



# Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 18-Jul-2019 | Report No: PIDISDSA26581



**BASIC INFORMATION**

**A. Basic Project Data**

Country Kenya	Project ID P168142	Project Name Kenya GPE Primary Education Development Project Additional Financing	Parent Project ID (if any) P146797
Parent Project Name Kenya GPE Primary Education Development Project	Region AFRICA	Estimated Appraisal Date	Estimated Board Date 13-Dec-2019
Practice Area (Lead) Education	Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency Ministry of Education

Proposed Development Objective(s) Parent

The project development objectives are to improve early grade mathematics competency and to strengthen management systems at school and national levels.

Components

- Improving early grade mathematics competencies
- Strengthening school management and accountability
- Strengthening capacity for evidence-based policy development at national level
- Project coordination, monitoring and evaluation

**PROJECT FINANCING DATA (US\$, Millions)**

**SUMMARY**

<b>Total Project Cost</b>	9.48
<b>Total Financing</b>	9.48
<b>of which IBRD/IDA</b>	0.00
<b>Financing Gap</b>	0.00

**DETAILS**

**Non-World Bank Group Financing**



Trust Funds	9.48
Education for All - Fast Track Initiative	9.48

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

**B. Introduction and Context**

Country Context, Sectoral and Institutional Context

1. Kenya’s long-term development goals are set out in the country’s Vision 2030, which aims to transform Kenya into a newly industrializing, middle-income country providing a high quality of life to all its citizens by 2030 in a clean and secure environment. The social pillar of Vision 2030 has ‘investing in the people of Kenya’ at its core, along with a commitment to addressing issues of access, equity, quality, and relevance of social service delivery. Considering that the government targets an increase in the country’s Human Development Index from 0.45 in 2005 to 0.7 in 2030, it places great emphasis on education as the primary means of economic development, social mobility, and national cohesion.
2. Kenya spends significantly more than most of its peers on education. Spending on education and training by all stakeholders expanded from about KSH325.7 billion in 2010 to about KSH 641 billion in 2016/7, representing 8.9 per cent of GDP in 2016/17. Table 1 shows sources of Education Financing. Notably, household spending in 2016/17 was estimated at KSH245.8 billion, representing 38.3 per cent of total education expenditure. Households finance indirect costs such as uniforms, transportation, accommodation and meals. This could undermine sustainable financing of education given Kenya’s poverty rate of 36.1 per cent which has implications for household affordability of direct education costs.

**Table 1: Sources of Education Financing (Ksh Million)**



	2010/11	2013/14	2014/15	2015/16	2016/17	Percentage share (2016/17)	Change 2016/17 over 2010/11
Central Government	188,584.4	264,901.0	290,691.9	307,743.5	339,117.8	52.9	79.8
Constituency Development Fund	4,885.6	5,636.6	5,862.0	6,096.5	6,340.4	1.0	29.8
County Governments	1,954.2	1,228.7	19,952.4	21,685.1	24,609.4	3.8	1159.3
Household (Parents)	109,111.8	196,354.1	213,995.0	230,424.0	245,869.3	38.3	125.3
NGOs and religious bodies	3,257.1	3,522.8	3,663.8	3,810.3	3,962.7	0.6	21.7
Private sector and companies	97.7	105.7	109.9	114.3	118.9	0.02	21.7
External loans and grants	2,377.7	1,499.0	1,500.8	1,500.8	2,996.0	0.5	26.0
Internally Generated Funds	15,308.2	16,557.4	17,219.7	17,908.5	18,624.8	2.9	21.7
Total Education Financing	325,707.0	489,805.2	552,995.5	589,283.0	641,639.3	100	97.0

3. While Kenya has made good progress in primary education completion and transition to secondary education compared to many other Sub-Saharan African (SSA) countries, the rapid expansion of the education system is increasingly affecting Kenya's capacity to maintain and improve the quality of education. Tables 2 and 3 shows trends in preschool and primary school enrollment. Kenya scores higher in the Human Capital Index (HCI) than the average for its region and income group. Children in Kenya can expect to complete 10.7 years of preprimary, primary and secondary school by age 18. However, when years of schooling are adjusted for quality of learning, this is only equivalent to 7.8 years: a learning gap of 2.9 year. Introduction of Free Primary Education (FPE) has successfully encouraged students from poorer socio-economic groups to enroll in primary schools, leading to increased net enrollment in public schools. Gender parity index (GPI) is close: pre-primary GPI is 0.96; primary GPI is 0.97; and secondary, it is 0.95.

**Table 2: Enrollment Trends in Pre-School for the period 2013-2017.**



	2013	2014	2015	2016	2017
Males	1,411,309	1,476,383	1,607,353	1,634,194	1,681,530
Females	1,454,039	1,543,482	1,560,502	1,565,647	1,612,283
<b>Total</b>	<b>2,865,348</b>	<b>3,019,865</b>	<b>3,167,855</b>	<b>3,199,841</b>	<b>3,293,813</b>
GPI	1.03	1.05	0.97	0.96	0.96
Gross Enrolment Rate (GER), %	71.6	73.6	76.4	76.6	77.1
Net Enrolment Rate (NER), %	66.9	70.4	74.6	74.9	76.9
Number of ECDE Centers	40,145	40,211	40,775	41,248	41,779
Number of ECDE Trained Teachers	83,814	88,154	92,906	97,717	106,938
Number of ECDE Untrained Teachers	17,248	16,630	14,281	13,102	11,338
Total No. of Teachers	101,062	104,784	107,187	110,819	118,276
Number of ECDE Training Colleges	131	140	143	147	276

Table 3: Enrollment Trends in Primary Sub-Sector for the period 2013-2017.

	2013	2014	2015	2016	2017
Males (thousands)	5,019.7	5,052.5	5,127.9	5,214.5	5,293.9
Females(thousands)	4,837.9	4,898.5	4,962.9	5,054.9	5,109.8
Total Primary (thousands)	9,857.6	9,950.8	10,090.9	10,280.1	10,403.7
GPI	0.96	0.97	0.97	0.97	0.97
Gross Enrolment Rate (GER), %	105.0	103.5	103.6	104.2	104.4
Net Enrolment Rate (NER), %	88.1	88.2	88.4	89.2	91.2
Primary Completion Rate, %	80.0	79.3	82.7	83.5	83.6
Primary secondary transition rate, %	74.1	76.1	81.9	81.3	81.8
Number of public primary schools	21,205	21,718	22,414	22,939	23,584
Number of private primary schools	6,821	7,742	8,919	10,263	11,858
Total number of schools	28,026	29,460	31,333	33,202	35,442
Average school size	352	338	322	310	294

- The increase in access has affected education quality, which is reflected by the low competencies in high order skills in early grade literacy and mathematics, and declining learning achievement at the end of the primary cycle. Figure 1 and 2 shows a high percentage of grade 3 pupils, 95.5 percent, is not attaining high order skills in mathematics, while 85.1 percent and 90.5 percent did not attain Level 1 competencies in English and Kiswahili respectively. In addition, wide regional disparities persist in learning achievement.

Figure 1: Learning outcomes in early grade mathematics at grade 3 (NASMLA , 2016)



Level	Description of Competency	% of pupils
Level 1	Applies single step addition or subtraction operations (e.g. add numbers without carrying over, subtract without borrowing). Counts in whole numbers.	83.1
Level 2	Applies a two-step addition or subtraction operation involving carrying over and borrowing. Applies simple multiplication operations involving multiples of 10. Recognizes simple fractions. Divides whole numbers. Identifies lines and patterns.	71.1
Level 3	Translates information presented in a sentence into one arithmetic operation. Interprets place value of whole numbers up to thousands. Adds and subtracts simple fractions. Interprets simple common everyday units of measurement such as days, weeks, litres, metres and shillings.	36.1
Level 4	Translates information presented in sentences into simple arithmetic operations. Uses multiple arithmetic operations (in the correct order) on whole numbers. <sup>5</sup>	4.5

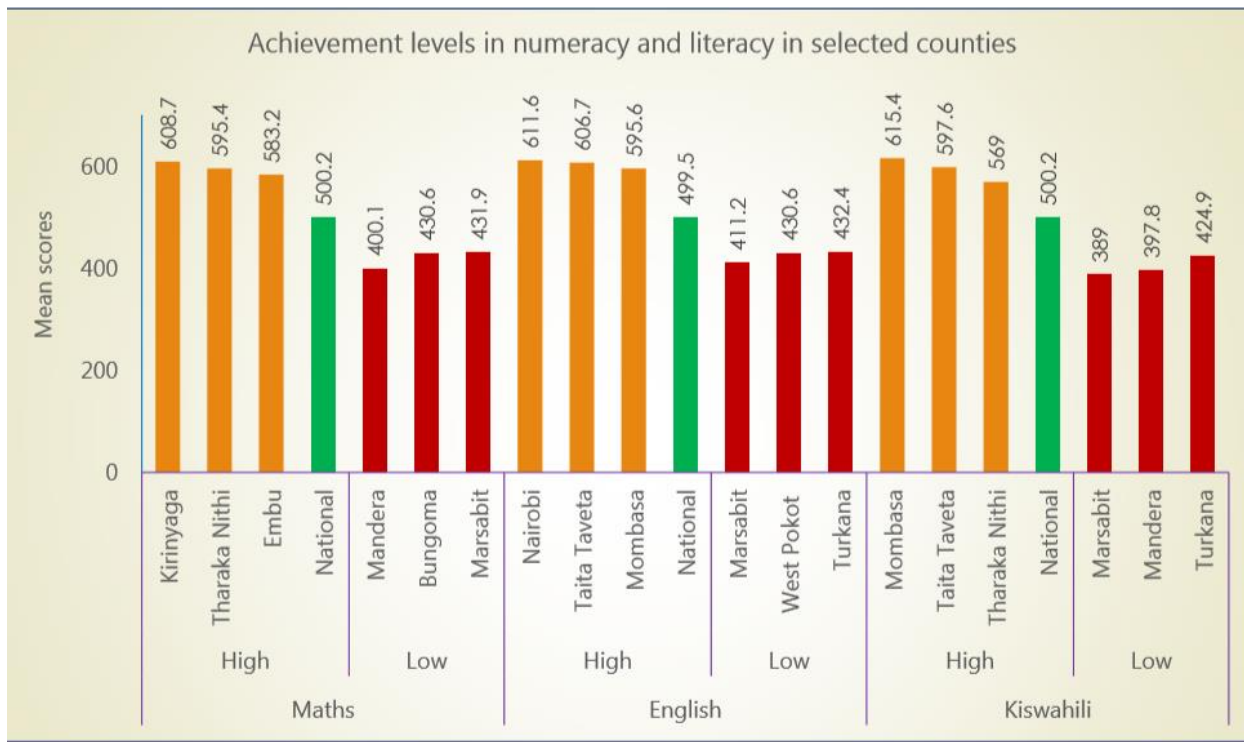
Figure 2: Learning outcomes in early grade literacy at grade 3 (NASMLA, 2016)

Level	Competency Description	English % of learners	Kiswahili % of learners
Level 1	Pre-reading: Matches words and pictures involving concrete concepts and everyday objects. Arranges words in alphabetical order.	14.9	10.5
Level 2	Emergent reading: Spells correctly simple everyday words and recognizes missing letters in such words. Uses familiar words to complete simple everyday sentences.	60.1	63.1
Level 3	Basic reading: Uses correct punctuation in simple sentences. Interprets meaning by matching words and phrases. Identifies the main theme of a picture.	38.1	69.2
Level 4	Reading for meaning: Links and interprets information located in various parts of a short passage. Infers meaning from short passages. Understands and Interprets meaning of a picture and writes short sentences to describe the theme.	28.6	47.1



- 5. Wide regional disparities persist regarding learning outcomes, access to education based on gender, location and region. Figure 3 shows learning achievement in the arid and semi-arid counties are below the national averages. Household surveys show that children from non-poor households and from urban areas have higher chances of being in primary school and transiting from primary to secondary. For example, NER varies from 42 percent in Garissa County to close to 96.8 percent in Nyeri county. Primary NER is about 90 percent for children from top 20 percent quintile relative to 75 percent in the bottom 20 percent quintile. Furthermore, close to 9 out of 10 children in urban areas are likely to be enrolled in grade 6 compared to 7 out of 10 children in rural areas. Teenage pregnancy amongst school-going girls is on an upward trend-one in every five girls between 15-19 years has begun childbearing. The girls are adversely affected by other gender related issues ranging from female genital mutilation, early marriages, traditional practices that have preference for the boy's than the girl's education and gender-based labor division. The SEQIP project is financing a study on students' violence and abuse, which will inform interventions aimed to prevent and redress gender based and students' violence.

Figure 3: Learning outcomes in early grade literacy and mathematics in selected Counties (NASMLA, 2016)



- 6. In response to the challenges on education quality, the Government has developed a new Competence Based Curriculum (CBC) that emphasizes active learning and critical thinking. The CBC will be implemented through a new education structure replacing the 8-4-4 system, which has been widely criticized for being heavily loaded in terms of content and too exam oriented, thereby putting undue pressure on learners. The success of this reform will require effective teacher preparation, alignment of learning materials and teaching methodologies developed under ongoing initiatives to improve foundational literacy and numeracy, with the CBC as well as a clear assessment framework for the core competencies that students are expected to acquire. The Kenya Institute of Curriculum Development (KICD), which is spearheading the reform, will need the Teachers Service Commission (TSC)'s support to train teachers in active learning methods as well as KNEC's involvement to



develop the necessary assessments. This underscores the need for the concerned education agencies/systems to be aligned to the goal of learning and to be coherent with one.

7. Curriculum reform, while necessary, will not be enough to bring about improved learning unless there is strengthened governance and accountability at the school level. The Boards of Management (BoMs) and the Parents Teachers Associations (PTA) of primary and secondary schools, while serving as the local accountability bodies, have inadequate capacity to monitor school administration for prudent resource utilization, teacher effort and student learning. Community engagement, identified as a very important factor for the success of school improvement planning, is also lacking due to most BoMs and PTA not convening open meetings to disclose school finances and performance on learning outcomes. In respect of school finances, the management of student capitation grants, which are the main resources for a school, suffers from the absence of clear guidelines and operational procedures for the use and accounting of these funds.
8. Data and information continue to be critical in the development of the education sector. The existing data management practices in the sector do not support evidence-based, timely, reliable and correct data. Institutions operate in silos and use different data systems that do not talk to each other, leading to mismatch of information and data sets. Currently, there are overlapping school level data maintained by the TSC, KNEC and MOE. Each of these institutions maintains separate data sets with separate school codes for the same school, causing challenges in harmonization of the data sets. A recent development is the launch of an online National Education Management Information (NEMIS) system. The NEMIS platform has been developed and is in the operationalization phase to support digital registration of all learners. The initiative was conceptualized to manage the inconsistencies of Kenya's large and complex education sector that serves millions of learners in about 84,000 learning institutions. A vast amount of information will be collected from NEMIS, which includes but is not limited to names of learners, teachers, institutions, as well as learners' ages, parents' information, and household details. This information will be used to keep track of learners' performance and determining core factors that undermine their progress.
9. Teacher shortage is estimated at about 100,000 mainly due to budget constraints at the macro level, and inadequate policies and guidelines for teacher management and deployment. In 2018, the Teachers Service Commission (TSC) developed a teacher shortage strategy with an aim to mitigate the impact of teacher shortage at the school level. The TSC has proposed, among other strategies, the need to leverage on technology; formalize mechanisms for teacher 'sharing' among schools within proximity while considering workloads; and a review of the staffing norms. TSC is also undertaking teacher management reforms, which have been prompted by teacher absenteeism; inadequate mastery of subject content knowledge and pedagogic skills; and the NASMLA findings, which show low learning outcomes. In January 2016, the TSC rolled out Performance Contracting (PC) for head teachers and the Teacher Performance Appraisal and Development (TPAD) process for teachers with an aim to enhance effective curriculum delivery at the classroom level; improve efficiency in teacher management; and enhance teacher professionalism while supporting continuous teacher professional development (TPD). An independent evaluation of the PC and TPAD will be conducted to assess effectiveness of these interventions, and to inform improvements.
10. Kenya's National Education Sector Strategic Plan (NESSP 2018-2022) has been developed to guide the Government's investment priorities in the sector. The forthcoming NESSP lays out key strategic objectives to enhance: (i) access and equity; (ii) quality and relevance through competence-based education, training and research; (iii) governance and accountability; and (iv) relevance and capacities for Science, Technology and Innovation (STI). In respect of (i), the NESSP aims to address regional disparities in access, and improvements in





learning outcomes, specifically at the basic education level. Strengthening of foundational numeracy skills is highlighted as a critical input to (iv). As with NESPP 2013-2018, the Education Development Partner Coordination Group (EDPCG) will support the MoE in implementing the new NESSP with special attention on encouraging strong government-led donor coordination; promoting coordinated policy dialogue; providing technical support on strategic issues in education; and ensuring that donor support to education is provided to the Government in a predictable and harmonized manner.

11. New GPE funding will continue the support provided through the PRIEDE, for Kenya to address key challenges in primary education and strengthen the country's relationship with development partners. Extensive consultations with, and participation of the EDPCG in preparation of the proposed AF, helped to ensure that the design build on existing government and donor-supported programs and can be implemented in a coordinated manner.

#### *Relationship with Country Partnership Strategy*

12. **The parent project and the proposed AF are aligned with the Kenya Country Partnership Strategy (CPS).** In responding to a key domain in the Kenya Country Partnership Strategy (CPS, 2014–2018)<sup>1</sup> that aims at building human capital through education and training, the GPE financed activities will contribute to helping the people of Kenya realize their full potential and to live in dignity, reduce inequality and social exclusion to develop shared prosperity. The AF's first focus area, which is to develop high order foundational numeracy skills, will enable students to continue successfully on their education path to be competitive in the labor market and gain employment. The ultimate outcome is improved livelihoods especially for the disadvantaged groups of the population. Its second focus area on strengthening governance and management systems at the national and school levels, is fully consistent with the CPS priorities on linking social accountability with enhanced development outcomes.

### **C. Proposed Development Objective(s)**

#### Original PDO

The project development objectives are to improve early grade mathematics competency and to strengthen management systems at school and national levels.

#### Current PDO

The project development objectives are to improve early grade mathematics competency and to strengthen management systems at school and national levels.

#### Components

#### **Component 1: Improvement of early grade mathematics competency (US\$3.0 million)**

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<sup>1</sup> The Kenya Performance and Learning Review (PLR)<sup>8</sup> of the CPS concluded that strategic objectives and design of the CPS remain valid, and extended the CPS by two years, to FY 2020.



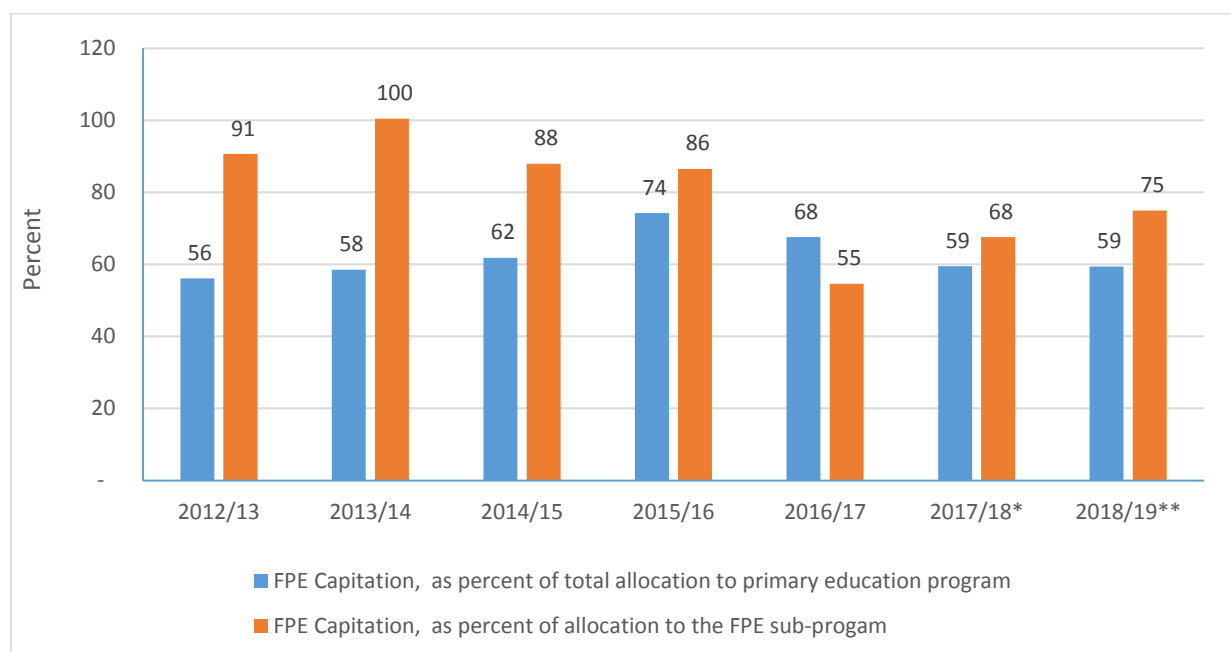
1. A new subcomponent (subcomponent 1.6) to support national rollout of an integrated EGM and EYE CBC training program will be added to component 1. The Government has allocated US\$5 million for the training of teachers and concerned county education staff that will be carried out in 2019/2020 under the national rollout of the early years CBC. Details on this rollout are being developed by the Government. It is expected that similar budgetary allocations will be made in the next few years to ensure that primary school teachers nationwide are adequately equipped to deliver the early years CBC. As part of the curriculum reform process, EGM textbooks and teaching methodologies developed under the parent project, were aligned with the early years CBC and adopted as the core CBC textbook.
2. An initial assessment of the proposed national rollout for the early years CBC raises some important concerns, especially in the application of the design and processes. The concerns include: (ii) lack of a structured pedagogy approach for all the subjects covered under the CBC framework; (iii) mechanisms for continuous teacher support; (iv) relevant teaching and learning support materials for some humanities and social science subjects; and (v) assessment on the quality of training and teacher support. EGM implementation experience under the PRIEDE provides valuable lessons to address these concerns. Specifically, the plan for the national rollout should ensure that teacher training and support is aligned with teaching/learning support materials and assessment. As such, the crucial next steps will be to: (i) incorporate the revised EGM methodologies into the early years CBC teacher training and support program; (ii) develop a detailed and costed implementation plan for implementing the integrated teacher training and support program for the EYE CBC; and (iii) roll out the implementation plan including progress monitoring. Subcomponent 1.6 will support the Government to carry out (i), (ii) and (iii) through DLI-based financing with two Disbursement-Linked Results (DLRs).
3. The DLI, which is scaling-up of EGM methodologies through national rollout of the EYE CBC, is critical for ensuring that all public primary school teachers, not just those in the PRIEDE schools, have access to effective materials and pedagogies for delivering foundational numeracy skills. Scaling-up will also enable the lessons learned during implementation of the parent project, to be used for informing the development of a school-based teacher support system for effective delivery of EGM nationally. This DLI contributes to not only improved learning outcomes but also NESSP equity priorities, given that low performing schools, the majority of which are in the lagging regions, will now benefit from the integrated teacher training and school-based teacher support program. The DLI and associated DLRs are described in the matrix below.

<b>DLI</b>	<b>DLR 1 (September -November 2019)</b>	<b>DLR 2 (December 2019 – September 2020)</b>	<b>Verification Method</b>
Scaling-up of EGM methodologies through national rollout of early years CBC	Costed implementation plan developed and approved by MoE PS and TSC CEO for national rollout of the early years CBC incorporating training on EGM methodologies  (US\$2 million, TBC)	At least 70 percent of primary school teachers trained in early years CBC with integrated EGM methodologies  (US\$1 million, TBC)	Proposed: Internal Audit at the National Treasury  (GoK resources will be used for verification)

**Component 2: Strengthening School Management and Accountability (US\$5.0 million)**

4. A new subcomponent (subcomponent 2.5) will be added to component 2 to integrate good school management practices and accountability mechanisms drawn from the SIP, into the nationwide student capitation grant scheme. Since 2003, the GoK has been implementing the Free Primary Education (FPE) Policy. The current annual capitation grant (CG) per learner is KES. 1,420 (\$14), an increase from KES. 1,020 (\$10) in 2013. Over the last five years (2014/15 -2018/19), the GoK has been spending close to KES. 12.6 billion annually on FPE capitation. Figure 5 and Table XX shows that that FPE capitation grants constitute the largest component of spending on primary education program. For instance, on average, 62 percent of spending on the primary education program over the last five financial years went to the FPE capitation grants. Further, the grants constituted close to 80 percent of the total spending on FPE sub-program.

Figure 5: FPE Capitation as a share of primary education program and FPE sub-program.



Source: Ministry of Education/Treasury; \* Approved Estimates, \*\* Estimates

Table 8: FPE Capitation Allocations to Learners

Table 8: FPE Capitation Allocations to Learners

FPE Capitation per child(Kshs)	Total Enrollments (in millions)	Total Capitation to Learners (Kshs, billions)	FPE to Primary Education Program (Kshs, billions)	Total Allocation to primary education program	FPE Capitation, as % of total allocation to primary education program	Total Allocation to Free Primary Education sub-program (Kshs, billions)	FPE Capitation, as % of allocation to the FPE sub-program
1,020	8.69	8.91	15.9	56.1	9.8	90.6	



2013/14	1,020	8.83	9.01	15.4	58.5	9.0	100
2014/15	1,320	8.88	12.48	20.2	61.8	14.2	87.9
2015/16	1,420	8.90	12.64	17.0	74.2	14.6	86.5
2016/17	1,420	8.88	12.58	18.6	67.5	23.0	54.6
2017/18*	1,420	8.98	12.75	21.4	59.5	18.9	67.5
2018/19*	1,420	9.00	12.78	21.5	59.4	17.1	75.0

Source: Ministry of Education; \*Approved Estimates

5. The DLI, which is improved accountability for the utilization of student capitation grants in primary schools, is therefore the critical link in the results chain that starts from application of good practices from the SIP to the management of student capitation grants by schools nationwide. Achievement of the DLI will contribute to improved efficiency in the management and accountability of capitation grants and contribute to improved learning outcomes, given that additional resources are likely to be channeled to improving the school learning environment because of more effective and accountable use of the capitation grant. In summary, this DLI contributes to a more conducive learning environment in schools as well as the NESSP efficiency priority. Implementation of DLR 2 in the matrix below will include monitoring and support at the school level by the county-based project teams (existing MoE and TSC staff). The project will leverage on technology to disseminate the guidelines and simplified manuals, and to collect feedback regarding the quality of training from headteachers and school committee members. The two DLRs under this DLI are outlined in the matrix below.

DLI	DLR 1 (September 2019- February 2020)	DLR 2 (March 2020 – June 2020)	Verification Method
Improved accountability for utilizing student capitation grants in primary schools	New policy guidelines and related simplified operations manual developed and approved  (US\$3 million, TBC)	At least 70 percent of primary school head teachers and school management committees trained in new guidelines and manual  (US\$2 million, TBC)	Internal Audit at the National Treasury  (GoK resources will be used for verification)

(GoK resources will be used for verification)

### Component 3: Strengthening Capacity for Evidence-based Policy Development at National Level (US\$ 0.7 million)

6. A new activity is added to subcomponent 3.1 (Strengthening data/EMIS in primary education) to reflect the shift in government focus from the old EMIS system to NEMIS, which uses an online platform for data collection. The NEMIS data, which is expected to be accurate and reliable, will be used to produce a statistical booklet on secondary education for FY 2018/19. Leveraging this new activity, the AF will seek to collect granular level data on the number of girls re-entering basic education from early marriages and teenage pregnancies. Data shows about 13,000 girls drop out of school each year in Kenya due to pregnancy. Financing for the new activity, which is compilation, publication and dissemination of this booklet, estimated to cost US\$ 0.2 million (TBC), will be added to the original allocation for this subcomponent.



7. Under subcomponent 3.2 (Monitoring learning achievement), there will be a new activity on capacity building of the KNEC in the skill domains flagged in a technical experts' review of the national assessment framework and instruments. Specifically, staff of the KNEC/NAC psychometric department will be trained in specific technical skills to enable them to improve learning assessment instruments, and to provide more informed advice to the MoE on Kenya's participation in international assessments.
8. A detailed description of the new activities under this component, including the cost breakdown, will be discussed in the updated project operational manual.

#### **Component 4: Project Coordination, Communication, and Monitoring and Evaluation (US\$1.0 million)**

9. Financing will be provided to sustain the operations of the PCU in the areas of project coordination, safeguards, communication, and M&E. The estimated cost of this activity is US\$0.5 million (TBC). Under M&E, a survey on grade 2 students' basic mathematical competency will be carried out at the end of the AF period to assess progress towards the performance target of an 84.1 percent improvement over baseline, a target which was not achieved by parent project's closure.
10. In addition to enhanced M&E, two key studies contributing to education sector policy development will be supported under this component. The first study will be an independent, third-party evaluation of the TPAD (estimated to cost US\$0.2 million) to provide the Government with thorough feedback on this system to inform further improvements. The second study will be on the feasibility of establishing an equalization fund for education to address the problem of under-resourced schools in lagging regions. Government's student's capitation is pegged on enrollment, which poses immense operational challenges for schools with low enrollment, particularly in the arid and semi-arid regions. This study, estimated to cost about US\$0.3 million, will entail an extensive review of regional and international experience on equalization funds to draw insights for developing an approach that fits Kenya's country context.
11. The cost breakdown for the final EGM survey two studies, together with a broad description of their objectives and scope, will be given in the updated operational manual.

#### Key Results

#### **D. Project Description**

1. **The proposed AF is consistent with the original PDO.** There are no substantial outstanding or unresolved safeguards or fiduciary issues in the parent project. The additional investments would not require any changes to the social and environmental category, nor would they trigger any new safeguard policies. The AF operation will retain the core components of the parent project, the support for which will be provided through an IPF with DLIs financing modality.
2. **The theory of change (TOC) underpinning the parent project remains relevant to the AF.** The first prong of the results chain attributing more effective teaching of EGM to improved learning outcomes has been validated by the project's end-line assessment on the gains made in basic mathematics competency of Standard 2 students. The second prong of the results chain is based on the premise that school improvement planning, better resourcing of schools through grants, and regular collection of education statistics and student learning achievement data, will lead to schools having a more conducive environment for learning. A robust external evaluation of the SIP intervention indicated that the participatory process led



to improved school management and accountability, which is essential for ensuring that resources are used for improving learning conditions in the targeted schools. The Government's efforts to develop the NEMIS and NASMLA are driven by the need for improved availability of data and evidence on school/student performance to guide sector policy development. The rigor of the ESA underpinning NESSP 2018-2022, is attributed to the collection of more reliable education statistics and learning achievement data through these emerging systems.

- 3. The proposed AF will promote changes in policy/practices to reinforce the impact of the inputs and outputs of the parent project on learning outcomes per the validated TOC.** Incentives for bringing about these changes will be provided through results-based financing to scale-up activities under components 1 and 2. More than 80 percent of the AF will be used for this purpose, which complies with the GPE requirement that at least 30 percent of new grant allocations be utilized as a Variable Tranche (VT) to finance results. The application of VT resources to components 1 and 2 will ensure that ESP priorities to improve efficiency, equity and learning outcomes are addressed. The remaining AF resources will be used for providing IPF support to refocus and/or enhance activities under components 3 and 4 aimed at strengthening data/EMIS, project management and overall M&E. Accordingly, the changes include: (a) revision of the Results Framework to target larger beneficiary numbers and incorporate new intermediate results indicators; (b) adding a DLI matrix for components 1 and 2 to describe the results and disbursement mechanism; and (c) extending the closing date of the overall project.

## E. Implementation

### Institutional and Implementation Arrangements

- 1. The implementation approach for the AF will mainly be consistent with the parent project.** Overall project management remains with the MoE. The TSC will have an important role in ensuring that the AF activities of component 1 are closely coordinated with the EYE CBC roll out across MoE, KICD, and KNEC to achieve the results that re linked to disbursement of grant proceeds. Implementation arrangements for Component 1, will therefore be adjusted to align to the forthcoming Government's structure for the roll of the early years CBC regarding school-based teacher support. However, considering the needed improvements in achievement of the EGM competencies target, the current EGM technical team will continue to support EGM activities within the overall CBC coordination framework by the TSC. Tentative plans show that the TSC will receive the proposed US\$5 million allocated for teacher support for early years CBC, requiring it to coordinate with the KICD and KNEC. Implementation arrangements for Component 1 will be further defined at appraisal. In addition, to ensure ownership and utilization of the TPAD evaluation study, TSC will be expected to handle procurement of consultancy services for this study and provide oversight. The MoE will implement component 2, which, like



component 1, will be supported through results-based financing. In respect of component 3, the MoE will be responsible for activities related to the strengthening of data/EMIS and policy development, while KNEC will be responsible for monitoring learning achievement activities. At the apex level, the Project Steering Committee (PSC) for the parent project will continue to oversee the progress and effectiveness of AF interventions, approve work plans and budgets and provide policy direction.<sup>2</sup> The PSC will meet at least once in a quarter or more frequently as required. The current project operational manual (POM) will be updated before appraisal, to reflect changes in implementation arrangements under the AF. The MoE will also prepare before appraisal, an 18 months workplan and procurement plan for the AF.

- 2. The dedicated PCU established by the MoE under the parent project will be maintained throughout the extended project implementation period.** Full-time personnel in the PCU will be responsible for the day-to-day project coordination, safeguards and fiduciary issues including implementation of social accountability and transparency mechanisms. Various technical committees will be constituted with specific terms of reference that will be included in an updated POM reflecting AF-supported activities. The PCU will procure consultancy specialist services to help in M&E, NEMIS, communications and other areas as needed.

#### **F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

The project will be implemented across Kenya and will particularly address the needs of the Vulnerable and Marginalized areas of the Country.

#### **G. Environmental and Social Safeguards Specialists on the Team**

Raymond Simon Maina Kirwa, Social Specialist  
Ben Okindo Ayako Miranga, Environmental Specialist

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<sup>2</sup> The PSC is chaired by the Cabinet Secretary and coordinated by the MoE Principal Secretary. Members comprise the TSC, KNEC and KICD Chief Executives, and key officials from National Treasury, Development Partners, Civil Society, among others.





**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The main environmental and social risks and impacts associated with the parent project are related to the e-waste management, minor construction and rehabilitation activities. The Additional Finance (AF) will not support any civil works, procurement of electronic equipment or activities that may result in new environmental and social risks and impacts.</p> <p>The project is assigned the Environment Assessment Category B, based on potential social impacts related to the Vulnerable and Marginalized groups (VMGs), and potential risks on GBV and SEA. The existing Environmental and Social Management Framework (ESMF) is applicable to the AF project, with minor revisions to reflect the scale up activities, the GRM, capacity building and training. The ESMF has been revised accordingly and was redisclosed in-country on May 6, 2019 and on the World Bank external website on May 8, 2019.</p> <p>The purpose of the ESMF is to provide guidance on measures and procedures to facilitate environmental and social risk management in the project, including the adaptive GRM, training and capacity building measures to enhance environmental and social performance for the project.</p>
Performance Standards for Private Sector Activities OP/BP 4.03	No	The policy is not triggered as no private sector activities are financed under the AF project
Natural Habitats OP/BP 4.04	No	The policy is not triggered because the AF project will not finance any activities that will result in direct or indirect impacts on natural habitats.
Forests OP/BP 4.36	No	The policy is not triggered because the AF project will not finance any activities that would be deemed to bring about conversion of natural forests or changes in management and protection or utilization of natural forests or plantations.
Pest Management OP 4.09	No	The policy is not triggered as the AF project will not finance any activities that will involve use of pesticides or pest management.





Physical Cultural Resources OP/BP 4.11	No	The policy is not triggered because the AF project will not finance activities that will affect or involve physical cultural resources.
Indigenous Peoples OP/BP 4.10	Yes	The Additional Financing scale up activities will be implemented nationally including areas where Indigenous Peoples Groups have collective attachments to, hence triggering OP/BP 4.10. The Vulnerable and Marginalized Groups Framework (VMGF) prepared for the parent project has been updated to reflect the AF scale-up activities. The purpose of the VMGF is to provide guidance on identifying potential negative impacts to the VMGs and social risks related to social conflicts resulting from biased targeting and selection of project beneficiaries and Gender Based Violence, Sexual Exploitation and Abuse (GBV-SEA) and mitigating the risks and impacts. The VMGF has been updated and includes the provision of the free prior informed consultations and a grievance redress mechanism. No major or significant adverse impacts are envisaged as a result of the project on the culture, traditions and social dynamics of the communities categorized as vulnerable and marginalized.
Involuntary Resettlement OP/BP 4.12	No	The policy is not triggered as the project will not involve land acquisition leading to involuntary resettlement or restrictions of access to resources and livelihoods.
Safety of Dams OP/BP 4.37	No	The policy is not triggered because the project will not finance any activities that include dams or irrigation structures.
Projects on International Waterways OP/BP 7.50	No	The policy is not triggered because the AF project will not finance any activities that involve transboundary rivers, lakes, body of waters or water with two or more stakeholders that calls for establishment of agreements, arrangements or any multilateral framework.
Projects in Disputed Areas OP/BP 7.60	No	The policy is not triggered because the AF project will not finance activities in disputed areas.



## KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

### A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project is assigned Environment Assessment Category B as the parent project, this is because of the likely negative impacts on the VMGs and potential risks on GBV and SEA. The main environmental and social risks and impacts associated with the parent project are related to the e-waste management, construction and rehabilitation of minor infrastructure facilities in the participating schools. The AF will not finance any civil works or procure additional electronic equipments. The safeguards policies Environmental Assessment (OP/BP 4.01) and Indigenous Peoples (OP/BP 4.10) were triggered under the parent project, will remain triggered for this Additional Finance (AF) project. No new safeguards policies will be triggered for the AF.

Environment: The proposed AF will not finance any civil works or procurement of electronic equipments as in the parent project and thus, no environmental risks and impacts are anticipated during implementation. The AF activities include: (i) new sub-component (1.6) to support roll out of an integrated EGM and early years CBC training program ; (ii) new subcomponent (2.5) will be added to component 2 to integrate good school management practices and accountability mechanisms drawn from the SIP; (iii) A new activity is added to subcomponent 3.1 (Strengthening data/EMIS in primary education) to reflect the shift in government focus from the old EMIS system to NEMIS, which uses an online platform for data collection; and (iv) Under subcomponent 3.2 (Monitoring learning achievement), there will be capacity building of the KNEC/NAC psychometric department on technical skills to enable them to improve learning assessment instruments, and to provide more informed advice to the MoE on Kenya's participation in international assessments.

The existing Environmental and Social Management Framework (ESMF) is applicable to the AF operation, it has been updated to reflect the scale up activities under the AF. The ESMF was prepared to provide guidance , mitigation measures and procedures for potential impacts that may likely to arise during the construction or rehabilitation of sanitation facilities and procurement of electronic equipment. The ESMF has been revised accordingly and was re-disclosed in-country on May 6, 2019 and on the World Bank external website on May 8, 2019. The Project Coordination Unit (PCU) will continue to monitor the implementation of plans agreed under the parent project.

Social: The VMGF is applicable to the AF operation with minor revisions to reflect the scale up for this project, as the activities financed by the AF and project areas are included in these instruments. The VMGF has been revised accordingly to include a Grievance Redress Mechanism (GRM) suitable for the Vulnerable and Marginalised Groups (VMGs), and has been adapted to receive and respond grievances related to the Gender Based Violence (GBV).The VMGF was re-disclosed in-country on May 13, 2019 and on the World Bank external website on May 14, 2019. The parent project prepared a communication strategy and Stakeholder Engagement Plan (SEP), which will similarly be updated for the AF project by July 2019.

In the parent project, the following lessons have were learnt: (i) The Project Coordination Unit (PCU) prepared Environmental and Social Management Plan (ESMP) checklist to guide schools in the managing potential environmental and social risks and impacts for the construction or rehabilitation minor infrastructure, the PCU were able to train the participating schools on the ESMP checklist and the implementation is considered satisfactory; (ii) The project has functional Grievance Redress Mechanism (GRM) that includes incident/complaint books at respective



schools, which is complemented with a WhatsApp platform for the PCU, County Project Coordinators and participating schools to share challenges, complaints and experiences; and (iii) sustained and continuous stakeholder engagement has resulted in increased community involvement in the running of primary schools through Boards of Management (BoMs), this has resulted in increased transparency and accountability of schools resources.

The project environmental and social performance and compliance as per implementation support mission carried in (March, 2019) was rated " Moderately Satisfactory".

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:  
There are no potential indirect long term impacts anticipated.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.  
There were no project alternatives considered.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

An Environmental and Social Management Frameworks (ESMF) was prepared for the parent project and has been updated to reflect the scale up activities for the AF project, to provide guidance on measures and procedures to facilitate environmental and social risk management for the project. A Vulnerable and Marginalized Groups Framework (VMGF) was prepared for the parent project, it has been revised to reflect the scale up activities. No major or significant adverse impacts are anticipated as a result of the AF on the culture , traditions and major social dynamics of the communities categorized as vulnerable and marginalized.

The Project Coordination Unit (PCU) at Ministry of Education (MoE) has limited capacity to manage the environmental and social safeguards. In this regard, the PCU has designated a full time environmental and social safeguards focal point supporting the project in managing environment and social risks and impacts. The environmental and social focal point works closely with respective county project coordinators and the participating primary schools to follow up on safeguard issues including the grievances and regular reporting on safeguards implementation for the project. To enhance the PCU capacity, the Bank has carried out targeted safeguards training to the PCU staff and the County project staff.

The project has allocated resources under component four (4) of the project to support safeguards activities that include: (i) Training county staff and participating schools on the project safeguards requirements; (ii) carrying out stakeholder engagement; (iii) operationalizing the GRM; and (iv) monitoring and reporting on the safeguards.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Key stakeholders for the AF project include the schools and communities, as were for the original project. An ESMF and VMGF were prepared for the original project and were consulted upon with the selected communities and stakeholders . The ESMF and the VMGF have been updated to reflect the scale up activities.



**B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

**Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
03-May-2019	08-May-2019	

**"In country" Disclosure**

Kenya  
06-May-2019

Comments

**Indigenous Peoples Development Plan/Framework**

Date of receipt by the Bank	Date of submission for disclosure
13-May-2019	14-May-2019

**"In country" Disclosure**

Kenya  
13-May-2019

Comments

**If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.**

If in-country disclosure of any of the above documents is not expected, please explain why:

**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Yes



Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

**OP/BP 4.10 - Indigenous Peoples**

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?

Yes

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes

**All Safeguard Policies**

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

**CONTACT POINT**

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**APPROVAL**

Task Team Leader(s):	Ruth Karimi Charo
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**Approved By**

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Practice Manager/Manager:	Safaa El Tayeb El-Kogali	14-Jul-2019
Country Director:	Carlos Felipe Jaramillo	19-Jul-2019

