



THE REPUBLIC OF KENYA

**MINISTRY OF EDUCATION
STATE DEPARTMENT OF EARLY LEARNING AND BASIC
EDUCATION**

**KENYA GPE COVID-19 LEARNING CONTINUITY IN BASIC
EDUCATION PROJECT**

**ENVIRONMENT AND SOCIAL MANAGEMENT FRAMEWORK
(ESMF)**

SEPTEMBER 2020

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ABBREVIATIONS AND ACRONYMS

ACHPR	-	African Charter on Human and Peoples' Rights
ASAL	-	Arid and Semi-Arid Lands
AWP&B	-	Annual Work Plan and Budget
BoM	-	Board of Management
CAJ	-	Commission for the Administration of Justice
CAS	-	Chief Administrative Secretary
CBC	-	Competency Based Curriculum
CBK	-	Central Bank of Kenya
CBO	-	Community Based Organizations
CDE	-	County Director of Education
CEDAW	-	Convention on the Elimination of All Forms of Discrimination Against Women
CHERP	-	COVID Health Emergency Response Project
CoD	-	Code of Conduct
CoK	-	Constitution of Kenya
COVID-19	-	Coronavirus Disease – 2019
CPC	-	County Project Coordinator
CPCU	-	County Project Coordination Unit
CPR	-	Comprehensive Project Report
CRPWD	-	Convention on the Rights of Persons with Disabilities
CSO	-	Curriculum Support Officer
CTS	-	Cash Transfer to Schools
DFID	-	Department for International Development
DOSH	-	Director of Occupational Safety and Health
DOSHS	-	Directorate of Occupational Safety and Health Services
DPC&D	-	Directorate of Projects Coordination and Delivery
DPCAD	-	Directorate of Projects Coordination and Delivery
DPE	-	Directorate of Primary Education
DPH	-	Department of Public Health
DQAS	-	Directorate of Quality Assurance
EACC	-	Ethics and Anti-Corruption Commission
ECD	-	Early Childhood Development
EDPCG	-	Education Development Partners Coordination Group
EDU TV	-	Education Television
EFA	-	Education for All
EGM	-	Early Grade Mathematics
EGR	-	Early Grade Reading
EMIS	-	Education Management Information System
ESA	-	Education Sector Analysis
ESCP	-	Environment and Social Commitment Plan
ESF	-	Environment and Social Framework
ESMF	-	Environment and Social Management Framework
ESMP	-	Environment and Social Management Plan
ESQAO	-	Education Standards Quality Assurance Officer
ESS	-	Environmental and Social Standard
FAQs	-	Frequently Asked Questions
FDSE	-	Free Day Secondary Education
FGDs	-	Focus Group Discussions
FIFO	-	First In First Out
FNSS	-	Food and Nutrition Security Strategy

FPE	-	Free Primary Education
GBV	-	Gender-Based violence
GDP	-	Gross Domestic Product
GIIP	-	Good International Industry Practice
GOK	-	Government of Kenya
GPE	-	Global Partnership for Education
GRMs	-	Grievance Redress Mechanisms
GRS	-	Grievance Redress System
HASP	-	Health and safety Plan
HGSMP	-	Home-Grown School Meals Programme
HIV/AIDS	-	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome
HUTLCs	-	Historically Underserved Traditional Local Communities
ICT	-	Information Communication Technology
IDA	-	International Development Association
IDSR	-	Integrated Disease Surveillance and Response
IEC	-	Information Education and Communication
ILO	-	International Labor Organization
INGOs	-	International Non-Governmental Organizations
IP/SSAHUTLC	-	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
IPC	-	Infection Prevention Control
IPCWMP	-	Infection Prevention and Control, Waste Management plan
KCPE	-	Kenya Certificate of Primary Education
KEMI	-	Kenya Education Management Institute
KEMSA	-	Kenya Medical Supplies Authority
KICD	-	Kenya Institute of Curriculum Development
KNBS	-	Kenya National Bureau of Statistics
KNEC	-	Kenya National Examination Council
KWS	-	Kenya Wildlife Service
LMP	-	Labour Management Plan
MoE	-	Ministry of Education
MoH	-	Ministry of Health
NAC	-	National Assessment Center
NASMLA	-	National Assessment for Monitoring Learner Achievement
NCPWD	-	National Council for Persons with Disabilities
NEMA	-	National Environment Management Authority
NEMIS	-	National Education Management Information System
NESSP	-	National Education Sector Strategic Plan
NGEC	-	National Gender and Equality Commission
NGO	-	Non-Governmental Organization
OSH	-	Occupational Safety and Health
PAD	-	Project Appraisal Development
PAI	-	Project Area of Influence
PCU	-	Project Coordination Unit
PDO	-	Project Development Objective
PHC	-	Primary Health Care
PIM	-	Project Implementation Manual
PPDA	-	Public Procurement and Disposal of Assets Act
PPE	-	Personal Protective Equipment
PRIEDE	-	Primary Education Development Project
PS	-	Principal Secretary
PSC	-	Project Steering Committee

PTA	-	Parents Teachers Association
PWDs	-	People Withwith Disabilities
RCCE	-	Risk Communication and Community Engagement
RoD	-	Records of Decision
SACMEQ	-	Southern Africa Consortium for Monitoring Educational Quality
SCAP	-	Safeguards Corrective Action Plan
SCDE	-	Sub-County Director of Education
SDELBE	-	State Department of Early Years and Basic Education
SDG	-	Sustainable Development Goals
SEA/H	-	Sexual Exploitation and Abuse / /Harassment
SEACMEQ	-	Southern and Eastern Africa consortium for Monitoring Education Quality
SEP	-	Stakeholders Engagement Plan
SEQIP	-	Secondary Education Quality Improvement Project
SMC	-	School Management Committee
SMP	-	School Meals Program
SMPC	-	School Meal Management Committee
SMS	-	Short Message Service
SNM	-	School Nutrition and Meals
SOP	-	Standard Operating Procedure
SPR	-	Summary Project Report
STIs	-	Sexually Transmitted Infections
TSC	-	Teachers Service Commission
TVET	-	Technical and Vocational Education and Training
UHC	-	Universal Health Coverage
UNICEF	-	United Nation International Children’s Fund
UPE	-	Universal Primary Education
USAID	-	United States Agency for International Development
VMG	-	Vulnerable and Marginalized Groups
WASH	-	Water, Sanitation, and Hygiene
WBG	-	World Bank Group
WFP	-	World food Programme
WHO	-	World Health Organization
WIBA	-	work Injury Benefit Act

EXECUTIVE SUMMARY

1. The GPE has allocated the Government of Kenya (GoK) US\$11 million, including a grant agent supervision fee of US\$200,000, from the GPE COVID-19 accelerated funding window designed to capacitate governments to mitigate the impact of COVID-19 on their education systems and help recovery. The Ministry of Education (State Department of Early Learning and Basic Education) has developed a COVID -19 response and recovery plan with the following main objectives: (i) to provide access to quality, equitable and inclusive education to learners during and after the crisis to ensure continued learning; (ii) to facilitate production of on-line teaching and learning materials, and to expand existing distance learning programmes; (iii) to train teachers to effectively support distance learning, including monitoring and assessment; (iv) to develop, and implement intervention programmes targeting the marginalized and most vulnerable learners especially the girls and learners with special needs; and (v) to provide psychosocial support to learners, teachers, education officials and other stakeholders.

2. The objective of the ESMF is to assess and mitigate potential negative environment and social (E&S) risks and impacts of the project consistently with the Government of Kenya regulations and those of the Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF). Specific objectives of the ESMF are to: (i) assess the potential E&S risks and impacts of the proposed project and propose their mitigation measures; (ii) establish procedures for the E&S screening, review, approval, and implementation of activities; (iii) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring E&S issues/ concerns related to the activities; (iv) identify the training and capacity building needed to successfully implement the provisions of the ESMF; (v) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (vi) establish the budget requirements for implementation of the ESMF. The ESMF also provides principles and specific processes to ensure that disadvantaged, vulnerable individuals or groups have access to the project's benefits.

PROJECT DESCRIPTION

3. The project interventions are conceptualized within an existing education ecosystem, where key education reforms are still ongoing despite the COVID-19 crisis. The project is therefore not conceived as just an emergency short-term response; instead, in line with the MoE's COVID-19 plan, it also includes a medium-term set of interventions to protect the education system and to build additional resilience for a crisis that is still unfolding and that will affect Kenya's society and economy for an uncertain period.

Project Development Objective

4. PDO Statement: To enhance access to on-line and distance learning for all students in primary and secondary schools and facilitate a smooth transition in the return to school for targeted vulnerable students.

5. ***PDO Level Indicators:***

- Percentage of students supported with remote learning interventions (online and distance programs) (male, female).
- Number of teachers trained in using remote learning methodologies (online and distance learning methods).
- Percentage of students, previously enrolled in pre-school, primary and secondary schools, who return to school once the school system is reopened, disaggregated (male, female).
- Number of students provided access to school meal and nutrition for at least 151 learning days in a year (male, female).

6. As required by GPE, these indicators will be further reported in numbers (for number of students supported with remote learning, and students who return to school) and percentages (for number of teachers trained, and students accessing school meals), and disaggregated by grades (pre-school, grades 1 to 12), by sub-county, and by subject specialization to provide more granular reporting on progress towards achieving the objectives.

Project Components

7. Component 1: Expanding existing remote learning opportunities for learning continuity for all students in basic education (US\$6.25 million). MoE is looking into solutions to maximize its existing remote learning resources and strengths in line with emergent international good practices in remote learning in the context of COVID-19. Good practice models are emerging, which Kenya can draw on, as well as building on its own experiences to deliver effective remote learning.

8. Component 2: Facilitate smooth transition back to school for vulnerable students and girls, when schools reopen (US\$3.0 million). This component supports two sub-components: grant for the existing National School Meals Program (SMP) and Provision of on-line based psychosocial support services.

9. Component 3: Project Coordination, Communication, and Monitoring and Evaluation (US\$1.55 million). This component aims to support project implementation, selected monitoring and evaluation activities, and to build capacity of MoE to conduct virtual meetings during the COVID-19 period and beyond. Although the project activities for this grant are delineated, overall, project management and coordination, will be implemented within the existing governance structures for the Kenya GPE PRIEDE project at MoE.

Project Beneficiaries

10. The Project will directly benefit the following: (a) about 60 percent of primary and secondary school students accessing online and distance learning; (b) about 1.75 million learners from the school meals program; (c) an estimated 150,000 head teachers, teachers and curriculum support officers will benefit from teacher training in online and distance learning; (d) students will benefit from the online based psychosocial support services; and (e) parents and care takers reached with remote learning tips.

Applicable World Bank Environmental and Social Standards

11. The Environmental and Social risk associated with the project is classified as “Moderate”. Six of the ten Environmental and Social Standards (ESSs) of the WB’s Environmental and Social Framework (ESF) have been screened as relevant: ESS1: Assessment and Management of Environmental and Social Risks and Impacts; ESS2: Labor and Working Conditions; ESS3: Resource Efficiency and Pollution Prevention and Management; ESS4: Community Health and Safety; ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (HUTLCs); and ESS10: Stakeholder Engagement and Information Disclosure. In addition to the World Bank ESSs, the project shall comply with the WBG Environment, Health and Safety (EHS) General Guidelines, and Guidelines on Prevention of gender-based violence and sexual exploitation and abuse (GBV/SEA) and the Kenya’s Environmental and Social Regulatory Framework. Applicable national Laws and regulations include; but not limit to, the Law on Environmental Management and Coordination Act, Public Health, Labor Laws and relevant regulations, Waste Management, Air Quality, Noise and Excessive Vibration as well as the GoK and relevant WHO guidelines on COVID-19.

Project Potential Environmental and Social Impacts

12. The overall anticipated environmental risks and potential negative impacts of the proposed renovation activities will be limited to: (i) localized noise; (ii) localized dust, (iii) management of solid waste, (iv) occupational health and safety risk (slip/fall, fire and traffic accidents), (v) spread of infectious diseases COVID-19, (vi) potential electronic waste from the procurement of ICT related equipment and (vii) impacts related to health and hygiene risks associated with food sourcing handling, delivery, distribution and storage of food. Key social risks include: (i) security threat, (ii) elite capture, discrimination and exclusion of vulnerable groups, (iii) GBV/SEA, (iv) labor disputes, (v) spread of HIV/AIDS and STIs; (vi) cyber bullying of children, (vii) lack of or inadequate public participation and consultation, and (ix) inadequate logistics or their inefficient management. These environment and social risks and impacts are not considered significant or irreversible impacts and can be addressed with straight-forward mitigation measures and good practices through proper enforcement of the environment and social management plan (ESMP) for the project. Other safeguard plans include the: (i) Pre-opening school audit checklist School for inspection of schools, (ii) plans and procedure for food sourcing, handling, storage for suppliers and schools), (iii) occupation health and safety (OSH) requirements for project workers and suppliers. Overall environmental and social risks classification for the project is **moderate**.

Mitigation measures

13. Mitigation measures for these and other risks identified have been described in detail in chapter 4 of this ESMF.

Institutional/Directorate Responsible

14. The existing Kenya GPE PRIEDE Project Coordination Unit (PCU), which is under the Directorate of Projects Coordination and Delivery DPC&D will be primarily responsible for the day-to-day project management and coordination, communication, safeguards, fiduciary and monitoring and reporting. The main implementing agency is the Ministry of Education, State Department of Early Years and Basic Education (SDELBE). The Principal Secretary (PS) in charge of the SDELBE, is the MoE's accounting officer and will have the primary responsibility for efficient and effective implementation of the project for achievement of the stated development objectives. The PCU is functional and has the capacity to also implement this project, considering that some of the key project activities will be directly executed and monitored by the Teachers Service Commission (TSC), Kenya National Examinations Council (KNEC) and Kenya Institute of Curriculum Development (KICD). These agencies are implementing entities of the PRIEDE and SEQIP projects, therefore, have experience with World Bank procedures. The PRIEDE PCU is currently composed of a National Project Coordinator; technical component leads and their deputies; accountants; procurement officers; a communication officer; ICT officer and social safeguards officer.

15. The project will acquire the services of an environment safeguards officer seconded from other ministries/institutions such as National Environment Management Authority (NEMA) to closely monitor project implementation. The current social safeguards specialist attached to SEQIP project will spend 60% of her time on this project since the current project is now well established. Other additional specialist in line with the ESCP including subject matter specialists on Gender Based Violence (GBV)/Sexual exploitation and Abuse (SEA), labor conditions (health & safety), medical waste management, and social inclusion shall be hired on need basis from the pool of specialists from the MoE Framework Agreement with the other agencies and institutions. The coordinator manages day-to-day operations of the PCU. Each component lead will be assigned the responsibility to coordinate, with a relevant implementing agency or Directorate, collect monitoring data to inform project progress reports and updating the results framework.

16. The Project Steering Committee (PSC) for the GPE PRIEDE Project, the SEQIP Project and USAID funded Tusome Project will continue to execute the overall Governance function of this

project. The PSC is chaired by the Education Cabinet Secretary whereas the Principal Secretary, State Department of Early Learning and Basic Education, serves as the Secretary of the PSC. Other key PSC members include relevant Directors from various Directorates at MoE; MoE 's Heads of Finance, Accounts and Procurement; Chief Executive Officers of KNEC, KICD, and TSC; and representatives from the National Treasury, Elimu Yetu Coalition, the Teachers Union, the Head Teachers Associations, and the Parents Associations. The PSC will provide strategic direction, endorse the Annual Work Plan and Budget (AWPB), ensure effective coordination among the project implementation agencies and review the implementation progress.

17. Capacity Building and Training Capacity building and training is proposed in this ESMF in the form of awareness and sensitization workshops targeting the PCU team in Environment and Social Framework (ESF) of the World Bank, including WBG EHS Guidelines and users of electronic devices at the Ministry of Education. The sensitization and awareness activities will focus on imparting knowledge onto users on best practices in e-waste management, including emphasis to recycle or take back e-waste to dedicated centers, environmental and health impacts of improper e-waste disposal as well as emphasizing the need for the project to procure electronic devices from credible manufactures to avoid purchasing refurbished or second hand devices with a short shelf life. Other training areas include:

- Pre-opening school audit checklist;
- E-waste handling, temporal storage and disposal;
- Stakeholder engagement, including grievance redress mechanism (GRM);
- Occupational and Community Health and Safety;
- Safe Food Hygiene Practices;
- Gender-Based Violence Risk Mitigation;
- Grievance Management; and
- Public health risk management, including COVID-19 preparedness under the project.

Stakeholder Engagement and Grievance Redress Mechanism

18. Engagements and consultations on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government agencies, development partners and other cooperating agencies, and community representatives. The Stakeholder Engagement Plan (SEP) is an instrument to guide the project stakeholder engagement process throughout implementation.

19. The grievance redress mechanism (GRM) (Section 8.0), which is a management system through which grievances will be resolved following a standard operating procedure (SOP) aligned to other management systems (communication, resourcing, reporting), has also been developed; the GRM is based on existing SEQIP mechanism. A grievance can be defined as a concern or complaint raised by an individual or a group of stakeholders affected by real or perceived project induced impacts. The grievance mechanism for the project provides a way to reduce risk for risks from the proposed projects, offers stakeholders an effective avenue for expressing concerns and achieving remedies, and promotes a mutually constructive relationship.

20. The GRM for this project is aimed at:

- Providing a predictable, transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting;
- Building trust as an integral component of broader stakeholder's relations activities; and
- Enabling more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement.

Gender-Based Violence (GBV) Action Plan (Annex VI)

21. The risk of GBV was identified during the consultations for this project. The Plan (Annex VI)

has been developed to accompany the implementation of the project grievance redress mechanism (GRM) to ensure that the Project does not have any negative impacts or does not further perpetuate GBV/SEAH. It presents operational activities as well as recommendations for GBV/SEAHSEA risk mitigation that build on existing mechanisms in the MoE, and the National and County Governments involved in the project. The Plan is based on existing protection, prevention and mitigation strategies and measures developed by the WB and coordinated through the MoE and its partners at the implementation level. GRM will be accompanied by the service provider for on-call psychosocial services which will include a hotline for reporting cases of GBV/SEAHSEA and child abuse.

Vulnerable and Marginalized Groups Plan (VMGP)

22. The VMGP has been prepared as a standalone document based on the existing VMGF developed for GPE-PREIDE project. The VMGP is aimed at ensuring that the project identifies Vulnerable and Marginalized Groups (VMG/HUTLC communities)/Historically Underserved Traditional Local Communities (HUTLCs) that will require to be actively engaged in the project processes and that they can equally benefit from the project interventions. The Plan identifies vulnerability based on the location (informal settlements, arid and semi-arid lands) and on individual attributes including gender, age and disability. The project will implement a tailored approach to ensure meaningful engagement with these groups. Such an approach will implement best efforts to ensure that these and other stakeholders have opportunities to provide inputs into project design and identify possible unanticipated project risks. Within the social distancing and other parameters set by the Kenyan Government, the MoE PCU will make all reasonable efforts to conduct meetings with stakeholders through diversifying the means of engagement, based on type and category of stakeholders.

1. INTRODUCTION

1.1 Background

23. This document presents an Environmental and Social Management Framework (ESMF) for the Kenya GPE COVID-19 Learning Continuity in Basic Education Project. The GPE has allocated the Government of Kenya (GoK) US\$11 million, including a grant agent supervision fee of US\$200,000, from the GPE COVID-19 accelerated funding window designed to capacitate governments to mitigate the impact of COVID-19 on their education systems and help recovery.

24. An outbreak of coronavirus disease (COVID-19) caused by the 2019 Novel Coronavirus (SARS-CoV-2) has been spreading rapidly across the world since December 2019, from Wuhan, Hubei Province, China to 213 countries and territories. As of September 02, 2020, the outbreak had already resulted in over 25 million cases and over 860,000 deaths. Over the past months, the outbreak has led to greater loss of life, significant disruptions in global supply chains, lower commodity prices, economic losses and social disruption in both developed and developing countries.

25. In Kenya, the first COVID-19 case was announced on March 13, 2020. As of September 2nd, 2020 the country had 34,315 cases with 577 deaths and 20,211 recoveries. In an effort to contain the virus, the National Government introduced several measures including the closure of all schools and learning institutions, curfews, lockdowns in specific areas considered to be hotspots (including Nairobi, Mombasa and Mandera), social distancing, wearing of masks, and increased attention to hand washing. These measures have led to closures or minimal functioning of factories, industries and other investment ventures.

26. The COVID-19 crisis threatens education and human capital accumulation. The learning crisis is likely to deepen, as more children may drop out of school, and the opportunity gaps between the rich and poor will become even larger. The immediate priority is to protect the welfare and potential of students during the crisis - keep them safe and healthy and ensure that they remain engaged in school and continue to learn. As schools plan to reopen, there is need to plan for and manage continuity through appropriate recovery strategies.

27. The proposed project will complement and leverage other relevant ongoing education projects supported by the World Bank and other development partners. The project interventions complement ongoing national level interventions under the Kenya GPE PRIEDE (US\$98.1 million, P146797) and Secondary Education Quality Improvement Project (SEQIP US\$200 million, P160083) to improve the overall teacher management and development systems, to reform procurement and distribution of textbooks, provide core textbook to all learners, improve basic school infrastructure including sanitation facilities in target schools; provide sanitary towels to girls in school. In addition, there are interventions targeting learners with special needs education, competency based curriculum reforms, and associated teacher trainings, improvements in national assessments to align process and test items to international assessments, and school-based teacher support initiatives to improve teacher proficiency and learning outcomes. The project is also complemented by technical assistance to MoE for Early Childhood Development (ECD) strategy and policy development.

1.2 Objectives of the ESMF

28. The objective of the ESMF is to provide a framework for effective management of environmental and social issues in the proposed Kenya GPE COVID-19 Learning Continuity in Basic Education Project. It seeks to both enhance environmental and social development benefits of the project and mitigate any adverse impacts, in line with Government of Kenya and World Bank Environment and Social Framework on management of environmental and social development

projects. Moreover, since the precise locations and potential impacts of future sub-projects are not known, the ESMF provides the basis for the preparation of necessary environmental and social tools, as needed for the sub-project investments supported through the Project.

29. This ESMF will serve as a tool for the MoE and implementing institutions to identify, plan for and mitigate potential environmental and social risks associated with every aspect of the project. It clarifies the environmental and social impacts/risks, and the proposed mitigation measures to be undertaken and the institutional responsibilities for implementing the environment and social management plan (ESMP) and monitoring the implementation of mitigation measures; stakeholder engagement, consultation and disclosure; and capacity building to ensure the aforementioned responsibilities will be carried out effectively. The social issues of concern to be addressed by the project include: exclusion of vulnerable, marginalized and minority VMGs/HUTLCs, selection bias and elite capture whereof project interventions, cyber bullying, sexual exploitation and abuse, sexual harassment and gender issues related to access to education and community involvement in the project, and the attendant social risks. All these risks are amplified by COVID-19 restrictions and challenges in the traditional access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring. An Electronic Waste Management Plan to be implemented by the MoE has been developed as part of this ESMF.

1.3 ESMF Purpose and Rationale

30. The ESMF has been selected as the environmental and social instrument for assessing, managing and monitoring environmental and social risks and impacts of the project. Since, since the specific sites for project implementation are not known; ESMF is the most appropriate instrument. The main purpose of this ESMF is therefore the establishment of procedures and methodologies for environmental and social assessments, review, approval and implementation of activities to be financed under the Project, as the nature, scope and locations of activities become known during the implementation of the Project.

31. The ESMF describes the appropriate roles and responsibilities of the MoE/PCU and other stakeholders and outlines the reporting procedures on environmental and social risk. It describes the managing and monitoring processes of environmental and social risks and impacts related to the project. It further determines the training, capacity building and technical assistance required for PCU to successfully implement the provisions of the ESMF; and provides practical information on resources for implementing the ESMF. It also lays out the Project's staffing and institutional arrangements clarifying the relations between PCU and the World Bank, including their roles and responsibilities in view of the implementation of the ESMF. The ESMF has been prepared in accordance with applicable World Bank Environmental and Social Standards (ESS) under the Environment and Social Framework ESF.

1.4 Project description

32. The Kenya COVID-19 Learning Continuity in Basic Education Project interventions are conceptualized within an existing education ecosystem, where key education reforms are still ongoing despite the COVID-19 crisis. The project is therefore not conceived as just an emergency short-term response, instead, and in line with the MoE's COVID-19 plan, it also includes a medium-term set of interventions to protect the education system and to build additional resilience for a crisis that is still unfolding and that will affect Kenya's society and economy for an uncertain period.

33. The Project Development Objective (PDO) is to *enhance access to on-line and distance learning for all students in primary and secondary schools and facilitate a smooth transition in the return to school for targeted vulnerable students*. The PDO Level Indicators¹ are:

- a. Students supported with remote learning interventions (on-line and distance programs) (male, female) (percent);
- b. Number of trained teachers using remote learning methodologies (on-line and distance learning methods);
- c. Percentage of students, previously enrolled in pre-school, primary and secondary schools, who return to school once the school system is reopened, disaggregated (male, female); and
- d. Number of students provided access to school meals and nutrition for at least 151 learning days in a year (male, Female).

34. The project, to be implemented over an 18-month period, will have three (3) components as summarized below.

35. **Component 1: Expanding existing remote learning opportunities for learning continuity for all students in basic education² (US\$6.25 million).** MoE is looking into solutions to maximize its existing remote learning resources and strengths in line with emergent international good practices in remote learning in the time of COVID-19. Good practice models are emerging, which Kenya can draw on, as well as building on its own experiences to deliver effective remote learning.

Sub-Component 1.1: Support Access and Delivery of inclusive On-line Content to all students in primary and secondary school (US\$3.75 million). This sub-component will support the following four interventions³: enhance the existing radio education channels through expanded partnerships to reach all regions; add new programming to EDU TV daily transmission schedule; support acquisition of supplementary online teaching and learning materials from external partners and providing this for free to all learners through radio, EDU TV and e-cloud; and strengthening of the e-cloud; enhance inclusiveness during the COVID pandemic by laying critical foundations for effective use of technology in education services in counties such as Garissa, Wajir, Mandera, Lamu, Tana-river and Turkana; and adapt the current content to be accessed via mobile phones, potentially increasing the reach of the resources developed.

Subcomponent 1.2 (US\$2.0 million): Teacher training in interactive remote learning methodologies: This sub-component will support capacity building of teachers in online and distance learning methodologies to ensure teachers play a role in supporting remote learning. Under this component, TSC and ICTA will offer training (using the revised training content) to a total of 250,000 head teachers (and or their deputies), teachers and curriculum support officers (CSOs).

¹These indicators will be further disaggregated by grades (pre-school, grades 1 to 12), by sub-county, and by subject specialization to provide more granular reporting on progress towards achieving the objectives.

²The Kenyan Constitution of 2010 provides the right to quality education and training to all. Articles 43(f) and 53(1) (b) of the Constitution provide for the right to education and the right to free and compulsory basic education, respectively. The Basic Education Act (2013) was revised accordingly to guarantee the right of every child to free and compulsory basic education. To operationalize the constitution, the Basic Education Act was revised in 2013 to include among others, a definition of 'free and compulsory basic education'. According to the revised Act, this includes pre-primary education, primary education, secondary education and special needs education and Adult and Continuing Education.

³ Operational details for each intervention will be included in the project's implementation manual.

Subcomponent 1.3 (US\$0.5 million): Create an integrated monitoring and evaluation system for remote learning interventions and provide support for parents and caregivers to monitoring student learning. This subcomponent will support the two interventions: **provide support for parents and caregivers to support and monitor student learning**; Under this intervention, KICD will collaborate with partners to further develop and disseminate simple tips to support parents and caregivers as they support learners at home, especially while using radio, TV and mobile phones. Under this activity, KICD will develop specific tips targeting parents/caregivers with children with disabilities, and *create an integrated monitoring and evaluation system for the remote learning interventions*. This intervention will support development of a readiness and decision support tool⁴ to assist and guide Kenya as it implements remote learning interventions. KICD will contract a relevant firm or institution to support development of monitoring and evaluation mechanisms for all online and distance learning interventions. The monitoring system is expected to leverage technology and online based monitoring tools. The monitoring, among other aspects, will include the need to establish utilization of the expanded remote education opportunities through radio, TV and e-cloud, and relevance of the simple tips provided to parents and caregivers to guide learners at home.

36. Component 2: Facilitate smooth transition back to school for vulnerable students and girls, when schools reopen (US\$3.0 million).

Subcomponent 2.1: Support to the National School Meals Program- SMP (US\$2.0 million). This sub-component will support a grant for the existing National School Meals Program (SMP). The grant will support: (i) provision of a fortified meal each learning day for Pre-school learners, and learners in grades 1, 2 and 3 in the existing selected schools under SMP, which are within informal settlements, arid and Semi –Arid areas; and (ii) expand provision of the fortified meal to additional schools within the informal settlements in urban centers, and special needs schools with a focus on Pre-school learners and learners in grades 1, 2 and 3. The existing SMP covers learners in pre-primary and primary schools in selected Counties (Annex II) and has two interventions: (a) Centralized Procurement system (in-kind). Food commodities are procured centrally and distributed to target schools in ten (10) arid Counties, b) Cash transfer to schools for the ‘home grown’ SMP on a per child cost of about US\$0.1 equivalent. Due to limited funds for this sub-component, the project will support the SMP through centralized procurement system. The SMP will be undertaken as per the established standards for nutrition and hygiene, and the school health and nutrition policy.

Subcomponent 2.2: Provision of on on-line based psychosocial support services (US\$1.0 million). This intervention will provide support to MoE to design an on-line based and toll-free psychosocial support services for school going children and their parents/guardians, through an agreement with one or two relevant institutions. The service will make provision for a blended mode (on-line and face-to-face) while considering the social distancing measures. This approach will allow for students needing the service and in regions with hardly any connectivity to be reached. MOE will also develop simple modules to guide the blended on-line and face to face psychosocial support and in collaboration with TSC train

⁴This tool would include minimum and recommended standards related to infrastructure, content, teacher support, and institutional implementation capacity, including mechanisms to monitor, assess and evaluate impact over time. The tool is also expected to address monitoring and documentation of how teachers can support remote learning to inform insights in the immediate, medium and long term, and emergence of innovative practices

guidance and counselling focal point teachers in schools within targeted areas, including informal settlements, which have been adversely affected by COVID-19 pandemic.

37. **Component 3: Project Coordination, Communication, and Monitoring and Evaluation (US\$1.55 million).** This component aims to support project implementation, selected monitoring and evaluation activities, and to build capacity of MoE to conduct virtual meetings during the COVID-19 period and beyond. Although the project activities for this grant are delineated, overall, project management and coordination, will be implemented within the existing governance structures for the Kenya GPE PRIEDE project at MoE. The component will support the following activities:

- a) Monitoring school attendance in all schools (US\$0.05 million). MoE will leverage the radio and TV partnerships under Component 1, to launch re-enrollment campaigns once schools re-open;
- b) Conduct a learning assessment in all primary schools (US\$1.0 million). Building on the NASMLA process and test items, the national assessment center (NAC) will support schools to conduct a school based simple learning assessment to inform areas of emphasis, particularly for learners lagging; and
- c) Overall project management, coordination and communication, and capacity enhancement for virtual meetings in MoE's main board room (US\$0.5 million).

38. Support under this component will include the following main activities: (a) monitoring school attendance in all schools, analysis of the data and dissemination; (b) learning assessments when schools reopen, analysis of the data and dissemination; (c) activities directly related to the project management, coordination and communication; and (d) procurement of a firm to establish a functional virtual meeting room in MoE's main board room. The firm will also be required to train relevant staff at MoE on the use and maintenance of the equipment. **Table 1-1** presents the key activities to be implemented under each of these components.

Table 1-1: Project support per component

Component	Support under the components
1. Expand existing remote learning opportunities for all students in Basic Education	<ul style="list-style-type: none"> Expand partnerships with radio and TV providers, and procurement of core ICT equipment to support the lessons recording and upgrading of the e-cloud Acquisition of online supplementary learning materials and development of additional online interactive lessons for all grades and subjects in basic education, including adaptation for learners with special needs and disabilities Review of existing digital learning training packages for teachers, and capacity building of target teachers j9u Procurement of relevant consultancy services to develop a readiness and decision support tool for remote learning interventions Develop a multi-modal strategy, which includes child protection, information and data security aspects Strengthen the e-cloud Develop monitoring mechanisms for online and distance learning interventions Establish virtual learning environment in target schools in Garissa, Wajir, Mandera, Lamu, Tana-river and Turkana Conduct semi-annual satisfaction surveys for remote learning services and disseminate findings Develop and disseminate simple tips to support parents and caregivers, including a help desk, as they support learners at home, Implement Occupational Safety and Health requirements during installation of ICT equipment; and Implement E-Waste Management Plan implementation during installation of ICT equipment.
2. Facilitate smooth	<ul style="list-style-type: none"> Procurement and provision of online based psychosocial support services

Component	Support under the components
transition back to school for vulnerable students and girls	<ul style="list-style-type: none"> • Technical assistance for the SMP activities, • Occupational Safety and Health requirements for project workers and suppliers, and • Implement the Plan and Procedure for School Food Sourcing, Handling and Storage for Suppliers and Schools.
3 Project Management, Coordination, Communication and Monitoring and Evaluation	<ul style="list-style-type: none"> • Monitoring school attendance in all schools, analysis of the data and dissemination • Learning assessments when schools reopen, analysis of the data and dissemination • Activities directly related to the project management, coordination and communication; • Procurement of a firm to establish a functional virtual meeting room in MoE's main office; and • Implement Environment and Social management Plans for the project.

1.5 Project Beneficiaries

39. The Project will directly benefit the following: (a) about 60 percent of primary and secondary school students accessing online and distance learning; (b) about 1.75 million learners from the school meals program; (c) an estimated 150,000 head teachers, teachers and curriculum support officers will benefit from teacher training in online and distance learning; (div) students will benefit from the online based psychosocial support services; and (e) parents and care takers reached with remote learning tips.

2. POLICY, LEGAL AND REGULATORY FRAMEWORK

40. This section presents the policy, regulatory and institutional frameworks for environmental and social management in Kenya and the relevant WB ESF Policy and other Good International Industry Practices and Conventions. These instruments are summarized in **Table 2-1** and **Table 2-2**.

2.1 Environmental and Social Policy, Regulatory and Institutional Framework

Table 2.1 discusses the relevant Environmental and Social Policy, Regulatory and Institutional Framework.

Table 2-1: Environmental Policy, Regulatory and Institutional Framework

#	Instrument	Provision	Relevance
2.1.1 Policy framework			
1.	National Environmental Policy, 2013	<p>The policy envisaged on the better quality of life for present and future generations through sustainable management and use of the environment and natural resources. The objectives of this Policy are to: (a) Provide a framework for an integrated approach to planning and sustainable management of environment and natural resources to guaranteed the Environmental Right: Every person in Kenya has a right to a clean and healthy environment and a duty to safeguard and enhance the environment.</p> <p>The policy further advocates for a broad public participation in decision making processes is one of the fundamental preconditions for sustainable development. This presupposes access to timely and accurate information on the environment. Sound environmental management has to be based on openness and participation at all levels.</p>	<p>The Policy requires all sub-projects which are likely to have environmental and social impacts to undergo environmental and social assessment in order to establish sound environmental management practices that provide for sustainable management of natural resources to guarantee quality life for present and future generation to enjoy the environmental right, this ESMF has been prepared to meet this policy requirement.</p> <p>Public participation was done from June 24th to July 5th, 2020 to capture as well as disseminate information to the PAPs. The Project Stakeholder Engagement Plan was prepared and disclosed in the WB Info Shop on April 25th, 2020 and has since been updated following consultations conducted in June 2020.</p>
2.	National Information, Communications and Technology (ICT) Policy, 2019	<p>This policy is designed to realize the potential of the digital economy by creating an enabling environment for all citizens and stakeholders. The ICT Policy defines the forward-looking position of the Government on various areas of the evolving ICT sector landscape in Kenya. The policy objectives include: Create the infrastructure conditions that enable the use of always-on, high speed, wireless, and internet across the country, facilitate the creation of infrastructure and frameworks that support the growth of data centres, pervasive instrumentation (Internet of Things), machine learning and local manufacturing while fostering a secure, innovation ecosystem, grow the contribution of ICT to increase the overall size of the digital and traditional economy to 10% of GDP by 2030, position the country to take advantage of emerging trends such as the shared and gig economy, by enhancing our education institutions and the skills of our people and by fostering an innovation, and gain global recognition for innovation, efficiency and quality in public service delivery.</p>	<p>The implementation of remote learning for schools and the installation of the ICT equipment at MoE will foster the one of the ICT objectives by enhancing the education institutions and the skills of the Kenya people and by fostering an innovation, and gain global recognition for innovation, efficiency and quality in public service delivery.</p>
3.	Kenya National Education Sector Strategic Plan 2018 – 2022	<p>The vision in Kenya's National Education Sector Strategic Plan 2018 - 2022 is for "Quality and inclusive education, training and research for sustainable development", and the mission is "To provide, promote and coordinate competence-based equitable learner centered education, training and</p>	<p>The project is a pillar in the realization of the sector strategic plan of access and equity, quality and relevance; governance and accountability as reflected in the PDO: To enhance access to on-line and distance learning for all students in primary</p>

#	Instrument	Provision	Relevance
		research for sustainable development". The plan has three themes: access and equity; quality and relevance; governance and accountability.	and secondary schools and facilitate a smooth transition in the return to school for targeted vulnerable students.
4.	National Guidelines for the Management of COVID -19 Waste, 2020	The National guidelines are aimed at outlining procedures that must be followed in the management of Covid-19 infectious waste in compliance with the provisions of the EMC (Waste Management) Regulations 2006 on segregation, securing, packaging, treatment and disposal as provided in the Seventh, Eighth and Ninth Schedules of the Regulation and the Health Care Waste Management Guidelines under the Ministry of Health.	The increased use of the protective and safety materials against spread of COVID -19 across the Country at offices, place of work and homes especially the face masks are single use resulting to increased waste generation which if not well addressed could pose both cross infections and environmental risk. SOP from the MoH shall be implemented in all place(s) of work.
5.	The National Occupational Safety and Health Policy, 2012	The Policy seeks to reduce the number of work-related accidents and diseases, and equitably provide compensation and rehabilitation to those injured at work or who contract occupational diseases.	The contractor for the small scale civil works during the installation of ICT equipment at the MoE Meeting room and the supplies in the SMP will adhere to the requirements of the policy by use of appropriate PPEs all the time as well as have appropriate insurance covers.
6.	Education Disaster Management Policy, 2017	This policy, underscores the importance of early warning systems and coordination of the disaster risk management cycle in the education sector. The policy also underlines the role of education in providing physical and psychological protection to the affected, as well as early reconstruction interventions in time of disaster.	The policy is receptive of the project to be implemented under the current COVID-19 especially the component on-line based psychosocial support services to parents and learners.
7.	Policy Framework for Nomadic Education in Kenya	The overall goal of the policy framework is to enable Kenya's nomadic communities to realize the goal of universal access to basic education and training.	The project is targeting the vulnerable group specifically in the Arid and Semi Areas who are categorized as "marginalized" in the CoK, the end goal of the project will contribute in the realization of this policy. The target areas for the project are the Nomadic areas as well. VMGP for the project will be implemented.
8.	Education and Training Sector Gender Policy 2015	The overall goal of this policy is to promote gender equality issues in regard to access, equity and equality in the education sector and to enhance empowerment for effective participation and contribution in national development by all.	The policy promotes gender equality issues in regard to access, equity and equality in the education sector which is being supported by the project as well.
9.	Sector Policy for Learners and Trainees with Disabilities, 2018	The policy is structured in thematic areas with inclusive education and training as an approach cutting across all themes meeting the needs of disabilities. The policy further recognizes that there are learners and trainees who may require special institutions and home-based care, depending on the severity of disability and their individual interest.	The component of remote training of teachers and learners will consider the special needs for both learners and teachers.
10.	Guidelines for E-	The e-waste Guidelines were developed to streamline the procedures of	All waste to be generated during the installation of ICT

#	Instrument	Provision	Relevance
	Waste management in Kenya, 2010	handling and disposal of e-waste generated by various sectors. The e-waste guidelines provide a framework for identification, collection, sorting, recycling and disposing of electrical and electronic waste (e-waste).	equipment at MoE meeting room and there after waste generated during operational time will be handled, managed and disposed of in adherence to the requirements of this guideline.
11.	National Nutrition Action Plan 2012-2017	The plan identifies 14 priority nutrition areas spelt out in the Food and Nutrition Security Strategy (FNSS) provided a conceptual guide to the development of this Plan of Action, which further identifies strategic objectives two of them corresponds to the activities and expected outcomes of the project, namely: <ul style="list-style-type: none"> i. Prevent deterioration of nutritional status and save lives of vulnerable groups in emergencies especially in the Arid and Semi-Arid Areas; and ii. Improve nutrition in schools and other institutions. 	Improved nutrition in schools and or the selected additional schools within the informal settlements is expected to contribute to the overall national efforts of promoting optimal nutrition.
12.	The National Food Safety Policy 2013	The policy addresses food safety concerns in the broad areas of legal and regulatory framework, information, education and communication, traceability, infrastructure and capacity. The policy envisages protecting and promoting consumer health while facilitating the orderly development of the food industries as well as fair practices in food trade.	The project will adhere to the provision of the policy during the implementation of the component of School Meal Program to ensure the supplies adhere to the food safety requirements (including having the necessary infrastructure) as well as fair competitive prices to be offered to the suppliers.
13.	County Public Participation Guidelines ⁵	-Every state actor is required to apply the national values and principles whenever they formulate, implement or interpret laws and policies -A complementary right is the right to access information in the CoK <i>Article 35</i> ⁶ .	The project will put measures in place to consult stakeholders on the project in line with the Kenya National Covid-19 guidelines as well as NEMA guidelines for consultation during COVID-19 period; use of ICT technology, comprehensive questionnaire and call-in will be used to engage communities. CoK 2010 confers all the sovereign power to the people of Kenya and it is exercised through delegated power by the State actors ⁷ .
14.	Safety Standard manual for schools in Kenya, 2008	This School Safety Standards Manual serves as a blueprint for enhancing safety at schools. The manual requires partnerships with various stakeholders, among them learners, schools, parents, local communities, NGOs, religious organizations and other community based organizations	The project has incorporated a number of partners who should participate during the implementation. The Plans and Procedures for food sourcing, handling and storage for suppliers/schools has been prepared as part of this ESMF to

⁵ County Public Participation Guidelines, at pg. (vii)

⁶ Article 35(1)(a) and (b)

⁷ Article 1 of the Constitution of Kenya

#	Instrument	Provision	Relevance
		(CBOs) to ensure the schools, and particularly the children, are adequately safe. It further calls for the learners in the school to have access to safe and wholesome food for their proper physical and intellectual development.	guarantee safe and wholesome food for the learners.
15.	Guidance for Infection Prevention & Control for Coronavirus Disease (Covid-19) In Homes/Communities	Provides comprehensive standardized information regarding the prevention and control of transmissible infections like COVID -19. The guideline provides administrators and Health Care Workers with the necessary information and procedures to implement Infection Prevention Control (IPC) measures against COVID -19.	The project shall adhere with the necessary information especially Infection Prevention Control procedures for managing the spread of COVID -19 amongst the contractors, sub-contractors and SMP suppliers as well as handling and disposal masks and other wastes to avoid new infections.
2.1.2 Regulatory Framework			
1.	The Constitution of Kenya, 2010	<p>Article 42 of the Bill of Rights of the Kenyan Constitution provides that ‘every Kenyan has the right to a clean and healthy environment, which includes the right to have the environment protected for the benefit of present and future generations through legislative and other measures’. In addition to the Economic and social rights: Article 43. (1) Every person has the right to education.</p> <p>The CoK has entrenched a strong bill of rights which recognizes the rights of all persons including the vulnerable and marginalized; environmental and developmental rights; and key national values and principles that must be integrated in policies, laws and service delivery processes. The CoK (Article 21.3) - specific provisions on social inclusion especially of VMGs include: affirmative action programs and policies for minorities and marginalized groups (Articles 27.6 and 56).</p>	<p>This ESMF have been prepared in line with the need to guarantee that ‘every Kenyan has the right to a clean and healthy environment’; by providing appropriate mitigation measure for potential impacts for the project. The project component promote remote learning for all beneficiary learners thereby enhancing the economic and social right of education among the vulnerable communities.</p> <p>The project will put measures in place to consult communities on the project in line with the CoK as well as NEMA guidelines for consultation during COVID-19 period; use of ICT technology, comprehensive questionnaire and call-in will be used to engage communities. Specific instruments including (SEP, GBV/SEHA and VMGP) will be implemented to meet the needs of the various groups including information dissemination and feedback.</p>
2.	Draft Environmental Management and Co-Ordination (E-Waste Management) Regulations, 2013	<p>The e-waste regulation have been developed to streamline the procedures of handling and disposal of e-waste generated by various sectors. The e-waste regulations provide a framework for identification, collection, sorting, recycling and disposing of electrical and electronic waste (e-waste).</p> <p>The regulation call for the enforcement of Polluter Pay Principle by requiring the producers of electric and electronic equipment to take responsibility of end of life of their equipment and ensure safe disposal.</p>	All waste to be generated during the installation of ICT equipment at MoE meeting room/procurement of core ICT equipment to support lessons recording and there after e-waste generated during operational phase and/or beyond project life will be handled, managed and disposed of in adherence to the requirements of this law. E-waste management plan has been developed as part of this ESMF which requires safe disposal.
3.	National Infection Prevention and	Provides comprehensive standardized information on the prevention and control of transmissible infections. The guidelines are intended to provide	The project will collaborate with MoH and ensure that all school facilities used as quarantine centers under the Ministry

#	Instrument	Provision	Relevance
	Control Guidelines for Health Care Services, 2015	administrators and Health Care Workers with the necessary information and procedures to implement Infection Prevention Control (IPC) core activities.	of Health COVID-19 Health Emergency Response Project (CHERP) are cleaned, fumigated and all waste materials taken care of in an appropriate manner this will be achieved through working with the MoH and the respective county Governments.
4.	Public Health Act, 2012	<p>The Act is the primary legislation applicable to matters of public health crises, authorizes public health authorities, particularly the Minister of Health, to take various actions during public health crises, including declaring an infectious disease a “notifiable infectious disease” or a “formidable epidemic, endemic or infectious disease,” and taking the necessary prevention and suppression measures to fight the disease. Specific powers accorded to health authorities for the purpose of prevention and suppression of an infectious disease include search, seizure, and detention powers; the power to designate any place as a quarantine area, including ships and aircraft; and the power to restrict or ban immigration into the country.</p> <p>Section 127 requires that all warehouses, go downs or buildings of whatever nature used for the storage of foodstuffs shall be constructed of such materials and in such manner as shall in the opinion of the medical officer of health render such warehouse, go down or building rat-proof.</p>	<p>The project will collaborate with MoH and ensure that all school facilities used as quarantine centers under the Ministry of Health COVID-19 Health Emergency Response Project (CHERP) are cleaned, fumigated and all waste materials taken care of in an appropriate manner this will be achieved through working with the MoH and the respective county Governments.</p> <p>County Public Health Department will ensure that schools have adequate safe storage facility for food items as well as adhere to measures on food hygiene.</p>
5.	Environmental Management and Coordination Act, 1999 (Amendment 2015)	The Act empowers the National Environment Management Authority (NEMA) to exercise general supervision and co-ordination over all matters relating to the environment and to be the principal instrument of government in the implementation of all policies related to the environment. The Second Schedule to the Act specifies the projects for which an ESIA or environmental audit must be carried out.	The project shall comply with the provisions of this regulation on issues related to, environmental assessment, solid waste and waste-water management, noise and vibrations among others. It is however notable that the project foresees limited environmental impacts in its operations as all risks and impact are minor and localized.
6.	Environmental (Impact Assessment and Audit) Regulations, 2019	This regulation provides guidelines to govern the conduct of Environmental Assessment and Audits in Kenya. Section 3 indicates that the regulations applies to policies, plans, programs, projects and activities specified in Part IV, Part V and 2nd schedule of the Act.	ESMF has been prepared in line with these requirements to identify all potential risks and impacts associated with the project and appropriate mitigation measures have been provided. An ESMP has been prepared for the minor renovation activities at MoE and E-waste management plan has been prepared as well for the project.
7.	Work Injury Benefits Act, 2007	This Act provides for compensation to employees for work related injuries and diseases contracted in the course of their employment and for connected purposes.	The project contractors / suppliers for the installation of ICT equipment and school meal program (respectively) shall comply with part II of this act with regard to obligations of the

#	Instrument	Provision	Relevance
			employer including compensation for temporary, total or partial disablement, treatment as well as provision of first Aid Services and insurance cover to workers.
8.	Occupational Health and Safety Act, 2007	This Act provides for the safety, health and welfare of all workers and all persons lawfully present at workplaces. It applies to all workplaces where any person is at work, whether temporarily or permanently.	Appropriate health and safety measures should be put in place to ensure workers, MoE staff, project staff (suppliers & contractors) and the general public are not exposed to health and safety risks associated with project activities. Occupational health and safety requirements are provided as Annex III.
9.	HIV/AIDS Prevention and Control Act, 2006	Part 11 Section 7 requires HIV and AIDs education in workplaces; specifically, provision of basic information and instruction on HIV/AIDS prevention and control.	HIV / AIDS awareness shall be done to all project staff before commencement of work, in addition project staff shall commit to adhere to the provision of act on this act by signing CoC with clearly spelt out requirements.
10.	The County Government Act No. 17 of 2012	Part II of the Act empowers the County Governments to be in charge of planning by coordinating and ensuring integrated planning within the county.	MoE is expected to coordinate all the project activities with the Counties. Since ECD is a devolved function the county shall be involved in all project activities targeting children under 6 years. County Public Health Department will ensure that schools have adequate safe storage facility for food items.
11.	Persons with Disabilities Act	Outlines the following entitlements: (1) a legitimate expectation of being able to enjoy <i>accessibility and mobility</i> ; ⁸ (2) a legitimate expectation of being able to access <i>public buildings</i> (that must now be adapted to suit needs of PWDs); ⁹ and (3) a legitimate expectation of being able to access <i>public service vehicles</i> (that must now be adapted to suit needs of PWDs). ¹⁰	The project will ensure that learners with disability are adequately supported to benefit from the project. Communication channels and tools will ensure that persons with disability are reached with project information in an appropriate manner.
12.	Children's Act	Article 7(i) states: Every child shall be entitled to education the provision of which shall be the responsibility of the Government and the parents. The right to healthcare is found in Article 8. <i>Section 10</i> of that Act further seeks to protect persons under the age of 18 years, by providing that they enjoy the entitlement to protection from economic exploitation and work that is hazardous or interferes with the	The project will target children in ECD, primary and secondary schools in the selected counties. The use of equipment will require the project team to ensure that no child is left behind. -On employment, none of the direct workers, contract workers and primary workers will engage a worker aged less than 18 years of age.

⁸ Section 21 of the Persons with Disabilities Act, [Act No 14 of 2003]

⁹ Section 22 of the Persons with Disabilities Act, [Act No 14 of 2003]

¹⁰ Section 23 of the Persons with Disabilities Act, [Act No 14 of 2003]

#	Instrument	Provision	Relevance
		child's education, or health; physical, mental, spiritual, moral or social development.	
13.	Employment Act in Part XII -Employment and Labour Relations Court Act -Labour Relations Act	The Act has a single subsidiary legislation titled the <i>Employment (General) Rules, 2014</i> that largely expounds on the terms and conditions of work - aside from other procedural aspects; with an entire schedule outlining the minimum rights bestowed upon employees, ¹¹ and another dedicated to the requisite elements of the <i>Policy Statement on Sexual Harassment</i> . ¹² Other relevant regulations include the Employment and Labor Relations Court Act, Labor Relations Act.	-All employers and employees, be they direct, contract or primary supply are guided by the Employment Act and the attendant labor laws. -Workers for the suppliers of the SMP and the contractors for the installation of ICT equipment at the MoE meeting room shall abide by the provision of the Act.
2.1.3 Institutional Framework			
1.	National Environment Management Authority (NEMA)	The responsibility of NEMA is to supervise and co-ordinate all matters relating to the environment and to be the principle instrument of Government in the implementation of policies relating to the environment.	National Environment Management Authority is one of the stakeholders that will be involved in external monitoring of the project in line with its supervisory role.
2.	Ministry of Education (MoE)	This project will be under the MoE and it shall be its primary role to monitor and measure the progress of implementation of the social and environmental safeguards.	The Ministry, through the PCU will have Environment and social safeguards specialists, who shall monitor the implementation of safeguards requirements and prepare periodic reports and submitted to the World Bank for review.
3.	Ministry of Health	The MoH under the COVID-19 Health Emergency Response Project (CHERP) and the respective County governments should ensure that all school facilities used as quarantine centers are cleaned, fumigated and all waste materials taken care of in an appropriate manner this will be achieved.	A pre-opening school audit checklist has been developed as part of this ESMF, the checklist shall be administered before resumption of schools to confirm on decontamination and preparation of the school re-opening is done as required.
4.	County Governments	The County Governments have powers to control or prohibit all businesses, factories and other activities including new projects which maybe or become a source of danger, discomfort or annoyance to the neighborhood and to prescribe conditions subject to which such activities shall be carried.	County Governments are key players in the project implementation; they shall supervise project roll out within their respective counties to ensure no activity being implemented shall become a source of danger, discomfort or annoyance to the neighborhood.
5.	State Department for Social Protection, Ministry of Labor and Social Protection	Sectoral oversight and management, of all matters concerning children, older persons and persons with disabilities. Overseas the development of policies on children, older persons, persons with disabilities and social development, management of statutory institutions.	The State Department has officers in all counties and most of the sub-counties across the country. Since they focus on children, older persons and persons with disabilities, they would be key to work with in the selection of beneficiaries and in monitoring the social impacts of the project.

¹¹ 2nd Schedule, of the Employment (General) Rules, 2014 [Act No 11 of 2007]

¹² 1st Schedule, of the Employment (General) Rules, 2014 [Act No 11 of 2007]

#	Instrument	Provision	Relevance
6.	National Council for Persons with Disabilities	<p>Oversight of all matters concerning persons with disability, including:</p> <ul style="list-style-type: none"> • Statutory responsibility for facilitation of disability mainstreaming programmes; • Formulating and developing measures and policies designed to achieve equal opportunities for PWDs; and • Cooperating with the government Recommending measures to prevent discrimination against PWDs; Registering persons with disabilities and institutions and organizations giving services to PWDs. 	The NCPWD has officers in all counties. It also has a list of persons with disabilities that could inform the implementation of the project. The officers could also support the process of translating documents and communicating with persons with disability (e.g. sign language and braille).
7.	Department of Labor, Ministry of Labor and Social Protection	<p>Sectoral oversight and management, of all matters concerning employment, labor relations and working condition including:</p> <ul style="list-style-type: none"> ▪ National Labor and Employment Policy Management; and ▪ Industrial Relations Management. <p>Promotion of Occupational Health and Safety at Work, Workplace Inspection, and Workman's Compensation policy.</p>	Although the project does not envisage undertaking major repair and/or construction works, there may be labor issues from the suppliers and contractors that may emerge during the project. There are labor officers in each county who would augment the county and national project teams in addressing labor-related issues.
8.	The State Department of Gender in the Ministry of Public Service and Gender	Sectoral oversight and management, of all matters concerning gender. Gender policy management, special programmes for women affirmative action social empowerment, gender main-streaming in ministries/departments/agencies, community mobilization, domestication of international treaties/conventions on gender, and policy and programmes on gender violence.	<p>Gender issues could emerge in employment. There is also a risk of GBV/SEA on the project affecting children, community members and workers.</p> <p>It is also notable that young girls face various challenges including unplanned pregnancies, early marriages and school drop-out. The department would be a key partner in this area.</p>
9.	Directorate of Occupational Safety and Health Services (DOSHS)	<p>Inspecting workplaces to ensure compliance with safety and health laws, including:</p> <ul style="list-style-type: none"> ▪ Examination and testing of regulated equipment; ▪ Measurements of workplace pollutants for purposes of their control; ▪ Investigation of occupational accidents and diseases with a view to preventing recurrence; ▪ Medical examinations of workers; ▪ Training on OSH, first aid and fire safety; and ▪ Disseminating information on occupational safety and health to customers. 	<p>The Directorate is present in all counties and has a key role to ensuring the safety of people at the workplace and in the community. DOSH may inspect the installed of the ICT equipment at the MoE meeting room to ensure safety of the facilities before use, in line with the requirement for workplace.</p> <p>In addition, the MoH will be responsible for fumigating, cleaning and disposal of all waste from schools that have been used as quarantine centers – it would be important for the public health officers under MoH to work alongside the OSH officers.</p>
10.	National Gender and Equality Commission (NGEC)	<p>Oversight and surveillance of all matters concerning gender equality and equity.</p> <p>Promoting gender equality and equity; coordinating gender main-streaming in national development; and facilitating gender main-streaming in national</p>	Equity is an important issue for all development projects. The Agency has specific mandates including ensuring that those considered marginalized benefit from the project interventions. The recommendations in the VMGP for the

#	Instrument	Provision	Relevance
		development.	project will be implemented

41. The relevant international conventions include: The African Charter on Human and Peoples' Rights (ACHPR, ratified in 1992), the International Labor Organization (ILO) Convention 169, the United Nations Declaration on the Rights of Indigenous People (UNDRIP) of 1989, World Bank Environment and Social Framework and the Sustainable Development Goals (SDGs).

42. Article 22 of the ACHPR¹³ is the right to economic, social and cultural development. This right imposes on the State the duty to ensure that persons can exercise this right by participating in development. It is also contained in the preambles of the *United Nations Convention on the Rights of Persons with Disabilities* (CRPWD) ¹⁴and the *Convention on the Elimination of All Forms of Discrimination Against Women* (CEDAW)¹⁵.

2.2 World Bank Environmental and Social Standards (ESSs)

43. The World Bank ESSs are designed to help the MoE to manage the risks and impacts of the project, and improve the environmental and social performance through a risk and outcomes based approach. This will ensure that proposed programs are environmentally and socially sustainable, thus improve decision-making. The environment and social risk rating under this project is considered as moderate risk. The Environment and Social standard screened as relevant are outlined in Table 2-2 below.

Table 2-2: World Bank Environmental and Social Standards (ESSs) relevant to the project

#	ESSs	Relevant	Reason
1.	ESS1: Assessment and Management of Environmental and Social Risks and Impacts	√	<p>The need for the project to have experienced Environmental Specialist and Social Specialist to undertake environmental and social assessments and monitoring during project preparation and implementation phase. This ESMF has been prepared through the scoping of key environmental and social risks and impacts of the Project and identified appropriate mitigation measures to be implemented. Additional E&S plans have been prepared to manage project specific risks and impacts namely:</p> <ul style="list-style-type: none"> i) Environment and Social Management Plan (Table 10-1); ii) E-Waste Management and Disposal Plan (Annex I); iii) OHS requirements for project workers and suppliers (Annex iii); iv) Pre-opening School Audit Checklist (Annex iv); v) Plans and procedures for food sourcing, handling and storage for the suppliers and schools (Annex v); vi) Grievance Redress Mechanisms (section 8.0)); and vii) GBV/SEA and Child Protection Prevention & Response Action Plan; (Annex vi) <p>The project shall obtain as appropriate, the necessary permits, consents and authorizations that are applicable from relevant national authorities.</p>
2.	ESS2: Labor and Working Conditions	√	<p>The activities supported by the project shall be conducted by MoE staff at the national and county levels, i.e. civil servants employed by the Government of Kenya. There will be limited contractual workers and primary suppliers who will be recruited by the Government to perform specific roles namely: the installation of ICT equipment at MoE virtual meeting room and the suppliers in the SMP. The contracted workers and primary suppliers will be orientated on and sign a code of conduct (COC) on expected behavior and safety standards including GBV risks. This has been outlined in a Labor Management Procedures prepared for the project.</p> <p>In line with ESS2 as well as the Kenyan law, Child labor, forced labor or</p>

¹³ Kenya has ratified the ACHPRs and it now forms part of the laws of Kenya by virtue of Article 2(8) of the Constitution of Kenya 2010.

¹⁴ Kenya has ratified the CRPWD

¹⁵ Kenya has ratified the CEDAW

#	ESSs	Relevant	Reason
			<p>conscripted labor shall not be used in the project.</p> <p>The project has prepared a responsive GRM to allow workers to quickly inform their immediate management of labor issues, such as a lack of PPE and unreasonable overtime. They will also be at liberty to use the project GRM among other measures for seeking recourse.</p>
3.	ESS3: Resource Efficiency and Pollution Prevention and Management	√	<p>The project will include the procurement of ICT equipment to be installed at the MoE virtual meeting room. This will involve the use of energy and generation of E-waste; thus need to ensure efficient energy consumption and adequate management of electronic waste, respectively. In terms of efficiency, the project should ensure that the equipment procured is energy efficient to the extent possible. For any ICT equipment that may be replaced should be disposed of in compliance to the E-Waste Guidelines and Regulations. An E-waste Management Plan (Annex I) has been prepared to ensure all waste generated are handled in environmentally sound manner.</p>
4.	ESS4: Community Health and Safety	√	<p>The use of some schools as quarantine centers under the Kenya COVID-19 Emergency Response Project presents a potential risk of exposing the school community (teachers, pupils and students) to other communicable diseases and the possible continued spread of COVID-19 after school re-opening.</p> <p>Other community risks include the possibility of harmful inward migration as school meals will be provided to a small number of schools relative to immense and widespread need leading to a possibility of population influx from neighboring locations, thus upset the community dynamics and perpetuate clashes and animosity exacerbating social and environmental fragility. Plans and procedures for food sourcing, handling and storage for the suppliers and schools are included in Annex V.</p> <p>The SMP component involves meal preparation and delivery to schools, the project will establish and implement a quality management system to anticipate and minimize risks and impacts from meal sourcing, preparation, delivery, distribution and storage. The project will also apply the concept of universal access; meaning unimpeded access for people of all ages and abilities in different situations and under various circumstances. Plans and Procedures for food sourcing, handling and storage for supplies in Schools has been prepared as part of the ESMF, Annex V.</p> <p>The project will ensure the avoidance of any form of GBV based on the GBV Action Plan prepared for this project and attached in Annex VI.</p>
5.	ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	X	<p>ESS5 in reference to permanent resettlement or land acquisition is not considered relevant. Activities that will lead to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement will be excluded from financing or managed as per the Standard requirements.</p>
6.	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	X	<p>ESS6 is not considered relevant, no project activities are expected to have impact to the natural habitat and ecosystem services. Proposed small scale renovation / installation of ICT equipment will be within the existing facilities.</p>
7.	ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	√	<p>The project will be implemented countrywide including the 14 counties where people meet the criteria under ESS 7. Project activities that could lead to differentiated risks on VMGs/IPs include on component one on access to mass media and remote learning opportunities where VMGs may have greater challenges in accessing remote learning opportunities and on component two on interventions to facilitate smooth transition of vulnerable students to schools. Understanding selection requirements and complying with application process will require a differentiated approach to information dissemination.</p>

#	ESSs	Relevant	Reason
			<p>The VMGF for GPE-PREIDE, which has similar geographical scope and target will be the basis for preparation of a VMGP. This will be prepared, consulted upon and disclosed within one month of project effectiveness and before commencement of related project activities as stipulated in the ESCP. Consultations will be conducted through VMG organizations on differentiated project impacts on VMGs and the VMG plan prepared.</p> <p>The updated SEP included adequate coverage on stakeholder engagement and the differentiated impacts and culturally and linguistically appropriate consultations and information disclosure processes for the VMG/SSAHUTLC context in Kenya.</p>
8.	ESS8: Cultural Heritage	X	Project activities do not touch on tangible or intangible cultural heritage.
9.	ESS9: Financial Intermediaries	X	Project activities do not envision the use of financial intermediaries.
10.	ESS10: Stakeholder Engagement and Information Disclosure		<p>√</p> <p>A key risks and impact under this standard relate to inadequate, ineffective and/or inappropriate stakeholder and community engagement and disclosure of information leading to exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the limited resources available under the project to do meaningful community engagements.</p> <p>The project has prepared a structured approach to engagement with stakeholders (see SEP, Section 7) that is based upon meaningful consultation and disclosure of appropriate information.</p>

2.3 World Bank Group Guidelines

44. The World Bank has several guidelines notes, which are applicable to various components of the proposed project, namely:

- i. World Bank Group EHS General Guidelines;

45. World Bank, Environment and Social Framework

2.4 Good International Industry Practice (GIIP)

46. The WHO technical guidance developed for addressing COVID-19 would be relevant for this project, more so given the understanding that the virus will be here for a while. With the understanding that at some points' schools will need to be opened for learners, it is critical that this project takes into view the COVID-19 guidelines being developed by the national Government and WHO. These technical guidance documents are evolving, and they are being updated as new information becomes available.

47. The WHO website <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance> provides technical guidance on issues related to COVID-19 which are updated regularly. Among the relevant guidelines to the project include:

- a) Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19 Preparedness and Response;
- b) Mental health considerations during COVID-19 Outbreak;
- c) Getting your workplace (in this case the schools) ready for COVID-19;
- d) A guide to preventing and addressing social stigma associated with COVID-19;
- e) Rational use of personal protective equipment for COVID-19;
- f) Advice on the Use of Masks;
- g) Water, sanitation, hygiene and waste management for COVID-19;
- h) Guide to local production of WHO-recommended Hand Rub Formulations 9 (which schools may need to benefit from local production); and

- i) WHO Considerations for school-related public health measures in the context of COVID-19 May 10 2020.

3. ENVIRONMENTAL AND SOCIAL BASELINE

3.1 Location and Size

48. Kenya (**Figure 3-1**) is located in the eastern part of the African continent approximately between latitudes 4°21' N and 4° 28' S and between longitudes 34° E and 42° E. It is bordered by Uganda to the west, Ethiopia and South Sudan to the north, Tanzania to the south and Somalia and the Indian Ocean to the east. Kenya covers an area of approx. 587,000 km², of which 11,000 km² consists of water bodies. The landscape is grouped into geographical zones including; the Savannah Lands covering most of the arid and semi- arid areas, the Coastal Margin, the Rift Valley, the Highlands and the Lake Victoria Basin.

Kenya: Location

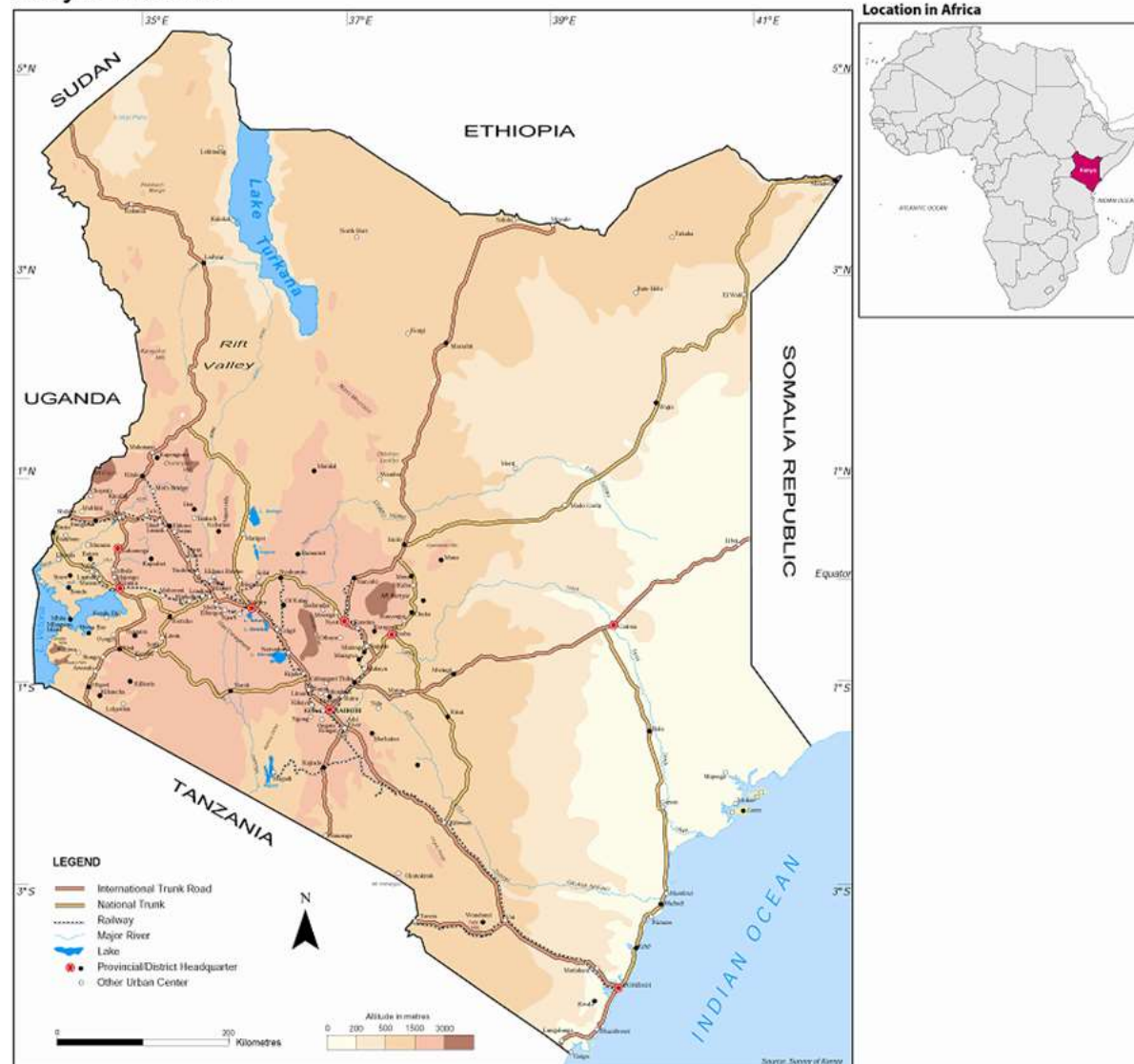


Figure 3-1: Kenya Map

49. Kenya sits on the Equator in East Africa. It is bordered by the Indian Ocean to the east, Somalia and Ethiopia to the north, South Sudan to the Northwest, Tanzania to the South, and in the West, by Uganda. Kenya is Africa's tenth most populated country and ranks 22nd in terms of its size (Source: Survey of Kenya, 2003).

50. The country lies along the equator in East Africa. Most of the country consists of high plateau areas and mountain ranges that rise up to 3,000 m and more. The plateau area is dissected by the Eastern Rift Valley, which is 40-50 km wide and up to 1,000 m lower than the flanking plateau. The narrow coastal strip along the Indian Ocean is backed by a zone of thorn bush-land. Some areas in central Kenya, at the flanks of the Rift Valley, and in western Kenya, close to Lake Victoria, are very densely populated.

51. The land stretches from the sea level (Indian Ocean) in the east through a diversity of landforms. From the coast, the altitude changes gradually through the coastal belt and plains (below 152 Metres above sea level), the dry intermediate low belt to what is known as the Kenya Highlands (over 900 Meters above sea level). The country is split by the Great Rift Valley into the Western part, which slopes into Lake Victoria from the Mau ranges and Mount Elgon (4,300m) and the Eastern part dominated by Mt. Kenya and the Aberdare Ranges, which rise to 5,200m and 4,000m respectively.

3.2 Physical Environment

52. ***Climate:*** Kenya enjoys a tropical climate. It is hot and humid at the coast, temperate inland and very dry in the north and northeast parts of the country. The average annual temperature for the coastal town of Mombasa (altitude 17 Metres) is 30.30 Celsius maximum and 22.40 Celsius minimum, the capital city, Nairobi (altitude 1,661 Metres) 25.20 Celsius maximum and 13.60 Celsius minimum, Eldoret (altitude 3,085) 23.60 Celsius maximum and 9.50 Celsius minimum, Lodwar (altitude) 506 Metres) and the drier north plain lands 34.80 Celsius maximum and 23.70 Celsius minimum. The long rains occur from April to June and short rains from October to December. The rainfall is sometimes heavy and when it does come it often falls in the afternoons and evenings. The hottest period is from February to March and coldest in July to August.

53. ***Topography and Drainage:*** The Republic of Kenya has an area of approximately 582,646 sq. km. comprising of 97.8 percent land and 2.2 percent water surface. Only 20 percent of the land area can be classified as medium to high potential agricultural land and the rest of the land is mainly arid or semiarid. Forests, woodlands and national reserves and game parks account for ten percent (10 percent) of the land area, i.e. 58,264 sq. km. The total land surface comprises of 13,396 km² of water surface. This water surface comprises of a number of small lakes with fluctuating limits as well as part of Lake Victoria and most of Lake Turkana. Only 3,831 km² of Lake Victoria is in Kenya while most of Lake Turkana lies in Kenya. Kenya's coastal line extends approximately 402 km along the Indian Ocean. Topographically, the country may be divided into 4 distinct geographical and ecological regions or zones with different patterns of land use, namely; the coastal plain, the arid low plateau, the highlands, and the Lake Victoria basin. The rainfall patterns are extremely varied but generally follow those regions, with the Lake Victoria basin receiving the heaviest and most consistent rainfall.

54. ***Hydrology:*** The four largest inland water bodies (Lake Victoria, Lake Turkana, Lake Naivasha, and Lake Baringo) account for about 1.9 percent of the land area. The majority of Kenya's lakes, including both saline and freshwater, and closed and open basin systems, are located within the Great East African Rift Valley. Kenya's major permanent rivers originate in the highlands. The Nzoia, Yala, Sondu Miriu, and Migori rivers drain into Lake Victoria. The Ewaso Ngiro River is found in the northeastern part of the country and the Tana and Athi rivers flow in the southeastern part. The rivers draining into Lake Victoria (covering over 8 percent of Kenya's land area) provide about 65 percent of Kenya's internal renewable surface water supply. The Athi River drainage area (11 percent of Kenya's land area) provides 7 percent, the lowest share among Kenya's major drainage areas (Survey of Kenya 2008 and MOWI).

55. **Soils and geology:** The geology of Kenya is characterized by Archean granite/greenstone terrain in western Kenya along Lake Victoria, the Neoproterozoic 'Pan-African' Mozambique Belt, which underlies the central part of the country and Mesozoic to Recent sediments underlying the eastern coastal areas. The Eastern Rift Valley crosses Kenya from north to south and the volcanics associated with rift formation largely obliterate the generally north-south striking Neoproterozoic Mozambique Belt (Schlueter 1997). Rift Valley volcanogenic sediments and lacustrine and alluvial sediments cover large parts of the Eastern Rift. About 59 percent of the soils have moderate to high fertility, meaning they are theoretically suitable for growing crops. Fertility levels, however, depend on the amount of rainfall. Given the distribution and variability of rainfall in Kenya, only about 17 percent of the land area has medium to high potential for crops, while the remaining 83 percent is classified as arid and semi-arid and so of low crop growing potential (Survey of Kenya 2003). Dry lands, however, provide essential habitat for about half the country's livestock and 70 percent of Kenya's wildlife (UNCCD 2002).

3.3 Biological Environment

56. Kenya's land is covered by different types of vegetation according to the climate, topography, and other physical factors. The major categories are grassland, forests, semi-deserts, and mountains. Human impacts on the land continue to alter the distribution, amount, and health of these ecosystems (Survey of Kenya 2003).

57. **Forests and woodlands:** Forests cover 2.9 percent of Kenya's land area (KFMP 1995). The main forest types are moist highland forest, dry forest, tropical rain forest, coastal forest, and riverine and mangrove forests (Survey of Kenya 2003). Although they are not extensive land cover, Kenya's forests provide significant goods and services, including numerous non-timber forest products that provide local people with food, fibers, medicines, and shelter. The closed canopy forests are habitat for a disproportionately large percentage of the country's wildlife and other biodiversity. It is estimated that they harbor 40 percent of large mammals, 30 percent of birds and 35 percent of the nation's butterflies. About half of Kenya's threatened mammals and birds are found in its forests (Survey of Kenya 2003).

58. **Freshwaters and wetlands:** Kenya's wetlands occur in both fresh and salt waters. They include coral reefs, mangroves, deltas, creeks, lakeshores, rivers, marshes, ponds, impoundments, and mountain bogs. They are a source of water, provide numerous ecosystem services, and have a high diversity of characteristic biota or living organisms (Ramsar Convention 2001). The wetlands cover about 14 000 km² (2-3 percent of the country's surface area) and are found along the major rivers. In addition, many seasonal and temporary wetlands occur all over the country, including rock pools and springs in the southern part of Nairobi, west of Ngong Hills, and at Limuru. Wetlands have also been created by damming water for hydroelectricity and water supplies, and some wetlands have been built to treat wastewater (Macharia 2004).

59. **Marine and coastal areas:** Kenya's marine and coastal environments include the Indian Ocean's territorial waters and the immediate areas that border the ocean. The Kenyan coast stretches 550 kilometers from the Somali border in the north in a south-westerly direction to the border with Tanzania. The fringing coral reef (comprised of about 140 species of hard and soft corals) runs between 0.5 km and 2 km off-shore with occasional gaps at the mouths of rivers and isolated areas facing creeks. Beaches, cliffs, or mangrove forests dominate the shoreline in most areas. The coral-reef system, mangrove swamps, and hinterland provide unique natural landscapes and a wide range of biodiversity resources of special conservation concern.

60. **Wildlife:** The game parks and spectacular wildlife in the country attract nearly two million tourists each year (UNWATER 2006) and generate important domestic revenues. Wildlife conservation

is thus a high priority. Formed in 1946, Nairobi National Park, just outside the city, was the country's first protected area. By 2008, about 75 237.9 km² (WCPA 2007) of the nation's land area had been set-aside as national parks and game reserves. Wildlife is also protected by bans on game hunting, killing animals even when they attack, and the trade in ivory and skins. Nevertheless, poaching is a significant threat to many species including leopards, cheetahs, lions, elephants, and rhinoceroses. Efforts are being made to restore populations of the endangered African elephant and black rhino, and an aggressive campaign is being waged against poachers. Moreover, increased pressure on marine resources has led the Kenyan government to establish a system of protected areas managed by the Kenya Wildlife Service (KWS) to conserve and manage the most important ecosystems along the coast. In total, Kenya has five Marine Protected Areas (MPAs).

61. E-waste management practices in Kenya have until very recently been predominantly informal, mainly involving collection and refurbishing and resale which is common in the informal sector. There appears to be limited dumping of e-waste in dumping sites as a result of the very active informal sector that collects the wastes before it reaches dumping sites. Other management practices include voluntary take back schemes piloted by the private sector. Local industries have the capacity to recover plastics, ferrous metals and aluminum, and sell the same to various users, including the informal market. However, local industries lack capacity to deal with copper, precious metals, and CRTs, as well as other hazardous fractions. Despite the existing Waste Management Regulations (2006), Kenya's National Solid Waste Management Strategy (2014) and the development of the draft Electronic Waste Management Regulations (NEMA), the institutional framework for waste management in Kenya is not fully operational. Enforcement of regulations is also challenging due to the diversity and variety of e-waste streams, scattered sources, unregulated imports and the large informal workforce. Collectors, refurbishers and the recycling infrastructures are generally not developed and therefore the flow down the value chain has much lower volumes. The existing system for managing e-waste in Kenya is generally not sustainable because mechanisms for collecting, sorting, reuse, refurbishing, repairing, and remanufacturing are not well developed and/or implemented.

3.4 Socio-Economic Background

Population distribution

62. The 2019 national census report, published in November 2019 by the Kenya National Bureau of Statistics (KNBS), indicates that Kenya's population is 47.5 million. The country's average household size is 3.9 and the. The age distribution, which is has a broad base, is presented in Figure 3.2.

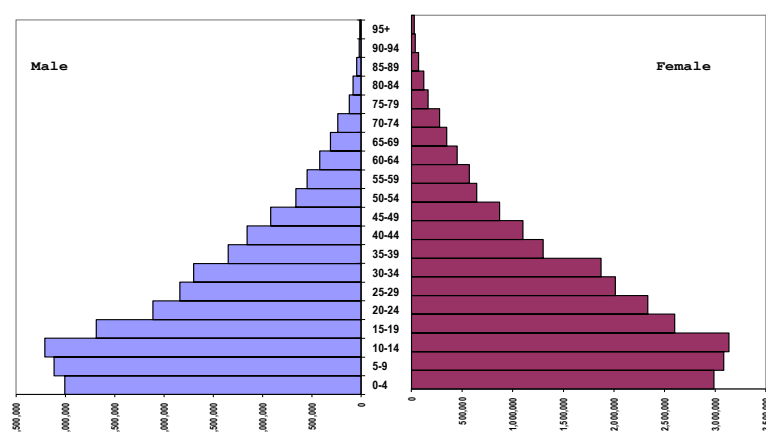


Figure 3-2: Population pyramid (2019)

Source: KNBS, Census Data

63. **Disability:** There are 918,270 people aged 5 years and above with a disability. (those of school going age). More females (523,883) than males (394,330) are living with disabilities. The common types of disability are mobility (385,417)), followed by visual (333,520). A total of 9,729 persons have albinism. A 2018 report by the Ministry of Education, shows MoE, indicates that the number of disabled children out of school has been rising steadily. About 300,000 children are disabled and out-of-school, while the number of teachers with special needs training remains inadequate, with only 1,135 teachers having been trained by 2016.¹⁶

64. **Information and technology:** Information on ownership and usage of selected ICT equipment and services indicates that 20,694,315 of individuals aged 3 years and above owned a mobile phone at the time of the census. More (2019). Slightly more females (10,425,040) than males (10,268,651) owned a mobile phone (although the difference is minimal). The data also show that 22.6 percent of individuals aged 3 years and above used internet while 10.4 percent used a computer. The proportion of population aged 15 years and above who searched and bought goods and services online was 4.3 percent.

65. **Household assets:** A functional television set was the popular household asset owned by 40.7 percent of households, with households in urban areas accounting for a larger share (62.5 percent) compared to those in rural areas (26.9 percent). These results have a huge implication on online learning in the country. It is clear that the use of the television for e-learning will disadvantage many learners, especially those in rural areas.

The economy

66. The economically active population, at the time of the national census, was 22.3 million, comprising those working - 19.7 million, and those seeking work - 2.6 million.¹⁷ About 84 percent of the workers were involved in the informal sector. The census established the population of youth aged 18 to 34 years at 13.7 million, out of which 61 percent were working while 1.6 million were seeking work or indicated that there was no work available. This implies that youth unemployment stood at that time at 39 percent.¹⁸

67. The real GDP growth in 2019 was about 5.4 percent, down from 6.3 percent in 2018.¹⁹ Out of a population of 47.6 million people, 35.6 percent live on less than US\$1.90 per day.²⁰ This proportion is likely to increase due to COVID-19 and other overlapping challenges confronting the nation. The onset of the pandemic has occurred concurrently with an invasion of desert locusts that has decimated agricultural yields, food security and livelihoods of households, particularly in Northern and North-Eastern Kenya. Additionally, the ongoing heavy rains have killed people and livestock, destroyed crops and investments in several parts of the country including Baringo, West Pokot, Kisumu, Kisii, Uasin Gishu, Elgeyo Marakwet, Nandi, Samburu, Tana River Counties, among others. As of May 07th, 2020 it was estimated that the floods had killed 194 people across the country and displaced over 100,000 households. The cumulative impacts of these shocks on the affected populations will be significant in the short, medium and long-term.

68. Kenya's medium-term growth prospects will be impacted by COVID-19, and much remains uncertain about the magnitude of the potential impact. Although the Kenyan economy has

¹⁶ <https://www.google.com/www.nation.co.ke/healthy-nation/children-suffer-most-from-disability-229392&usg>

¹⁷ Kenya National Bureaus of Statistics. Kenya Population Preliminary Report, 2019.

¹⁸ Kenya Bureau of Statistics, 2019.

¹⁹ Kenya Economic Update. April 2020. Edition 21. World Bank.

²⁰ Population Census, 2019.

important sources of resiliency, the COVID-19 shock is expected to reduce growth in 2020 with large impacts on services (travel, tourism, and events), agricultural exports, and slowdown in remittances. Measures being taken to slow the rate of infection (“social distancing”), including home confinement, travel restrictions, closure of schools and entertainment spots, suspension of public gathering and conferences, and a nightly curfew, are expected to affect both production and consumption across all sectors of the economy.

69. More than half of Kenya’s urban population (56 percent) live in informal settlements/slums. For example, within Nairobi, poverty is highly concentrated in these unplanned settlements, with nearly a third of slum residents being poor compared to just 9 percent of those living outside slum areas. With the spread of COVID-19, and the associated measures for ‘social distancing’ as well as the restricted movements, there is a high likelihood of reduced job opportunities for this urban population.

70. The country’s economic growth will be negatively impacted by COVID-19 shocks. Productivity in key economic sectors is likely to be severely constrained by the measures taken by the Government to slow down the spread of the pandemic. The inability of poor households to cope with adverse shocks and their limited financial resilience will have severe long-term implications, as reduced spending on food, education, and health can dramatically slow human capital accumulation. With poor, vulnerable and marginalized households relying on blue-collar jobs, their ability to finance expenditures related to basic services such as health and education, will be compromised. The Government has introduced a fiscal stimulus to address economic fallout associated with COVID-19, effectively pausing the planned fiscal consolidation. The stimulus included on the expenditure front, additional spending to strengthen the health systems to handle corona infections, measures to provide relief to households (through cash transfers) and protect businesses.

The Education sector

71. The National government spending on education is about 5.3 percent of GDP. A large share, about 92 percent of this expenditure, goes to recurrent expenditure. In terms of access to education, the country has made some major strides. The number of Pre-Primary centers spread primary centers rose from 40,145 centers in 2012 to 41,779 centers in 2018. The enrolment in pre-primary education increased from 2,865,348 in 2013 to 3,390,545 in 2018. The Gross Enrolment Rate (GER) in pre-primary education stood at 75.4 % in 2018 while the net enrolment rate was at 77.2% during the same year.

72. At primary school level, the number of primary schools increased from 28,026 in 2013 to 37,910 in 2018, with enrolment rising from 9.8 million in 2013 to about 10.5 million pupils in 2018 during the same period. This growth translated to a reduction in GER from 105% to 104% in primary school education, while NER increased from 88.1% in 2013 to 92.4% in 2018. On gender parity, the government investment in primary education has resulted to improved parity index from 0.96 in 2013 to 0.97 in 2018. The completion rate of primary education has also increased considerably from 80% in 2013 to 84.2% in 2018, while the retention rate increased from 77% to 86% during the same period.

73. The number of secondary schools increased from 8,734 to 11,399, while enrolment in secondary education grew from 2 million to 2.9 million during the period 2013 to 2018. As outlined in the Education Sector Analysis (ESA), the GER increased from 54.3% in 2013 to 70.3% in 2018 while NER increased from 38.5% to 53.2% during the same period. The gender parity now stands at 0.95 in 2018.

74. Technical and Vocational Education and Training (TVET) has experienced remarkable growth over the last five years. The number of TVET institutions increased from 700 in 2013 to 1,300 in 2018. Over the same period, enrolment grew by 92.5% from 148,009 in 2013 to 363,884 in 2018. The gender parity index improved from 0.68 in 2013 to 0.78 in 2018.

75. The university sub-sector has witnessed growth in the last 5 years due to the establishment of new universities and expansion of the existing ones. The number of universities increased from 57 in 2012 to 74 in 2018. The total university student enrolment increased by 48.8% from 361,379 in 2013 to 537,733 in 2018. The enrolment by gender was 310,367 (57.7%) male and 227,356 (42.35) female in 2018. Student enrolment, by gender, in public and private universities, from 2013/14 to 2016/17, shows that gender parity stood at 68.89% in 2014, 68.63% in 2015, and 71.48% in 2016 and with a decrease to 70.86% in 2017.

76. Despite this, the country faces a number of challenges in the sector. At the basic education level, there are important sources of internal inefficiencies. For instance, more than 40 percent of children who start Grade 1 do not go up to Form 4. Another issue is that an estimated 1 million school going children are out of school, mostly in ASAL counties. There are also wide disparities in access to education, based on gender, location and region. For instance, girls are generally left behind in ASAL areas. Another aspect is that, in addition, nearly 6 out of 10 children from the poorest quintile, who enrolled in Grade 1, are expected to complete Grade 6, compared to 9 out of 10 children from the richest quintile. Another challenge is that more children at basic education level are entering school but not adequately learning. In relation to performance, less than 20 percent of the candidates sitting for KCSE exams score C+ and above over the last two academic years, which is the entry qualification for university education.

77. Since the 1980's, providing school meals to primary school children in Kenya has been the joint responsibility of the World Food Programme (WFP) and the Ministry of Education. Now, the Ministry of Education is taking over full responsibility of providing hot lunches to almost two million pupils in the arid and semi-arid areas of the country. The Home-Grown School Meals model was first implemented in the semi-arid areas between 2009²¹ and 2012. During this time, WFP invested in building the skills of the Ministry of Education and Agriculture and Health as well as donating equipment such as vehicles and computers to enable the smooth running of the feeding programme. The Government, having successfully taken over school feeding in the semi-arid areas, moved swiftly to start the process in the much needy arid areas. In 2015, Isiolo County was the first arid county to transition from WFP-supported school meals to the cash-based Home-Grown School Meals Programme. Today, almost all schools under the feeding programme are receiving cash to buy food from local markets — greatly boosting trade and agricultural production. The gradual handover was completed in June 2018 and WFP formally handed over the programme to the Government in a public event held in Isiolo this October. This commitment has been demonstrated in many ways, one of which is funding. In the budgetary year (2018/2019), the Government set aside Kshs 2.4 billion (US\$ 23.8m) for school meals²².

Overview of Primary Health Care (PHC) in Kenya

78. Kenya has an estimated population of 47,564,296 million, 75% in rural areas (see Annex II). Roughly 46% of the country's population live below the poverty line. The country's gross domestic product Gross Domestic Product (GDP) per capita is US\$ 1377. With a Gini coefficient estimated at

²¹ In 2009, Home-Grown School Meals Programme was launched with 540,000 children now being fed by the Government instead of WFP. A gradual handover strategy was developed.

²² A total of 1.6 million children in 4,048 schools are receiving a hot lunch under the school meals programme in 2018 all financed by the Government.

0.445, nearly half of Kenyans (46%) live below the poverty line¹ In Kenya, 75% of the population have received some formal education – 52% with primary education and 23% with secondary education and above. The main source of employment is agriculture at 32.0%, while 23.7% have wage employment. According to the Kenya Health Policy (2014–2030), the 10 leading causes of death in Kenya are HIV-related ailments (29%), perinatal conditions (9%), lower respiratory tract infections (8%), tuberculosis (6%), diarrheal diseases (6%), malaria (5%), cerebrovascular diseases (3%), ischemic heart disease (3%), road traffic accidents (2%) and violence (2%). The country has made remarkable progress in improving key health indicators over recent years. The government's health goal is attainment of universal health care coverage (UHC) for key services, including maternal, neonatal and child health services. Public primary health facilities have been reported to be pro-poor, particularly across rural locations. Neonatal mortality rates are higher among women aged under 20 years (20 per 1000 live births) than for those aged above 20 years. The risk of losing a child during birth is lower among educated women (11 per 1000 live births, compared to 15 per 1000 for women with no education). The rate for delivery by a skilled attendant is lower in rural areas (94%, compared to 98% in urban areas). Immunization coverage stands at over 70%, with higher coverage among urban residents (78%, compared to 73% for rural locations).²³

79. **Gender-based violence:** In times of public health emergencies, households are placed under serious strain, which raises the risk of domestic violence. COVID-19 is already driving this trend and if the stay-at-home orders are prolonged, it is anticipated that GBV cases will increase significantly, especially among the young people. The potential key GBV/SEA and sexual harassment (SH) risks may emerge in schools and at the work place among contract and supply workers. It is estimated that 6.5 percent and 2.7 percent of adolescent girls and boys (aged 10-19 years of age), respectively, have been sexually abused.²⁴ The potential key GBV/SEA and sexual harassment (SH) risks may emerge in schools and at the work place among contract and supply workers. In addition, school drop-out, particularly for girls and child labor are likely to increase as a result of limited economic opportunities and incomes at the household level. The proposed GBV interventions will build on the current framework being used by SEQIP to report, manage and monitor GBV incidents on the project. Details on the GBV/SEA and mitigation measures are contained in the GBV Action Plan attached in Annex VI.

²³ Kenya Household Health Expenditure and Utilization Survey. Nairobi, Kenya: Ministry of Health; 2013.

²⁴[https://www.google.com/url?&url=https://www.kenyapaediatric.org/&usg=AOvVaw2_Bf-5VKabht3fYMDjpEVA](https://www.google.com/url?https://www.google.com/url?&url=https://www.kenyapaediatric.org/&usg=AOvVaw2_Bf-5VKabht3fYMDjpEVA) Adolescent-health-situational-analysis-Dr.-Christine-Wambugu-.pdf

4. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND MITIGATION MEASURES

4.1 POSITIVE IMPACTS

80. The proposed project activities will have significant positive impacts on the education system in the following ways:

- expanded remote learning opportunities for learning continuity for all students in basic education;
- expanded partnerships with radio and TV providers, and procurement of core ICT equipment to support the lessons recording and upgrading of the e-cloud;
- acquired online supplementary learning materials and development of additional online interactive lessons for all grades and subjects in basic education, including adaptation for learners with special needs;
- updated digital learning training packages for teachers, and capacity building of target 150,000 teachers and 100,000 Curriculum Support Officers (CSOs);
- developed materials for readiness and decision support tool for remote learning interventions;
- developed multi-modal strategy, which includes child protection, information and data security aspects;
- strengthen the e-cloud by providing self-paced online courses for the teachers and CSOs at no fee;
- developed integrated monitoring and evaluation system for the remote learning interventions;
- Developed tips that support parents and caregivers, including a helpdesk, as they support learners at home especially while using radio, TV and mobile phones;
- Direct employment of the workers for the contractor and suppliers of SMP;
- Increased enrolment due to smooth transition back to school for vulnerable students especially girls from the vulnerable areas (informal settlement and arid and semiarid areas), when schools reopen as a result of School Meals Program; and
- Availability of the online band toll-free based psychosocial support services to students and parents/caretakers.

Other indirect benefits of Virtual Meeting

- **Contribution to environmental protection:** virtual meetings work on green technology, organizations and businesses reduce the increasing the amount of carbon in the environment; environment-friendly communication method that reduces travel and paper printing.
- **Reduces the cost of organizing the meetings:** virtual meeting only requires ICT device with internet connection. On the other hand, a physical meeting time requires time and money to travel, hotel accommodation expenses.
- **Allows connection from anywhere in the entire country at any one given time:** with improved the internet connection such that users (teachers, CSO, learners, parents/guardians and other participants) can connect and interact from any part of the country. This also save on space that could have been used for holding meetings, especially where the participants are many.
- **Virtual meetings allow sharing of a broad variety of information in real time:** The participants in the education sector can share information; whether text, video or audio without the need for expensive telephone bridge connections. Many virtual meeting software also enables easy recording of your webinars for future reference and sharing with those unable to attend the actual real time session, this allows record keeping.

- **Virtual meeting allows real time two-way communication:** the speaker establishes a much stronger personal "in the same room" feeling among the participants. Using desktop sharing software, the audience can follow along with virtually any operation you are conducting on your screen. This is great for training and review of documents; and .
- **Virtual meetings allow effective illustrations:** Whiteboard features enable drawing and typing on the screen to enable sketch type illustrations of ideas and capture of notes. Text chatting features enable easy question and answer interaction, surveys, and polls, sharing of website addresses and other information in real time.

4.2 POTENTIAL NEGATIVE ENVIRONMENT AND SOCIAL RISKS AND IMPACTS

81. The project will not finance activities related to water, sanitation and hygiene (WASH), electricity supply or distribution of radios, TVs, phones, tablets to schools and local community. The project will also not finance activities related to cleaning and disinfection of schools used as quarantine facilities. This is being financed under the MoH project, Kenya COVID -19 Emergency Response Project. ICT equipment and renovation activities will be limited to MoE Virtual Meeting Room. No physical or civil works are expected, except for possible small scale interior works in the MoE meeting rooms to enable installation of ICT equipment. Therefore, no sensitive environmental features are expected to be impacted. Other impacts are related to health and hygiene risk associated with safe sourcing, handling, delivery, distribution and storage of food under the SMP.

82. Therefore, the overall anticipated **environmental risks and potential negative impacts** of the proposed activities will be limited to localized noise, dust emissions, solid waste (including e-waste), occupational health and safety, community health and safety (during operational phase of the project), with the most notable risk related to possible spread of infectious diseases – in particular COVID-19 and associated waste management issues. Key **social risks** include: a) insecurity for project operations and associated workers; b) exclusion of vulnerable, marginalized and minority members of the community as well as the migrants from project benefits amplified by the context of limited resources against widespread need; c) selection bias and elite capture, where project benefits are diverted to less-vulnerable individuals and locations; d) poor access to beneficiaries for meaningful community engagements and difficulty in monitoring social issues; e) Sexual Exploitation Abuse and Harassment (SEAH/SEA) and other forms of GBV (such as sexual abuse of learners and sexual harassment of workers during delivery and serving of school meals and cyber bullying due to the increase presence of both learners and teachers on-line.

83. All social and environmental risk risks/potential impacts and their mitigation measures are detailed in this section 4 and appropriate environment and social management instruments/plans have been prepared (Annexed):and annexed:

- Annex I: E-Waste Management/Disposal Plan;
- Annex III: OHS Requirements for Project Workers and Suppliers;
- Annex IV: Pre-opening School Audit Checklist;
- Annex V: Plans and Procedures for food sourcing, handling and storage for suppliers and Schools; and
- Annex VI: GBV/SEA Action Plan.

4.2.1 Project Planning, Design and Installation of ICT Equipment

4.2.1.1 Procurement of Substandard ICT Equipment

84. The project will procure some ICT equipment to be installed at the MoE virtual meeting room for the use in conferencing and or remote meetings. There is possible risk of purchasing substandard ICT equipment thus not responsive to the value for money as well as failure to work as envisaged in the project, or total breakdown generating e waste.

Mitigation Measures

- Adherence to the project procurement procedure,.
- Carry out due diligence to guarantee the credibility of manufacturers supplying the electronic devices,.
- Products warranty for all Electronic Devices purchased and suppliers should train MoE in operation and maintenance of the equipment, .
- Procure all electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life, or already categorized as E-Waste,.
- Faulty ICT equipment should be returned to the supplier in line with warranty period and procurement agreements, .
- Procure electronic devices which are energy efficient, and.
- Identify buyback options with equipment suppliers.

4.2.1.2 Localized Noise

85. The project will support small scale interior works in the MoE virtual meeting room to during the installation of ICT virtual equipment. During this installation, there will be elevated noise level but localized within the MoE virtual meeting room where ICT equipment will be installed. This may cause nuisance to the immediate MoE offices within the same building as well as the contractor staff.

Mitigation Measures

- Selecting equipment with lower sound power levels i.e. use of hand drilling machines;
- Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider used generators;.
- Post safety signage including Men/Women at work;.
- Provide fit to work PPEs (ear plug/ear muffs) for all contractor workers involved in the areas with elevated noise levels;.
- Coordinate with the office users/staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site; .
- Plan the installation activities to take place during the weekends when MoE staff are not at work to avoid congregation of large number of persons; and .
- The contractor should use equipment (i.e. hand drilling machine) that is/are in good working condition and periodically serviced.

4.2.1.3 Dust Emissions

86. The ICT technician will be required to install ICT equipment within the selected premise of MoE meeting room or virtual lab, these installations include the tracking of the internet cables, installation of the internet routes on the wall. To ensure strong anchoring, minimal drilling of the wall may be done thus causing localized dust emission within the meeting rooms. A secondary source of emissions may include exhaust from diesel engines of transport trucks (transporting equipment and food to schools in different parts of the country).

Mitigation Measures

- Suppress dust during pneumatic drilling on the wall by water spraying where necessary,
- Practice good general housekeeping at the work site; sweep off the drilled out materials,
- Post safety signage including Men/Women at work (or work in progress); and).
- Provide fit to work PPEs for all contractor and suppliers workers involved in the renovation and installation activities.

4.2.1.4 Generation of Solid waste

87. The installation of ICT equipment at the MoE Meeting room may be associated with generation of small amounts of general waste include the packaging materials for the ICT equipment (carton boxes, nylon paper and general wrapping materials, pieces of electric wire/ pins).

Mitigation Measures

- The contractor shall ensure provision of waste bin at the site to handle waste generated;.
- Efficient use of materials to as much as possible avoid and minimize waste production;.
- Ensure waste are recycled/reused before opting to dispose of;.
- Use of durable, long-lasting materials that shall not need to be replaced often; and.
- MOE shall ensure that the contractor shall contract a NEMA licensed Waste handling company collects and disposes of the waste in accordance to EMCA Waste Management Regulations, 2006.

4.2.1.5 Occupational Health and Safety

88. The project activities during implementation and operational phase, including installation of ICT equipment at the MoE meeting room may be associated with the potential occupational safety and health risks including physical hazards, such as slips, falls from heights associated with working on ladders, elevated noise, electrocution of the workers/staff, and limited exposure to air pollution hazards, including elevated dust levels.

Mitigation Measures

- The contractor shall provide the workers with the required PPE and enforce on use at all times while at the work site;.
- The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality;.
- Carry out job risk Assessment (analysis of hazard likely to exists and precautions need to be undertaken) before executing the assignment; .
- Use of safety signage “MEN/WOMEN AT WORK” to warn MoE and the contractor workers on site;.
- Provision of adequate signage and communication of risks to workers and MoE staff community;.
- Hazardous areas should be clearly marked with signs easily understood by workers, visitors and the general public, as appropriate.
- Contractor workers should be trained in the use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards;.
- Electrical works should be performed by trained and qualified experts;.
- Ensure that electrical equipment is properly connected before switching on sockets;.
- Use only the standard electrical connectors when joining extension leads or cables, and.
- In case on any spillage at working areas, the contractor should clean the spillage immediately, post anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls.

4.2.1.6 Spread of Infectious Disease – COVID-19

89. Possible spread of infectious diseases as a result of, failure to adhere to COVID-19 prevention measures at the MoE and other project areas. Possible infection routes include: contact with infected masks and gloves, weak compliance with the precaution measures for infection prevention and control on COVID-19 including hand washing hygiene, respiratory / /cough antiques, and lack of established procedure for disposal of used PPE, among others.

Mitigation Measures

- Train all contractors' workers on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms;.
- Train all contractors and MoE workers in respiratory hygiene, cough etiquette and hand hygiene; and .
- Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices.
- Use GRM procedures (Section 8) to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing; .
- All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs; .
- Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including workers and visitors; .
- Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks; .
- Avoid congregation of more than 15 workers at one location.
- At all project sites maintain social distancing of at least 2 meters;.
- Restriction of the number of people accessing the work areas; and.
- Use alcohol based sanitizers of at least 70% alcohol to fumigate the offices and work areas to be free of COVID -19 contamination.

90. Prior to re-opening of schools, MoE will collaborate with MoH to inspect the schools using Pre-opening School Audit Checklist (Annex IV) shall be administered to verify on the general state of cleaning and disinfection of the school facilities used as quarantine areas to ensure schools are safe for learners, teachers / staff and the wider school community to help prevent new risks on transmissions on COVID-19 and also to address the stigma associated with use of this learning institutions.

4.2.1.7 Labor disputes

91. During implementation of the project, a number of contractor workers will be employed to install the ICT equipment for conferencing at the MoE meeting room. Potential labour disputes include may arise due to breach of contract regarding conditions of employment, fringe benefits, and hours of work, and wages negotiated or of already agreed terms. Labor disputes may also arise due to disagreements amongst workers and between workers and the contractor.

Mitigation measures

Implement all the requirements of the Project LMP that has been prepared including but not limited to:

- Fair terms and conditions shall be applied for all workers (guided by relevant Kenya labour laws);
- The project shall also have GRMs for project workers (direct workers and contracted workers) to promptly address their workplace grievances;
- The project shall respect the workers' right of labor unions and freedom of association in accordance with Kenyan laws; and

4.2.1.8 Security Threat

92. The main security threat associated with the project include petty criminal offences that involves the small-scale thefts of light IT equipment and personal effects which can involve aggressions.

Mitigation Measures

- Staff badges shall be issued to the authorized workers to access the MoE offices building;
- All visitors shall be required to fill a visitor form providing all personal details and purpose of the visit;
- Engraving/marketing each piece of ICT equipment with a property number and maintaining a list of equipment at MoE.
- A data file with information regarding the visitor will be recorded and kept in MoE control room;
- Security induction must be done to all project staff; and
- A search of personal luggage shall be performed by the guards at the access control point to ensure no access of all the prohibited items into the project site and MoE Office Building.

4.2.2 Operational phase of the project

4.2.2.1 Security Threat

93. The main security threat associated with the project include petty criminal offences that involves the small-scale thefts of light IT banditry also within Northern Kenya Counties is the ever-imminent threat from the lawless Al-shabab from neighboring Somalia may pose a some threat to the implementation of the school meal program. Lastly, under the SMP, some project beneficiary schools may be located in areas where cattle rustling within the nomadic communities in the Northern Kenya (who are also known to be armed) could pose a security risk to the smooth implementation of the project.

Mitigation Measures

- All workers and MoE staff involved in the field operations shall be oriented on security threats,
- A site-specific security assessment will be conducted when the schools for School Meals Programmes have been identified and it is determined that the security landscape warrants such an assessment. Based on the findings of the assessment, a security management plan will be prepared by a security specialist as required. A typical security management plan will entail;
 - Overview of security situation in areas covered under the project including Arid and Semi-Arid Counties;
 - Objective of security management plan;
 - Security approach;
 - Adoption of standards and International Good Practice i.e. World Bank ESF, local regulations;
 - Use of Journey Management Plans,;
 - Identify the roles and responsibilities for monitoring security activities and strategic decision making;
 - Resource requirements in management of security risks,;
 - Incident reporting protocol;
 - Timely communication using Satellite Phones / Very Small Aperture Terminal & Very high frequency radio calls (SATPHONES/VSAT/VHF),); and
 - Alert levels: Green-Business as Usual- Security Risks Effectively Controlled, Yellow-Enhanced Security Measures Required, Orange-Implementation of Increased Security Controls and Preparation for Lock Down and/or Site Evacuation and RED-Cease Operations and Lock Down or Evacuate Site and Service delivery.
- Staff badges shall be issued to the authorized workers to access the MoE offices building;
- All visitors shall be required to fill a visitor form providing all personal details and purpose of the visit. A data file with information regarding the visitor will be recorded and kept in MoE control room; Security induction must be done to all project staff;
- The MoE shall work closely with the Ministry of Interior to ensure the security of the workers and the facilities involved in project are responsive;

- Engraving/marketing each piece of ICT equipment with a property number and maintaining a list of equipment at MoE; and
- A search of personal luggage shall be performed by the guards at the access control point to ensure no access of all the prohibited items into the project site.

4.2.2.2 Discrimination and exclusion of vulnerable groups

94. The vulnerable groups who are historically underserved traditional local communities may be disproportionately disadvantaged or made more vulnerable and fail to benefit from the development and opportunities resulting from the project through discrimination and exclusion during the selection of the beneficiaries. In addition, there is possibility of exclusion of commonly disadvantaged categories such as women, PWDs, youths and elderly in planning processes, leadership and implementation. This can be exacerbated in the selection bias and or elite capture, where project benefits are diverted to less-vulnerable individuals, schools and locations. However, exclusion of vulnerable, marginalized and minority members of the community as well as migrants from project benefits may as well be amplified by the context of limited resources against widespread need.

To ensure protection and non-discrimination of persons with disabilities, care will be taken to ensure that selection processes for suppliers of school meals and online content does not exclude PWDs and that processes and procedures for recruitment and management of project workers does not similarly discriminate against PWDs. These processes are elaborated in the LMP.

Mitigation measures

95. The project documents – LMP, SEP and VMGP, have provisions to ensure that the VMGS/HUTLCs are appropriately consulted and engaged in all project activities and benefit from the interventions. In addition:

- The employment of project workers shall be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship;
- Hold sensitization meetings on resources planning, implementation and conflict resolution mechanisms;
- Institutionalization of social inclusion of all categories in processes and decision making;
- The project shall comply with the Employment Act, 2007 on gender equality in the workplace, which will include provision of maternity and sick leave; and
- The contracts with third parties shall include non-exclusion requirements which will also be part of the monitoring system. Third party workers will also be sensitized on the GRM and encouraged to use it in case of complaints.

4.2.2.3 Sexual Exploitation and Abuse (SEA)

96. The movement of the project staff (contractors' and MoE-PCU team) from one location to another especially the delivery of the SMP to respective schools may result into illicit sexual behaviors such as uncalled for sexual advances, sexual exploitation and abuse between project workers and communities.

Mitigation measures

97. The project shall adhere to the measures proposed at GBV/SEA and Child Protection Prevention and Response Action Plan (Annex VI). Additional measures identified by the Project Labor Management Plan, Stakeholder Engagement Plan and Vulnerable and Marginalized Plan shall be adhered to, to ensure the vulnerable and marginalized groups need (migrants and the specific teachers to be trained) are catered for. Among the mitigation measures include:

- Sensitization of project workers and the MoE staff and benefiting communities;
- Instituting Grievance redress committee to handle among others sexual abuses;

- Involving local authorities and police where appropriate in handling sexual abuses; and
- All project personnel should be trained against SEA awareness programs as well as the beneficiary community.

4.2.2.4 Labor disputes

98. The contractor and suppliers for SMP will have workers who will be involved in the installation of ICT equipment and procuring and delivery of all requisites of the School Meal Program. Potential labour disputes include may arise due to breach of contract regarding conditions of employment, fringe benefits, hours of work, and wages negotiated or of already agreed terms. Labor disputes may also arise due to disagreements amongst the workers and between workers and the contractors and SMP service providers.

Mitigation measures

The project shall adhere to the requirements proposed in the project LMP including:

- Fair terms and conditions shall be applied for project workers (guided by relevant laws);
- The project shall also have GRMs for project workers (direct workers and contracted workers) to promptly address their workplace grievances; and
- The project shall respect the workers' right of labor unions and freedom of association;

4.2.2.5 Cyber Bullying

99. The implementation of remote learning interventions will enhance learners, teachers, CSOs and parents/guardians' access to on-line internet services. The use of this on-line platform may expose the users to cyber bullying.

Mitigation Measures

- MoE shall work with Ministry of ICT to ensure KICD adequately considers aspects of information and data security, including child protection and cyber-bullying mitigation; and.
- Caregivers and parents should be trained to protect learners from on line harassment/GBV.

4.2.2.6 Traffic related Hazards

100. There is high risk associated with traffic and road safety hazards during the operation phase in relation to the collection, supply and delivery of the food supplies to schools in different parts of the country under the SMP.

Mitigation measures

- Use of competent drivers with defensive driving technics;
- MoE shall regularly inspect vehicle safety and maintenance;
- Only road worthy vehicles (through regular inspection and certification by Department of Motor Vehicle Inspections) shall be used in transportation of school meals to avoid frequent breakdowns and risks of road accidents.
- All drivers and loaders shall sign the code of conduct (Coc);).
- Drivers (especially going to high insecurity areas) shall follow guidance on safe emergency driving; .
- Use of high visibility protective clothing (reflective jacket);).
- Ensuring vehicles with restricted rear visibility is outfitted with audible back-up alarms,.
- Install speed limit signs at all schools and require deliveries to obey speed limits; and .
- All fleet handling deliveries shall observe speeds limits to a maximum of ≤50km/hr out of major towns but ≤10kms in towns or near the MoE offices.

4.2.2.7 Fire risk

101. Without provisions for fire safety, there is a risk of fire outbreak at the MoE facility during the renovation work especially in the use of electric hand drills during the installation of ICT equipment. Fires can start from ignitable materials, cigarette smoking in non-designated places or old electrical connections malfunctioning. The bulky storage of the food materials under the SMP at school stores' pose a risk of fire hazards as well.

Mitigation Measures

- MoE should provide fire suppression facilities including fire extinguishers/ fire blanket to the MoE offices and learning facilities and ensure the fire-fighting equipment is serviced as required;
- Key staff at the MoE office shall have basic training in fire control;
- Fire emergency telephone numbers should be displayed in communal areas;
- The MoE, beneficiary schools and the contractor shall prepare site specific emergency response plans (Section I (Emergency Response Plan template) of Annex III: OHS Requirements for Project Workers and Suppliers) within one month after the commencement of activities at school and MoE virtual meeting room; and.
- Undertake regular fire drills at offices and schools to test on emergency response and use the results to improve on the response mechanism.

4.2.2.8 Gender-Based Violence

102. There is a risk of GBV against the girls during the installation and use of equipment. Learners could also be at risk in the school environment from fellow students, teachers and workers. There is also potential risk among co-workers contracted by the MoE and among the primary suppliers. This GBV could spill over to the communities in the form of sexual favors to benefit from the project interventions. Since the project provides for training of various cadre of staff, there is also a risk of GBV between learners and between learners and instructors.

Mitigation measures

The provision of Annex VI: GBV/SEA Action Plan shall be adhered to including but not limited to:

- Monitor and report on the behavior of project workers at all levels;
- Ensure the people engaged in project activities understand the GBV referral pathway;
- Ensure all learners and community members have access to the GRM contacts; and
- All workers assigned to or recruited to serve on this project shall sign the CoC (see the LMP for the project).

4.2.2.9 Lack of or inadequate public participation and consultation

103. Public participation is a legal requirement for any development activity. However, given the emergency nature of this project and the COVID-19 context, this process may not be effectively done. Those at the periphery - rural populations, the urban poor and HUTLCs may be discriminated against in this process.

Mitigation measures

Project shall adhere to the project stakeholder engagement approach described in the Project SEP and the VMGP including but not limited to:

- Ensure that measures are put in place to identify and reach the HUTLCs and rural populations with project information;
- Use communication channels that are accessible to vulnerable and marginalized groups including use of community radios, translating information in local languages; and
- Identify and equip local leaders with information on the project more generally and the GRM for further dissemination in their communities.

4.2.2.10 Improper Food Hygiene and Safety Risks

104. The SMP shall provide school learners with food prepared by the school and purchased from MoE accredited food suppliers within the respective counties. The nutritional status, preparation of foodstuffs and the health of those preparing food have far reaching implications on the health of the learners and teachers as well. This may culminate into food poisoning due to poor handling and storage practices.

Mitigation Measure

105. SMP shall comply with guidelines as elaborated in Annex V: Plans and Procedures for Food Sourcing, Handling and Storage for Suppliers and Schools. The procedures entails the; aggregation, storage and distribution of food namely: Home Grown School Meals Programme Technical Development Plan, 2012,; National School Meals and Nutrition Strategy 2017–2022; and the National Food Safety Policy 2013. Other Good International Industrial Practices are in the Code of Practice-General Principles of Food Hygiene; Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application (WHO & FAO, 2003)); and Codex Alimentarius (WHO & FAO, 2009); including but not limited to:

- The Ministry of Education, the Public Health Department and the school community will ensure that schools have adequate safe storage facility for food items;
- The schools should have detailed protocols on hygiene measures, cleaning procedures and safe food preparation practices;
- Where the school has a feeding program, the quality of food must be inspected by County Public Health Officer on a regular basis;
- Due diligence on food safety and hygiene for storage facilities during the selection of suppliers under the SPM;
- School administrators should ensure that food purchased for children is in good condition, fresh and safe for human consumption;
- School administrators should undertake measures including: stop rodents from entering stores and secure the store free from increased moisture content) to protect food from rodents and bacterial contamination while in the storage facility;
- School administrators should ensure that the areas where food is prepared, including tables where food is chopped or cut as well as the utensils used for such purposes, are cleaned at all times;
- Teachers should encourage learners to observe basic hygiene, especially the washing of hands, before and after meals;
- Personnel mandated to serve food to learners should be sensitized to practice basic hygiene such as washing of hands and observing personal cleanliness;
- School should make efforts to ensure that learners with special needs are properly catered for in relation to their dietary needs;
- Children displaying regular/frequent discomforts after eating food should be referred to medical personnel for tests on allergies;
- Training of food suppliers on use of PPE, safety and hygiene related issues;
- Food storage premises should be properly designed for ease in cleaning to encourage proper sanitation and maintenance;
- School administration should ensure that all food handlers have valid medical certificates and renewed periodically;
- Monitoring and inspections on the critical areas including; purchasing, storage; distribution and handling to ensure adherence to health and safety policies;
- MoE may periodically undertake food safety risk assessment; and
- Proper record keeping and documentation should be encouraged at all levels from the suppliers to schools.

4.2.2.11 Spread of Infectious Disease – COVID-19

106. Possible spread of infectious diseases as a result of failure to adhere to COVID-19 prevention measures at the MoE and other project areas including the supply chain for the School Meal Program. Possible infection routes include: contact with infected masks; and gloves; weak compliance with the precaution measures for infection prevention and control on COVID-19 including hand washing hygiene, respiratory/cough, and lack of established procedure for disposal of used PPE, among others.

Mitigation Measures

- Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms;.
- Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing;.
- All workers (suppliers) delivering SMP food items shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs; .
- Mandatory provision and use of appropriate Personal Protective Equipment (PPE) shall be required for all project personnel including workers and visitors; .
- Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks;.
- Avoid concentration of more than 15 persons at one location. Where more than one person are gathered, maintain social distancing of at least 2 meters;.
- Use alcohol based sanitizers of at least 70% alcohol to fumigate the offices, work areas, store and project vehicles delivering food to the schools; .
- Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and .
- Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices/schools.

4.2.2.12 Generation of E-Waste and associated impacts

107. E-Waste, also called electronic waste, is the name for electronic products that have come towards the end of their “useful life.” This includes computers, monitors, copiers, printers, cellphones, and many more electronic devices. The project will renovate and install the ICT equipment at the MoE meeting room to enhance virtual meeting, the ICT equipment is the direct source of E-Waste. E-waste has a negative effect on the environment in the following ways:

108. Improper including: (i) improper disposal of electronic waste leads to public health and safety risks occurring from discharge of heavy metals in the environment; and (ii) polluting air, water and soil due to the release of pollutants such as persistent organic pollutants (POPs), including flame retardants (poly brominated biphenyl), dioxins (polychlorinated dibenzodioxins and dibenzofurans), perfluoroalkyles, polycyclic aromatic hydrocarbons (PAHs), and heavy metals (lead, chromium or hexavalent chromium, cadmium, mercury, zinc, nickel, lithium, beryllium) during dismantling, burning, and chemical processing. Most of these hazardous chemicals are found in the plastic housing of the electronic equipment to reduce flammability, insulating material, solder of printed circuit boards, glass panels, and gaskets of computer monitors, connectors and hard drives.

Mitigation measures

- Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste;.
- Where available, utilize buyback options with equipment suppliers;.

- As much as possible, recycle all E-waste through the licensed e-waste recycling companies;²⁵
- Establish an E-Waste Temporal Collection Center at MoE; including collection bins/receptacles; .
- MoE education shall contract a NEMA licensed company to transport all E-wastes to NEMA licensed E-waste recycling companies.
- MoE shall return faulty ICT gadgets to the supplier depending on warranty period/agreement;.
- Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management; and.
- The contractor for the installation of the ICT equipment shall adhere to the provisions in the E-Waste Management Plan (Annex I).

²⁵Waste Electrical and Electronic Equipment Centre (WEEE Centre), Sintmund Group, Sinomet Kenya Limited and E-waste Initiative Kenya (Ewik): National E-Waste Management Strategy, 2019.

5. The Environmental and Social Screening Process

109. The GPE Covid-19 Education response project does not envisage any new sub-projects during project implementation, but in the case of any changes in project design and/or new the emergency of sub-projects, this section sets out the procedures (steps 1-6) for identifying, preparing and implementing the sub-projects, environmental and social screening, preparation of required E&S plans, consultation on such plans, review, approval and implementation. The purpose of this screening process is to determine whether the activities are eligible to be financed or are part of the exclusion list. The extent of environmental and social assessments that might be required prior to the commencement of the sub-projects will depend on the outcome of the screening process.

110. The environmental and social process of screening, preparation of Environmental assessment due diligence reports consists of the following 6 steps:

5.1 Step 1: Screening of the Sub-Projects

111. The objectives of environmental and social screening are: (i) determine whether activities are eligible to be financed; (ii) to evaluate the environmental and social risks associated with the proposed sub-project; (iii) to determine the depth and breadth of Environmental Assessment (EA); and (iv) to recommend an appropriate choice of EA instrument(s) suitable for a given project. Criteria for classification include type, location, sensitivity, and scale of the project, as well as the nature and magnitude of its potential environmental and social impacts. The initial screening for the selection of the sub-projects will be conducted based on the exclusion criteria below:

- Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage. The sub-projects that may cause long-term, permanent and/or irreversible adverse (e.g. loss of major natural habitat) impacts;
- Activities that have high probability of causing serious adverse effects to human health and/or the environment;
- Activities that may have significant adverse social impacts and may give rise to significant social conflicts;
- Activities which would require Free Prior Informed Consent; and
- Activities that may affect lands or rights of VMGs or other vulnerable minorities;

112. In the event the project has additional sub-projects, the project Environment and Social specialists will be tasked to prepare and complete the Environmental and Social Screening checklist depending on the sub-projects, to facilitate identification of potential environmental and social impacts, the ESS relevant and assignment of appropriate environmental and social risk rating, and where required recommend the relevant due diligence actions such as the preparation of ESIA.

5.2 Step 2: Assigning of risk classification

113. Assignment of appropriate risk classification to a particular activity will be based on environmental and social screening outcome. According to World Bank ESF, projects are classified as 'high risk', 'substantial risk', 'moderate risk' or 'low risk' according to the environmental and social sensitivity of the sub-project.

5.3 Step 3: Carrying out Environmental and Social Assessment

114. After analysing data contained in the environmental and social screening form and having identified the right environmental risk classification, there by the scope of the environmental assessment required, the MoE Environment and Social Specialists will make a recommendation as to whether: (a) no Environmental assessment required, hence the project is flagged off to continue, ; (b) implementation of simple mitigation measures will be required and thus development of Summary Project Report (SPR)/ESMP; or (c) a detailed Environmental Social Impact Assessment ESIA (Comprehensive Project Report-CPR) will be carried out. The ESIA will be undertaken in accordance with the NEMA approved terms of reference by a NEMA Lead Expert.

5.4 Step 4: Public Consultations and Disclosure

115. In carrying out ESIA for the Medium and High Risk projects an evidence of comprehensive public consultation including; duly signed minutes of consultation meetings with project affected persons and key stakeholders, attendance lists and filled questionnaires are required. These public consultations will take place during the environmental and social screening process, and the input from the public consultations will be reflected in the design of the mitigation and monitoring measures. However, it is notable that due to COVID-19 in-person consultations may not be possible, hence the need for innovation including consultations either through email or virtual consultation. World Bank requires disclosure of the environmental assessment report both in-country by the client (MoE) and at World Bank websites.

5.5 Step 5: Review and Approval

116. The prepared Environment and Social Instruments will be reviewed by Environmental and Social Specialists at MoE as well as cleared by the World Bank counterparts. Once cleared by the World Bank, it will be submitted to NEMA for approval and licensing. The low and medium risk projects shall be submitted to NEMA county office where the proposed project site is located for review. The County Director of shall acknowledge receipt of the SPR by issuing an SPR application reference number and an acknowledgement letter. The SPR shall, WITHIN FIVE DAYS, be screened and assessed for completeness and the following Records of Decision (RoD) of the Authority made and communicated in writing to the Proponent. The Comprehensive Project Report (ESIA) will be submitted to NEMA office for review and approval.

5.6 Step 6: Monitoring, Supervision and Reporting

117. All the activities to be financed under the Kenya GPE COVID-19 Learning Continuity in Basic Education project will follow the ESF, ESS and the provisions described and agreed in the ESMF, ESCP, SEP, LMP and other due diligence reports prepared to ensure proper management of environment, social, safety and health requirements.

118. Environmental monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures. The Environment and social specialists will be responsible for monitoring the project activities. Any accident or incident shall be reported to the MoE and the World Bank within 24-48 hours of occurrence.

5.7 Social screening steps

119. Social screening will be undertaken for each sub-project to identify the key social risks and outline appropriate mitigation measures. Table 5-1 illustrates the key steps to be followed in ensuring social risks are appropriately managed.

Table 5-1: Social Screening Checklist

No.	Activity	Rationale
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1.	Identify the key social risks	The objectives of social screening are to: assess the social risks associated with a proposed operation; determine the depth and breadth of social assessment; and recommend an appropriate mitigation measures.
2.	Assign a social risk classification	Assignment of appropriate social risk classification to a particular activity will be based on information provided in the environmental and social screening form that the MoE environment and social officers will have administered.
3.	Conduct a social assessment	If the project/sub-project is perceived to have social impacts, a social management plan (ESMP as Step 3 above) will be developed including consultations with different stakeholder groups. The MoE will define the ToRs which will be shared with the Bank for approval.
4.	Public consultations and disclosure	Documents, including the ESIA, ESMP, etc. produced as part of this project will be disclosed by the World Bank on its website and by the MoE as part of public consultation process and prior to commencement of project activities.
5.	Monitoring of the social mitigation plans	Social monitoring will be implemented to monitor the implementation of the mitigation plans. The indicators to be monitored will include: <ul style="list-style-type: none"> - Access to information and services for the VMGs/HULTCs; - Progress in the implementation of the SEP; - Adherence to the provisions in the LMP; and - Grievance reporting and resolution

6. PUBLIC CONSULTATION AND DISCLOSURE

120. Consistent with the requirements for stakeholder engagement and taking into account COVID-19 restrictions on movement, this section describes the consultation process and how project-specific information will be disclosed in relation to this ESMF. Consistent with the SEP (see Section 7 below), this section describes how to achieve communication between the Project Coordination Unit (PCU) and the affected communities and stakeholders. Reference should be made to the Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings (Annex VII) and NEMA guideline on conduct of public consultation for EIA, EA and SEA during the period of the Corona Virus (COVID -19) pandemic with possible consultation channels including the use of ICT innovation and a comprehensive questionnaires to collect stakeholders comments.

121. In preparation for this project, the MoE undertook engagements and consultations on the project design and the planned activities and implementation arrangements with key institutional stakeholders, including the relevant Government agencies, development partners and other cooperating agencies. These engagements and consultations, which were held with key stakeholders presented in *Table 6-1*, were undertaken in compliance with Kenyan Government social distancing and related COVID-19 requirements. In view of the limitation in movement imposed to COVID-19 across the country, the project was not in a position to consult community members. Some of the key issues raised during the consultations included access to training for educators, access to equipment and learning materials especially in remote rural areas and equitable consideration of all learners in distribution of project resources. The specific concerns are addressed in the various documents produced for this project including the Environment and Social Management Framework (ESMF), Gender Based Violence (GBV) Action Plan, VMGP and LMP.

Table 6-1: Consultations on project risks and mitigation measures

Stakeholder	Date	Participants	Key points Discussed
Ministry of Education (MoE)	April 11	<ul style="list-style-type: none"> Ann Gachoya (Directorate of Policy, Partnerships & EACA) Stephen Jalenga (Gender Desk Officer) Josephine Ondieki (Safeguards Officer - PCU) 	<ul style="list-style-type: none"> Project scoping Strengthening of existing systems and structures of Education for Covid-19 response Planned activities, implementation arrangements Partnership with Education partners to support project interventions
Ministry of Education (MoE)	April 12	<ul style="list-style-type: none"> Ann Gachoya (Directorate of Policy, Partnerships & EACA) Stephen Jalenga (Gender Desk Officer) Josephine Ondieki (Safeguards Officer – PCU) 	<ul style="list-style-type: none"> Discussed Risk Management Matrix to be included in the COVID-19 Emergency Plan Developed and agreed on Risk Management Matrix to be included in the COVID-19 Emergency Plan Developed Mitigation measures to be included in the COVID-19 Response Plan
KENYA TROIKA PLUS (+)	April 15	<ul style="list-style-type: none"> UNESCO/Chair - EDPCG Elijah Mungai - MOE Ann Therese Ndong-Jatta Regional Director/ UNESCO John Kimotho - KICD Martha Ekirapa -MOE/DPCAD Ruth Charo - World Bank Andrew Kegode - UNESCO Marilyn Hoar - UNICEF Cynthia Achieng - UNESCO Virginia Mumo - UNESCO 	<ul style="list-style-type: none"> GPE COVID-19 Response Discussions (DPC&D) Development of Project Document GPE Application Grant Grant Management Agency MOE GPE funded COVID-19 response Project Lodging of GPE Application

Stakeholder	Date	Participants	Key points Discussed
		<ul style="list-style-type: none"> Michelle Chen - USAID Lilian Gangla-USAID Louse Agnes Mackongo - UNESCO Enos Radeny – USAID 	
Ministry of Health	April 19	<ul style="list-style-type: none"> Martha Ekirapa- MOE Ruth Karimi Charo - World Bank Daniel Yumbya - MOH Raymond Kirwa - World Bank Agnes Njoroge - MOE Diana Sirma - World Bank Lydia Muchemi - MOH Kennedy Buhere - MOE Asumpta Matei-MOE Samuel Siringi - MOE 	<ul style="list-style-type: none"> Key Environmental and Social Risks and Proposed mitigation measures Input into Preliminary Safeguards Instruments Disinfection and fumigation of educational institutions used as quarantine and Isolation Centre's Implementation arrangements discuss collaboration between MoE and MOH. Key inputs into a Risk and Communication Strategy, key messages targeting children
MoE, MOH	April 23	Kennedy Buhere Judith Sirma	<ul style="list-style-type: none"> Corona Virus Disease Literacy Package
MoE World Bank	April 24	Mary Nyamongo Josephine Ondieki	Labour Management Procedures

122. The emergency nature of the project and challenges brought about by restrictions related to COVID-19 have combined to pose significant challenges in the effective consultation of stakeholders, communities and affected parties. While ensuring compliance with national guidelines on social distancing and related requirements, project stakeholder consultations and engagement activities during the preparation phase have, however, not be deferred, but have been designed to be fit for purpose to ensure effective and meaningful consultations to meet the project's and stakeholders' needs.

123. The project targets a substantial numbers of learners and their families, who are part of the vulnerable and marginalized groups (VMGs) and/or historically underserved traditional local communities (HUTLCs), therefore it merits a fit for purpose, tailored approach to ensure meaningful consultations. Such an approach will use best efforts to ensure that these and other stakeholders have opportunities to provide inputs on project design and identify possible unknown project risks. Within the social distancing and other parameters set by the Kenyan Government, the MOE PCU will make all reasonable efforts to conduct meetings with stakeholders through diversifying means of communication, based on type and category of stakeholders.

Additional stakeholder consultations of stakeholders

124. Following the project approval, a consultation was held on June 17, 2020 during which the draft SEP was consulted upon. The online meeting brought together 35 participants, mainly drawn from the national and county education offices (see Annex VIII for the list of participants). The virtual consultation was augmented by a questionnaire that sought to gather information on Google drive on the various aspects of the project that needed to be consulted upon. The questionnaire was completed by over 700 participants drawn from all parts of the country involving Board of Management, Education Officers at the county level and teachers. The questions included:

- i. Which key stakeholders need to be consulted?
- ii. What are the potential risks envisioned in implementing this project? And how can we resolve them?
- iii. What measures should the project put in place when address vulnerable, marginalized and minority groups?

- iv. How should grievances related to this project be handled? What is the most effective way to share information and get feedback in the context of COVID-19?
- v. Which other intervention is being implemented in the context of COVID-19? What experiences and lessons have you learnt in implementing similar interventions (especially those funded by the World Bank funded)?

125. The key outcomes of the consultations included the following:

- i. Additional stakeholders identified during the consultations included the Members of County Assembly (MCAs) and sponsors of schools (including faith-based groups);
- ii. The key risks anticipated by the participants included the risk to COVID-19 infections (due to overcrowding in classrooms, lack of masks) and lack of infrastructure to enable the use of e-learning tools. Poor network and lack of ICT equipment were also cited;
- iii. Building more classrooms, providing PPEs (masks), increase access to water and sanitation, community education were identified as key mitigation measures; and
- iv. The most effective means of sharing information were identified as WhatsApp, phone and email;²⁶ and
- v. The need to retain a social safeguards officer attached to the project was also raised given his/her critical role in ensuring that the project beneficiaries are protected and receive maximum benefits from the project (summary results are presented in Annex IX).

126. During the project implementation and once the COVID-19 restrictions are lifted, additional tailor-made engagements will be conducted with the stakeholders and communities with a focus on the VMGs/HUTLCs within the communities (including girls, marginalized communities and persons with disabilities), taking into particular consideration cultural sensitivities, literacy levels of stakeholders, accessibility and other special needs of stakeholders with disabilities and those representing other vulnerable groups.

127. The project has established a structured approach to engagement with stakeholders that is based upon meaningful consultation and disclosure of appropriate information, considering the specific challenges associated with COVID-19. In as much as feasible, stakeholder engagement should minimize close contact. People affected by project activities have been provided with accessible and inclusive means to raise concerns and grievances. This is through established communication channels and through the GRM established by the MoE (Section 8 below). Complaints will be received from the general public, direct and contract workers, and primary supply workers including confidential complaints on GBV. A complaints protocol will be developed on which all staff and complaints handlers will be trained (details are contained in the LMP for the project).

128. The project has developed a SEP, building on the existing GPE project, which provides the steps of project stakeholder engagement. There is also a section on engagement plan that identifies the key stakeholders and the ways in which communication will be channeled based on the WHO and MoH guidelines on Risk Communication and Community Engagement (RCCE). The project will support this and ensure that it is implemented. The SEP will be updated and re-disclosed based on the magnitude of the changes made.

129. The dissemination approaches taken will ensure that information is meaningful, timely, and accessible to all affected stakeholders, including VMGs/HUTLC communities as described in the VMGP developed for this project. The project will use different languages, appropriate

²⁶It should be noted that most of the respondents were from the Ministry of Education at the National and County levels hence the preferred means of communication

communication e.g. FM radios for hard to reach communities while addressing cultural sensitivities, as well as challenges deriving from illiteracy or disabilities. Due to the expected country-wide implementation of activities, all socio-economic groups (including people in poor urban areas and remote rural areas) will be taken into consideration during roll-out of the project information.

130. Stakeholder engagement and GRM Processes (Section 8) will also be critical in component 2: re-entry of learners into the schools. For Component 2 activities the MoE will work closely with the MoH to ensure that the schools are safe and that they observe the necessary COVID-19 prevention measures including access to wash areas, sanitizers/soaps, masks and establishment of social distancing measures. For schools currently under use as isolation and/or quarantine centers, the MoE will coordinate with the MoH to ensure that the facilities are properly sanitized and waste managed appropriately before the schools re-open (refer to Pre-opening School Audit Checklist presented Annex IV). This process will be spearheaded by the BoM, Head Teachers and County Education Directors. There will be timely communication with parents to reassure them about the children's safety. The schools learners, teachers, management and administration will have access to the GRM system in case they have any complaint on the school preparedness or handing over processes.

131. The project will conduct continuous behavior assessment and community sensitization through mobile feedback (text messages, social media platforms) and dedicated radio call-in shows both mainstream and vernacular.

7. STAKEHOLDER ENGAGEMENT PLAN

132. A SEP has been prepared for this project and publicly disclosed in Kenya on MoE and the World Bank websites, it will also be disclosed locally based on the strategies identified in the SEP. The SEP has identified the key stakeholders for the project and their needs. It has included an elaborate engagement plan which is aimed at ensuring that the stakeholders are consulted and have access to information on a regular basis. It has also defined the community hierarchy with the highest point in the Education system being the Cabinet Secretary. The SEP will be updated when required and potential updates will be publicly disclosed.

133. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- a. **Affected Parties:** persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- b. **Other Interested Parties:** individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- c. **Vulnerable Groups:** persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

134. Stakeholders will be kept informed as the project develops and evolves, including reporting on project environmental and social performance and the implementation of the SEP and grievance redress mechanisms (GRM). This will be important for the wider public, but equally and even more so, for the primary beneficiaries (learners, teachers and BoM). Table 7-1Table 7-1 presents the key milestones to be achieved by the project as part of this SEP. It is notable that the responsibility for execution will lie solely with the MoE.

Table 7-1: Milestones for the SEP

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
After appraisal	Risk communication and community engagement strategy	Key informant discussions and FGDs	Communication expert, Media experts and information users including VMGs	MoE communication expert/social safeguards officer
Implementation	Complaints about service provision	County focal point logs and reports and national hotline	Receivers of information and services. Information or Data managers	MoE, PCU
Quarterly evaluation and feedback survey	Feedback of effectiveness of different channels of communication	Survey and Direct observation of the project subjects	Different stakeholders and VMG groups	MoE Communications

8. GRIEVANCE REDRESS MECHANISMS

135. The GRM is a management system through which grievances will be resolved following a standard operating procedure (SOP) aligned to other management systems (communication, resourcing, reporting) for all project workers including the contactors, sub-contractors for the installation of ICT and suppliers for the school meal program. A grievance can be defined as a concern or complaint raised by an individual or a group of stakeholders affected by real or perceived project induced impacts. A grievance mechanism provides a way to reduce risk for the proposed projects, offers stakeholders an effective avenue for expressing concerns and achieving remedies, and promotes a mutually constructive relationship. A well-functioning grievance mechanism:

- Provides a predictable, transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting;
- Builds trust as an integral component of broader stakeholder's relations activities; and
- Enables more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement.

136. Within the KENYA GPE COVID-19 Learning Continuity in Basic Education Project, the following principles will be established to ensure the effectiveness of the GRM:

- Commitment to fairness in both process and outcomes;
- Freedom from reprisal for all involved parties—within MoE and in the counties;
- Dedication to building broad internal support across project lines;
- Main-streaming responsibility for addressing grievances throughout the project, rather than isolating it within a single department; and
- Willingness by MoE leadership to visibly and sincerely champion the grievance system.

Table 8-1 provides the feasible principles for the implementation of GPE /MOE GRM.

Table 8-1: Principles of GPE/MOE GRM

Principles	Details
Fairness	GPE- PRIEDE will (i) treat grievances with confidentiality, (ii) assess grievances impartially, and (iii) handle grievances transparently
Objectiveness and independence	GPE-PRIEDE GRM will: (i) operate independently of all interested parties to ensure fair, objective and impartial treatment of all cases (ii) ensure GRM officials at all levels have adequate means and powers to investigate grievances (e.g., interview witnesses, access records)
Simplicity and accessibility	GPE-PRIEDE GRM will provide simple and easy to understand procedures for filing grievances by aggrieved parties: GPE-PRIEDE will provide a range of contact options for submitted grievances to include: (i) Telephone number (preferably toll-free), an (ii) E-mail address (iii) Postal address GPE-PRIEDE will ensure that the GRM is accessible: (i) in remote project areas (ii) in language that is easy to understood by stakeholders with low level of education (iii) at no cost to the user
Responsiveness and efficiency	GPE-PRIEDE will: (i) be responsive to the needs of all complainants, (ii) train staff to take effective action upon, and (iv) Respond quickly to grievances and suggestions.
Speed and proportionality	GPE-PRIEDE will ensure all grievances, simple or complex, are addressed and resolved in a quick, decisive, and constructive manner.

Participatory and social inclusion	GPE-PRIEDE will: (i) encourage all stakeholders to submit grievances and comments to the uptake location and using provided uptake channels ²⁷ (ii) ensure poor people, marginalized groups, and special needs access GRM services
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137. The GRM is aligned to international best practice and guidelines and has taken the following factors into consideration:

- i. Proportionality: scaled to risk and adverse impacts on affected communities ;
- ii. Cultural appropriateness: considers culturally appropriate ways of handling community concerns. ;
- iii. Accessibility: clear and understandable mechanism that is accessible to all segments of the affected communities at no cost. ;
- iv. Transparency and accountability: to project affected stakeholders at field level. ; and
- v. Appropriate protection: prevents retribution and does not impede access to other remedies.

The following types of reports and/or complaints will not be considered by the project team:

- i. Complaints that are incomplete or not specific in nature;
- ii. Communication in the nature of offering suggestions; and
- iii. Communication seeking guidance or explanation.

Likely grievances include:

- ii. Project time-lines;
- iii. Targeted beneficiaries;
- iv. Targeted counties;
- v. Targeted actors;
- vi. Project activities; and
- vii. Project negative impacts.

138. A detailed GRM is presented in the SEP and includes how issues will be addressed, resolved and communication managed to ensure that the complainants get feedback in a timely manner. It is notable that GBV complainants will be referred to a service provider (as further explained in the GBV Action Plan Annex VI) while the workers will have a system for managing complaints as articulated in the SEP and LMP. The GRM grievance flow is presented in Figure 8-1.

²⁷ Community members, members of vulnerable groups, project implementers, civil society, and the media).

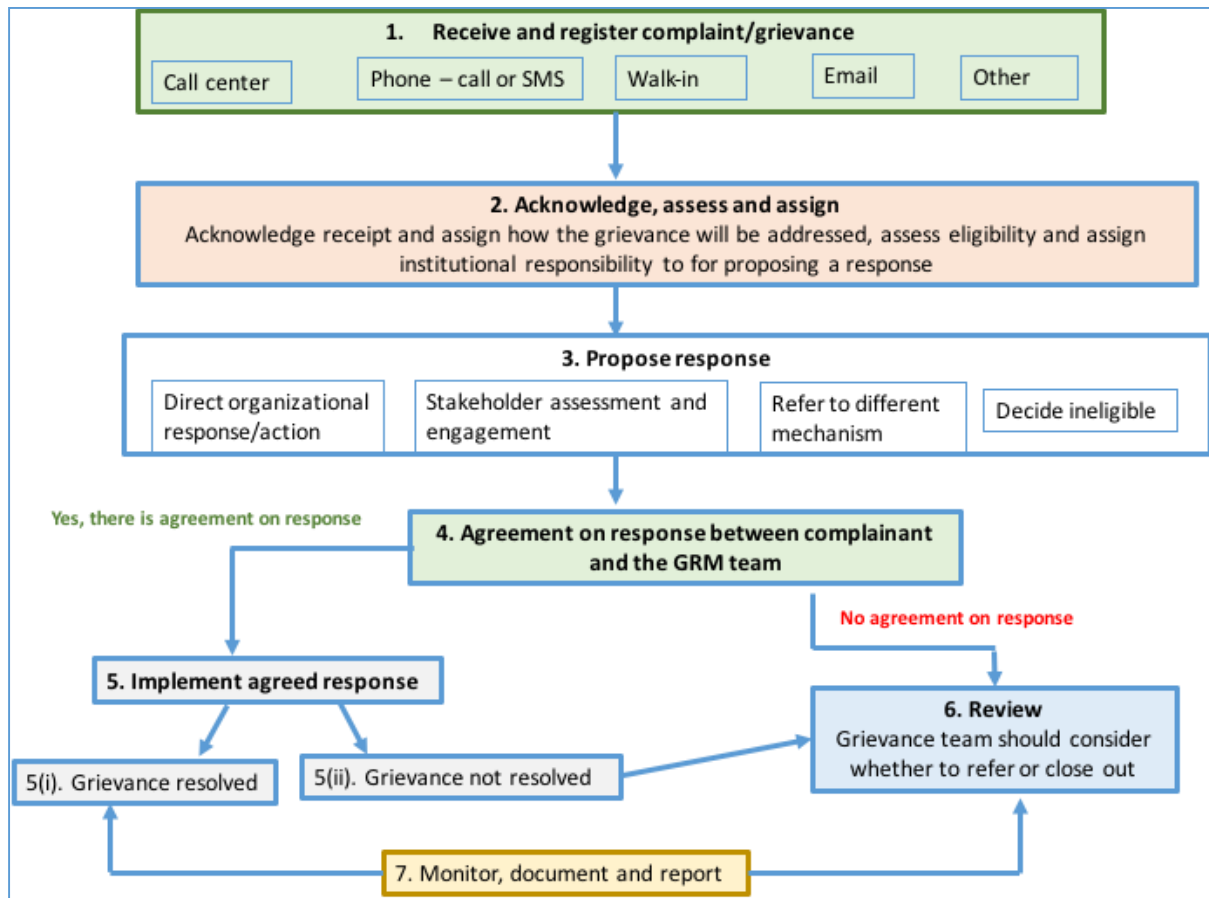


Figure 8-1: Grievance Redress System Work flow Diagram

9. INSTITUTIONAL ARRANGEMENTS, RESPONSIBILITIES AND CAPACITY BUILDING

9.1 Implementation Arrangements

139. Similar to the Kenya GPE PRIEDE project, the project implementation will be mainstreamed into the government education management system. The MoE, State Department of Early Years and Basic Education (SDELBE), will be the main implementing agency for the project. The Principal Secretary (PS) in charge of the SDELBE, who is also the MoE's accounting officer, will have the primary responsibility for efficient and effective implementation of the project for achievement of the stated development objectives. All the key decisions, including financial and procurement, related to the project implementation will be vested with the PS.

140. The Directorate of Projects Coordination and Delivery (DPC&D) will oversee the overall Project implementation. The DPC&D will be instrumental in the project's operational matters: it coordinates with the National Treasury, Central Bank of Kenya (CBK) and the MoE's internal Finance Department for timely flow of funds and processing of withdrawal applications; ensures compliance with fiduciary and safeguard requirements of the projects; and carries out necessary M&E. The DPC&D is empowered by the PS to take some day-to-day decisions required for the project implementation.

141. The existing Kenya GPE PRIEDE Project Coordination Unit (PCU), which is under DPC&D will be primarily responsible for the day to day project management and coordination, communication, safeguards, fiduciary and monitoring and reporting. The PCU is functional and has the capacity to also implement this project, considering that some of the key project activities will be directly executed and monitored by the TSC, Kenya National Examinations Council (KNEC) and KICD. These agencies are implementing entities of the PRIEDE and SEQIP projects, therefore have experience with World Bank Operational safeguards policies. However, the PCU has not yet implemented a project under the WB Environmental and Social Framework (adopted in 2018). The PRIEDE PCU is currently composed of a National project coordinator, technical component leads and their deputies, accountants; procurement officers, Social Safeguards Specialist, a communication officer and ICT officer. The project is able to fit the staff programs and both projects will be effectively implemented using the existing staff. As SEQIP is now under implementation and the workload substantially reduced, the social specialist seconded will split time between this project and SEQIP on a 60:40 basis. The environmental specialist will be seconded on a full time basis.

142. The project will get the services of the environment safeguards officer seconded from other ministries/institutions such as (NEMA) to closely monitor project implementation. The current social safeguards specialist attached to SEQIP project will spend 60% of her time on this project since the current project is now well established. Other additional specialists in line with the ESCP including subject matter specialists on GBV/SEA, labor conditions (health and safety), medical waste management, and social inclusion shall be hired on need basis from the pool of MoE Framework Agreement with the other institutions. The coordinator manages day to day operations of the PCU. Each component lead will be assigned the responsibility to coordinate with a relevant implementing agency or Directorate²⁸ to collect monitoring data to inform project progress reports and updating of the results framework.

143. The Project Steering Committee (PSC) for the GPE PRIEDE Project, the SEQIP Project and USAID funded Tusome Project will continue to execute the overall Governance function of this project. The PSC is chaired by the Education Cabinet Secretary whereas the Principal Secretary, State

²⁸ The results framework includes responsibility for each component lead.

Department of Early Learning and Basic Education, serves as the Secretary of the PSC. Other key PSC members include relevant Directors from various Directorates at MoE; MoE 's Heads of Finance, Accounts and Procurement; Chief Executive Officers of KNEC, KICD, TSC, KEMI²⁹ and CEMASTE³⁰; and representatives from the National Treasury, Elimu Yetu Coalition, the Teachers Union, the Head teachers' associations, and the Parents Association. The PSC will provide Strategic direction, endorse the Annual Work Plan and Budget, ensure effective coordination among the project implementation agencies and review the implementation progress. The institutional and implementation arrangements are summarized in Figure 9-1.

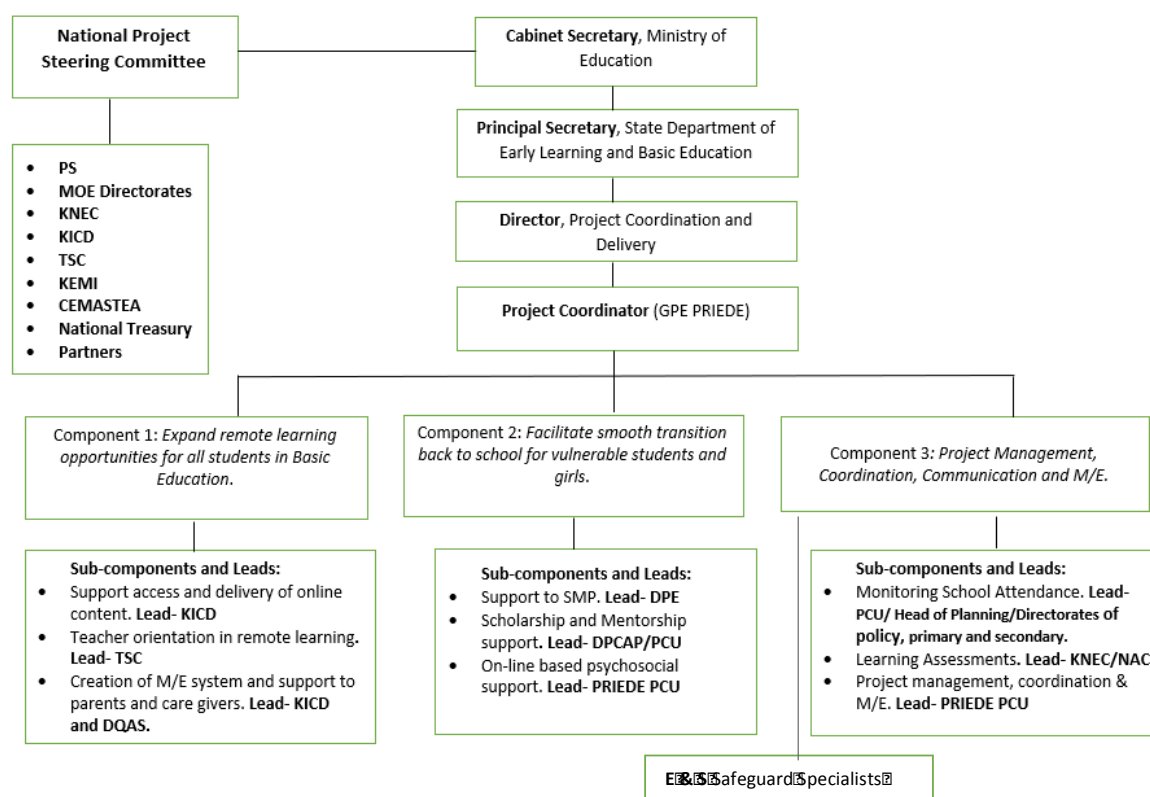


Figure 9-1: Institutional and implementation arrangements

144. EdTech COVID-19 Help Desk support: Regarding implementation of Component 1 interventions for radio, TV, the e-cloud, and establishment of monitoring system for remote learning, MoE (through KICD) will reach out for technical support from the newly created EdTech COVID-19 Help Desk of the EdTech Hub³¹ for additional support to conceptualize a detailed implementation and monitoring plan for the specified activities in the PIM. Kenya is one of the target countries for this 'free' technical assistance service.

a) *Component 1: Expand existing remote learning opportunities for learning continuity for all students in Basic Education.*

²⁹ KEMI: Kenya Education Management Institute

³⁰ CEMASTE: Centre for Mathematics, Science and Technology Education in Africa

³¹ EdTech COVID-19 Help Desk of the EdTech Hub <https://edtechhub.org/helpdesk/>; [EdTech Hub Help Desk online request web site](#) The EdTech Hub is jointly supported by the World Bank, Dfid and the Gates Foundation to provide dedicated research and technical support to target countries on 'edtech' topics including use of radio and television.

145. Subcomponent 1.1: Support access and delivery of on-line content to all students in primary and secondary schools. KICD will directly be responsible for implementation and monitoring of activities under this sub-component. KICD will work closely with the Directorate of Quality Assurance and Standards (DQAS) regarding quality assurance, and associated guidelines for the on-line and distance learning activities. MoE will be responsible for timely procurement of the required consultancy services and goods for this sub-component, as per the approved procurement plan.

146. Subcomponent 1.2: Teacher training in interactive remote learning methodologies. TSC will take the lead in implementation and monitoring of activities for this subcomponent. TSC will identify target teachers for training, while considering equity and inclusiveness aspects. TSC will engage its officers based at the county and sub-county levels to provide hands-on support to teachers at the school level, and to sensitize the school boards of management on the online and distance learning. In addition, TSC will collaborate with KICD on the ICT course under the Elimika intervention to explore areas for coordination and joint delivery of the ICT related courses that target teachers. The details for teacher targeting, engagement of the field-based staff, and coordination with KICD will be detailed in the PIM, which is expected thirty days (30) after project effectiveness.

147. Subcomponent 1.3: Create an integrated monitoring and evaluation system for remote learning interventions and provide support for parents and caregivers to monitoring student learning. KICD, in collaboration with DQAS, will be responsible for implementation of activities under this component. KICD will liaise with partners who are already providing aspects of the 'simple tips' in remote learning utilization for some groups of parents and caregivers. KICD will review and adapt these messages, for national wide dissemination. MoE will be responsible for timely procurements of the required consultancy services for this sub-component as per the approved procurement plan.

b) Component 2: Facilitate smooth transition back to school for vulnerable students and girls.

148. Subcomponent 2.1: Support to the National School Meals Program (SMP). The Directorate of Primary Education (DPE) will be responsibility for implementing and monitoring of activities under this subcomponent. DPCAD will provide overall oversight, including the required coordination with WFP for TA for the SMP activities. The PSC will be expected to review and endorse the expanded list of target schools for the SMP. The MoE will be responsible for timely procurement of services and goods for this sub-component, and as per the approved procurement plan. The PIM will include the operational details for the SMP, the criteria used to identify additional target schools, and the updated list of target schools by Sub County and county (schools identified from the informal settlement and special needs schools will be marked accordingly).

149. Subcomponent 2.2: Provision of on-line based psychosocial support services. The GPE PRIEDE PCU will be directly responsible for implementation of this activity. The PCU will develop terms of reference and procure (as per the approved procurement plan) a partner agency or institution to provide psychosocial services. The PCU, in collaboration with County Project Coordination Units (CPCU) and the KICD radio and TV partnerships, will sensitize learners and teachers of the psychosocial support services opportunity, including specific guidance on how to access the service. The PCU will work with the procured agency or institution to prepare a quarterly summary report for the project progress report and the results framework. The MoE will be responsible for timely procurement of services for this sub-component as per the approved procurement plan.

150. *Component 3: Project Management, Coordination, Communication and Monitoring and Evaluation.* The GPE PRIEDE PCU will be responsible for day to day project management and coordination. The PCU will be responsible for preparation of the eighteen (18) months' work plan and budget (AWP&B) for the project; monitoring of the results framework and quarterly reporting; facilitate project communication; ensure compliance with fiduciary and safeguards requirements; and coordinate with the Directorate of ICT to establish a virtual meeting room at MoE. Monitoring of school attendance, development and dissemination of guidelines when schools re-open (to guide student assessment, grade promotion and national examinations) will be implemented by a joint technical working group formally appointed by the PS. The membership will include officers from the PRIEDE PCU; planning and NEMIS team, departments and directorates of Policy, Primary and Secondary and other relevant members. The PCU will act as the secretariat for this working group. The learning assessments will be conducted by the KNEC/NAC as per learning assessment processes and framework, which will be summarized in the PIM.

151. **Stakeholder Engagement:** The county and sub-county education offices will continue to play a key role in facilitating, coordinating, and monitoring project implementation at the school level. At the county level, the existing County Project Coordination Unit (CPCU), set up under the GPE-PRIEDE Project and each having a County Project Coordinator, will be responsible for facilitating project coordination, implementation and monitoring at the school level and providing reports to the PCU. In coordination with the PRIEDE PCU, the CPCUs will support implementation and reporting on tasks that need to be undertaken at the school level such as campaigns and community mobilizations for re-enrollment of learners when schools re-open, and support for monitoring implementation of the school meals program in target schools.

152. KICD will undertake satisfaction survey for students, teachers and learners regarding the remote learning interventions, and use the feedback provided to adjust and or improve the on-line learning and distance learning interventions. KICD will also provide simple tips to parents, in both English and Kiswahili, to enable them to guide learners in remote learning at home.

153. **Development Partners Coordination.** : The Kenya Education Development Partners Coordination Group (EDPCG) provides a forum for coordination and consultation among the development partners (DPs) and MoE on the key issues across Kenya Education Sector. The EDCPG members meet monthly, and quarterly with the MoE. Like the ongoing Kenya GPE PRIEDE project, this project will be included as a 'standing agenda' of the EDCPG monthly meeting. EDCPG will be invited to participate in implementation support missions. In addition, the project will be coordinated within the coordinating framework outlined in the MoE's COVID-19 Emergency Response Plan. The framework includes linkages with development partners.

154. The project implementation will be mainstreamed into the Ministry of Education, Science and Technology system. The TSC will be responsible for the implementation of the teacher appraisal process at the school level. The KNEC will be responsible for the analysis of the KCPE results and the implementation of the national assessments of Grade 2 in mathematics and Grade 3 in core subjects as well as the dissemination of SACMEQ IV. A committee led by the MoE PS and consisting of the TSC and KNEC Chief Executives will be responsible for overseeing the progress and effectiveness of the project interventions.

155. MoE will appoint three full-time personnel to be responsible for the day-to-day project coordination and implementation. There will be one Project Coordinator and two deputy coordinators. One deputy coordinator will be in charge of Component 1 and the other deputy coordinator will be in charge of Components 2 and 3.

156. Component 1 implementation will be coordinated with inputs from the Basic Education Directorate, Procurement/Supply team for the textbook procurement and from Kenya Institute of Curriculum Development (KICD) for the training and pedagogical supervision. Component 2 will be coordinated with inputs from Basic Education Directorate, KNEC and TSC and School Audit Department. Various departments such as the Planning Directorate, the Policy Directorate, the Education Standards and Quality Assurance Council and the Basic Education Directorate will implement component 3. The existing Project Coordination Unit (PCU) under the MoE will be used to coordinate the project activities.

9.2 Safeguards Instruments Implementation and Operation

157. It is envisaged that, during the project implementation and operation phases, e-waste is not expected to be generated. However, the project should ensure sustainable handover and ownership of the equipment under the project including; agreements on proper disposal of e-waste beyond project life. ESMP for the renovation of the installation of ICT equipment at the MoE Meeting room and the implementation of the SMP through the suppliers to the respective school shall be adhered all through the project phases. Reference will also be made to the VMGP to ensure appropriate inclusion of VMGs/HUTLCs in the project processes. Other key instruments prepared include the SEP, LMP, e-waste management plan and GBV Action Plan.

158. This ESMF contains an E-Waste Management/Disposal Plan (Annex I) which is expected to guide MoE in handling and disposal of the ICT equipment and the electronic devices during the planning, design, installation and operation phase of the project life. It will be the responsibility of MoE to ensure that the disposal plan is followed and that mitigation measures proposed are adhered to. NEMA and the PCU will undertake monitoring and supervision and reporting to the Bank in respect to the implementation and compliance with the disposal plan. Other specific plans (OHS Requirements for project workers and suppliers, and Plan and Procedure for food sourcing, handling and storage for the suppliers and schools, GBV/SEA and Child Protection Prevention and Response Plan and VMG Plan shall be implemented throughout project cycle.

9.3 Capacity Building and Training

159. Identified training areas include:

- Training on the Environment and Social Framework, including WBG EHS Guidelines;
- Pre-opening school audit checklist;
- E-waste handling, temporal storage and disposal;
- Stakeholder engagement, including GRM;
- Occupational and Community Health and Safety;
- Safe Food Hygiene Practices;
- Gender-Based Violence Risk Mitigation;
- Grievance Management;
- The contracted ICTIT firm should train MoE on operation and maintenance of the installed ICT equipment; and
- Public health risk management, including COVID-19 preparedness under the project.

Targeted training will be offered to the following:

- a) about 60 percent of primary and secondary school students accessing online and distance learning;
- b) about 1.75 million learners from the school meals program;
- c) an estimated 150,000 head teachers, teachers and curriculum support officers will benefit from teacher training in online and distance learning;
- d) students will benefit from the on line based psychosocial support services; and
- e) parents and care takers reached with remote learning tips; and

- f) MoE staff representatives on the management and maintenance of ICT equipment.

160. Capacity building and training is proposed in this ESMF in the form of awareness and sensitization workshops targeting users of electronic devices at the Ministry of Education. The sensitization and awareness will focus on imparting knowledge on users on best practices in E-waste management, including emphasis to recycle or take back E-wastes to dedicated centers, environmental and health impacts of improper E-waste disposal as well as emphasizing the need for the project to procure electronic devices from credible manufactures to avoid purchasing refurbished or second hand devices with a short shelf life. Table 9-1 shows the indicative budget for capacity building and implementation plan:

Table 9-1: Capacity Building and Implementation Plan

Activity	Description	Unit cost, US\$
Training of the PCU staff on the New World Bank Environment and Social Framework, including WBG EHS Guidelines with a focus on Occupational Health and Safety	Workshop to be facilitated by the WB safeguards team and project E&S specialist	5,000.00
Training of the PCU on the project ESMF, ESMPs, VMGP, GBVA/SEHA, LMP, GRM and project Plans and Checklists developed under ESMF.	Workshop to be facilitated by the project E & S specialist with support from the WB safeguards team on the training on ESMF/ESMP, pre-opening school audit checklist. /project OHS requirements and other plans prepared.	5,000.00
Training the SMP suppliers on the Plans and Procedures for food sourcing, handling and storage of supplies, Food Hygiene and handling and OSH requirements	Workshop facilitated by the PCU E&S specialist for the procured suppliers before commencement of work	5,000.00
Monitoring on implementation of ESMF/ESMP and other related safeguard management plans	Internal monitoring using the project E & S specialist	10,000.00
Awareness creation for general public on the available remote classes and psychosocial support	Radio, TV discussions, Newspaper adverts on issues relating to remote classes and available psycho social support available for parents / guardians and learners.	30,000.00
Grand Total		55,000.00

NB: A supplementary budget shall be set aside by the PCU for undertaking the supplementary capacity building and training during implementation on basis of the above initial training.

9.4 ESMF Disclosure

161. Bank procedures require the disclosure of this ESMF report to project affected groups, local NGOs, and the public at large. The MoE will make available copies of the ESMF (after clearance by the Bank) which includes; E-waste management plans, Occupational Safety and Health requirements for workers and Suppliers, Pre-Opening School Audit Checklist, Plans and Procedure for food sourcing, handling and storage for suppliers and schools, GBV/SES and Child Protection Prevention and Response Plan and VMG Plan as annexes on MoE and the World Bank websites.

9.5 Environmental and Social Management Process

162. This ESMF contains recommended mitigation measures and monitoring indicators (*see Table 10-1*) through which the adverse impacts as a result of installation of ICT equipment at MoE meeting room and the health and hygiene risks associated with the school meals program will be managed. The MoE project Environment and social safeguards specialists will ensure the proposed mitigation measures in the ESMP (SMP and Installation of ICT equipment) to be adopted from this ESMF-ESMP are implemented by:

- Ensuring appropriate health and Safety clauses are included in the contract agreement between MoE and the suppliers and/ or contractors;
- Carrying out the environment, health, safety and GBV / SEAH orientation of the contractors' staff before actual provision of good and services;
- Following the program for monitoring the environmental and social impacts of the project, both positive and negative;
- Carrying out routine supervision during project implementation of project activities (such as installation of the ICT equipment at MoE and delivery of food supplies in the respective beneficiary schools);
- Taking lead in the follow up to ensure OHS requirements are adhered by all service providers and contractors;
- Ensuring inclusive and genuine stakeholder engagement and feedback mechanism, including a functional grievance redress mechanism for the project both at national and county level;
- Timely reporting any anomaly or discrepancy arising during project implementation like fatality to the project coordinator; and
- Participating in the periodic monitoring team including the WB implementation support mission.

9.5.1 Mitigation Considerations and Monitoring Options

163. The risks and impact associated with the project are minor to moderate impacts that are localized and can be easily mitigated. Specific measures have been suggested in this regard where practicable. With regard to negligible and minor impacts where the project activity is not expected to cause any significant impact in such cases, best practice measures and mitigation have also been recommended where appropriate to improve the environmental and social performance of the Project. The mitigation options considered may include; project modification, provision of alternatives installation mechanisms, project timing, and environmental pollution control for the case of dust and noise. In cases where the effectiveness of the mitigation is uncertain, monitoring programs shall be closely monitored and the corrective actions implemented. Environmental monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures. All the activities to be financed under the Project will follow the ESF, ESS and the provisions described and agreed in the ESMF, ESCP, SEP, LMP, OHS requirements, GBV/SEAH, VMGP and other due diligence reports to be prepared to ensure proper management of environment, social, safety and health requirements. The Environment and Social Specialists will be responsible for monitoring the project activities at the national level and will coordinate and work closely with the county officers at the beneficiary counties.

9.6 Monitoring Roles and Responsibilities

9.6.1 Internal monitoring

9.6.1.1 Ministry of Education

164. MoE will have Environment and Social safeguard specialists as part of the project management team who will take lead in guiding and implementing environmental and social requirements of the project, working in close collaboration with the respective County Governments, Public Health department in the implementation of the SMP, and the Ministry of Health in the auditing of schools used as quarantine areas prior to opening of schools. MoE Social Officers has the requisite training and expertise to undertake necessary monitoring of this project. The project will get the services of the environment safeguards officer seconded from other ministries (NEMA) to closely monitor project implementation. However, their technical capacity will be enhanced by induction training at the beginning of project implementation to appreciate the new

World Bank Environment and Social Framework. This will facilitate a better understanding and appreciation of safeguard requirements through discussion of modalities for implementation of the project ESMF provisions.

9.6.2 External Monitoring

9.6.2.1 National Environment Management Authority

165. The responsibility of the NEMA is to exercise general supervision and co-ordination over all matters relating to the environment and to be the principle instrument of government in the implementation of policies relating to the environment. NEMA has adequate capacity to handle E-waste and has been in the forefront in spearheading the development of E-waste regulations. There are NEMA offices in all Counties headed by the County Directors who offer supervisory role within the respective counties. Close collaboration with NEMA Nairobi County will be key in the implementation of the project component of installation of ICT equipment at the MoE virtual meeting room and other core ICT equipment to support the lessons recording and upgrading of e-cloud.

9.6.2.2 Directorate of Occupational Health and Safety Services

166. The Directorate of Occupational Safety and Health Services (DOSHS) is one of departments within the Ministry of Labour and Social Protection, whose primary objective is to ensure safety, health and welfare of all workers in all workplaces. Unsafe and unhealthy work environment causes accidents, diseases, disasters and environmental pollution that occasion huge economic and social burdens to individuals and enterprises thereby stifling economic and social growth. The Directorate enforces Occupational Safety and Health Act, (2007) with its subsidiary legislation which aims at prevention of accidents and diseases at work. It also administers the Work Injury Benefits Act, 2007 (WIBA, 2007) which provides for compensation of workers who have been injured or have suffered a disease out of and in the course of employment.

167. The Directorate is present in all counties and has a key role to ensuring the safety of people at the workplace and in the community. DOSH may inspect the installed ICT equipment at the MoE meeting room to ensure safety of the facilities before use.

9.6.2.3 World Bank

168. World Bank implementation support mission shall be periodically done to ascertain the level of implementation in line with the Environment and Social Commitment Plan, Environment and Social Management Framework for the project as well as the World Bank Environment and Social Framework and WBG general environment health and safety guidelines.

10. Environmental and Social Management Plan

10.1 Monitoring Plan

169. This section describes the specific E&S due diligence provisions necessary to avoid, minimize, or mitigate project activities with potential risks, and monitor their outcomes. This process also includes identification of institutional responsibilities (implementation, supervision, monitoring and evaluation, and reporting) along the lifetime of the interventions, timing of actions, how these provisions will be monitored and reported on, and identification of budget requirements. The objectives of the ESMP are:

- a. To identify measures and plans to prevent, reduce, mitigate and/or compensate adverse impacts and enhance positive impacts; including the environmental, health and safety aspects of the project's interventions/activities, risks and negative impacts of the project;
- b. To provide an estimation of the budgetary costs for implementing the mitigation measures alongside the implementing agencies responsible for addressing project impacts;
- c. Develop environmental and social monitoring plan, corresponding to measures proposed in the mitigation plan, for project activities/sub-projects and the implementation of mitigation measures with estimated cost. The monitoring plan has included the parameters to be monitored, methods to be used, frequency of measurements, responsibility and budget;
- d. To identify the responsibilities and capacity assessment for each of the participating implementing agencies responsible for addressing project impacts; description of institutional arrangements and reporting procedures; and
- e. To prepare clear ESMP in such a manner that environmental and social requirements e.g. mitigation measures and monitoring plan related to project activities (sub-projects) could be incorporated in the bidding/contract documents.

170. All the activities to be financed under the KENYA GPE COVID -19 Learning Continuity in Basic Education Project will follow the ESF, ESS and the provisions described and agreed in the ESMF, ESCP, SEP, VMGP, LMP, GBVAP, OSH Plan and other due diligence reports to be prepared to ensure proper management of environment, social, safety and health requirements. The safeguards team will be responsible for monitoring the project activities undertaken by the supplies, contractors and subcontractors at the national level and will coordinate and work closely with the county officers at the respective beneficiary counties. Any accident or incident shall be reported to the MoE and the World Bank within 24-48 hours of occurrence.

10.2 Monitoring indicators

171. The monitoring indicators under ESMP for assessing environmental and social management for the project, include: i) waste management; ii) compliance with legislation; iii) Environment, Social Health and Safety (ESHS) performance of the project, ESSs requirements including but not limited to, stakeholder engagement activities, adherence to COVID -19 guidelines and grievances log. In addition, indicators for monitoring grievances and their resolutions and the participation of VMGs/HUTLCs will also be monitored. Use of the indicators for environmental and social monitoring will be included in the training and capacity building program.

172. Environmental and social monitoring is an applied research and analysis activity to support cost-effective and timely assessment of the status and trends in environmental and social conditions in response to different project activities. Also, it is necessary to assess the project performance against the desired mitigation measures, and compliance with the regulations and environment and social standards in order to protect people's health and safety, and the environment health and performance. Monitoring activities should be applied to direct monitoring indicators whenever applicable to the specific impacts and/or compliance with provisions of the ESMP as presented on **Table 10-1**.

Table 10-1: Environmental and Social Management and Monitoring Plan

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
Project Planning, Design and Installation of ICT Equipment							
Installation of ICT Equipment	Procurement of Substandard ICT Equipment	<ul style="list-style-type: none"> • Adherence to the project procurement procedure, • Carry out due diligence to guarantee the credibility of manufacturers supplying the electronic devices, • Products warranty for all Electronic Devices purchased, • Procure all electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life, or already categorized as E-Waste, • Faulty ICT equipment should be returned to the supplier in line with warranty period and procurement agreements • Identify buyback options with equipment suppliers, and • Procure electronic devises which are energy efficient, • Adhere to the requirements of the E-waste Management Plan (Annex I).) 	Available warrant of equipment	Document Review	Installation phase	Environment Expert, Procurement expert	500.00
Installation of ICT Equipment	Localized Noise and vibration	<ul style="list-style-type: none"> • Selecting equipment with lower sound power levels i.e. use of hand drilling machines; • Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider used generators; • Post safety signage including Men/Women at work; • Provide fit to work PPEs (ear plug / ear muffs) for all workers involved in the areas with elevated noise levels; • Coordinate with the office users / /staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site; • Plan the installation activities to take place during the weekends when MoE staff are not at work to avoid congregation of large number of persons; and • The contractor should use equipment (i.e. hand drilling machine) that is/are in good working condition and are 	Recorded cases of complaints by the staff at MoE	site Visit Document review	Installation phase	Environment Expert	500.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		periodically serviced,					
Installation of ICT Equipment	Dust Emission	<ul style="list-style-type: none"> • Suppress dust during pneumatic drilling on the wall by water spraying where necessary, • Practice good general housekeeping at the work site; sweep off the drilled out materials, • Post safety signages including Men/Women at work (or work in progress); and) • Provide fit to work PPEs for all workers involved in the renovation and installation activities in line with OHS requirements (Annex III).) 	Recorded cases of complaints from the MoE staff	site Visit Document review, and photography	Installation phase	Environment Expert	500.00
Installation of ICT Equipment	Generation of solid waste	<ul style="list-style-type: none"> • The contractor shall ensure provision of waste bin at the site to handle waste generated; • Efficient use of materials to as much as possible avoid and minimize waste production; • Ensure waste are recycled/reused before opting to dispose of; • Adhere to the requirements of the E-waste Management Plan (Annex I);) • Use of durable, long-lasting materials that shall not need to be replaced often; and • The contractor shall contract a NEMA licensed Waste handling company to collect and dispose of the waste in accordance to EMCA Waste Management Regulations, 2006 	# of waste Bin at the site,	Site Visit Project progress reports review	Installation phase	Environment Expert	-
Installation of ICT Equipment	Occupational health and safety: slip/fall, elevated noise, dust, & electrocution	<ul style="list-style-type: none"> • The contractor shall provide the workers with the required PPE and enforce on use at all times while at the work site in line with OHS requirements (Annex III).) • The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality, • Carry out job risk Assessment (analysis of hazard likely to exists and precautions need to be undertaken) before executing the assignment; • Use of safety signage “MEN/WOMEN AT WORK” to warn MoE 	Accident logs, First Aid Kits, Fire extinguishers	Site Visit Document review, and photography	Installation phase	Environment & Social Expert	-

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		and the contractor workers on site; <ul style="list-style-type: none"> • Provision of adequate signage and communication of risks to workers and MoE staff community; • Hazardous areas should be clearly marked with signs easily understood by workers, visitors and the general public, as appropriate; • Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards; • Electrical works should be performed by trained and qualified experts; • Ensure that electrical equipment is properly connected before switching on sockets; • Use only the standard electrical connectors when joining extension leads or cables, and • In case on any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls. 					
	Spread of infectious diseases - in particular COVID-19	<ul style="list-style-type: none"> • Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms; • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices. • Use GRM procedures (Section 8: Grievance Redress Mechanisms) to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing; • All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 	# of reported cases at site, # availability of IPC strategies for hand and water hygiene, use of PPE	Site Visit Document review Grievance/ incident log	Installation phase	Social Expert , CPHO	Variable

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>screening which may include temperature check and/or other vital signs;</p> <ul style="list-style-type: none"> • Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including workers and visitors; • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks; • Avoid congregation of more than 15 workers at one location. • At all project sites, maintain social distancing of at least 2 meters; • Restriction of the number of people accessing the work areas; • Use alcohol based sanitizers to fumigate the offices and work areas to be free of COVID -19 • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices. 					
	Labour disputes	<ul style="list-style-type: none"> • Fair terms and conditions shall be applied for workers (guided by relevant laws);) • The project shall implement section 8: Grievance Redress Mechanisms for project workers (direct workers and contracted workers) to promptly address their workplace grievances; • The project shall respect the workers' right of labor unions and freedom of association in accordance with Kenyan laws, and • Implement all the requirements of the Project LMP that has been prepared. 	# of reported cases at site,	Site Visit Document review,	Quarterly	Social Expert	1000.00
	Security Threat	<ul style="list-style-type: none"> • Staff badge will be issued to the authorized staff to access the MoE offices building, • All visitors will be required to fill a visitor form providing all 	# of reported cases at site, Use of security	Site Visit Document review, and	Quarterly	Environment and Social Expert ,	500.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		personal details and purpose of the visit. <ul style="list-style-type: none"> • Engraving / /marking each piece of ITC equipment with a property number and maintaining a list of equipment at MoE; • A data file with information regarding the visitor will be recorded and kept in MoE control room; Security induction must be done to all project staff; • The MoE will work closely with the Ministry of Interior to ensure the security of the workers and the facilities involved in project are responsive; • A search of personal luggage will be performed by the guards at the access control point to ensure no access of all the prohibited items into the office building and project site. 	badges, Trainings offered to staff/security personnel at MoE,	photography		Security personnel	
Operational Phase of the Project							
Recruitment and/or secondment of staff to the project	Security Threat	<ul style="list-style-type: none"> • All workers and MoE staff involved in the field operation shall be oriented on security threats, • A Project level security management plan for all personnel undertaking field operation shall be prepared by sector specialist to be hired by MoE ones the project implementation areas have been determined, • Staff badges shall be issued to the authorized workers to access the MoE offices building; • All visitors shall be required to fill a visitor form providing all personal details and purpose of the visit. A data file with information regarding the visitor will be recorded and kept in MoE control room; Security induction must be done to all project staff; • The MoE shall work closely with the Ministry of Interior to ensure the security of the workers and the facilities involved in project are responsive; • Engraving / /marking each piece of ICT equipment with a property number and maintaining a list of equipment at MoE; and 	# of reported cases at site, Use of security badges, Trainings offered to staff,	Field Visit Document review, and photography	Quarterly	Environment and Social Expert, Security Personnel/ Village elders	1000.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> A search of personal luggage shall be performed by the guards at the access control point to ensure no access of all the prohibited items into the project site. 					
Selection of Project beneficiaries	Discrimination and exclusion of vulnerable groups	<ul style="list-style-type: none"> MoE shall implement a targeting program for the marginalized and most vulnerable learners especially the girls and learners with special need and teachers in line with GBV/SEA and Child Protection Prevention and Response Action Plan (Annex VI), Project Labor Management Plan, Stakeholder Engagement Plan, and VMGP for the project will be implemented. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship in line with the project Labour Management Plan; Hold sensitization meetings on resources planning and conflict resolution mechanisms, Institutionalization of social inclusion of all categories in processes and decision making, The project shall comply with the Employment Act, 2007 on gender equality in the workplace, which will include provision of maternity and sick leave, There will also be enough and suitable toilet and hand washing facilities, separate from men and women workers, boy youths and girl youths as the community cultures demand; The contracts with third parties will include non-exclusion requirements which will also be part of the monitoring system. 	#Procedure of project targeting	Field Visit and Document review,	Quarterly	Social Expert ,	500.00
Selection of Project beneficiaries	Sexual Exploitation and Abuse (SEA)	<ul style="list-style-type: none"> Sensitization of project workers and the MoE staff and benefiting communities; Instituting Grievance redress committee to handle among others sexual abuses in line with GBV/SEA and Child Protection Prevention and Response Action Plan (Annex VI),) 	# of reported cases # of cases handled to conclusion Existence of SEA Plan	Field Visit Document review	Quarterly	Social Expert	500.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> Involving local authorities and police where appropriate in handling sexual abuses; and All project staff should be trained against SEA awareness programs for workers and the beneficiary community. 					
	Spread of HIV/AIDS and STIs	<ul style="list-style-type: none"> Carry out periodic HIV/AIDS awareness for workers and staff, Carry out voluntary HIV/AIDS testing for workers; and Workers should sign the CoC and abide by its provisions for HIV/AIDS awareness and prevention in line with the project Labour Management Plan. 	# HIV/ AIDS campaign done Training record available	Field Visit Document review	Quarterly	Social Expert, CBO	500.00
Access to remote learning materials	Cyber bullying of children and teachers	<ul style="list-style-type: none"> MoE will work with Ministry of ICT to ensure KICD adequately considers aspects of information and data security, including child protection and cyber-bullying mitigation; Caregivers and parents should be trained to protect learners from on line harassment. 	# training done, # internet sites controlled access # of registered cases	Document review	Quarterly	Social Expert/ KICD/ Teachers/ Parents	500.00
Distribution of school meals	Traffic Hazards	<ul style="list-style-type: none"> Use of competent drivers with defensive driving technics; MoE shall regularly inspect vehicle safety and maintenance; Prior inspection of vehicles to ensure only road worthy vehicles and trucks shall be used in transportation of school meals to avoid frequent breakdowns and risks of road accidents. This will be done by the Head Driver in conjunction with PCU Environment Safeguards officer; All drivers and loaders should sign the CoC in line with the project Labour Management Plan; Drivers (especially going to high insecurity areas) should follow guidance on safe emergency driving; Use of high-visibility protective clothing (reflective jackets);) Ensuring vehicles with restricted rear visibility is outfitted with audible back-up alarms, Install speed limit signs at all schools and require deliveries to obey speed limits; and 	# of accidents recorded, Vehicle inspection reports, and Journey Management Plans	Field Visits and document review	Quarterly	E&S Experts, Head Teachers, SMPC, Drivers	2000.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> All fleet handling deliveries shall observe speeds limits to a maximum of 50km/h out of major towns and 10kms in towns or near the MoE offices. 					
Provision of psychosocial support for parents and guardians	Limited access to parents with limited literacy levels	<ul style="list-style-type: none"> Engagement of people who can speak the local languages for ease of communication, Translation of materials into Kiswahili and dominant local languages, Provision of targeted support for parents who are not literate. 	# and type of translated materials # of parents/guardians reached with translated material	Field Visits Data collection at the community level	Quarterly	E&S Experts,	500.00
Training of Head Teachers and department heads	Compromised selection process	<ul style="list-style-type: none"> Ensure the development of a criteria for selection by teachers to benefit from the training; and Disclose, at the county level, information on those selected for training done under the project Selection of teachers will not be discriminatory 	-Selection criteria -No. of teachers trained	Training procedures	Quarterly	E&S Experts,	1000.00
Installation of ICT Equipment /Storage area of the school meals	Fire risks	<ul style="list-style-type: none"> MoE should provide fire suppression facilities including fire extinguishers/ fire blanket to the MoE offices and learning facilities and ensure the firefighting equipment is serviced as required, Key staff at the MoE office shall have basic training in fire control; MoE and the beneficiary schools shall prepare fire emergency management plans at the commencement of activities at school and MoE virtual meeting room; and All offices and schools shall prepare fire emergency management plans; and Undertake regular fire drills at offices and schools to test on emergency response and use the results to improve on the response mechanism. 	# of fire accidents recorded,	Field Visits and document review	Quarterly	E&S Experts, Head Teachers,	500.00
	Gender-Based Violence	The provision of Annex VI: GBV/SEA and Child Protection Prevention and Response Action Plan shall be adhered to included	# of reported cases	Field Visit Document	Quarterly	Social Expert	-

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		but not limited to: <ul style="list-style-type: none"> • Monitor and report on the behavior of project workers at all levels; • Ensure the people engaged in project activities understand the GBV referral pathway; • Ensure all learners and community members have access to the GRM contacts; and • All workers assigned to or recruited to serve on this this project shall sign the CoC (see the LMP for the project).) 	# of cases handled to conclusion # Existence of GBV/SEA Plan	review			
Selection of project beneficiaries	Lack of or inadequate public participation and consultation	<ul style="list-style-type: none"> • Implement the requirements of VMGP to identify and reach the HUTLCs and rural populations with project information; • Use communication channels that are accessible to vulnerable and marginalized groups as well as migrants (where applicable) including use of community radios, translating information in local languages; and • Identify and equip local leaders with information on the project more generally and the GRM (section 8 of this ESMF) for further dissemination in their communities. 	Record of Public participation, Meetings minutes, # of complains recorded	Field Visit Document review	Quarterly	Social Expert	1000.00
Distribution of School Meals	Improper Food Hygiene and Safety Risks	<ul style="list-style-type: none"> • The Ministry of Education, the Public Health Department and the school community will ensure that schools have adequate safe storage facility for food items; • The schools should have detailed protocols on hygiene measures, cleaning procedures and safe food preparation practices in line with Annex V: Plans and Procedures for School Food Sourcing, Handling and Storage for Suppliers and Schools; • County Public Health Officer Where the school has a feeding program, the quality of food must be inspected by County Public Health Officer on a regular basis • Due diligence food safety and hygiene for storage facilities during the selection of suppliers under the SPM; • School administrators should ensure that food purchased for 	# of recorded case of food poisoning or complaints from learners Clean & tidy store free of rodents Clean food preparing and serving areas, Adequate tap water for hand	Field Visit Document review	Quarterly	Project Coordinator Environment and Social expert County Occupational Safety and Health officer County Public health officer	2,000.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>children is in good condition, fresh and safe for human consumption;</p> <ul style="list-style-type: none"> • School administrators should undertake measures including: stop rodents from entering stores and ensure the store is free from increased moisture content) to protect food from rodents and bacterial contamination while in the storage facility; • School administrators should ensure that the areas where food is prepared, including tables where food is chopped or cut as well as the utensils used for such purposes, are cleaned at all times; • Teachers should encourage learners to observe basic hygiene, especially the washing of hands, before and after meals; • Personnel mandated to serve food to learners should be sensitized to practice basic hygiene such as washing of hands and observing personal cleanliness; • School should make efforts to ensure that learners with special needs are properly catered for in relation to their dietary needs; • Children displaying regular/frequent discomforts after eating food should be referred to medical personnel for tests on allergies; • Training of food suppliers on use of PPE, safety and hygiene related issues; • Food storage premises should be properly designed for ease in cleaning to encourage proper sanitation and maintenance; • School administration should ensure that all food handlers have valid medical certificates and renewed periodically; • Monitoring and inspections on the critical areas including; purchasing, storage; distribution and handling to ensure adherence to health and safety policies; • MoE may periodically undertake food safety risk assessment; 	<p>washing</p> <p>Valid medical certificate for school food handlers</p>				

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		and <ul style="list-style-type: none"> • Proper record keeping and documentation should be encouraged at all levels from the suppliers to schools. 					
	Spread of Infectious Disease – COVID-19	<ul style="list-style-type: none"> • Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms; • Use grievance procedures (section 8: GRM) to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing; • All workers (suppliers) delivering SMP food items shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs; • Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including suppliers, workers and visitors; • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks; • Avoid concentration of more than 15 persons at one location. Where more than one person are gathered, maintain social distancing of at least 2 meters; • Use alcohol based sanitizers to fumigate of offices, work areas, store and project vehicles delivering food to the schools; • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices /schools. 	# of reported cases at site, # availability of IPC strategies for hand and water hygiene, use of PPE	Field Visit Document review, and photography	Quarterly	Environment And Social Expert/CPHO	Variable
Operation & Management of ICT Equipment	Generation of E-Waste with associated toxic	<ul style="list-style-type: none"> • Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices 	Clearly labelled E-waste bins / receptacles,	Field Visit Document review,	Annually	Project Coordinator	2,500.00

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator monitoring for	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
	chemicals leading to Air Pollution, pollution of ground water,	<p>with a short shelf life or already categorized as E-Waste;</p> <ul style="list-style-type: none"> • Where available, utilize buyback options with equipment suppliers; • As much as possible, recycle all E-waste through the licensed e-waste recycling companies as listed in Annex I: E-Waste Management Plan; • Establish an E-Waste Temporal Collection Center at MoE; including collection bins/receptacles; • MoE education shall contract a NEMA licensed to Transport all E-wastes to NEMA licensed E-waste company, and/or • MoE shall return faulty ICT gadgets to the supplier depending on warranty period/agreement; • Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management; and • The contractor for the installation of the ICT equipment shall adhere to the provisions in the E-Waste Management Plan (Annex I: E-Waste Management Plan). 	<p>Warrant for the ICT Equipment</p> <p>Temporal E-waste collecting facility at MoE, Training record for E-Waste handling, E-Waste disposal Certificates</p> <p>NEMA-Waste License for contracted Firm</p>	Photography		Environment expert	
Total							15,500.00

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Annex I. E-Waste Management/Disposal Plan

General E-Waste Management

173. The Ministry of Education through the respective parties shall characterize, segregate and sort the E-waste at sources of generation according to composition, source, types of e-waste produced, or according to local regulatory requirements. The following guidance applies to the management of non-hazardous and hazardous e-waste. Effective planning and implementation of e-waste management strategies has included:

- i) The definition of opportunities for source reduction, as well as reuse and recycling,;
- ii) The definition of procedures and operational controls for on-site storage, ; and
- iii) The definition of options / /procedures / /operational controls for treatment and final disposal.

E-Waste Prevention Processes

174. This has been designed and shall be operated to prevent, or minimize, the quantities of e-waste generated and hazards associated with the e-waste generated in accordance with the following strategy:

- i) Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as e-Waste;
- ii) Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs,; and
- iii) Minimizing hazardous e-waste generation by implementing stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed.

Recycling and Reuse

175. In addition to the implementation of e-waste prevention strategies, the total amount of e-waste may be significantly reduced through the implementation of recycling and re-use plans to be done by a NEMA E-Waste Licensed Firm that shall be contracted by Ministry, which should consider the following elements:

- i) Identification and recycling of products that can be reintroduced into the operational processes and or increase its lifetime; and
- ii) Establishing recycling objectives and formal tracking of e-waste generation at the site.

Treatment and Disposal

176. In cases when e-waste is still generated after the implementation of feasible e-waste prevention, reduction, reuse, recovery and recycling measures, e-waste materials should be treated and disposed of, and all measures should be taken to avoid potential impacts to human health and the environment. Selected management approaches is consistent with the recommendations in Draft Environmental Management and Co-ordination (E-Waste Management) Regulations, 2013, and may include one or more of the following:

177. Timely removal, treatment and/or disposal at permitted facilities specially designed to receive the e-waste.

Hazardous E-Waste Management

178. Hazardous e-waste should always be segregated from non-hazardous e-waste. If generation of hazardous e-waste cannot be prevented through the implementation of the above general e-waste management practices, management shall focus on the prevention of harm to health, safety, and the environment, according to the following additional principles:

- i) Identification of hazardous e-waste and its separation from other waste until removal from site, ;

- ii) Hazardous e-waste materials that are frequently generated in small quantities within the projects activities such as equipment and maintenance activities. Examples of these types of e-waste include: used batteries (such as nickel-cadmium or lead acid); and lighting equipment, such as lamps or lamp ballasts, servers, computers, cables, etc. This e-waste should be managed following the guidance provided in the above sections.;
- iii) Ensuring that contractors handling, treating, and disposing of hazardous e-waste are reputable and legitimate enterprises, licensed by NEMA and following good international industry practice for the e-waste being handled,; and
- iv) Ensuring compliance with applicable local and international regulations.

Hazardous E-Waste Storage

179. Hazardous e-waste shall be stored so as to prevent or control accidental releases to air, soil, and water resources in an area location where:

- i) E-waste is stored in a manner that prevents the commingling or contact between incompatible e-waste, and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatibles or physical separation such as walls or containment curbs,;
- ii) Store in closed containers (some could be radioactive proof), away from direct sunlight, wind and rain),);
- iii) Secondary containment systems shall be constructed with materials appropriate for the e-waste being contained and adequate to prevent loss to the environment,;
- iv) Provision of readily available information on compatibility to employees, including labelling each container to identify its contents,;
- v) Limiting access to hazardous e-waste storage areas only to the MoE employees who have received proper training, ;
- vi) Clearly identifying (label) and demarcating the area, including documentation of its location on a facility map or site plan, plan'; and
- vii) Conducting periodic inspections of e-waste storage areas and documenting the findings .

Transportation of E-Waste

180. All e-waste containers designated for off-site transport shall be secured and labelled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site, and be accompanied by an E-waste transfer note (i.e., manifest) that describes the load and its associated hazards, consistent with the Transport of Hazardous Materials good practices and guidance. The transport of e-waste should be through a contracted NEMA registered e-waste handler.

Monitoring

181. Monitoring activities associated with the management of hazardous and non-hazardous e-waste should include:

- i) Regular visual inspection of all e-waste storage collection and storage areas for evidence of accidental releases and to verify that e-waste are properly labelled and stored.;
- ii) Inspection of loss or identification of cracks, corrosion, or damage to protective equipment, or floors, ;
- iii) Verification of locks, and other safety devices for easy operation (lubricating if required and employing the practice of keeping locks and safety equipment in standby position when the area is not occupied),);
- iv) Documenting any changes to the storage facility, and any significant changes in the quantity of materials in storage, ; and
- v) Regular audits of e-waste segregation and collection practices.

Monitoring records for hazardous e-waste collected, stored, or transported shall include:

- i) Name and identification number of the material(s) composing the hazardous e-waste or Physical state, ;
- ii) Quantity (i.e., kilograms, number of containers),); and
- iii) E-waste transport tracking documentation shall include, quantity and type, date dispatched, date transported and date received, record of the originator, the receiver and the transporter, .

182. Method and date of storing, repacking, treating, or disposing at the facility, cross-referenced to specific manifest document (e-waste transfer notes) numbers applicable to the hazardous e-waste or the Location of each hazardous e-waste within the facility, and the quantity at each location. **Table 11-1** below is the proposed Waste Management/Disposal Plan for the project.

Table 11-1: Waste Management/Disposal Plan

Issue: Procurement and provision of ICT Equipment to the Ministry of Education				
Impact	Mitigation	Monitoring	Responsibility	Budget (USD)
<p>Air Pollution through improper disposal which leads to release of toxic, hazardous and carcinogenic gaseous</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste; Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs, Implement stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed, Identify and recycle of some of ICT products that can be reintroduced into the operational processes, Establish E-Waste Collection Centers within MoE , including collection bins / receptacles; Contract the services of NEMA Licensed E-Waste Firm to timely remove E-wastes from MoE for treatment and/or disposal at permitted facilities, and Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>	<p>Warranty for Electronic Devices purchased; Review of procurement evaluation report for the manufacturers supplying the electronic devices; Availability of E-waste receptacles for collecting E-waste at the MoE ; Records of Good Housekeeping and visual inspection; Certificate of disposal of E-wastes given by the NEMA Licensed E-Waste Firm attesting that E-wastes from the project have been successfully disposed of; and Number of awareness and training conducted for users of electronic devices on E-waste.</p>	<p>MoE procurement Officer, MoE Environment Safeguard Officer, County Public Health Officers, NEMA County Director</p>	<p>500 USD</p>
<p>Human Health Impacts due to poor disposal Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully</p>				
<p>Pollution of land resources including landfills Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully.</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste; Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs,</p>	<p>Warranty for Electronic Devices purchased; Review of procurement evaluation report for the manufacturers supplying the electronic devices; Availability of E-waste receptacles for collecting E-waste at the MoE ;</p>	<p>MoE procurement Officer, MoE Environment Safeguard Specialist, County Public Health Officers, NEMA County Director</p>	<p>500 USD</p>

Issue: Procurement and provision of ICT Equipment to the Ministry of Education				
Impact	Mitigation	Monitoring	Responsibility	Budget (USD)
Pollution of water bodies Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully.	Implement stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed, Identify and recycle of some of ICT products that can be reintroduced into the operational processes, Establish E-Waste Collection Centers within MoE , including collection bins / receptacles; Contract the services of NEMA Licensed E-Waste Firm to timely remove E-wastes from MoE for treatment and/or disposal at permitted facilities, and	Records of Good Housekeeping and visual inspection; Certificate of disposal of E-wastes given by the NEMA Licensed E-Waste Firm attesting that E-wastes from the project have been successfully disposed of; and Number of awareness and training conducted for users of electronic devices on E-waste.	MoE procurement Officer, MoE Environment Safeguard Officer, WRA Regional Director, County Public Health Officers, NEMA County Director	500 USD
Growth of informal E-waste disposal centers Improper and indiscriminate disposal of E-waste is likely to lead to the mushrooming of informal waste disposal centers in neighborhoods which further exacerbates the problem of E-waste	Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.		MoE procurement Officer, MoE Environment Safeguard Officer, NEMA County Director County Public Health Officers,	500 USD
Grand Total				2,000.00

Annex II: Population Distribution for Counties benefiting from the Two-School Meals Programme (SMP) Interventions

183. **Table 11-2** shows the population distribution and densities for the beneficiary counties for the SMP through the two interventions (Table 11-3: Cash Transfer and Centralized SMP for the selected Counties).

Table 11-2: Population Distribution and Density for the Beneficiary Counties

County	Population	Land Area (Sq. Km)	Population Density (No. per Sq. Km)
Counties in informal settlements			
Nairobi	4,397,073	694.9	6,325
Mombasa	939,370	229.7	4,084
Nyeri	759,164	2361	322
Nakuru	2,162,202	2,325.8	930
Kisumu	1,155,574	2085.9	554
Eldoret	475,716	2,955.3	160
Arid Counties			
Baringo	666,763	10,976.4	61
Garissa	841,353	44,753	19
Isiolo	268,002	25,336	11
Mandera	867,457	25,939.8	33
Marsabit	459,785	66,923.1	7
Samburu	310,327	21,000	15
Tana River	315,943	35,375.8	9
Turkana	926,976	77,000	12
Wajir	1201,007	55,840.6	22
West Pokot	621,241	9,169.4	68
Semi-Arid Counties			
Elgeyo Marakwet	454,480	3,049.7	149
Embu	608,599	2,821	216
Kajiado	1,117,840	21,292.7	52
Kilifi	1,453,787	12,245.90	119
Kitui	1,136,187	30,430	37
Kwale	866,820	8,270.3	105
Laikipia	518,560	8,696.1	60
Lamu	143,920	6,273.1	23
Machakos	1,421,932	6,043	235
Makueni	987,653	8,008.9	123
Narok	1,157,873	17,921.2	65
Taita Taveta	340,671	17,083.9	20
Tharaka Nithi	393,177	2609	151

Table 11-3: Targeted Counties (Including Informal Settlements) for National SMP

SMP intervention: Cash Transfer for 'Home Grown' SMP		
S/NO	NAME OF COUNTY	SUBCOUNTY
1	BARINGO	Baringo Central
2	ELGEYO/MARAKWET	Keiyo South
		Marakwet East
		Marakwet West
3	EMBU	Mbere North
		Mbere South
4	KAJIADO	Kajiado Central
		Isinya
		Kajiado West
		Loitoktok
		Mashuru
5	KILIFI	Kaloleni
		Malindi
		Ganze
		Magarini
6	KITUI	Ikutha
		Katulani
		Kyuso
		Lower Yatta
		Mumoni
		Mutitu
		Mutomo
		Mwingi Central
		Mwingi East
		Tseikuru
7	KWALE	Kinango
		Lungalunga
		Matuga
8	LAIKIPIA	Laikipia Central
		Laikipia East
		Laikipia North
		Laikipia West
		Nyahururu
9	LAMU	Lamu
10	MACHAKOS	Athi River
		Kalama
		Machakos
		Masinga
		Matungulu
		Mwala

11	MAKUENI	Kathonzweni
		Kibwezi
		Makindu
		Mbooni East
		Nzau
12	NAIROBI	Dagoretti
		Kangemi
		Kawangware
		Kibera
		Korogocho
		Lower Kabete
		Makongeni
		Mathare
		Mukuru
		Westlands
13	NAROK	Narok South
		Narok East
		Narok North
14	NYERI	Kieni East
		Kieni West
		Nyeri Central
15	TAITA TAVETA	Mwatate
		Taveta
		Voi
16	THARAKA NITHI	Tharaka North
		Tharaka South
SMP intervention: Targeted Counties for the Centralised Procurement System (In - Kind)		
	COUNTY	Sub-County
1	Baringo	East Pokot
2		Tiaty East
3		Marigat
4		Mogotio
5		Baringo North
6	Garissa	Dadaab
7		Balambala
8		Garissa
9		Lagdera
10		Ijara
11		Hulugho
12		Fafi
13	Isiolo	Isiolo
14		Garba Tulla

15		Merti
16	Mandera	Mandera Central
17		Mandera West
18		Kutulo
19		Banisa
20		Mandera North
21		Kiliweheri
22		Mandera East
23		Arabia
24		Lafey
25	Marsabit	Marsabit Central
26		Laisamis
27		Loiyangalani
28		Chalbi
29		North Horr
30		Moyale
31		Sololo
	COUNTY	Sub-County
32	Samburu	Samburu East
33		Samburu Central
34		Samburu North
35	Tana River	Tana River
36		Tana Delta
37		Tana North
38	Turkana	Turkana South
39		Turkana East
40		Turkana Central
41		Loima
42		Turkana West
43		Turkana North
44		Kibishi
45	Wajir	Tarbaj
46		Wajir East
47		Wajir West
48		Eldas
49		Habaswein
50		Wajir South
51		Wajir North
52		Buna
53	West Pokot	North Pokot
54		Pokot South
55		West Pokot
56		Central Pokot
57		Kipkomo

Annex III: OHS Requirements for Project Workers and Suppliers

The MoE endeavors, in all its projects and operations, to prevent personal injuries, ill health and damage to property. To guarantee this, MoE shall implement the Pre-Qualification Checklist for all contractors (included in the Labor Management Plan for the project) to ensure that the contractors have OSH management systems and program; project specific OSH plan; safety training provided to management and workers; competency, availability and qualifications of construction safety managers and staff; and OSH inspection processes to be implemented. All suppliers, contractors and sub-contractors will be required to have Group Accident and Medical Insurance Covers.

This Project Occupational Health and Safety Requirements (here after referred as Plan) have been designed to assist the management of activities and support a risk-based approach to preventing dangerous acts that could lead to injuries or illnesses or serious incidents (including COVID-19 infections) at MoE workplace as well as supply of goods and services. The plan will ensure that workers and suppliers will exhibit professionalism in performing their duties effectively and efficiently. The purpose of this plan is to establish a uniform and comprehensive process for prompt investigation and reporting of incidents, property damage, near misses, and significant Environmental, Health and Safety incidents including the spread of COVID-19 infection. This plan is intended to provide the minimum OHS requirements that all service providers / contractors and sub-contractors shall be required to adhere to; it shall be appended to the contracts.

This Plan is a live document that will be reviewed on a need basis and updated if necessary.

A. Local laws, Regulations and other Compliance Requirements.

Project implementation will adhere to the relevant Health and Safety legislation requirements in Kenya. This should also include the relevant requirements of interested parties that have been identified in the ESMF. A check for legal compliance shall be undertaken to ensure that this project is compliant with the legal and other requirements:

- a) The National Occupational Safety and Health Policy, 2012,;
- b) The National Food Safety Policy 2013,;
- c) Safety Standard manual for schools in Kenya, 2008,;
- d) Public Health Act, 2012,;
- e) Work Injury Benefits Act, 2007,;
- f) Occupational Health and Safety Act, 2007, and;
- g) HIV/AIDS Prevention and Control Act, 2006. ;
- h) WB ESF;
- i) WBG EHS Guidelines; and
- j) COVID-19 prevention guidelines:.

B. General Requirements

Personal Protective Equipment (PPE) includes all equipment or apparel designed to provide workers with a barrier against workplace hazards and exposure. The equipment should protect the; head, eye, face, body, and foot. PPE protects workers/suppliers from the effects of exposure to chemical, physical, and safety hazards.

184. Project workers / suppliers (for the contractors and sub-contractors) who are exposed to work related physical and safety hazards that could cause injury or illness are required to wear PPE. Determining the existence of these hazards is a process referred to as "hazard assessment" and is also known as a "job safety analysis" (JSA) or "job hazard analysis". This process is the critical evaluation of a work site to document the existence of a hazard, the severity of the

workplace, and the specific PPE that will be used to protect employees from that hazard. Each hazard assessment must be included in the site specific health and safety plan.

Component Managers will be responsible in ensuring the suppliers and contractor / /sub-contractor workers develop project-specific job hazard analysis for tasks they are to conduct and for incorporation in Health and Safety Plans (HASPs) in accordance with OSH Act 2007.

MoE will establish PPE requirements, job hazard analysis procedures, and improve operational procedures through the use of this document. Preventing workplace injuries within MoE is the principle purpose of job hazard analysis. This document will provide a basis for studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), determining PPE requirements, site safety and security and establishing the best way to perform the job to reduce or eliminate these hazards.

At a minimum, HASP shall be developed by all the suppliers, contractors and sub-contractors for each sub-projects, the HASP shall outline the hazards and risks associated with the tasks needed to be performed and include proper control methods including the use of proper PPE and engineering controls and the oversight competent key personnel in place.

RESPONSIBILITY: The Project Coordinator and Environment Safeguards Expert are responsible for all facets of this OHS requirements and has authority to make necessary decisions to ensure success of the project. The Project Coordinator and environment safeguard specialist are the sole persons authorized to amend these instructions on OHS requirements in consultation with the project coordination unit.

C. Incident Management and Reporting Process

I. Initial Communication

As soon as any member of the PCU team member becomes aware of an alleged or actual incident, the team member should prepare an email to the Project Coordinator (PC) using the permitted channels so that PC is timely aware within 24 hours, who will there after communicate to the TTL and E & Safeguards Specialists in the WB within 24-48 hour of the occurrence.

II. Incident Investigation and Classification

An investigation should be initiated immediately following any incident. The scene of the incident must be immediately secured so as not to damage or destroy evidence that may be necessary during the investigation. In general, the following information should be gathered and provided in written format using prepared Incident. Report Form Section **F: OHS Incident Investigation Form**. The incident should be classified within 48 hours of receipt of the information, within 24 hours will be preferable if possible. If it cannot be fully classified due to missing information, then a preliminary classification should be provided and confirmed as details become available. The potential ESH incidents include, but not limited to:

- Occupational Health and safety related incidents from; slips, falls from heights,
- Fire emergency,
- Road accidents to either project staff or contractors staff,
- GBV/SEAH;
- Child protection risk including child labour,
- Security risks like banditry for food suppliers in the arid and semi-arid areas, and
- Improper food hygiene, contamination leading to food poisoning

The classification is based on several factors, including the nature and scope of the incident, as well as the urgency in which a response may be required. There are three levels of classification:

Indicative, Serious and Severe. The incidence should be classified as soon as possible as per the following classes.

- i. Indicative – Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people.
- ii. Serious -- An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources.
- iii. Severe -- Any fatality or incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources.

III. Incident Reporting / Notification

Provides the minimum requirements for the investigation, reporting and recording of incidents which result in injury or illness to a person, or damage to any property, in order to ensure compliance with national regulations and the WBG general EHS guidelines; contract provisions, insurance policy requirements and to prevent re-occurrence. All incidents (indicative, serious and serious or fatality) shall be investigated and reported within 24-48 hours to World Bank and recorded pursuant to the requirements of this section. Notification of the WB ensures that the appropriate level of Management is aware of and understands the issues surrounding any given incident is critical to the Bank's response, including securing the resources necessary to address the situation and issues arising.

IV. Determine the Root Cause / Investigation

The PCU shall conduct root-cause analysis of the incident and identify the sequence of events and factual circumstances. The analysis should identify what failing(s) led to the accident, what safety measures were in place, and the risk information/training provided to workers on site. The level of supervision of unskilled labour should also be assessed.

- Recommend actions to be taken to rectify the failure(s) that led to the incident,
- Review the safety procedures at different sites and identify the health and safety measures to be taken to minimize the risks of future accidents both to workers and to local residents. Relevant site visits should be carried out to support the analysis. Health and safety representatives of the Contractors and implementing agencies, as well as other technical counterparts as necessary should be interviewed to gain a comprehensive understanding about health and safety management.
- Review the OHS measures in Safeguards instruments and plans in construction contracts and recommend enhancements as needed. The assessment should identify what the existing procedures for safe performance of construction activities (excavation, scaffolding, working at heights, welding, etc.) are and should recommend appropriate procedures should the existing ones have gaps.
- Review the capacity of Contractors to implement OHS standards. The assessment should review the training plans for skilled and unskilled labour for effectiveness and propose improvements to the training and communication program so that workers are adequately guided to safely perform their work.
- Review the existing arrangements for recruiting labour and what type of insurance (life or injuries and occupational health risks) and compensations are provided.
- Review compliance to the Labour Law and other international treaties by Contractors or Subcontractors.
- Assess the sufficiency of the measures that the Contractors take to minimize risk to the MoE project staff, school communities and communicate with them. Recommend improvements as necessary.

V. Determining Response: Remedial Actions / Preventive Measures

Once the real root cause and all contribution factors are identified, the next step is to use the Hierarchy of Health and Safety Controls to identify appropriate corrective action. The single most important outcome that results from an incident is the implementation of an effective, high-level safety control that eliminates the possibility of the incident reoccurring. Design the Safeguards Corrective Action Plan (SCAP) and discuss with the Bank, including actions, responsibilities and time lines for implementation, and a monitoring program. All project workers shall be required to fully abide by the Code of Conduct in compliance with the project Labour Management Plan.

VI. Follow Up

PCU shall implement SCAP and monitor progress if the response action proposed were effective to prevent future re-occurrence and report on implementation to the World Bank.

The incident management and reporting process can be summarized in the six steps (see Figure 11-1 below). Each step includes a sub-set of activities:

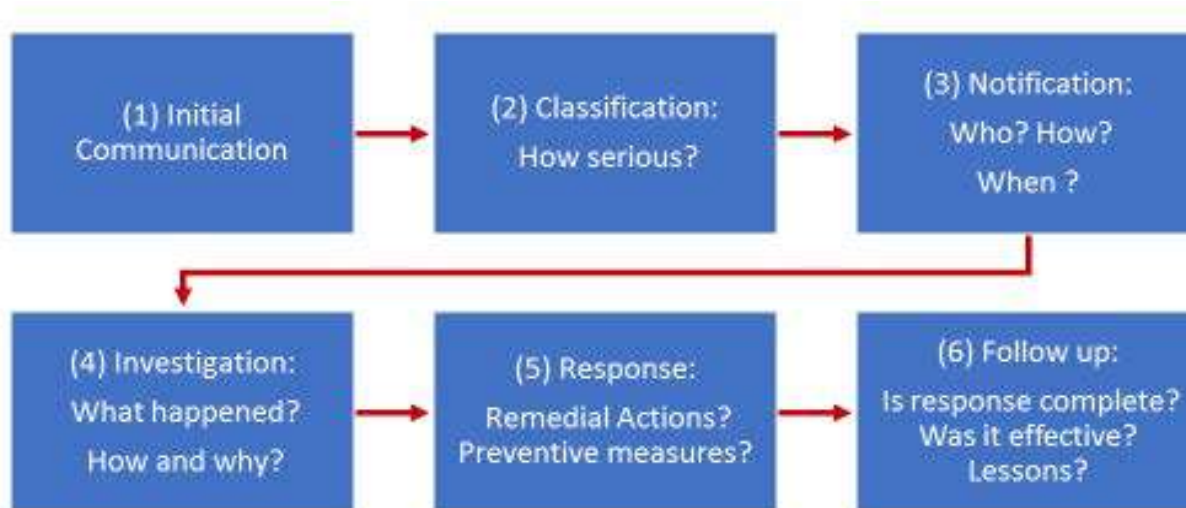


Figure 11-1: Incident Reporting Process

D. Job Safety Analysis

Once the tasks and general hazards have been identified, the identified hazards will need to be controlled/reduced, as appropriate. The potential hazards associated with the project and the possible control measures includes:

- Noise Hazards – Hearing protection will be worn by all personnel operating or working within the vicinity of equipment emitting noise level; when noise is sufficient to interfere with general conversation at a normal speaking volume; when noise levels exceed 85 dBA; and/or when MoE requirements indicates that it's usage is mandatory to use ear muffs,
- Vibration: Exposure to hand-arm vibration from equipment such as hand and power tools, should be controlled through choice of equipment, and limiting the duration of exposure. Exposure levels should be checked on the basis of daily exposure time and data provided by equipment manufacturers,
- Electrical Hazards – Exposed or faulty electrical devices, such as circuit breakers, panels, cables, cords and hand tools, can pose a serious risk to workers. Avoid operating electrical equipment in a wet floor or environment. If equipment must be connected by splicing wires, all electrical work must be performed by a licensed and competent electrician.

- d) Vehicle Driving and Site Traffic: Poorly trained or inexperienced vehicle drivers have increased risk of accident with other vehicles, pedestrians, and equipment. SMP delivery vehicles if not managed well represent potential collision scenarios. The project will hire competent defensive drivers with experience over 7 years, all vehicles shall be inspected for road worthiness by the Head drivers at the PCU,
- e) Ergonomic Hazards – Proper lifting techniques such as keeping the back straight and legs bent, shall be utilized when lifting equipment or loading/offloading of the school meals from the trucks. If the lifting cannot be lifted in this manner, if it is too heavy to lift alone. Call other personnel, or use a mechanical device for lifting.
- f) Hazard due to Working at Heights: Fall prevention and protection measures should be implemented whenever a worker is exposed to the hazard of falling more than two meters; when through an opening in a work surface. Fall prevention / protection measures may be warranted on a case-specific basis when there are risks of falling from lesser heights.
- g) Chemical Hazards – MoE will work in collaboration with MoH during the decontamination /disinfection of the schools used as quarantine facilities, persons involved in the supervision works will be required to wear the minimal required PPE for protection against the chemicals used.
- h) Fire Hazards –the use of hand held drilling machine during the installation of ICT equipment at MoE may lead to electric short circuit leading to potential fire hazard. All electrical works should be performed by trained and qualified experts.
- i) Protection against possible risks as provided in the Public Health Act and in tandem with section 6 (2) of the OSH Act, 2007 and in view of COVID-19 related risk will be managed through:
 - Arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of ICT equipment and food suppliers under SMP;
 - Ensuring that workers or suppliers participate in the application of Infection prevention and control (IPC) safety and health measures / guidelines as advised by Ministry of Health including availability of hand wash facilities, water and soap, alcohol-based hand sanitizer;
 - Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves (respiratory hygiene, cough etiquette and hand hygiene) and the need to be tested if they have symptoms;
 - Provision of such information, instructions, training and supervision as is necessary to ensure the safety and health at work of every worker or suppliers;
 - All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs;
 - Any worker showing symptoms of respiratory illness (fever, cold or cough) and has potentially been exposed to COVID-19 should be immediately removed from work and tested for the virus at the nearest local hospital;
 - Project management must identify the closest hospital that has testing facilities in place, to refer workers/staff;
 - Persons under investigation for COVID-19 should not return to work at the project site until cleared by test results. During this time, they should continue to be paid daily wages
 - If project workers live at home, any worker with a family member who has a confirmed or suspected case of COVID-19 should be quarantined from the project site for 14 days, and continued to be paid daily wages, even if they have no symptoms.
 - Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing;

- Mandatory provision and use of appropriate Personal Protective Equipment (PPE) shall be required for all project personnel including workers and visitors;
- Avoid concentration of more than 15 workers at one location. Where more than one person are gathered, maintain social distancing of at least 2 meters;
- Restriction of the number of people accessing the work areas;
- Fumigation of offices, work areas and project vehicles delivering food to the schools; and
- Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices.
- The project will also adhere to any other GoK guidelines on COVID-19 as well as World Bank guidelines on Covid-19 measures.
- Workers are to limit face to face working and work facing away from each other when possible.
- Consider introducing an enhanced monitoring process for activities where less than 2 m distance may be required.
- All equipment should be thoroughly clean before and after using it.
- Provide additional supervision to monitor distancing and teams not to be rotated.
- Increased ventilation should be provided within enclosed spaces.
- Reusable PPE should be thoroughly cleaned after use and not shared between workers. These should be stored in suitable places.
- Single-use PPE should be disposed of so that it cannot be reused and to control potential contamination.
- Workers deemed clinically vulnerable should never work within 2 m of persons.
- Break times should be staggered to reduce congestion and contact at all times and
- Additional sanitary measures are implemented on-site: hand washing stations with a posted hand washing protocol, hand sanitizer stations, provision of disinfectant wiping products.

E. Emergency Response Procedures

The Emergency Operations Coordinator EOC (Environment Safeguards Officer) is the person who serves as the main contact person for the MoE in the case of an emergency. The EOC is responsible for making decisions and following the steps described in this emergency response plan. In the event of an emergency occurring within or affecting the work-site, the primary contact (Site Safety Officer for the suppliers, contractor and sub-contractors) will serve as the EOC. If the primary contact is unable to fulfil the EOC duties, the secondary contact will take on this role: .

Primary contact:

Name:

Telephone number:

Telephone number:

Email:

Secondary contact:

Name:

Telephone number:

Telephone number:

Email:

Emergency contact numbers

- i. Ambulance

- ii. Police
- iii. Hospital
- iv. Fire Brigade
- v. Traffic Police

Potential emergencies

The following potential emergencies have been identified in hazard assessments:

- i. Occupational Health and safety related incidents; slips, falls from heights,;
- ii. Fire emergency. ;
- iii. Road accidents to MoE project staff or contractors staff,;
- iv. Security risks like banditry for food suppliers in the arid and semi-arid areas,; and
- v. Improper food hygiene, contamination leading to food poisoning.

Location of emergency equipment

- a) Fire Alarm
- b) Fire extinguisher
- c) Fire horse
- d) Panic Alarm Button
- e) Personal protective equipment
- f) Emergency Communication Equipment (satellite phones, radio calls, etc.).)

Training requirements for emergency response

- a) Type of trainings
- b) How often are employees trained

Employees trained in the use of emergency equipment

- a) -
- b) -
- c) -
- d) -
- e) -

First Aid Kits

- a) Type of first aid kit with all prerequisite materials,
- b) Location of first aid kit within the MoE, School Stores and in the contracted Trucks for delivering school meals,
- c) Transportation for ill or injured employees to the nearest hospital for medication.

First aid attendant (employee trained in first aid)

- i. Name
- ii. Location
- iii. Shift or hours of work

Communications

Communication

We will communicate our emergency plans to employees (MoE project staff or contracted workers) in the following ways,;

- a) Code of conduct
- b) Employment contract commitment,
- c) Tool Box Talks
- d) Official Notice boards

e) Brochures

In the event of fatality or a disaster, we will communicate to the MoE and World Bank in the following way:

Official official letter with the contractors' letterhead to the Ministry of Education, who will transmit the information to the World Bank within 24-48 hours of the incident.

A. Key Requirement for the OHS Emergency Response

- i. Audible Warning Alarm System: The warning system will be tested 4 times a year,
- ii. Evacuation route clearly demarcated,
- iii. No obstruction within the walkways,
- iv. Clearly and legible located, copied, and posted building and site maps evacuation routes,
- v. Mock Fire Drills and practice evacuation procedures should be done at least 4 times a year.
- vi. All workers must leave the work place quickly in strict adherence to this evacuation procedure,
- vii. Assembly site is clearly demarcated and legible poster available,
- viii. Site Safety Officer is the person responsible for issuing all clear safety instructions,
- ix. Shelter in Place to be oriented to all workers: in case of emergency, all workers will be provided with the emergency supplies, if any, by the suppliers, contractor or sub-contractors in the shelter location and which supplies individuals should consider keeping in a portable kit personalized for individual needs.
- x. All the emergency contact information displayed on strategic areas including notice boards with the details on Table 11-4: Table 11-4.

Table 11-4: Employee Emergency Contact

#	Employee Name	Designation	Contact person and number	Alternative contact person and number
1.		Site Foreman		
2.		Site safety officer		
3.		Clerk of Work		
4.		Project manager		
5.		Safeguards Officer		
6.				
7.				
8.				

Review Plan

This Emergency Response Plan will be reviewed and updated on quarterly basis and or as need arises i.e. change of the critical personnel.

F. OHS Incident Investigation Form

Classification of Accident

Indicative

☐

Serious

☐

Severe / Fatality

☐

Description the accident:

.....
.....

Date and Time of Accident:

Location of the accident:

Source of accident alert:

Investigation

Date and Time of Investigation:

Names and Status of Investigating Team

Name.....Position.....Sign.....

Name.....Position.....Sign.....

Name.....Position.....Sign.....

Complete accident investigation questionnaire and attach copies to Incident Investigation Form.

Findings of Investigation Team

Teams description of event leading up to the accident

Teams Description of the accident itself

Team's view on the causes of the accident

Recommendation to reduce potential accident (immediate fix)

Date.....No.....Section.....

1. Root causes:.....

2. Preventive Action taken:.....

3. Further Recommendation Preventive actions:.....

Signature.....Date.....

Project coordinator: Comments and Actions to be taken or recommended to higher authority:

Signature.....Date.....

Annex IV: Pre-Opening School Audit Checklist

Pre-Opening School Audit Checklist is a risk-based approach to evaluate the effectiveness of the decontamination, disinfection and cleaning exercise undertaken by MoH for the schools that were used as quarantine centers. Prior to re-opening of schools, MoE will collaborate with MoH to inspect the schools using this checklist (Table 11-5) to verify on the general state of cleaning and disinfection of the school facilities used as quarantine areas to ensure schools are safe for learners, teachers / staff and the wider school community to help prevent any new risks on transmissions on COVID-19 and also to address the stigma associated with use of this learning institutions.

NB: MoH project (P173820) will be responsible for cleaning, disinfection and sanitization of the schools used as quarantine areas before hand over to MoE.

Name of the school	
County Located	

The following are the team members involved in the audit process:

Name	Designation	Agency	Signature
1.
2.
3.
4.
5.

Table 11-5: Pre-Opening School Audit Checklist

#	ACTION TAKEN	TICK	
		YES	NO
	A) CLEANING, DISINFECTION AND DECONTAMINATION		
1.	Identify the chemical (disinfectants) used for decontaminating / disinfecting?		
2.	Was MoH using a checklist of school facilities during disinfection – to ensure all buildings were cleaned? (School Facilities: classroom, dormitories, sanitary, staffroom, dining, & conference rooms)		
3.	Were the surfaces cleaned with soap and water first before disinfecting? (Dirty surfaces should be cleaned with soap and water prior to disinfection)		
4.	Were the open surfaces identified and disinfected? List all open areas that were disinfected? (Disinfecting kills germs on surfaces)		
5.	Was the school playground Cleaned and disinfected? Outdoor areas, like playgrounds in schools generally require normal routine cleaning/solid waste collection.		
6.	Does the school side-walks have handrails / touching surfaces? If YES, were they disinfected?		

	Side-walks should not be disinfected, since the spread of COVID-19 from these side-walks is very low and disinfection is not effective, however if it has handrails / touching surfaces, then there is need to disinfect.		
7.	Were all surfaces identified, cleaned and disinfected: (Examples are: Tables, doorknobs, light switches, counter tops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.)		
8.	Are school furniture easy to clean/disinfect against COVID-19 contamination? Were all furniture cleaned and disinfected? How was it done?		
9.	Were the school electronics such as tablets, touch screens, keyboards, and remote controls disinfected? Consider putting a wipe-able cover on electronics. Follow manufacturer's instruction for cleaning and disinfecting. If no guidance, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly.		
10.	Did MoH collect all the waste generated during the cleaning /disinfection process of the schools? If yes, how and where was it disposed of?		
11.	Is there any remaining waste from disinfecting exercise observed on school premises?		
	B) SCHOOL INFECTION, PREVENTION AND CONTROL MEASURES		
12.	Does the school have a controlled access (i.e. gated school) with security guard to monitor and register all people accessing the school? This is helpful in reducing chances of re-contamination of the school through limiting unauthorized access to people.		
13.	Does the school have multiple well-stocked hand washing station (soap and water)? Does the school have Hand sanitizers?		
14.	Does the school have policies, SOPs, administrative measures, school guidance manual on infection control and resources to ensure appropriate hand hygiene, respiratory etiquettes, physical & social distancing are implemented?		
15.	Does the school have legible posters or signs encouraging Hand Hygiene and Respiratory Etiquettes displayed? How are they being implemented? Are these posters and signages based on the national or WHO COVID guidelines?		
16.	Does the school have a school policy on wearing a mask or a face covering (use of PPEs) in line with MoH guidelines? NB: If a child or school staff is sick, she/he should not come to school. Each person should always use mask within the school environment, except the exempted children ≤ 5 years.		
17.	Does the school have adequate ventilation systems operating properly to increase circulation of outdoor air as much as possible, for example open windows and doors?		
18.	Does the school have access to a nurse/contact to health facility to facilitate the care in case of emergency? What is the nearest health facility in the vicinity?		

	Post Emergency phone contact number(s) (Ambulance) on the school Notice Board.		
19.	Who is in charge of checking the social distancing, hand-washing and testing?		
20.	Does the school have labelled waste bins for collecting different streams of waste? How are the wastes handled from point of waste generation to point of disposal?		
21.	Are school cleaners provided with appropriate PPEs?		
22.	How can you categorize the school as per the filled questionnaires above?		
	Low Risk: 1. The school has SOPs and administrative measures being implemented, 2. There is a dedicated person for checking the social distancing, hand-washing and testing, 3. The school promote and demonstrate to have adequate WASH Facilities: <ul style="list-style-type: none"> • Soap and safe water is available at age-appropriate hand washing stations. • Legible posters encouraging frequent and thorough washing (at least 20 seconds).) • Hand sanitizers in toilets, classrooms, halls, and near exits where possible. • Adequate, clean and separate toilets or latrines for girls and boys. 4. Clean and disinfected school buildings, classrooms and especially water and sanitation facilities particularly surfaces that are touched by many people (railings, lunch tables, sports equipment, door and window handles, toys, teaching and learning aids etc.) <ul style="list-style-type: none"> • Use disinfectants for disinfecting surfaces and 70% ethyl alcohol for disinfection of small items, and ensure appropriate equipment for cleaning staff. 5. Increase air flow and ventilation where climate allows (open windows, use air conditioning where available, etc.) 6. Legible signs encouraging hand and respiratory hygiene practices 7. Waste is removed daily and disposed of safely, no accumulated wastes especially masks. 8. Classroom arrangement have the space requirement of 3 feet apart for each pupil. 9. The school has a controlled access (gate) manned by security person, 10. School cleaners are provided with appropriate PPEs,		
	Moderate Risk: 1. The school has some SOPs and administrative measures not being implemented, 2. There is a dedicated person for checking the social distancing, hand-washing and testing but does not undertake his/her roles, 3. The school have some WASH Facilities: <ul style="list-style-type: none"> • No soap and safe water availed nor hand washing stations. • Hand sanitizers are provided in some areas like classrooms, near exits and not all. • There are separate toilets or latrines for girls and boys but are not clean and tidy, 4. There is laxity in disinfected high touch surfaces within the school buildings, classrooms and water and sanitation facilities particularly (railings, lunch tables, sports equipment, door and window handles, toys, teaching and learning aids etc.) have not been disinfected, 5. Moderate air flow and ventilation at school classroom, office, dining, dormitory among others areas (Not all windows can be opened),) 6. Few legible signs encouraging hand and respiratory hygiene practices 7. Delay in collecting wastes from the temporal waste holding area. 8. Moderately congested classroom arrangement not meeting the space requirement of 3 feet apart for each pupil. 9. The school has a controlled access (gate) but not manned by security person, 10. Not all school cleaners are provided with appropriate PPEs.		

	High Risk: 1. The school does not have SOPs nor clear administrative measures being implemented, 2. There is no dedicated person for checking the social distancing, hand-washing and testing 3. The school does not have adequate WASH Facilities: <ul style="list-style-type: none"> • No soap and safe water available nor hand washing stations. • No hand sanitizers in toilets, classrooms, halls, and near exits where possible. • There are no adequate, clean and separate toilets or latrines for girls and boys. 4. School buildings, classrooms and water and sanitation facilities particularly surfaces that are touched by many people (railings, lunch tables, sports equipment, door and window handles, toys, teaching and learning aids etc.) have not been disinfected, 5. No adequate air flow nor ventilation for school classroom, office, dining, dormitory among others areas (open windows cannot be opened and there is no use air conditioning) 6. Legible signs encouraging hand and respiratory hygiene practices 7. There is a pile of waste littered within the compound / /uncollected from the temporal waste holding areas. 8. Congested classroom arrangement not meeting the space requirement of 3 feet apart for each pupil. 9. Schools entry and exit not controlled, people enter and exit from all direction any time. 10. School cleaners are not provided with appropriate PPEs.		
	Any other Comments?		

CERTIFICATION

Reviewed and approved by			
Name:		Name:	
Designation:		Designation	
Date	Signature	Date	Signature

SAMPLE CLEANING AND DISINFECTION CERTIFICATE

A technical evaluation of the filled Pre-Opening School Audit Checklist shall be done by the County Public Health Officer and/or Director of Public Health and the County Director of Education. Upon satisfaction of the school risk level, the school will be issued with a Cleaning / Disinfection Certificate as a requirement by the MoH. The certificate shall be co-signed by the County Public Health Officer and/or Director of Public Health and the County Director of Education (see **Figure 11-2: Sample Certificate for Cleaning and Disinfection**).

CAP 242	Public Health Revised	2012
	MINISTRY OF HEALTH Department of Environmental Health	Cert. No. MOH. 272/—/2020
CLEANING / DISINFECTION CERTIFICATE <small>(strike out the unnecessary)</small>		
This certificate is issued to _____ on the _____ (dd/mm/year)		
The exercise was undertaken by _____		
This certificate is valid for 21 days or as directed by a public health officer		
This certificate has been issued in accordance with Public Health Act Cap 242 Laws of Kenya Rules 30 and 46(1) part IV – Prevention and Suppression of Infectious Diseases A—General Provisions 21 and the Public Health (Prevention, Control and Suppression of COVID—19) Rules, Legal Notice no. 26, 2020 (section 6 & 7)		
_____ Director Public Health Ministry of Health	_____ Director Public Health County _____	

Figure 11-2: Cleaning / Disinfection / Certificate for School

Annex V: Plans and Procedures for School Food Sourcing, Handling and Storage for Suppliers and Schools

1 Introduction

The nutrition challenges impede progress and sustainable development, in particular, poor diets and malnutrition have devastating effects on children's health, school performance and ability to learn. Schools present an ideal platform for a coordinated and coherent response to address some of the main factors contributing to these challenges. They also offer a variety of entry points and opportunities to engage multiple sectors and stakeholders. For instance, the (regular) provision of nutritious meals through school meal programmes has been shown to improve vulnerable children's diet quality, attendance and enrolment, particularly for girls³².

1.1 School Feeding and Nutrition

School feeding programmes are central to school enrolment, retention, cognitive development, and education achievements of school going children. The Ministry of Education – Kenya recognizes that feeding at school is an essential component of a children friendly school, and that not feeding a child at school is a violation of children's right under the United Nation's Declaration on Rights of the Child.

1.2 School Meal programmes and their importance

A school meal programme shall entail interventions through which pupils and students are provided with a meal or snack in the school setting, with the intent of improving attendance, enrolment, nutritional status and learning outcomes. School feeding have been defined by the World Bank as “targeted social safety nets that provide both educational and health benefits to the most vulnerable children, thereby increasing enrolment rates, reducing absenteeism, and improving food security at the household level”.

1.3 Guidelines on School Feeding and Nutrition in Kenya

The Government of Kenya has undertaken different School Meals Programmes in recent years. The MoE implements jointly with the World Food Programme in the arid and semi-arid lands, whilst the Agriculture Sector implemented another programme in areas with a better developed agriculture sector. The current Home-Grown School Meals Programme (HGSMP) is implemented under the School Meals and Health Unit of the Ministry of Education and the Njaa Marufuku Kenya Programme is implemented by the Ministry of Agriculture. The approach used in these initiatives is multi-sectoral, involving the participation of various ministries and development partners. The programme implementation will rely on and comply with specific guidelines including, the Home-grown School Meals Implementation Policy and Guidelines, which covers:

- Roles of Management structures for implementation;
- Operation of HGSMP at school level;
- Roles and responsibilities of the School Nutrition and Meals Committee (SNMC) at school level;
- Procurement of food from the home-grown school meals approach, from tender to inspection and receipt of food;
- Food management (stacking, food safety and hygiene, food handling, inspections and stock control, food quality);
- Standard school meal composition;
- Food preparation (requirements, adequate facilities, procedures from preparing to serving); School Health, Hygiene and Nutrition Education;
- Monitoring, Evaluation and Reporting.

³² FAO. 2019. School Food and Nutrition Framework. Rome. 36 pp. License: CC BY-NC-SA 3.0 IGO.

- Nutrition surveillance and micro-nutrient supplementation guidelines (to be developed);
- Supply chain guidelines covering aggregation, storage and distribution of food for suppliers' capacity development;
- Strategies to promote local supply.

1.4 Nutrition Standards and requirements

This strategy will guide on the minimum school meal composition as suggested on **Table 11-6** below: **Table 11-6**.

Table 11-6: Standards for composition of 1 school meal

Standards for composition of 1 school meal	
Cereals and root crops (energy foods): cassava, maize, rice, sorghum, millets, sweet potato, yams, Irish potato, bread and chapatti	~150 grams per child per school day
Protein sources and possible substitutes: eggs, pulses (beans, lentils, pigeon peas, cow peas etc.), meat, milk, ground nuts	~40 grams per child per school day
Dairy	½ to 1 cup
Vegetable oil	~5 grams per child per school day
Iodized Salt	~3 grams per child school day
*Complementary rations of fresh fruits (1 cup) and vegetables (½ cup cooked or 1 cup fresh) should be provided as often as possible.	
When school meals do not suffice, micro-nutrient powders can be added to cooked school meals to address micro-nutrient deficiency among school children.	
This amounts to ~30 percent or one third of the daily energy requirements and the dietary diversity needs for a child	

(Source: National Nutrition Action Plan, 2012-2017)

Nutrition surveillance must be in place and integrated with this strategy for the nutrition component to fulfil its goals. Micro-nutrient supplementation is only possible with adequate strategies and implementation guidelines in place, supported by strong coordination between Health and Education sectors.

Regarding food quality, food safety, storage and preparation, specific guidelines guide the implementation of school meals initiatives. For more information, please refer to the HGSM Implementation Guidelines published by MoE. Micro-nutrient supplementation will be addressed in specific guidelines together with standards and procedures for assessment of micro-nutrient deficiency.

For successful implementation of school nutrition and meals initiatives, appropriate Water, Sanitation, and Hygiene Promotion (WASH) practices in food preparation and provision, and public health standards for food handlers are crucial and need to be observed as cross-cutting issues for all stakeholders at all levels. This also includes respect to standards on preparation and consumption of meals.

1.5 Aggregation, storage and distribution of food commodities

School nutrition and meals programme requires complex logistic arrangements, whilst being an opportunity for accessing market for farmers and local processors. Each modality will rely in specific arrangements which will comply to Guidelines relating to aggregation, storage and distribution of food namely: Home Grown School Meals Programme Technical Development Plan,

2012, National School Meals and Nutrition Strategy 2017–2022 and the National Food Safety Policy 2013. Other Good International Industrial Practices are Code of Practice-General Principles of Food Hygiene; Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application (WHO & FAO, 2003) and Codex Alimentarius (WHO & FAO, 2009).

1.6 Management Modalities of School Meals implementation

The School Nutrition and Meals programme include different modalities of implementation as described below:

- **Centralized:** Procurement is done centrally at the national or county and then the food distributed to schools for preparation. ;
- **Decentralized:** Funds are transferred to schools from the national, county, community or other donors. The schools undertake the procurement; prepare meals and manage the programme through locally established mechanisms.;
- **A mixed model:** This is a combination of the centralized and the decentralized models. ; and
- **Others:** covers outsourced modalities and community-based initiatives.

1.6.1 Centralized modality

This modality refers to the direct supply of food to schools. The food is either procured internationally or locally, then distributed to schools. Either the government or a delegated institution organizes the procurement process, purchases the food and is responsible for the logistics to deliver it to schools. In this case, logistic arrangements can be shared between institutions or partners through several different models according to each region's capabilities and constraints. In-kind provision is of special relevance in areas where food supply chains are not well organized or if the decentralized procurement is too difficult, e.g. in remote areas.

1.6.2 Decentralized modality

Purchases are organized at school level. In this case, funds are often transferred to schools, which will be responsible for purchasing, storing, preparing and serving the meals. This modality has been widely used in Kenya, most often combined with the targeting of local smallholder farmers for food supply.

1.7 Food production – agriculture (added value, processing and distribution of food commodities, procurement and home-grown)

Sourcing from local smallholder production (i.e. the production of these farmers as close as possible to the territory of benefiting schools) is an acknowledged goal of the present Strategy. The supply must satisfy the nutrition, food safety and food quality standards, which is why a key advantage of home-grown sourcing for school meals is the availability of fresh and nutritious food for children whilst respecting the cultural habits of each region. Nevertheless, the supply from smallholder farmers should not be limited solely to fresh and raw food: jams, cookies and similar products that farmers can learn to produce can be considered, improving their income through added value and capacity development.

In this regard balance of macro and micro-nutrients must always be observed, which means avoiding food with low nutritional value and establishing nutritional requirements that are not based on calories. Nutrient dense foods provide nutrients for your body such as fiber, vitamins and minerals with low added sugar and fat, while energy dense foods, or high calorie foods, provide many calories with little nutritional value.

1.8 Stakeholder Engagement Plan (SEP)

The SEP for the project has been prepared and will be used as a guiding principle of this Plan and Procedure for School Food Sourcing, Handling and Storage for Suppliers and Schools. Communities may and may be not engaged in mobilizing resources, but they must not be left outside the design, oversight and implementation of nutrition and school meals initiatives. The engagement of community brings several benefits: improved health and nutrition education impacts, closer link to smallholder farmers, functional monitoring and oversight of implementation, and the overall improvement of cost-effectiveness of the school meals interventions.

School Meals Programme Committees (SMPCs) should be established at every benefiting school in Kenya, with varying compositions depending on which roles county governments assign to these committees. As parents and community already donate time when participating in the school meals programme committees at school level, further support such as in-kind or monetary complements should be demanded only as a last measure, e.g. in cases of emergency due to natural or human causes.

1.9 School Meal Programme Committees (SMPCs)

School Meal Program Committees are sub committees the school governing bodies. SMPCs shall be composed of members of the school Finance and Development Sub-Committee in accordance with the National School Meals and Nutrition Strategy 2017–2022. The School Meal Program Committee will use the existing leadership (Chairperson, Secretary and Treasurer) of the School Finance and Development Sub -Committee.

- Quorum shall be 3 members present;
- In case of a tie in voting, the Chairperson shall have a second, or casting vote;
- The term of a School Meal Program Committee shall be 3 years and each member shall only serve for a maximum of 2 terms; and
- The School Meal Program Committee shall be accountable to the governing body which shall be ultimately accountable for all school finances and food contributions.

1.9.1 Functions of a School Meal Program Committee

1.10 Form of Contribution to the School Food Programme

The School Meal Program Committee in areas, rural or urban, shall determine in what form resources should be contributed, after consulting all stakeholders (school governing body and Foundation Bodies). Having regard to the relative convenience of each mode of contribution for parents in a particular school, such contribution may take the form of:

- a. Agreed quantity of good quality beans and seed maize in kind; and

Cash equivalent of the agreed food staples at the parent's option

The School Meal Program Committee may vary the food staples in the food basket if other food staples in any season are cheaper than the standard staples specified herein, provided that such staples are cereals and pulses of equivalent nutritional value.

1.10.1 School Feeding Register

The head teacher shall keep and maintain a school feeding register, to ensure that every student/pupil eats something at lunch in time. Termly summaries of this register shall be forwarded to the School Governing Body for corrective action, if need be.

1.10.2 Food Procurement and Transportation

All schools shall have a functional procurement committee (to deal with the food sourcing).

- The Finance and Development Sub – Committee of the Governing body is the School Meal Program Committee (SMPC), unless a separate procurement committee is constituted;

- Procurement Committees shall observe the provisions of the Public Procurement and Disposal of Assets Act (PPDA) to the full extent possible;
 - Abridged, simplified procurement guidelines shall be issued for use at school level;
- County authorities shall take lead in training to build capacities of SMPCs;
- The time and method of transportation shall aim to minimize food spoilage and nutrient loss.
- To extent possible all food shall be procured from the school catchment area; and
- The transporters delivering to school shall observe acceptable speed limit within school compound. They should sign a Code of Conduct and undertake food hygiene and safety training prior to starting the assignment of school delivery as provided for in the LMP.

1.10.3 Food Storage and Preservation at School

All schools shall have adequate and appropriate food storage facilities in line with Guidelines relating to aggregation, storage and distribution of food namely: Home Grown School Meals Programme Technical Development Plan, 2012, National School Meals and Nutrition Strategy 2017–2022 and the National Food Safety Policy 2013. Other Good International Industrial Practices are Code of Practice-General Principles of Food Hygiene; Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application (WHO & FAO, 2003) and Codex Alimentarius (WHO & FAO, 2009). The following measure shall be implemented:

- A designated member of the SMPC shall be responsible for receiving food into, and issuing out of the store;
- The store in charge and another member of the School Meal Program Committee regularly take stock, and prepare reports for SMPC and school governing body;
- Proper documents on food receipts and issues are kept at all times;
- Food stock records are periodically audited by the County internal auditors;
- Different food commodities are stocked separately for effective stock management. The “first in first out” (FIFO) principle shall be applied in the utilization of, and accounting for food stocks; all expired food stocks shall be discarded;
- Schools shall be encouraged to use safe locally available preservation methods according to Kenya Bureau of Standards (KEBS);
- Layout of food storage should consider environmental hygiene that is away from wash rooms, garbage disposal areas and detergents to reduce possible risks of contamination.
- The Ministry of Education, the Public Health Department and the school community will ensure that schools have adequate safe storage facility for food items, and easy to clean, and
- School administrators should undertake measures including: stop rodents from entering stores and secure the store free from increased moisture content) to protect food from rodents and bacterial contamination while in the storage facility.

NB: If no refrigeration is available, no perishable products shall be stored within school stores.

2.0 Food Hygiene and Sanitation

2.1 Food Hygiene

- a. Food utensils shall be kept clean and dry at all times;
- b. Fruits and vegetables shall be washed with safe water before consumption;
- c. All other food preserved with chemicals shall be rinsed; such rinsing must be verified by a member of the School Meal Program Committee;
- d. Food shall be covered during and after preparation, and always served appropriately – “serve hot food hot and cold food cold”; and
- e. Food vending in or near school premises shall be regulated, and the facilities regularly inspected by members of the SMPC.
- f. Clean and sanitize all surfaces prior to food handling in the kitchen.

- g. Food that was unsafely stored or was not verified for safe production practices should be labeled as unsafe for consumption and discarded.

2.2 Personal Hygiene

- a. All kitchen staff shall undergo an overall routine medical examination, at least every six months;
- b. Kitchen staff shall practice personal hygiene at all levels, e.g. hand washing after visiting the toilet and before food preparation; keep nails short, and always cover hair while preparing food; and
- c. Hand wash facilities – a stand and wash basin – shall be installed near food serving areas for use before and after eating.

2.3 Environmental Hygiene

- a. All schools shall provide sanitary equipment at all times;
- b. All schools shall always have a clean safe water source for drinking and for cooking;
- c. School toilets and latrines shall be constructed to extent possible away from the kitchen, while water and soap shall always be provided so that staff, students and or pupils can wash their hands after visiting the toilet, before eating and after eating;
- d. Rubbish pits shall be constructed for the proper management of kitchen and other wastes; all degradable waste should be disposed of by composting;
- e. All the waste disposal sites should be well fenced and access denied to any unauthorized persons; and
- f. Arrange for and supervise the periodic health check of kitchen workers by health inspectors from Ministry of Health (MoH).

2.4 School Food Preparation and Service and Safety

The plan has adopted the WHO Guidelines on the five keys to safer food in school food preparation and service namely:

2.4.1 Clean Food

- ✓ Wash your hands before handling food and often during food preparation
- ✓ Wash your hands after going to the toilet
- ✓ Wash and sanitize all surfaces and equipment used for food preparation
- ✓ Protect kitchen areas and food from insects, pests and other animals

2.4.2 Separate raw and cooked

- ✓ Separate raw meat, poultry and seafood from other foods
- ✓ Use separate equipment and utensils such as knives and cutting boards for handling raw foods
- ✓ Store food in containers to avoid contact between raw and prepared foods

2.4.3 Cook thoroughly

- ✓ Cook food thoroughly, especially meat, poultry, eggs and seafood,
- ✓ Bring foods like soups and stews to boiling to make sure that they have reached 70° C. For meat and poultry, make sure that juices are clear, not pink. Ideally, use a thermometer, and
- ✓ Reheat cooked food thoroughly.

2.4.4 Keep food at safe temperatures

- ✓ Do not leave cooked food at room temperature for more than 2 hours,
- ✓ Refrigerate promptly all cooked and perishable food (preferably below 5°C),
- ✓ Keep cooked food piping hot (more than 60°C) prior to serving,

- ✓ Do not store food too long even in the refrigerator, and
- ✓ Do not thaw frozen food at room temperature.

2.4.5 Use safe water and raw materials

- ✓ Use safe water or treat it to make it safe,
- ✓ Select fresh and wholesome foods,
- ✓ Choose foods processed for safety, such as pasteurized milk,
- ✓ Wash fruits and vegetables, especially if eaten raw,
- ✓ Do not use food beyond its expiry date.

2.5 School Kitchen

- Kitchen premises should be properly designed to ease cleaning of all areas,
- Recruitment of kitchen staff shall be based on merit and professionalism; and
- Kitchen, dining hall and food stores must be to extent possible away from the pit latrine.

2.6 First Aid Kits and Safety Equipment

- All schools shall have first aid kits; and
- All school food stores and kitchens shall have fire-fighting equipment.
- All kitchen staff (and selected school staff) should be trained to administer first aid;
- Each school should have an agreed point of contact at a nearby medical center for emergencies,
- Selected school staff shall be in charge of ensuring completeness of the first aid kits and working condition of the fire-fighting equipment.

2.8 Food waste

Food waste in schools must:

- be removed from areas such as kitchens and dining rooms as quickly as possible to avoid it building up,
- disposed of in isolated places within the school compound, away from any site where learners are active such as the classrooms, play grounds, toilets, water points and gates,
- be put in containers that can be closed, unless the school can satisfy the local authority that other types of containers or systems of disposing of waste are appropriate (all containers must be of appropriate construction, kept in sound condition, be easy to clean and, where necessary, to disinfect),
- enter into agreement with NEMA Licensed waste handling company to remove waste from the school and dispose of in a hygienic and environmentally friendly way, in accordance with Kenyan legislation,
- not be a direct or indirect source of contamination (e.g. touching surfaces that food is prepared on or attracting pests).

School Meal Program Committees shall ensure that they have adequate facilities for storing and disposing of food waste and other rubbish. Stores for waste must be designed and managed in a way that enables them to be kept clean and, where necessary, free of animals and pests. It is good practice that all refuse containers be lined with plastic liners which can be easily removed and disposed of to ensure that the minimum of food waste comes into contact with the container. All waste bins must be made of durable materials capable of being cleaned regularly and disinfected periodically. Bins or sack holders used in areas preparing high-risk foods must be disinfected more frequently.

3.0 Roles and Responsibilities

3.1 Overview

This review focuses on highlighting the roles played by some stakeholders to ascertain food safety and quality under the project and the legislations under which they operate. Food is considered to be safe if there is reasonable demonstrated certainty that no harm will result from its consumption under anticipated conditions of use.

3.2 Stakeholders Roles and Responsibility

3.2.1 The Ministry of Education (MoE)

The Ministry of Education shall responsible for:

- ✓ Design, coordinate and monitor the program;
- ✓ Provide relevant policies and guidelines;
- ✓ Allocate resources;
- ✓ Integrate school feeding programmes into existing education systems and planning processes;
- ✓ Build capacity of Counties and schools to implement the programme, and
- ✓ Provide education and communication materials to community groups, school board of management, parents, teachers and students on the program implementation and safety requirements.

3.2.2 Board of management

The functions of the Board of Management of a basic education institution shall be to-

- a. promote the best interests of the institution and ensure its development;
- b. promote quality education for all pupils in accordance with the standards set under Basic Education Act, 2013 or any other written law;
- c. ensure and assure the provision of proper and adequate physical facilities for the institution;
- d. manage the institution's affairs in accordance with the rules and regulations governing the occupational safety and health and specifically Food Safety;
- e. advise the County Education Board on the staffing needs of the institution;
- f. facilitate and ensure the provision of guidance and counselling to all learners;
- g. provide for the welfare and observe the human rights and ensure safety of the pupils, teachers and non-teaching staff at the institution;
- h. administer and manage the resources of the institution including the resources for SMP;
- i. receive, collect and account for any funds accruing to the institution;
- j. recruit, employ and remunerate such number of non-teaching staff as need arise and
- k. perform any other function to facilitate the implementation of its functions under 2013 Basic Education No. 14 or any other written law.

3.2.3 School meal programme committees (SMPC)

The SMPCs responsibility shall include:

Subject to approval by the School Governing body, the SMPC shall:

- ✓ Determine the quantities of food staples to be contributed per term with reference to recommended calorie allowances;
- ✓ In the case of cash equipment, determine the amount of money equivalent of such food staples to be contributed per term by parents who opt to pay in cash;
- ✓ Make accountability every school term for food contributed or procured;

- ✓ Produce monthly, termly and annual reports to the Governing body, and County and Sub-County Levels. Keep proper inventory of such food stocks.
- ✓ Handle complaints about quality and quantity that may arise;
- ✓ Through the School Food Focal Person, supervise the daily preparation of food, and ensure proper hygiene and sanitation in the food preparation area;
- ✓ Arrange for, and supervise the periodic health checks of kitchen workers by Health Inspectors and public health personnel;
- ✓ Arrange for, and supervise the periodic fumigation of food stores;
- ✓ In collaboration with the Head teacher and Head Agriculture Department in the school liaise with County Agriculture extension workers to supervise activities in school gardens geared towards production of supplementary nutrients;
- ✓ Implement programme at school level (depending on school meals modality),
- ✓ Mobilize and involve parents,
- ✓ Monitor food consumption, and
- ✓ Account to government, community and development partners

3.2.2 Parents

The parents' responsibility shall include:

- ✓ Ensure pupils go to school and/ or attend on-line classes;
- ✓ Ensure complete adherence of students / pupils to hand hygiene, sanitation and safety measures;
- ✓ Promote and support on the school hygiene and sanitation practices such as ensuring the school food store is safe, clean, dry and free of rodents.

3.2.3 Teachers

The teachers' roles shall include:

- ✓ Train and coordinate the participation of students / pupils in education initiatives;
- ✓ Institute a committee to participate in the monitoring of the programme and
- ✓ Ensure complete adherence of students / pupils to hand hygiene, sanitation and safety measures.

3.2.4 Students / Pupils

The students / pupils' roles shall include:

- ✓ Actively participate in the programme as beneficiaries;
- ✓ Link the community with pertinent knowledge;
- ✓ Contribute to maintenance of hand hygiene, sanitation and healthy environment for successful implementation of the school feeding programme; and
- ✓ Make effort to inform their parents and guardians on the effects of school feeding to general academic performance.

3.2.5 Community groups (Religious and Social groups, NGOs, Farmers, Private Industries and Individuals)

The roles of the various community groups shall comprise of:

- ✓ Participate in the supply, distribution and delivery of food items to the schools;
- ✓ Contribute to the promotion of safety and security of the school and the school feeding;
- ✓ Participate in food production;
- ✓ Provide labor and other resources for operationalizing the program;
- ✓ Participate in monitoring and evaluation; and
- ✓ Disseminate the information about the sensitization initiatives organized by the school on nutrition, hand hygiene and health etiquettes in managing COVID-19 to the local community.

3.2.6 Mass Media

The role of mass media shall entail the following:

- ✓ Convey accurate messages on school feeding programs in the country;
- ✓ Promote awareness, advocacy, dissemination and reporting on the school feeding program;
- ✓ Participate in monitoring and evaluation; and
- ✓ Mobilize the community to support the program.

4.0 Institutional Framework

The institutional framework for coordination and management of the National School Meals and Nutrition Program is presented in this section, and is depicted on **Figure 11-3**:

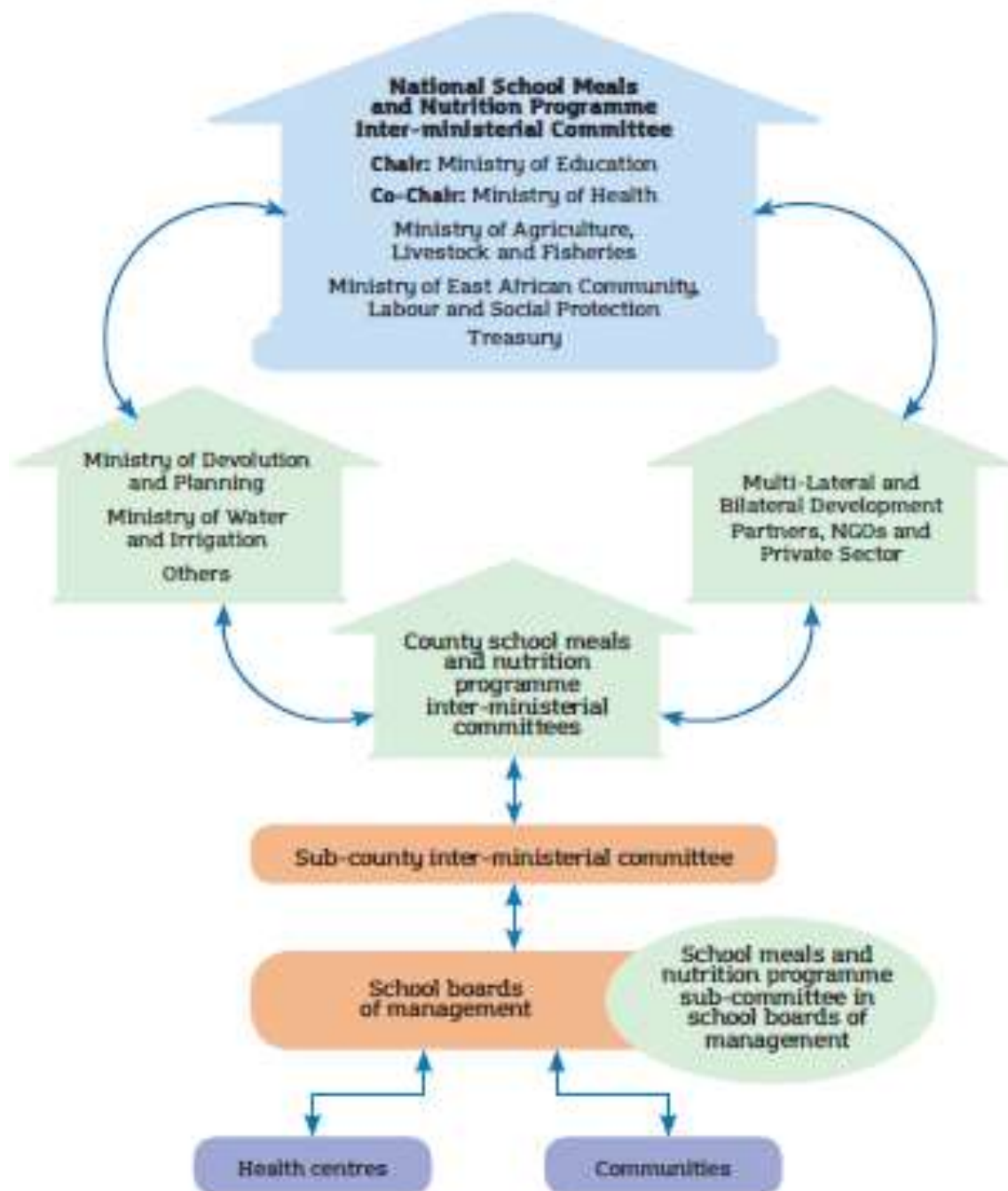


Figure 11-3: Institutional framework for coordination and management of SMP

Annex VI: GBV/SEA and Child Protection Prevention and Response Action Plan

Health pandemics do not affect populations equally. Gender as well as other social, cultural, political or economic aspects can determine inequalities among individuals and social groups. These aspects can interact to influence the capacities, but also vulnerabilities of women, girls, men and boys. Furthermore, emergencies threaten health, safety and security of communities, especially for children. Abuse, neglect, exploitation and violence against children is likely to increase in such environments. Pandemics have been shown to make it more difficult for women and girls to receive treatment and health services. This is compounded by multiple or intersecting inequalities, such as ethnicity, socioeconomic status, disability, age, race, geographic location and sexual orientation, among others which influences access and decision-making to critical health services and information about COVID-19.³³

Emerging evidence on COVID-19 impacts indicates several ways in which the pandemic may impact on violence against girls and boys of school going age. These include: (i) gender based violence (GBV);³⁴ (ii) increased risk of women and girls in emergency settings, including refugee camps and IDP settlements; and (iii) increased risk of sexual exploitation and violence by state officials and armed guards, especially in view of the curfew hours and lockdowns among the other advisories issued by the government during such crises.

This Action Plan has been developed to accompany the implementation of the project grievance redress mechanism (GRM) to ensure that the Project does not have any negative impacts or further perpetuate GBV/SEA. It presents operational activities as well as recommendations for GBV/SEA risk mitigation that build on existing mechanisms in the MoE, and the National and County Governments involved in the project. The Plan is based on existing protection, prevention and mitigation strategies and measures developed by the WB and coordinated through the MoE and its partners at the implementation level.

Context of GBV in Kenya

Incidence of GBV in Kenya presents a significant and persistent challenge. Despite important gains in advancing more equitable gender norms in Kenya, as anchored for example in the 2010 Kenya Constitution and Vision 2030, challenges in the promotion of gender equality across multiple dimensions persist and incidence rates of GBV remain high. Child marriage remains a prevalent challenge, with 23 percent of women between the ages of 20-24 reporting their first marriage before the age of 18 years.³⁵

There is, however, significant regional variation in the prevalence of both physical and sexual violence country-wide with very high rates of both physical and sexual violence observed in some regions. Rates of sexual violence against women exceed 20 percent in Nairobi, Western Region and Nyanza (where rates of sexual violence against men are also the highest in the country at around 13 percent). In particular, intimate partner (or domestic) violence (IPV) is prevalent, with nearly half of women (47 percent) having experienced some form of spousal violence (DHS 2014). About two-fifths (39 percent) report having experienced some form of physical or sexual violence, while 36 report having experienced emotional violence.

³³Policy Brief: The Impact of COVID-19 on Women, 9th April 2020.

³⁴www.unicef.org/Fighting-the-shadow-pandemic of violence against women and children during COVID19COVID-19.

³⁵UNICEF global databases, 2018, based on Demographic and Health Surveys (DHS), Multiple Indicator Cluster Surveys (MICS) and other nationally representative surveys.

Drivers of GBV include entrenched social norms. Harmful socio-cultural practices such as early and forced marriage, as well as female genital mutilation or circumcision (FGM/C), also persist in some parts of the country, while alcohol and substance abuse further contribute to GBV. While gains have been made in the reduction of FGM/C, currently reported at 21 percent, in part due to legislative advances and public awareness campaigns, there remains striking regional differences in numbers. It is notable that whereas nearly all women in the North Eastern Province have experienced FGM/C, in Western province, only 8 percent have undergone the practice. Poverty and unemployment are also key drivers of GBV, as associated stress and frustration often manifest in negative coping behaviors including aggression and violence, particularly in the home. An analysis of risk factors contributing to IPV indicate that spousal characteristics play an important role in women's experiences of violence in the home.

A culture of silence around experiences of GBV prevails across the country. This is influenced by socio-cultural norms that both stigmatize survivors, justify and normalize perpetration of violence, particularly in the home. The 2014 DHS found that 42 percent of women believe wife beating is justified, as compared with 36 percent of men. Feelings of shame and fear also deter survivors from seeking care or reporting incidents to justice or security actors. As such understanding of incidence is often impaired and the magnitude of the challenge is likely even more significant. According to the 2014 Kenya DHS, over half of women (53 percent) who experienced sexual violence never sought care nor told anyone about their experiences of violence, while 42 percent of those who experienced physical violence never sought care or told anyone. It is notable that there is limited understanding of male experiences of physical or sexual violence in Kenya, however, several studies highlight experiences particularly of sexual assault among adult men and boys. Actual and perceived stigmatization is often even more pronounced for male survivors, thus the scope and extent of the challenge remains underreported and poorly understood.

Adolescents (aged 10-19 years) account for 24 percent of the national population.³⁶ Most adolescents would normally spend a lot of their time in school (in boarding or day schools) with short breaks in between. However, following the closure of schools on March 15, 2020, these children are at home. Data from Kenya Demographic and Health Survey (2014) show that one (1) in every 5 girls between 15-19 years was either pregnant or already a mother at the time of the survey. As of 2019, the latest statistics from the Global Childhood show that Kenya had the third-highest teen pregnancy rates in the world with 82 births per 1,000 births.³⁷ Further, it is estimated that 6.5 percent and 2.7 percent of adolescent girls and boys, respectively, have been sexually abused.³⁸ The prolonged stay at home, with limited scope for engagement in physical and other activities could be exposing these children to sexual activities and abuse. In addition, school drop-out, particularly for girls and child labor are likely to increase as a result of limited economic opportunities and incomes at the household level.

For adolescents in informal settlements and rural areas, the circumstances for abuse are rife within the COVID-19 context. Most of these adolescents are idle, they may not have food, and the anxiety and abuse from parents/guardians could be a driver for sexual activity. It is also

³⁶Kenya Demographic and Health Survey, 2018.

³⁷According to the United Nations Population Fund Report, Kenya has recorded 378, 397 adolescent and teenage pregnancies for girls aged 10-19 years between July 2016 and June 2017, specifically, 28, 932 girls aged 10-14 and 349,465 girls aged 15-19 became pregnant.

³⁸[https://www.google.com/url?&url=https://www.kenyapaediatric.org/&sa=D&source=docs&u=https://www.kenyapaediatric.org/&usq=__g__](https://www.google.com/url?https://www.google.com/url?&url=https://www.kenyapaediatric.org/&sa=D&source=docs&u=https://www.kenyapaediatric.org/&usq=__g__) Adolescent-health-situational-analysis-Dr.-Christine-Wambugu-.pdf

probable that young girls could be taken advantage of sexually by adults or older adolescents in exchange for food and/or cash. It is even harder for households in informal settlements to protect their children given the confined spaces they occupy and the general limited access to basic needs and services.

The Government has developed critical legislation, legal instruments and policy frameworks that seek to address and mitigate the consequences of GBV. These include, the Sexual Offenses Act of 2006, the National Gender and Equality Commission (NGEC) Act of 2011, the Counter Trafficking in Persons Act of 2010, the Prohibition of Female Genital Mutilation Act of 2011, the Victims Protection Act of 2014, revisions to the Penal and Criminal Procedure Codes in 2012 and Children's Act of 2007. Key standards at the national level have been developed. Other instruments include the National Policy for Prevention and Response to GBV (2014), National Guidelines on the Management of Sexual Violence (2014), and the National Monitoring and Evaluation Framework towards the Prevention of and Response to Sexual and Gender-Based Violence in Kenya (2016). These measures outline key provisions for GBV prevention and response, management and treatment of incidence of sexual violence, and key indicators to monitor progress in national efforts to prevent and respond to sexual violence.

Categorization of GBV/SEA

The WB Guidance Note on GBV/SEA describes GBV/SEA as an 'umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences.'³⁹ GBV/SEA can occur in a variety of ways, including through the infliction of physical, mental, and sexual harm or suffering threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse and denial of resources, services and opportunities, trafficking and abduction for exploitation, or IPV perpetrated by a former or current partner.

The WB defines SEA as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. This includes, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment (SH) is understood as unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report on both. Both women and men can experience SH.

The WB Guidance Note defines four key areas of GBV/SEA risks:

- i. *SEA* - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion;
- ii. *Workplace sexual harassment* - unwanted sexual advances; requests for sexual favors, sexual physical contact;

³⁹WB, Good Practice Note. Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, September 2018, p.5.

- iii. *Human trafficking* - sexual slavery, coerced transactional sex, illegal transnational people movement; and
- iv. *Non-SEA* - physical assault, psychological or physical abuse, denial of resources, opportunities or services and IPV.⁴⁰

The broader definition of GBV/SEA will be applied to this project. This approach will ensure that a wider set of acts are covered in order to guarantee the protection of project affected persons, especially of the learners, community members and workers.

Potential Project-related GBV/SEA Risks

There are several GBV-related negative impacts anticipated from this project. There is a risk of GBV against learners in the school environment from fellow students, teachers and workers. There is also potential risk among co-workers contracted by the MoE and among the primary suppliers. GBV could spill over to the communities in the form of sexual favors sought by service providers (e.g. by contractors and primary suppliers) to benefit from the project interventions, including the SMP. Since the project provides for face-to-face training of various cadres of staff, there is also a risk of GBV among learners and between learners and instructors. Specifically, the following forms of abuse are likely to occur:

- i. *SEA* - exploitation of learners/workers and community members by the project workers (direct, contract and primary suppliers) using their differential power. This could lead to rape/defilement of school-going children and rape of women engaged in project activities as workers and service providers, and;
- ii. *Workplace sexual harassment*: this may occur among the workers within the MoE and IPs, contract workers and primary suppliers in the form of unwanted sexual advances; requests for sexual favors, sexual physical contact;

Key GBV/SEA Mitigation Measures

Reporting of GBV/SEA cases committed by contract workers or other workers engaged by the project will be critical especially when school-based learning resumes. The MoE and the implementing partners including primary suppliers, will require contractors/suppliers to accurately and fully report instances involving credible allegations of GBV/SEA by contract workers, primary suppliers, and/or third parties; and sharing of best practices and lessons learned on addressing GBV/SEA with other stakeholders.

When working with Primary Suppliers, adequate safeguards will be established and appropriate actions taken on GBV/SEA. This will include screening, cooperative arrangements, monitoring, and termination of arrangements where applicable. The dedicated focal points identified for this project (social safeguards officers, and GRM focal points at the national and county offices) have the overall responsibility for the implementation of prevention of SEA (PSEA) policies and activities, and will report regularly to the Project Coordination Unit (PCU) and the WBG.

1. GBV/SEA programming guiding principles are outlined below.

- i. *Confidentiality*: at all stages of the intervention, the privacy and confidentiality of survivors will be assured, prioritizing the well-being of survivors and ensuring that the delivery of services and support will not compromise the privacy or identity of the individuals involved.

⁴⁰ WB, 2018, p.3

- ii. *Respect*: respect of the wishes, dignity and choice of the survivors will be observed at all times and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks and consequences of an action, before information is shared or action is taken.
- iii. *Safety and security*: awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by GBV/SEA will be sufficiently addressed and factored into any GBV/SEA intervention or initiative.
- iv. *Non-discrimination*: all GBV/SEA interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by GBV/SEA, without regard to sex, gender, age, ethnicity, religion or other status.

Community awareness

Practice within WB funded projects prescribes that beneficiary awareness raising efforts are undertaken on PSEA in beneficiary communities. Information will be provided on the MoE's standards of conduct and reporting mechanisms; community-based complaints mechanisms will be set up in project sites and offices as appropriate, including mechanisms for monitoring and reviewing the complaints mechanisms. An incident reporting form is an integral part of the complaints and investigation mechanisms.

GBV/SEA Referral Pathways

2. **The WB advocates for survivor centered approach to managing all GBV/SEA cases.** The security and safety of the survivor should take precedence with any actions taken once the case is reported. The PCU aims to provide avenues for comprehensive GBV/SEA services including GBV/SEA case management, psychosocial support and referral mechanisms for survivors, among others, as illustrated in Table 11-7:

Table 11-7: Template of a Referral Mechanism

TELLING SOMEONE AND SEEKING HELP (REPORTING)			
Survivor/client tells family, friend, community member or service provider; that person accompanies the survivor to the health or psychosocial entry point		Survivor/client self-reports to any service provider	
IMMEDIATE RESPONSE			
The service provider must provide a safe, caring environment and respect the confidentiality and wishes of the survivor/client, learn the immediate needs, and give honest and clear information about the services available. If agreed and requested by survivor/client, obtain informed consent and make referrals, accompany the survivor/client to assist her/him in accessing services			
Medical/health care entry point-GBV/SEA	Psychosocial support entry point -GBV/SEA Adult	Psychosocial support entry point-GBV/SEA Child- under 18	
List of health facilities or other entities offering GBV/SEA care and support at the county level (e.g. Level 4/5 hospital, Liverpool VCT)	Agencies (list agencies operating in the county)	The Children Services and other organizations involved in child protection	
If the survivor/client wants to pursue police/legal action or if there are immediate safety and security risks, for example, if the survivor is a minor (under 16 years), refer and accompany survivor to police/security or to legal assistance for information			
Safety and Security		Legal Assistance Counselors	
AFTER IMMEDIATE RESPONSE, FOLLOW-UP AND OTHER SERVICES			
Over time and based on survivor’s/Client’s choices can include any of the following:			
Healthcare	Psychosocial services/Case	Protection, security, and justice actors	Basic needs - children’s

	management		services, safe shelter
Refer to facilities identified as able to handle GBV/SEA cases (each County has facilities that manage GBV/SEA)	This could be accessed at health facilities or through partners (CSOs, CBOs or FBOs)	<p>Agency Name: The Kenya Police, Ministry of Labor and Social Protection, National Gender and Equality Commission (NGEC)</p> <p>SERVICES:</p> <ul style="list-style-type: none"> * Arrest perpetrator – Police * Issue Police Form (P3) free of charge * Gather evidence and complete file for case * Inform survivor and witnesses on court hearing * Provide physical protection/safe shelter <p>Agency Name: to be determined</p> <p>SERVICES:</p> <ul style="list-style-type: none"> * Provide legal counselling * Transport, accommodation and meals for survivor/witness and family to attend court 	<p>Agencies: Children Services (among other providers depending on the county)</p> <p>SERVICES:</p> <ul style="list-style-type: none"> *Livelihood program, life skills/vocational training/ entrepreneurship. NFIs

Access to Justice

The provision for a project-based GRM does not in any way limit the aggrieved party from seeking recourse from the courts of law in the country. Information will be provided to the project beneficiaries on the legal system that they could use as needed including the sources outlined below.

- The Judiciary system has in the past invested in strengthening the National Police Force to establish gender desks in most police stations across the country. Specific police officers have also been trained to manage survivors and ensure that all necessary information and evidence is gathered to facilitate prosecution of offenders/perpetrators as necessary.
- The National Gender and Equality Commission (NGEC), which has a GBV/SEA mandate, has offices across the country which can be used to facilitate access to justice for survivors and their families.
- There are many organizations (both local and international) operating across the country (although not evenly distributed) which render support to survivors in the pursuit of justice.
- It is notable that counties occupying the Arid and Semi-Arid lands (ASALs) may not be adequately resourced to deal with all aspects of GBV/SEA and special efforts are required to ensure that survivors get support when they need it through partnering with locally based institutions and agencies.

Prevention of Sexual Exploitation and Abuse

This Plan aims to facilitate a consistent approach across all potential GBV/SEA complaints received from every possible channel established to manage GRM on the project (email, call center/hotline, phone calls, in-person reports, etc.). The WB has PSEA mechanisms and SEA misconduct response systems, which will apply and ensure that all parties engaged in the project respond to the misconduct of project staff or any worker of contractors and primary suppliers. These responses will follow the different organizational set-ups, but will all comply with the relevant WB protocols on PSEA (articulated above). Responses will include the implementation of sanctions for violations of workers' codes of conduct (CoCs).

All IPs, contractors and suppliers for this project are obligated to create and maintain an environment that prevents GBV/SEA. They are also required to develop systems that maintain this environment, including but not limited to the following.

- i. *Adoption of the Core Principles of the WB on PSEA⁴¹.* All categories of workers will be inducted and required to sign a CoC, which includes expected standards of behavior regarding GBV/SEA. The IPs, contractors and primary suppliers will further ensure that all workers have been inducted and have signed a CoC.
- ii. *Prevention of Child Labor:* The project shall not engage anyone aged below 18 years of age (as per ILO guidelines to prevent Child Labor).
- iii. *Media:* The MoE will ensure that images of children are not used without the consent of both the parent/guardian/caregiver and the child (assent based on the age), and any pictures should have children fully dressed and none should depict them as victims including in captions.

Mitigation of SEA

3. Several mitigation measures will be implemented by the project to ensure the protection of all learners supported by the project.

- i. *Community awareness and disclosure of CoC:* The CoC will be made available to the public in the project areas, especially to identified project stakeholders. Education and raising of awareness for communities and learners on SEA and their legal rights will be done. Project beneficiaries will be made aware of the laws and services that can protect them and provide redress in case of an incident.
- ii. *Community awareness on child protection concerns:* Communities will be informed that in case project and partner staff abuse children, they should refer such complaints to child protection partners and any other agencies engaged in GBV/SEA prevention without recording the survivor's details. They could also report to: Child Helpline - 116; and GBV Toll Free Line – 1175 (see Annex IX for more details).
- iii. *Gender and child sensitive communication channels:* Disclosure will take place through different communication channels taking into consideration child and survivor safety when designing and distributing information by the PCU and/or the respective IP. For instance, information on cards, pamphlets and/or posters will be distributed in places like bathrooms, where the learners can look at them without being observed by other people⁴². Also, construction sites and waste management sites, which attract children playing in the community, will be used to disseminate PSEA information.
- iv. *Training of Workers and Partners:* the MoE and all IPs will ensure their direct workers, partners, suppliers and others are trained in CoC, GBV/SEA and child protection risk issues as part of their induction (and refreshers will be offered regularly). They will roll out direct training activities for all contracted, as well as community workers deployed for their activities – prior to the start of such. The IPs will ensure that records of all inductions are kept and shared with the PCU. The PCU and WB Team will further review training materials and make suggestions for revision if there are gaps.
- v. *Cases of GBV/SEA can be reported through the general Project GRM:* the GRM focal points for the project will be trained to receive GBV/SEA cases in an appropriate manner. Beneficiaries and communities will generally be encouraged to report all GBV/SEA cases through the dedicated GBV/SEA referral system and complaints resolution mechanism. Contact information will be made explicit in all community awareness sessions, as well as be part of

⁴¹IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

⁴²WB, 2019.

the publicly disclosed information. All information will be made accessible to learners and all project beneficiaries. The GBV/SEA referral system will ensure that survivors receive all necessary services, including medical, legal, counseling, and that cases involving children aged 16 years and below are reported to the police where applicable (as illustrated in Table 11-7 above).

Cases of GBV will require immediate attention. If such cases are reported through the Project GRM, the GRM focal point will report the case immediately to the PCU, as the PCU is obligated to report any cases of GBV/SEA to the WB within 24 hours. Furthermore, cases need to be reported to the respective IPs, if they concern direct workers or workers from a contractor, NGO partner or even community workers.

Response to GBV/SEA

The Project team has established a separate GBV/SEA response mechanism that will be used in line the WB Guidance. Responses will include the implementation of sanctions for violations of worker CoC.

- i. All partners and contractors will be required to develop organizational whistleblowing policies that encourage workers to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting. The definition, scope, and protection measures may differ between organizations. General principles apply to whistle-blowers, as they would to any complainant, and internal agency policies will protect whistle-blowers on GBV/SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies (this obligation is also contained in the CoC which is signed with all workers engaged on project activities).
- ii. All IPs will commit to timely and expeditious action to provide assistance to survivors and to comply with all timelines for action laid out in this Action Plan.

Investments in GBV/SEA service provision and referral pathways

This GBV/SEA Action Plan provides general guidance and recommendations for improving existing mechanisms, specifically in rural areas and the historically marginalized communities. Where services are not available, training will be provided to frontline health providers on basic response (e.g. psychosocial first aid and basic care). This will be done in consultation with other agencies engaged in project activities including UNICEF, as appropriate.

- i. *Safety audit and GBV/SEA assessments* to understand specific GBV/SEA risks in project sites that relate to learners in schools as well as changes in community gender dynamics.
- ii. *GBV/SEA risk assessments:* This assessment will serve to understand possible negative impacts in gender dynamics in schools and communities in implement appropriate mitigation measures. Examples of activities include the engagement of key stakeholders in the community, psychosocial support to learners and parents/guardians, etc.
- iii. *Mapping and delineation of GBV/SEA referral services in project areas:* In order to complete existing information on referral pathways in project areas, a community and stakeholder consultation on GBV/SEA referral pathways assessment will provide information on the functioning and effectiveness of referral pathways in place. Consultation will take place during the Project Inception Phase and will serve to update this GBV/SEA Action Plan.
- iv. *Provision of a package of GBV/SEA services* (medical, legal, mental health, psychosocial and materials support) in project areas as per results of the GBV/SEA mapping of services. GBV/SEA services will be provided through either mobile health outreach teams and/or community/county health centers depending on the project area needs.

- v. *Training on GBV/SEA and Survivor Centered Response for community and county health professionals.* The training of key community structures will include GBV/SEA guiding principles and referral pathways. Also, training on WHO guidelines for Clinical Management of Rape (CRM) and psychosocial support.
- vi. *Provision of hygiene/dignity kits* for vulnerable girls including GBV/SEA survivors and pregnant girls.
- vii. *Provision of relevant GBV materials*, including fliers on referral pathways to be used in case of violation, school reentry guidelines, and legal redress mechanisms.
- viii. *Strengthen coordination and collaboration:* This will be done at national and county levels by involving the government's relevant units in strengthening of the GBV/SEA package of services and referral systems in project areas.

Partnership and Collaboration

The project will seek partnership with several partners at the national and county levels. These will include the MoH, Department of Gender, NGECC, Children's department, Police Service, Judiciary, Probation and Office of the DPP to ensure that perpetrators are arrested, tried in court and sentenced accordingly. The Department of Children's Services has the capacity to rescue abused children and secure them while court proceedings are ongoing to prevent perpetrators from interfering with the judicial process. Further, faith-based organizations, NGOs and various charity organizations also offer support services and rescue efforts countrywide.

GBV/SEA capacity building, monitoring and evaluation

The project will put in place monitoring tools to ensure adherence to the provisions made in this plan.

Response to GBV/SEA

The PCU, as well as IPs, will use the existing GBV/SEA referral pathways as well as expand the availability of the basic package of multi-sectoral GBV/SEA services at the county level. Also, the project will build capacity of service providers to deliver quality GBV/SEA services in line with best practices, with a focus in counties that might not have GBV service providers. The project will ensure that affected women, men, boys and girls receive psychosocial support and safe referral services.

Monitoring and Supervision

The Project safeguards team will monitor all GBV/SEA reported cases through the various reporting mechanisms and report back to the PCU. The monitoring will adopt a mixed-methods approach, including the utilization of perception surveys and community-based monitoring to enable an in-depth understanding of the impact of project activities on community members. This is a particularly pertinent approach given the sensitivities of the interventions that center on children.

Continuous monitoring: new complaints and ongoing cases and complaints will be followed closely by the GBV/SEA focal points at the county and national levels.

Monthly review of services: the PCU will conduct monthly review of services to ensure the continuous availability of services, continued access to services by survivors, dissemination of correct information to survivors during case management and to women, girls and the community at large during awareness on available services.

Quarterly monitoring: The PCU will monitor the implementation of this Action Plan on a quarterly basis. Quarterly reviews will focus on:

- i. Ensuring that all activities (as listed above) have been undertaken and/or are on track;
- ii. Reviewing all referrals made in specific cases, and assessing whether complaints have been handled and/or resolved appropriately;
- iii. Monitoring and reporting on the effectiveness of the implementation of the GBV/SEA Action Plan; and
- iv. Reporting on progress on all activities and re-assessment of risks, and monitoring of the situation as appropriate.

Non-compliance: where quarterly reviews identify non-compliance with the GBV/SEA Action Plan, the matter will be reported to the Project Manager in case of IPs' non-compliance and to the WB in case of PCU non-compliance. The PCU and WB will then seek clarification from the respective IP or PCU and jointly develop plans on how to assist to bring activities back on track. Serious cases can lead to the termination of contract with the IP.

Monitoring and evaluation of PSEA activities will include the following measures:

- i. The PCU will ensure that all project workers sign the CoC developed for this project. Spot checks will be done at funded facilities to monitor adherence to this provision;
- ii. All staff will be trained on PSEA, CoC and the relevant protocols. All GBV/SEA related complaints will be received and handled in a manner that safeguards the well-being of the survivor;
- iii. It is expected that all IPs, contractors and sub-contractors will disclose their CoC, and that IPs will report all related activities to the PCU for monitoring purposes;
- iv. PCU will monitor that IPs have a GBV/SEA free environment and implement safety audit recommendations regarding lighting, signing of CoC, information on GRM and referral pathways; and
- v. PCU will monitor the project implementers bimonthly on their implementation of the GBV/SEA action plan via reports, community based monitoring and field visits.

On GBV/SEA programming, the PCU will monitor that:

- i. Communities, including children, are aware of the risks of GBV/SEA, their rights and the mechanisms available to them to report GBV/SEA cases;
- ii. Appropriate GBV/SEA services and referral pathways are provided to survivors;
- iii. Referral pathways are in place and functional;
- iv. Percentage of first responders who are trained/oriented on the referral pathway;
- v. Standard intake and referral forms are developed and utilized by service providers; and
- vi. Percentage of GBV/SEA survivors who were referred for comprehensive care, within a given time period.

Annex VII: Technical Note on Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020

With the outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

These restrictions have implications for World Bank-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

This Note offers suggestions to World Bank task teams for advising counterpart agencies on managing public consultation and stakeholder engagement in their projects, with the recognition that the situation is developing rapidly and careful regard needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

Investment projects under implementation. All projects under implementation are likely to have public consultation and stakeholder engagement activities planned and committed as part of project design. These activities may be described in different project documents, and will involve a variety of stakeholders. Commonly planned avenues of such engagement are public hearings, community meetings, focus group discussions, field surveys and individual interviews. With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for task teams' consideration while advising their clients:

Task teams will need to review their project, jointly with the PMUs, and should:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders (international, national, local) etc.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country/project area would affect these engagements.

- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines. For example, selection of resettlement options by affected people during project implementation. Reflecting the specific activity, consider viable means of achieving the necessary input from stakeholders (see further below);
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, task teams should discuss and agree with PMUs the specific channels of communication that should be used while conducting stakeholder consultation and engagement activities. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and Skype;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, such as would be the case for Resettlement Action Plans or Indigenous Peoples Plans preparation and implementation, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PMU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

Investment projects under preparation. Where projects are under preparation and stakeholder engagement is about to commence or is ongoing, such as in the project E&S planning process, stakeholder consultation and engagement activities should not be deferred, but rather designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. Some suggestions for advising clients on stakeholder engagement in such situations are given below. These suggestions are subject to the coronavirus situation in country, and restrictions put in place by governments. The task team and the PMU should:

- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;

- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and Skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. Webex, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - *Virtual registration of participants:* Participants can register online through a dedicated platform.
 - *Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics:* These can be distributed online to participants.
 - *Review of distributed information materials:* Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
 - *Discussion, feedback collection and sharing:*
 - ✓ Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
 - ✓ Group, team and table discussions can be organized through social media means, such as WebEx, Skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
 - *Conclusion and summary:* The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project web links/websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and/or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions. *Engagement with direct stakeholders for household surveys:* There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of

affected people, take inventory of their affected assets, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder engagement approaches that will be appropriate in the specific setting. The teams should reach out to the regional PMs for ENB and Social Development or to the ESSA for the respective region, in case they need additional support to develop such tailored approaches.

- In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

Annex VIII: List of Participants - Stakeholder Engagement Plan (June 17, 2020)

S/NO	NAME	COUNTY
1	Elijah Mungai	Nairobi
2	Martha Ekirapa	Nairobi
3	Peter Gachathi	Nairobi
4	Victoria M.	CDE Kiambu
5	Margaret Mwirigi	CDE Nyamira
6	Atebe Isaac Myangau	CDE Kisumu
7	Sifuna Nelson Mabele	CDE Nyandarua
8	Njogu Jane Wajira	CDE Kwale
9	Moses Gachungi Mureithi	CDE Makueni
10	Josephine Ondieki	NAIROBINairobi
11	Julie Omolo	SEQUIP
12	Juma Mwangi	NAIROBINairobi
13	Irene Ochieng	NAIROBINairobi
14	Adan Mohammed Robe	CDE Samburu
15	Daniel K. Cheruiyot	Nyandarua
16	Robinson Kiarie	Makueni
17	Leruso M. Philip	Samburu
18	Ledama K. Kudik	Narok
19	Nancy W. Munga	Kirinyaga
20	Nyankira Orina	Kisumu
21	Clare E.Kusa	Nandi
22	Eunice Bweya	Vihiga
23	James Kimotho	Nairobi
24	Kennedy Dimba	Nyamira
25	Serafino Samuel	Meru

S/NO	NAME	COUNTY
26	Hulbai Gedij	Wajir
27	Abdia Dohia	Mandera
28	Patrick Vasi	Isiolo
29	Josiah Kilei Mwawana	Kwale
30	Samuel C. Ondieki	Siaya
31	Susan C Mitei	Baringo
32	Shumi Ali Muhamed	Lamu
33	Emily M. Nyaga	Kiambu
34	Elizabeth Chesang Marangach	Busia
35	Catherine Cheboiwo	Nairobi

Annex IX: A Summary results from online consultations

The questionnaire further below was sent to respondents mainly drawn from about 20 counties across the country. In total, about 700 questionnaires were completed and returned. Below is a summary of the key issues captured from the open ended questions.

Q: What are the potential risks envisioned in implementing this project?

- i. No learning, movement, interaction. Most of the schools does not have proper equipment in taking e-learning.
- ii. Rejection of community due to competing demands of parents and program activities.
- iii. Inadequate funding, misplaced priorities, conflict of interest, uncompleted projects, poor record keeping and lack of transparency.
- iv. Insecurity.
- v. Retrogressive culture, sparsely populated population, language barrier, tough and inaccessible terrains.
- vi. Risk of COVID-19 infections with limited access to health facilities.
- vii. Cost of the project, lack of ICT and power in other rural areas, lack of water for hand washing as this is the new norm, sanitization of physical facilities before usage, capacity building the implementers, lack of sensitization, and proper management of resources.
- viii. Loss of digital equipment, and
- ix. Lack of experience in implementing Bank funded project using the new Environment and Social Framework, 2018.

Q. How can these risks be mitigated?

- i. Sensitization and awareness raising
- ii. Effective planning
- i. Put in place measures to mitigate against COVID-19 infection and death.
- ii. Use community leaders and teachers to track and trace all learners for online or distance learning and school feeding.
- iii. Enable stakeholders to ICT connectivity.
- iv. Conduct a lot of sensitization to all the stakeholders on measures that have been put in place to curb the spread of COVID-19.
- v. Provide water tanks and tents for open air classes.
- vi. Build more classrooms, provide more desks, provide masks, sanitizers, etc.
- vii. Gradual opening of schools as you put facilities in place.
- viii. Capacity building of teachers, parents and other stakeholders, provision of adequate resources, ensure prompt and adequate delivery of the digital content, provision of school meals to curb truancy.
- ix. Proper supervision of learners as they continue with online learning.
- x. Address teachers' attitude, install a software blocking other irrelevant sites, and provide solar powered gadgets.
- xi. Use of multi-sectoral approach, engage all the stakeholders, facilitate field officers to undertake monitoring and evaluation, and
- xii. Training of the Project Coordination Unit Staff on the new Environment and Social Framework, 2018.

Q. What measures should the project put in place when address vulnerable, marginalized and minority groups?

- i. Provide requisite preventive facilities and infrastructure.
- ii. Ensure access to facilities.

- iii. Engage project workers in all aspects of project rollout right from implementation have their representative in the committee.
- iv. Advocacy, monitoring of vulnerable, marginalized and minority groups.
- v. Avail materials required including masks, soap, running water and self-hygiene
- vi. Embrace affirmative action.
- vii. Assess and understand the nature of vulnerability, major issues making the groups to be marginalized, long term/sustainable intervention measures, community/groups involvement in getting solutions to their own problems.
- viii. There should be enhanced psychosocial support in these areas.
- ix. Increased partnerships with CBOs and other non-governmental agencies to improve sanitation facilities in the institutions of learning.
- x. Budgetary allocation through the FPE/FDSE capitation for provision of water and sanitation facilities.
- xi. Training parents on child protection measures against cultural practices that may render them vulnerable and marginalized.
- xii. Training learners on how to take care of themselves and measures to take in case they fall ill or feel vulnerable to abuse.
- xiii. Provide meals for the shift classes.
- xiv. Identify and mobilize parental social communication forums e.g. WhatsApp groups.
- xv. Give priority to the vulnerable and marginalized and minority groups in all project benefits.

Q. How should grievances be handled?

- i. Implement the prepared project grievance redress mechanism.
- ii. Through reporting grievances to the persons running the project.
- iii. The different levels engaged should be empowered to handle grievances, i.e. sub-county, county, region and national levels. Issues that the field team cannot handle to be escalated to the national office.
- iv. Establish a toll free sms to a central center.
- v. Involve the stakeholders in carrying out social accounting
- vi. Establish an on-line platform for raising complaints e.g. website.
- vii. Grievance registers to be maintained at sub-county, county, and ministry headquarters.
- viii. Issues could also be raised through public barazas and radio transmission in local languages.

Q: What experiences and lessons have you learnt in implementation of similar interventions (especially those funded by the World Bank funded)?

- i. Need to for transparency, accountability and ensure safeguards measures are in place.
- ii. Accountability, monitoring and evaluation. There is need to use resources availed and used prudently,
- iii. If the PCU is well coordinated, then project implementation will be coordinated.
- iv. Strict adherence to procedures and policies.
- v. Stratified information and transparent records keeping including receiving and managing feedback.
- vi. More sensitization/training is required before implementation.
- vii. Success of project is highly dependent on participatory engagement of key stakeholders from inception.
- viii. Attention needs to be focused on monitoring and evaluation so that gaps in the project can be identified and dealt with real time.