Section 4.0 of the main report.

C.4 Key findings by theme

C.4.1 Mandate, roles and chain-of-command

Strengths

- The core legal mandates of KFS and KWS are clear in sectoral legislation and are broadly reflected in internal manuals and management plans. Both agencies have structured hierarchies, with defined roles for headquarters, regional and station-level commanders.

Institutional Analysis of KFS and KWS for KEWASIP

- The reviewed documents generally distinguish between civil functions (e.g. community outreach, resource permits) and enforcement functions (e.g. patrols, arrests, seizures), with delegated authority set out for field staff.
- Some management plans and PFMPs begin to map institutional responsibilities across KFS/KWS, county governments and CFAs, providing an entry point for clearer co-management arrangements.

Gaps and weaknesses

- Internal documents rarely cross-reference the wider institutional landscape (National Police Service, National Land Commission, county governments, human-rights institutions), which can lead to ambiguity during joint operations and in complex land or eviction cases.
- There is limited written guidance on how institutional roles evolve as projects such as KEWASIP introduce new investments, infrastructure and livelihood activities in existing protected areas.
- Station-level arrangements (e.g. informal understandings about who leads joint patrols or who handles complaints) are often not formalised in MoUs or standard terms of reference.

Implications for KEWASIP

KEWASIP-supported revisions should:

- Map and explicitly reference key external entities (NPS, NLC, county security and environmental committees, human-rights and anti-corruption bodies) in revised SOPs and management plans;
- Clarify, in MoUs and SOPs, who exercises operational command during joint patrols and who is responsible for incident investigation, evidence custody and communication with communities; and
- Ensure that revised documents explicitly state how KEWASIP-financed infrastructure and activities affect institutional responsibilities, including for community engagement and grievance handling.

C.4.2 Use of force, firearms and arrest/detention

Strengths

- Existing SOPs and standing orders, as described by KFS and KWS staff during interviews and field visits, do set out a basic continuum from presence and verbal warnings through to arrest and, in high-risk situations, use of firearms.

Reporting through station occurrence books and specific forms for discharge of firearms is routine in many sites.

- Weapons management procedures cover core control measures such as authorisation for issue and return, armoury registers and ammunition accounting.
- Training curricula include initial instruction on weapons handling, safety and lawful use of force.

Gaps and weaknesses

- There is no single, consolidated use-of-force policy per agency that sets out clearly, in one place, the principles of necessity, proportionality, precaution, last resort and duty of care, along with explicit prohibitions (e.g. on lethal force to protect property alone). Instead, expectations are spread across a mix of standing orders, training notes and informal practice.
- Station-level practice on warning shots, verbal warnings and medical aid varies and is not standardised in the written materials. The duty to provide or facilitate immediate medical assistance to injured persons, and to record such assistance, is not uniformly articulated.
- Arrest, search and detention procedures are not consistently integrated with community-facing rights (e.g. information on reasons for arrest, access to legal assistance) or with the requirements of the National Police Service where suspects are handed over.
- Firearms re-qualification cycles, refresher training in de-escalation and scenario-based training for complex incidents are insufficiently specified in the written documents, leading to the irregular practice observed in the main report.

Implications for KEWASIP

Within KEWASIP, KFS and KWS should:

- Develop and adopt a consolidated, service-wide use-of-force policy for each agency, aligned with UN Basic Principles, the National Police Service framework and the World Bank's requirements on security personnel.
- Translate this into short pocket cards for field staff, summarising the continuum, prohibitions and reporting/medical-aid obligations, and refer to these cards explicitly in SOPs and training materials.
- Update firearms and arrest/detention SOPs to standardise requirements on warnings, recording and immediate medical assistance after any use of force, and ensure they explicitly describe coordination with police procedures when suspects are handed over.

- Codify firearms re-qualification intervals, requirements for scenario-based training and links to posting decisions in training manuals and HR policies, rather than treating them as ad hoc or discretionary practices.

C.4.3 Community engagement, access and grievance handling

Strengths

- Many protected and forest area management plans, as well as PFMPs, contain sections on community participation, co-management through Community Forest Associations and collaboration with community wildlife structures. These provide a foundation for structured dialogue and joint problem-solving.
- Internal documents recognise the existence of statutory human-wildlife conflict compensation schemes and outline, to varying degrees, the roles of KWS and counties in processing claims.
- At station level, there are established, if informal, routes for communities to raise concerns (chiefs' barazas, meetings with station commanders, telephone contact).

Gaps and weaknesses

- There is no unified, written grievance mechanism framework that would meet ESS10 and good-practice criteria (multiple channels, accessibility, clear timeframes, tracking numbers, appeals and feedback). Provisions are fragmented across different management plans, letters and informal practices.
- Internal codes of conduct and SOPs have limited explicit language on protection from retaliation for complainants and witnesses, on confidentiality (especially for SEA/SH and other sensitive harms), and on the duty to use grievance data for learning and preventive action.
- The linkage between project-level grievance mechanisms and statutory remedies (courts, commissions, NLC, Ombud institutions) is generally not spelled out, leaving communities and staff without clear written guidance on escalation options.
- Written service standards for response to human-wildlife conflict, boundary disputes and access problems are either absent or not routinely shared with communities in a documented, accessible way (e.g. posted in stations, translated summary leaflets).

Implications for KEWASIP

KEWASIP should support KFS and KWS to:

- Consolidate existing complaints routes into a written, PA/forest-level grievance mechanism for KEWASIP sites, with clear procedures, templates and service standards, and ensure this mechanism is embedded in SOPs and management plans.
- Incorporate explicit non-retaliation clauses, survivor-centred approaches for SEA/SH and child protection cases, and confidentiality provisions into codes of conduct, GRM SOPs and training materials.
- Include in written guidance a clear map of how project-level grievance handling interfaces with statutory mechanisms and oversight bodies, and how staff should advise complainants on escalation.
- Require management plans and PFMPs to publish (and periodically update) local service standards for HWC response, boundary dispute handling and grievance resolution, in formats accessible to communities.

C.4.4 Land, resettlement and livelihood restrictions

Strengths

- National legislation and the Constitution set relatively strong formal protections around property rights, community land and resettlement, which are referenced in higher-level policy documents and in some management plans.
- Several PFMPs and park management plans recognise existing customary uses (e.g. grazing, collection of firewood and non-timber forest products, cultural and spiritual sites) and include zoning approaches that seek to accommodate these uses under controlled conditions.
- Some documents provide for negotiated access arrangements, benefit-sharing and use of community structures for conflict resolution, particularly around resource access and human–wildlife conflict.

Gaps and weaknesses

- Internal SOPs and codes of conduct do not systematically translate constitutional and statutory protections into operational rules for field staff, particularly regarding evictions, house demolitions, burning of dwellings, destruction of crops and other livelihood restrictions.
- Written procedures often focus on enforcement of statutory offences without providing practical guidance on how to weigh proportionality,

alternatives to eviction, mitigation measures and compensation pathways in complex situations.

- Interfaces between KFS/KWS and the National Land Commission, county governments and other land authorities are rarely spelled out in the documents that field staff actually use.
- There is limited written guidance on how to handle legacy land disputes and overlapping claims in ways that are consistent with rights, conflict-sensitive and aligned with World Bank ESS5/ESS7.

Implications for KEWASIP

As part of KEWASIP:

- KFS and KWS should develop short, operational guidance notes (or annexes to existing SOPs) on eviction, clearance, boundary enforcement and livelihood restriction, drawing explicitly on constitutional protections, NLC procedures and relevant jurisprudence.
- These notes should clarify that eviction and destruction of homes are measures of last resort, to be used only following due process and with appropriate oversight, and that alternative measures (e.g. negotiated access, phased compliance, compensation, assisted relocation) must be considered and documented.
- Management plans and PFMPs should explicitly identify areas with legacy or active land disputes and set out agreed processes (with NLC and local authorities) for addressing them, including documentation, engagement and monitoring requirements.

C.4.5 Accountability, discipline and oversight

Strengths

- Codes of conduct and staff regulations set out core ethics (integrity, non-corruption, respect for the public) and define disciplinary offences, sanctions and procedures.
- There are internal mechanisms for dealing with misconduct, including convening disciplinary boards and imposing sanctions up to dismissal.
- Some documents reference obligations to cooperate with external investigative bodies (e.g. police, internal affairs, anti-corruption agencies) in serious cases.

Gaps and weaknesses

- The reviewed codes and SOPs seldom make explicit reference to national external oversight bodies (Independent Policing Oversight Authority, Kenya National Commission on Human Rights, Ethics and Anti-Corruption Commission) and their roles in relation to alleged abuse by KFS/KWS personnel.
- Internal disciplinary procedures place most emphasis on protecting institutional reputation and compliance with internal rules; less emphasis is placed on victim-centred remedy, transparency and learning.
- Whistle-blower protection and non-retaliation for staff who report abuses or unsafe practices are weak or absent in the written frameworks.
- There are no standard requirements in SOPs for public disclosure of non-sensitive summaries of security incidents or grievance mechanism performance, which limits transparency and community trust.

Implications for KEWASIP

KEWASIP provides an opportunity to:

- Update codes of conduct and disciplinary regulations to reference external oversight institutions explicitly, clarify cooperation obligations, and reflect the principles of transparency, fairness and victim-centred remedy.
- Introduce clear, written non-retaliation provisions for both communities and staff who raise complaints or report misconduct, including protection measures and sanctions for retaliation.
- Embed requirements for routine, anonymised public reporting of key security and grievance indicators (e.g. through “trust dashboards”) in SOPs and management plans, with roles and frequencies specified.

C.4.6 Joint operations and coordination with security forces

Strengths

- At national level, there are MoUs and standard arrangements for collaboration between KFS/KWS and NPS, and in some counties these have been adapted in practice to support joint patrols and operations.
- Operational relationships between station commanders and local police are generally functional; joint patrols occur, information is shared, and suspects are handed over for further investigation and prosecution.
- Officers and rangers are aware that when operating alongside police, they must respect police command structures and evidentiary requirements.

Gaps and weaknesses

- Many station-level joint operations rely on informal understandings rather than written MoUs that specify rules of engagement, command and control, vetting of personnel, complaint handling and investigation responsibilities.
- Existing MoUs and agreements, where they exist, tend to be high-level and do not translate World Bank, UN Basic Principles or Voluntary Principles expectations into operational clauses (e.g. on proportional force, community engagement, and medical aid and reporting in mixed patrols).
- There is limited written guidance on how joint operations should interface with grievance mechanisms, both for community complaints and for staff concerns about partner-agency conduct.
- In some contexts, there is no systematic requirement to vet police officers or other public security personnel participating in joint patrols for prior credible allegations of abuse.

Implications for KEWASIP

KEWASIP should support:

- Development and adoption of standard MoU templates between KFS/KWS and NPS for joint operations in KEWASIP landscapes, including detailed clauses on: rules of engagement, chain of command, vetting, training, community engagement, incident reporting and investigation, and grievance handling.
- Incorporation of these MoU provisions into internal SOPs and training materials so that field staff understand and can operationalise them in daily work.
- Periodic joint reviews of MoU implementation, with lessons fed back into SOPs and KEWASIP's Security Management Plans and grievance systems.

C.5 Cross-cutting conclusions and priorities for document revision

The overall picture from the documentary review is that:

- **Foundations are present:** KFS and KWS operate under clear statutory mandates and have established internal codes, SOPs and management plans that provide a starting point for safe and rights-compatible enforcement.
- **Practice has outpaced documentation in some areas:** As reflected in the main report's field findings, officers and rangers have developed operational routines (e.g. for graduations of force, incident logging, informal grievance

handling) that are more nuanced than what is captured in older SOPs and codes.

- **Alignment with international good practice is partial and uneven:** Key elements emphasised by the World Bank ESF, the Protected Areas guidance, UN Basic Principles, Voluntary Principles, IRF Code and CAO grievance guidance such as consolidated use-of-force policies, structured SRAs and SMPs, ESS10-compatible grievance mechanisms, explicit non-retaliation, and detailed MoUs for joint operations are not yet fully embedded in the written frameworks.

KEWASIP should therefore prioritise a small number of document-level reforms that have high leverage for risk reduction and institutional strengthening, including:

1. **Consolidated use-of-force and arrest policies** for KFS and KWS, aligned to international standards and linked to training and firearms re-qualification requirements.
2. **A unified, written grievance mechanism framework** for KEWASIP sites, referencing statutory remedies, with clear non-retaliation provisions and special handling of sensitive harms.
3. **Operational guidance on land, evictions and livelihood restrictions**, aligned with constitutional and NLC frameworks and World Bank ESS5/ESS7.
4. **Updated codes of conduct and disciplinary procedures** that embed transparency, cooperation with oversight bodies, whistle-blower protection and routine public reporting of non-sensitive security and GM data.
5. **Standardised MoUs and joint-operations SOPs** with NPS and other security actors, explicitly integrating rules of engagement, vetting, training, community engagement and incident management.

These document revisions should be sequenced with, and reinforced by, KEWASIP's proposed capacity-building activities, Security Management Plans and grievance mechanism roll-out, so that what is written is both practicable and embedded in day-to-day operations.

Annex D. Cross-walk of institutional assessment recommendations to ESF instruments

This annex summarises how the main recommendations from the institutional assessment map onto KEWASIP’s Environmental and Social Framework (ESF) instruments. It is intended as a practical tool for ensuring that priority actions identified in Sections 6.0 and 7.0 are not treated as a stand-alone advisory list, but are embedded in the project’s binding commitments and operational guidance.

The table below links each major recommendation cluster to:

- the **ESCP action(s)** or ESF theme it supports;
- the **instrument(s)** through which it should be operationalised (SEP and GRM; ESMF and Security Management Plan(s); ESMPs; internal KFS/KWS instruments); and
- brief notes on implementation.

Note: ESCP action numbering and section references are indicative and should be aligned with the final ESCP, SEP and ESMF once these are agreed.

Institutional assessment recommendation cluster	Relevant ESCP action(s) / ESF theme	Primary ESF instruments for implementation (SEP / ESMF / SMP / ESMP / internal)	Implementation notes
1. Complete and use institutional assessment and social conflict analysis	ESCP Action 1.1(ii) – institutional assessment and social conflict analysis; ESS1, ESS4, ESS5, ESS7, ESS10	ESCP; ESMF (context and risk sections); Security Management Plan(s) (SMPs); Section 6.0 risk matrix	This report (Sections 3–4, 6–7 and Annexes A–C) fulfils Action 1.1(ii). ESCP should record completion and require periodic updating of the social conflict analysis for KEWASIP landscapes, with key findings integrated into the ESMF and SMPs.
2. Strengthen and harmonise use-of-force (UoF), arrest and detention standards for KFS/KWS	ESCP action on security personnel (ESS4); alignment with UN Basic Principles and domestic law	ESMF – Security Management Plan(s); KFS/KWS service-wide UoF policy and SOPs; ESMP “Security Annexes”	Consolidate existing standing orders and SOPs into a single, public-facing UoF policy per agency, aligned with UN Basic Principles and national law. Develop simple “UoF pocket cards”; require adoption in

Institutional assessment recommendation cluster	Relevant ESCP action(s) / ESF theme	Primary ESF instruments for implementation (SEP / ESMF / SMP / ESMP / internal)	Implementation notes
<p>3. Conduct and maintain Security Risk Assessments (SRAs) and adopt Security Management Plan(s) for KEWASIP</p>	<p>ESCP action on security risk management (ESS4); ESS1/ESS4</p>	<p>ESMF – dedicated SMP chapter/annex; site-specific ESMPs</p>	<p>KEWASIP SMP(s) and use them in site ESMP Security Annexes.</p> <p>ESCP should require an SRA and SMP for KEWASIP, following WB Security Personnel guidance. The SMP should consolidate: risk analysis; UoF and joint-operations arrangements; training; incident-reporting and review; GRM pathways for security-related complaints. ESMPs should include short Security Annexes summarising SMP content for each site.</p>
<p>4. Define status and mandate of community scouts and treat them as associated security personnel</p>	<p>ESCP action on security personnel (ESS4); ESS4/ESS7</p>	<p>SMPs; PFMPs and PA/forest management plans; KFS/KWS SOPs and MoUs with CFAs; SEP / GRM procedures</p>	<p>Explicitly recognise CFA/community scouts as community-based auxiliaries and “associated security personnel” for KEWASIP: unarmed, no independent arrest powers, focused on observe–advise–refer. Codify their roles and limits in PFMPs, SOPs and MoUs; require vetting, HRBA/GRM/safeguarding training and inclusion in grievance and non-retaliation provisions.</p>
<p>5. Design and operationalise an accessible, trusted GRM with a dedicated pathway for security-related complaints</p>	<p>ESCP action(s) on SEP / stakeholder engagement and GRM (ESS10); ESS4/ESS7</p>	<p>SEP (GRM design and communications); project-wide GRM procedures; SMP (security complaint handling); KFS/KWS internal complaint/disciplinary systems</p>	<p>Align GRM design with ESS10 and CAO good practice: multiple channels; clear timelines; tracking and feedback; survivor-centred handling of sensitive harms. Include an explicit “security and enforcement” complaint category and referral protocols to KFS/KWS discipline, police and oversight bodies. Reflect GRM structure and service standards in the SEP and SMP, and communicate these locally.</p>
<p>6. Strengthen training, refresher cycles and competence management for</p>	<p>ESCP action on capacity building (ESS1/ESS4/ESS10); ESS2, ESS4</p>	<p>ESMF – capacity-building plan; SMPs; KFS/KWS training plans and HR systems; ESCP capacity actions</p>	<p>Institutionalise regular, scenario-based refresher training on HRBA, de-escalation, UoF, first aid, GRM intake and safeguarding for KFS/KWS staff and participating</p>

Institutional assessment recommendation cluster	Relevant ESCP action(s) / ESF theme	Primary ESF instruments for implementation (SEP / ESMF / SMP / ESMP / internal)	Implementation notes
KFS/KWS staff and community scouts			scouts. Link training recency to deployment decisions. Record key commitments as ESCP capacity-building actions and detail them in the ESMF and SMPs.
7. Clarify procedures for evictions, boundary enforcement and livelihood restrictions, grounded in national law and ESS5/ESS7	ESCP actions on land, resettlement and access restrictions (ESS5/ESS7); ESS1	ESMF – land/access and resettlement sections; SMPs; KFS/KWS SOPs and guidance notes; site ESMPs; PFMPs and PA plans	Develop short operational guidance (or SOP annexes) on evictions, clearance and access restriction: last-resort threshold; due process and documentation; coordination with NLC and courts; mitigation and support measures. Flag legacy dispute areas in ESMPs and PFMPs and require conflict-sensitive engagement. Capture key undertakings in the ESCP. Update codes of conduct and GRM/SMP procedures to include explicit non-retaliation clauses for complainants and whistleblowers; clarify cooperation with external oversight bodies; and introduce routine, anonymised public reporting of key security and GRM indicators (e.g. through “trust dashboards”). ESCP should record these as institutional strengthening actions.
8. Improve transparency, oversight and non-retaliation for complaints and incident reporting	ESCP actions on stakeholder engagement, GRM and security personnel; ESS4/ESS10	SEP (non-retaliation commitments and GRM); KFS/KWS codes of conduct and disciplinary procedures; SMPs; ESCP	Update codes of conduct and GRM/SMP procedures to include explicit non-retaliation clauses for complainants and whistleblowers; clarify cooperation with external oversight bodies; and introduce routine, anonymised public reporting of key security and GRM indicators (e.g. through “trust dashboards”). ESCP should record these as institutional strengthening actions.
9. Embed conflict-sensitive community engagement and benefit-sharing in KEWASIP landscapes	ESCP actions on stakeholder engagement and community development; ESS7/ESS10	SEP (stakeholder mapping, engagement strategies, information disclosure); PFMPs and PA plans; ESMPs; M&E framework	Use social conflict findings to refine stakeholder mapping and engagement strategies in the SEP. PFMPs and PA plans should include co-designed rules on access, benefit-sharing and conflict-resolution, with special attention to VMGs and customary institutions. ESMPs should identify local hotspots and set out conflict-sensitive engagement and monitoring measures.
10. Establish robust incident-review, learning and	ESCP actions on monitoring and	SMPs; KFS/KWS incident-reporting and investigation SOPs; ESCP	Require consistent classification, recording and review of security incidents (including UoF events,

Institutional Analysis of KFS and KWS for KEWASIP

Institutional assessment recommendation cluster	Relevant ESCP action(s) / ESF theme	Primary ESF instruments for implementation (SEP / ESMF / SMP / ESMP / internal)	Implementation notes
assurance mechanisms for security-related events	reporting; ESS1/ESS4/ESS10	monitoring provisions; project M&E	serious injuries/fatalities and serious complaints). Build “after-action” and assurance routines into SOPs and SMPs, with periodic analysis of patterns and lessons. ESCP and project M&E should include indicators and reporting arrangements for these processes.