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GOVERNMENT OF KENYA



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MINISTRY OF WATER, SANITATION AND IRRIGATION

Kenya Water, Sanitation and Hygiene Program (K-WASH)

IPF COMPONENT

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

October 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the Recipient) will implement the Kenya Water Supply, Sanitation and Hygiene (the Program), with the involvement of the Ministry of Water, Sanitation and Irrigation (MoWSI) as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide financing for the Program, as set out in the referred agreement.
2. The Recipient shall ensure that the Program is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Program, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Program implementation, to reflect adaptive management of Program changes and unforeseen circumstances or in response to Program performance. In such circumstances, the Recipient through the Ministry of Water, Sanitation and Irrigation, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, Principal Secretary, State department of Water and Sanitation of the Ministry of Water, Sanitation and irrigation (MoWSI). The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health, and safety (ESHS) performance of the TA activities, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit quarterly reports to the World Bank throughout Program implementation, commencing 3 months after the Effective Date</p> <p>Submit each report to the Association no later than 14 days after the end of each reporting period.</p>	Ministry of Water, Sanitation and Irrigation (MoWSI)
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the TA activities which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries, forced or child labor. Provide sufficient detail regarding the scope, severity, and possible root causes of the incident or accident, indicating immediate measures taken or time bound corrective actions that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Any such incidents/accidents should be promptly reported by the TA activities consultant to the Program Management Unit (PMU) using standard forms contained in the ESMF.</p> <p>Subsequently, at the Association's request, prepare an incident or accident investigation report detailing all the root causes and an agreed time bound corrective action plan to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent reports to the Association within 5 business days after initial notification of the incident or otherwise in a timeframe agreed on with the Association.</p>	MoWSI
C	<p>CONSULTANTS' MONTHLY REPORTS</p> <p>Require TA consultants to provide monthly monitoring reports on ESHS performance to PMU/Program Implementation Unit Units (PIUs) in accordance with the metrics specified in the respective bidding documents and contracts.</p>	<p>Submit the ESHS Performance Reports to the PIUs on a monthly basis</p> <p>Submit the synthesized ESHS Performance Reports to the Association on quarterly basis</p>	PMU

	Require PMU to submit a synthesized Report on ESHS performance on quarterly basis to the Association through the MoWSI. The report should include a schedule of statutory permits, licenses, audits, and any other requirements as agreed by the association.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE		
	<p>1. MOWSI shall have the overall responsibility for implementation of the K-WASH, including the TA activities, and shall maintain a Program Management Unit (PMU) with dedicated and qualified E&S staff and financial resources to support management of ESHS risks and impacts associated with TA activities. Throughout the life of the program, the PMU shall retain at least 1 full time Environmental Specialist, 1 full time Social Specialist, and (if needed), a Communications Specialist, to help the PMU coordinate and manage program ESHS risk. As needed for the efficient delivery of the TA activities, the PMU may mobilize additional staff on short-term or long-term assignment to support the program on specialized areas such as SEA/SH prevention and response, stakeholder engagement, workers and community health & safety, social inclusion, grievance management, security risks management etc. Further, The PMU will deploy a Credible Verification Agency (CVA) for the verification of Program results throughout the project implementation phase.</p> <p>2. The MOWSI shall ensure each participating county maintains a County Program Coordination Unit (PIU) with adequate qualified staff and resources to support management of environment and social risks of the TA at the County level, including at least 1 Environmental Specialist and 1 Social Specialist.</p> <p>The Program will encourage the counties to utilize the existing national and county systems, including the use of the trained specialists dealing with Financing Locally Led Climate Action (FLLoCA), Kenya Devolution Support Program (KDSP) and the Kenya</p>	<p>1. Establish the PMU with the requisite E&S specialists within the first month of effectiveness and maintain it throughout the TA implementation period.</p> <p>2. During year 1 of program implementation, the PMU shall meet at least biweekly to address matters arising from TA activities and at least monthly for 1 year</p> <p>3. If considered necessary, hire specialized consultants (i.e., SEA/SH SH prevention and response Consultant and Security Specialist) prior to the start of related TA activities.</p> <p>1. Each County shall provide a list of staff that have been through other World bank PforR to reduce the learning curve in the program prior to the start of related TA activities</p> <p>2. Prior to the start of related TA activities</p>	MoWSI

	Urban Support. Program (KUSP) to reduce the learning curve, and also apply the lessons learned from these programs to implement the K-WASH program. When necessary, the WSPs/counties will engage experts to offer consultancy services to support the Counties and WSPs on the various ESHS risk management aspects as need arise, including preparation of the Strategic Environmental and Social Assessment (SESA) and other instruments.		
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Prepare, consult upon, adopt, publicly disclose, and implement the Strategic Environmental and Social Assessment (SESA) for all proposed plans, policies, programs. In this regard, ensure the TORs for the SESA and other TA activities are in line with provisions of the ESF, and seek Bank clearance prior to procuring the consultancy services. The TA activities, in particular the SESA, will identify and highlight the downstream E&S risks and impacts, and recommend the preparation of appropriate E&S instruments to be developed for the management of downstream E&S risks and impacts.</p> <p>The SESA shall cover, but not be limited to:</p> <ul style="list-style-type: none"> • Environmental Management and Coordination Act (EMCA) guidelines on carrying out SESA • Overall program-wide Environmental and Social risks assessment. • Standardized management and mitigation procedures for handling environmental and social risks resulting from the program in the Government of Kenya context. • Gender-Based Violence (Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Prevention and Response Action Plan. • Procedures for screening of E&S risks and impacts of TA activities consistent with the ESSs and the exclusion list. The exclusion lists includes excluding sub-projects that are likely to result in: <ul style="list-style-type: none"> • Significant conversion or degradation of critical natural habitats or cultural heritage sites. • Air, water, or soil contamination leading to significant adverse impacts on the health or safety of individuals, communities, or ecosystems. • Workplace conditions that expose workers to significant health and personal safety risks. • Land acquisition and/or resettlement of a scale or nature that will have significant adverse impacts on affected people or the use of forced evictions. • Large-scale changes in land use or access to land and/or natural resources. 	Prepare the SESA and other TA activities ToRs and obtain Bank clearance for the same prior to procuring out their consultancy services	

	<ul style="list-style-type: none"> • Adverse E&S impacts covering large geographical areas, including transboundary impacts, or global impacts such as greenhouse gas (GHG) emissions. • Significant cumulative, induced, or indirect impacts. • Activities that involving the use of forced or child labour. • Significant adverse social impacts, marginalization of, and/ or may give rise to significant conflict within or among community or social groups. • Activities with high risk of GBV and SEA-SH. • Activities that would (a) adversely affect lands or rights of VMGs/SSAHUTLCs or other vulnerable and marginalized groups; b) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (c) cause the relocation of VMGs from land and natural resources that are subject to traditional ownership or under customary use or occupation; or (d) have significant impacts on cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected communities. • Investment on land for which clear ownership document is not available. • Activities that may involve physical/economic displacement of more than 200 PAPs. • Procedures to prepare program specific E&S risk management instruments, such as chance finds procedure, monitoring and reporting system, capacity Building and Training, Security Risk assessment and Security Management Plan, Vulnerable and Marginalized Groups Framework/Plans (VMGF/VMGP), Resettlement Policy Framework/ Resettlement Action Plan (RPF/RAP), Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM) among others, as applicable. <p>2. The SESA shall be prepared and implemented in a manner satisfactory to the Bank and shall be disclosed in on the MoWSI website</p> <p>3. Allocate adequate resources (financial and human) to ensure effective implementation of the instruments that have been prepared for the management of TA activities related risks, including this ESCP, LMP, SEP Sexual Exploitation and Abuse and Sexual Harassment (SH) Prevention and Response Plan, and if necessary, Security Management Plan (SMP)..</p>	<p>2. Initiate the preparation of any plans, policies, programs and strategies that may be recommended by the SESA, only after obtaining World bank concurrence and after the SESA has been formally adopted.</p> <p>3. The SESA shall be a living document and once adopted, MoWSI will implement the respective SESA provisions throughout Program the implementation period. The SESA shall</p>	
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		<p>be reviewed periodically to 1) ensure performance, and 2) determine whether any changes are needed to adapt to Project activities</p> <p>Implement the SEA/SH Prevention and Response Action Plan, the LMP, the SEP, the GRM, and, if necessary, the SMP, throughout the duration of the Program</p>	
1.3	<p>MANAGEMENT OF TA CONSULTANCIES</p> <p>Develop and implement procedures for managing consultants which include but not limited to:</p> <ul style="list-style-type: none"> • Ensuring that Terms of Reference (TORs) and other procurement-related documents (as appropriate) for TA, and TA contracts must provide details on Project E&S requirements • Minimum environmental and social requirements consistent with the provisions of the ESSs for inclusion in the procurement and contracting process including bidding documents for all TA assignments. • Monitor consultants' commitment and compliance with ESSs including commitment to the ESHS codes of conducts. • Providing grievance mechanisms for consultants and sub consultants, affected communities and other stakeholders. • Ensuring that consultants provide details on their oversight on environmental, social, health and safety (ESHS) performance monthly to the PIU. • Requiring consultants to develop a grievance mechanism to handle the concerns of their employees. • Requiring consultant to have a Labor Management Procedures that conforms to the requirements of the Program LMP and ESS2 • 	<p>Prior to the preparation of procurement documents.</p>	MoWSI
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that all the consultancies, studies, capacity building, training, and any other technical assistance activities under the Program are carried out in accordance with terms of reference (ToRs) acceptable to the Association, and consistent with the applicable ESF which will form part of the operational manual for the program. Thereafter ensure that the outputs of such activities comply with the terms of reference (ToRs). In this regard, ensure that the process includes adequate capacity of ESHS staff who will be involved in reviewing of all TA products. This will ensure adequate</p>	<p>Throughout Program implementation.</p>	MoWSI

	consideration of measures needed to manage ESHS risks in future programs/activities are consistent with ESF and ESS requirements		
1.5	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>TA may comprise or include review or updating of existing plans, policies or programs. Some of these plans, policies or programs may be subject to retroactive financing under the TA. These activities should be identified during program preparation, and due diligence must be conducted to identify any required actions to ensure that such activities meet the requirements of the ESSs. In some cases, an E&S audit may be needed, which normally would be completed during program preparation. In others, amendment to existing work contracts, or a corrective action plan may be needed. Accordingly, this action should reflect the due diligence requirements applicable to the retroactive financing and their timeframe</p>	As part of TA preparation, the SESA should incorporate the existing plans, programs and policies that are to be included for adjustment under the TA prior to procurement and implementation of TA concerning retroactive financing.	MoWSI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare, consult upon, adopt, publicly disclose and implement the Labor Management Procedures (LMP) for the TA activities, including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), training of workers on code of conduct (including relating to SEA and SH), security, forced labor, child labor, grievance arrangements for TA workers, and applicable requirements for TA consultancies. Labor-related risks associated with future downstream investments will be addressed in the ToRs of the relevant TA activities. ToRs for TA activities will be developed during implementation and prior reviewed by the Bank before procurement of consultancy services is launched.</p> <p>Technical Assistance outputs prepared in line with ESS 2 shall comply with requirements described in Section 1.4</p>	<p>Prepare, consult upon, adopt and publicly disclose the LMP, prior to Appraisal and thereafter implement the LMP throughout Program implementation.</p> <p>Develop a training needs assessment matrix, and training plan for each training areas prior to procurement and implementation of TA activities.</p> <p>Adopt the OHS measures prior to program commencement and thereafter implement them throughout Program implementation.</p>	<p>MoWSI</p> <p>MoWSI</p>
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Subject to SESA recommendations, include in all TA TORs for downstream activities, the requirements for the preparation of Labor Management Procedures (LMP), including measures for all groups of workers' OHS risks, workers Grievance Mechanism, as outlined</p>	OHS procedures shall be prepared within two months of effectiveness and shall be maintained throughout Program implementation	

	in section 1.2 above. OHS Measures shall be designed and implemented, in accordance with national law and the World Bank EHS guidelines and ESS 2.		
2.3	GRIEVANCE MECHANISM FOR PROGRAM WORKERS Establish and operate a grievance mechanism for the TA workers, that is equipped with a specific channel to handle and resolve SEA/SH complaints as per the GM described in in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging TA workers and thereafter maintain and operate it throughout the TA implementation timeframe.	MoWSI
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT As part of the SESA, ensure adequate consideration of measures needed to manage any natural resources EHS risks are in all TA activities consistent with ESS3 and the ESF Develop ToRs in procurement documents for TA requiring of the consultant to take into consideration ESS3 requirements with respect to development of future actions, policies, etc. that are the subject of the respective TA.	Prepare the SESA and other TA activities ToRs and obtain Bank clearance for the same prior to procuring out their consultancy services Publicly disclose the SESA after obtaining bank clearance and thereafter implement it throughout Program implementation.	MoWSI
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from TA activities, including, inter alia, community health risks associated with the behavior of, and relationships with, TA workers, and include measures to minimize the potential for community exposure to such risks including communicable diseases and COVID-19. Include mitigation measures in the LMP. ,	Same timeframe as for the adoption and implementation of the SESA and maintained throughout Program implementation	MoWSI
4.2	SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH) RISKS Adopt and implement a SEA/SH Action Plan to assess and manage the Program risks related to SEA and SH Adopt, publicly disclose and implement the Sexual Exploitation and Abuse and Sexual	SEA/SH Prevention and Response Action Plan shall be prepared within two months of effectiveness and shall be	MoWSI

	<p>Harassment (SEA/SH) Prevention and Response Plan to assess and manage sexual exploitation and abuse (SEA) / and sexual harassment (SH) risks associated with TA activities.</p> <p>Incorporate SEA/SH mitigation measures, as applicable, in subprogram ESMPs to be prepared under action 1.2 above</p>	<p>maintained throughout Program implementation</p> <p>Throughout program implementation</p>	
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess security risks of the TA activities, including pre-deployment of Security Risk Assessment (SRA) and ensure that downstream security risks associated with TA activities are addressed and an adoptive security management plan (SMP) is in place prior to any TA consultancy teams mobilizing to site.</p> <p>The MoWSI shall implement TA activities in communal and VMG areas in a culturally sensitive manner, avoiding any aggravation of local communal conflicts between different communities / individuals living in the same area.</p>	<p>Prepare one overall SMP to be cleared by the Bank prior to commencement of TA activities, and thereafter maintain throughout program implementation period</p>	MoWSI
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Prepare TORs for the TA and SESA studies in line with the provisions of ESS5 and ensure the E&S risks related to land acquisition, involuntary resettlement and impacts on livelihoods, are assessed as part of the SESA in line with this ESS5. The SESA shall make recommendations on how to manage potential risks associated with this ESS in future downstream projects, including the type of E&S instruments (RPF, RAP and LRP) to be prepared to manage those risks, and procedures for preparing these instruments.</p>	<p>As part of the preparation of procurement documents for SESA and other respective TA consultancy contracts</p>	MoWSI
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Develop ToRs in procurement documents for TA requiring of the consultant to take into consideration ESS6 requirements with respect to development of future actions, policies, etc.</p>	<p>As part of the preparation of procurement documents for SESA and other respective TA consultancy contracts</p>	MoWSI
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK (VMGF)</p> <p>Prepare TORs for all TA activities, including the SESA studies, in line with the provisions of ESS7. Also, ensure that E&S risks of proposed TA activities on VMGs are assessed, and mitigation measures recommended to ensure SESA outputs related to this ESS include measures for ensuring that future downstream subprograms are implemented in a</p>	<p>As part of the preparation of procurement documents for SESA and other respective TA consultancy Tor\Rs and contracts</p>	MoWSI

	<p>manner that provides VMGs with equitable access to program benefits, including the establishment of procedures for preparing a VMGF and VMGPs. Such recommendations should include a description of the proposed grievance mechanism for address complaints submitted by VMGs during implementation of any future downstream programs</p> <p>Through the SEP, provide adequate and culturally appropriate forms of meaningful consultations on content on the TA activities. As part of the SESA, undertake a social assessment to guide the Program on how to mainstream respective measures and suggest additional activities to address the specific issues associated with VMGs identified in the plans, programs and policies supported through the TA.</p>		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>The Program will finance type 2 and 3 TA activities that will not result into any civil works. In this context, it is not expected that it could directly or indirectly affect tangible or intangible cultural heritage or chance finds. However, the ToRs for the TA activities and Strategic Environmental and Social Assessment (SESA) studies shall be prepared in line with this ESS to ensure all risk of on Cultural Heritage and Chance finds are well assessed and provisions of ESS 8 adequately considered and complied to.</p>	As part of the preparation of procurement documents and ToRs for SESA and other respective TA consultancy contracts	MoWSI
ESS 9: FINANCIAL INTERMEDIARIES			
	Not Relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, adopt and implement a Stakeholder Engagement Plan (SEP) for the Program, consistent with ESS10, which shall include measures to, inter alia, provide TA stakeholders with timely, relevant, understandable and accessible information, and, as appropriate, consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. In addition, the provisions of the SEP outlined in section 1.2. shall be included into the respective activity ToRs for future downstream programs</p> <p>Update the SEP to include input from the Social Assessments and the SEA/SH action plan as needed upon finalization of the SESA.</p>	<p>Stakeholder Engagement Plan that will be disclosed prior to appraisal and shall be implemented throughout Program implementation.</p> <p>The SEP shall be updated within 12 months of program effectiveness and when/if necessary, along the program cycle.</p>	MoWSI
10.2	<p>PROGRAM GRIEVANCE MECHANISM</p> <p>Establish publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate the resolution of concerns and grievances in relation to the TA activities, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Program-affected parties, at no cost and without retribution, including</p>	The SEP, which outlines the GM for TA activities, shall be prepared and established prior to program appraisal. and thereafter, maintain and operate	MoWSI

	<p>concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. In addition, the provisions of the SEP outlined in section 1.2. shall be included into the respective activity ToRs for the downstream Program activities</p>	<p>the mechanism throughout Program implementation.</p> <p>The GM will be shared with stakeholders prior to start of TA activities</p>	
CAPACITY SUPPORT			
CS1	<p>As applicable to TA activities, capacity building activities, of which training is a part, may be required for MoWSI, PMU and PIU, WSPs staff on the practical implications and application of:</p> <ul style="list-style-type: none"> • Environment and Social Framework (ESF) • WBG EHS Guidelines • Labor Management Procedures (LMP) consisting of Code of Conduct for program workers in relevant languages and Labor Specific GRM, • Environmental and Social Management Plans (ESMPs) Occupational and Community Health and Safety including First Aid and road safety • Proper consideration of potential ESHS risks in TA activities, in particular feasibility studies and policy/strategy development, • Disability inclusion and inclusion of VMGs and other vulnerable groups • Management of risks related to involuntary resettlement/land acquisition • SEA/SH Prevention and Response Action Plan • Stakeholder Engagement Plan • Program wide GM • Security Management Plan • Any additional training based on the capacity needs assessment outlined in the ESSA report 	During program implementation	MoWSI, PMU, PIUs
CS2	<p>As applicable, the MoWSI PMU and the County PIUs will offer training to TA workers, beneficiaries, and oversight committees and :</p> <ul style="list-style-type: none"> • Environmental and social legal requirements; • Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency ESIA methodology and process; • Environmental and social impact determination (tools and methods); • Mitigation hierarchy (Avoid, Minimize, Restore & Offset (AMRO); • Stakeholder mapping and engagement; 	During program implementation	MoWSI, County Governments, Identified Ministries, Departments and Agencies

	<ul style="list-style-type: none"> • SESA, ESIA and ESMP preparation, monitoring and monitoring techniques; and • SEA/SH risk prevention (including worker codes of conduct) and response • Preparation and implementation of Security Management Plan Proper consideration of potential ESHS risks in Program TA activities, in particular feasibility studies and policy/strategy development, • Disability, VMG and other vulnerable groups inclusion training • Workers Grievance Management • Labor management procedures 		
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