



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 03/19/2024 | Report No: ESRSC04188

**I. BASIC INFORMATION****A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P501648	Program-for-Results Financing (PforR)	SEEQIP	2025
Operation Name	Kenya Secondary Education Equity and Quality Improvement Program		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Kenya	Kenya	EASTERN AND SOUTHERN AFRICA	Education
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Republic of Kenya	Ministry of Education (MoE)	27-May-2024	30-Sept-2024
Estimated Concept Review Date	Total Project Cost		
05-Dec-2023	400,000,000.00		

Proposed Development Objective

The Program Development Objective (PDO) is to improve equitable access to quality secondary education, and strengthen systems for delivering equitable education outcomes.

B. Is the operation being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project Activities

[Description imported from the Concept Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

This Operation Information Summary (OIS) outlines a proposal for a new operation focused on secondary education (Junior, and Secondary Education). The proposed operation builds on the ongoing objectives and interventions under the Kenya Secondary Education Quality Improvement Project (SEQIP P160083), and Kenya: Primary Education Equity in Learning Program (KPLEEP, P176867) operations, to further consolidate, at scale, promising interventions. The proposed operation will use the financing instrument, a Program for Results (PforR), to complement KPEELP Program's objectives



by emphasizing result-oriented strategies, systems strengthening and capacity building of relevant oversight institutions to improve overall policy implementation, and equitable service delivery. Context Summary The basic education system needs to expand rapidly to accommodate the nearly 2 million students expected to enroll in Junior and Senior Schools over the next 7 years. Of immediate concern is the 1.7 Million in Junior school, grade 7, that will join Grade 9 in about 18 months (January 2025). These learners will require an additional 20,000 new classrooms nationwide. The government has put in place fiscal measures to recruit an additional 120,000 teachers for junior and senior by 2025, and instructional materials are being developed from November 2023 for grade 9. Overall, from 2010 to 2022, enrollment in secondary education grew at an average of 7 percent per year, increasing from 1.6 million to 3.8 million students. However, transition rates have yet to reach their pre-pandemic peak of 91.0 percent in 2020, as they dropped to 78.5 in 2021 due to the pandemic and remained around 78.6 in 2022. Maintaining the growing demand and the recovery has demanded significant resources and Kenya has consistently invested around 5 percent of its GDP during the last decade. Sustaining the high levels of investment to address growing needs in education is therefore a necessity. At the same time, Kenya has made immense efforts in the roll out of the Competency Based Curriculum (CBC) and Competency Based Assessment (CBA). The Presidential Working party on Education Reforms (PWPER, 2022/2023) recently conducted an evaluation of the implementation of the CBC and CBA in the past 4-5 years and has made solid technical recommendations to further improve implementation of the CBC and CBA. The emerging challenges in the PWPER report include a need to further redefine the scope and learning areas of the CBC to focus better on core competencies only; align teacher preparation and support at the school level to new pedagogical approaches required for the CBC and CBA; provision of operational costs and a minimum essential package of school inputs for adequate implementation of the CBC and CBA, and to minimize demands on parents/households on CBC related costs for each learner; and establishment of a robust monitoring and learning process for the CBC and CBA to continuously inform improvements and adjustments. The expansion and roll-out of CBC and CBA will need to deliberately address existing inequalities in access and learning in order to improve learning outcomes for all children. Regarding access, although the national gross enrollment rate in secondary stood at 76.5 percent, 9 counties presented rates under 40 percent. Poorer educational outcomes are also concentrated in the poorest populations and some counties in the north and northeast. Similarly, while gender parity has been achieved in access at a national level, disparities in learning outcomes remain significant: on average, girls underperform in math and science at both primary and secondary national tests. In addition, improving learning outcomes in secondary education in rural areas, lagging regions and for poorer populations is essential to achieve the objectives Kenya has set for itself, in improving education performance, including school to work transition.

Proposed Results Areas The proposed PforR program will support the implementation of a series of recommendations in three focus areas: i) expanding equitable access to quality Junior and Senior School Education; ii) Further transformation of teaching and teacher management and support and; iii) Systems strengthening and building institutional capacity for equitable service delivery, fostering inclusivity and equality. These focus areas are aligned to the National Education Sector Strategy and Plan (NESSP II) as well as the PWPER report recommendations specifically concerning junior and senior schools Education. Below is a preliminary scoping of the proposed Results Areas for the new operation: a) Result Area 1: Expanding Equitable Access to Quality Junior and Senior School Education: i. Adequate implementation and monitoring of CBC and CBA in Junior and Senior Schools: Develop an operational plan with critical milestones and timelines for implementation of the CBC and CBA in Junior and Secondary Schools, implement the proposed reforms in e-assessments under the CBA, and develop and implement robust monitoring and learning mechanisms for CBC and CBA implementation to inform continuous improvements in implementation. ii. Infrastructure Development: Construction of new 20,000 classrooms/integrated learning resource centers for Junior School, and the associated WASH facilities to meet the WASH-students ratio standards for Junior schools. Regarding the National school meals program, infrastructure development will also include construction of kitchen/food safety facilities as needed,



clean cooking energy, and fencing of schools particularly where children are considered exposed and vulnerable. iii. Inclusive Education: Specific efforts to improve performance of girls' and vulnerable boys' performance in Sciences, Mathematics and English (SME); in Special Needs Education (SNE), strengthen data quality to inform targeting and investments for various SNE categories, and capacity building of 10 regional Educational Assessment Centers; and support development of guidelines for accelerated learning and implementation of these guidelines targeting marginalized learners and out-of-school children and youth, and the enhancing of adult and continuing education. b) Result Area 2: Further Transformation of the Teaching Quality, Teacher Development and Management. i. Enhance quality and relevance of Pre-service and in-service teaching training interventions. Further support the development and implementation of teaching training programs and retooling activities, alignment to Competency-Based Teacher Education (CBTE) and Competency-Based Teacher Assessment (CBTA) for Junior and Senior Schools. ii. Enhancing provision of high quality and affordable instructional materials: Support the implementation of reforms for instructional materials under the School Learning and Instructional Material Centre (SLIMC), for CBC and CBA, including teachers' resources, mobile science kits for Junior school, virtual labs for Senior School, and adapted instructional materials and learning assistive devices for learners with Special Needs Education (SNE). iii. Technology integration for remote learning: Scaling up virtual teaching/live streaming in schools affected by teacher physical presence mainly due to insecurity. An independent of the live streaming pilot is initiated to inform design for the scale up. c) Results Area 3: Systems Strengthening and Building Institutional Capacity for Equitable Service Delivery. Building systems and enhancing institutional capacity and quality to improve equitable service delivery in a systemic and sustainable approach. Relevant institutional assessments will be conducted to inform strategic systems strengthening and capacity building: i. Enhancing a Central Scholarship Administration System at the Jomo Kenyatta Foundation (JKF). Centralizing the fragmented offer of scholarships by various financing sources with improved targeting to further increase transparency and reach the most in need, through systems and capacity building and a consolidated scholarship fund. The established structures and process for the Elimu Scholarship program, provides a good practice model that this intervention could build on, while ensuring cost effectiveness in the operational and administration costs for the scholarships. ii. Centre for Mathematics, Science and Technology Education in Africa (CEMASTEA) -equip new facility under construction to support ICT-enabled continuous teacher professional development. The scope of the facility, including equipment, was scaled down due to significant cost escalations under SEQIP. iii. Kenya Institute of Special Education (KISE): Strengthen selected facilities (studios), for advanced diagnosis and rehabilitation of SNE children; In addition, implement an action plan to revamp 10 regional Educational Assessment Centers (EARCs) now mapped under KISE ; and develop and deliver at KISE, a continuous TPD for teachers teaching SNE. iv. The Kenya Education Management Institute (KEMI): Develop a resource center, including technology enabled content and resource materials, for capacity building of school managers (Boards of Management, Head Teachers, County and Sub-County Based Education Officials, school bursars). Coordination in the implementation of Pre-school services, including implementation of upcoming national quality assurance framework and standards for pre-schools, and establishment of teacher performance and appraisal mechanisms for teacher teaching pre-primary 1 and 2.

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 2,000]



The proposed Program is nationwide with the TA activities being implemented across 19 counties that have high levels of inequality in secondary education. The counties include Wajir, Mandera, Turkana, Garissa, Samburu, Siaya, Bungoma, Bomet, Kisii, Narok, Tana River, Elgeyo Marakwet, Baringo, Migori, Laikipia, Kitui, Kericho, Embu, and Meru. No specific locations within these counties have been identified at concept stage, but these are expected to be within established educational institutions, thus likely to present minimal or no risks or any mayor adverse impact on biodiversity or cultural heritage sites. Some of the targeted counties have a presence of Indigenous People, known as Vulnerable and Marginalized Groups (VMGs) in Kenya. Other counties such as Wajir, Mandera, Turkana, Garissa, and Samburu are considered hard to serve given their fragility, conflict and violence status.

The IPF component will finance targeted type 2 and type 3 TA activities, supporting the formulation of policies, programs, plans, strategies or legal frameworks and strengthening borrower capacity, respectively. The preliminary TA gaps identified include: (i) insufficient information systems for inclusion and tracking of Out of School Children (OOSC), including refugees who are OOSC; (ii) design and implementation support for integrating climate mitigation and adaptation measures in the education curriculum for teacher training colleges; (iii) insufficient capacity building provided for key institutions with mandates for ongoing reforms (relevant semi-autonomous agencies under MoE); (iv) implementation of key ESRM and fiduciary actions as will be identified in the Program Action Plan (PAP); (v) insufficient capacity for Program management and implementation, including monitoring and evaluation (M&E); and (vi) lack of targeted assistance to support the transition of refugee schools managed by humanitarian aid agencies into national system/county management schools.

D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

[Description of Borrower's capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 2,000]

The key implementing agencies, the Ministry of Education (MoE) and the Teachers Service Commission (TSC), have developed experience in implementing Bank funded interventions including an IPF on Secondary Education Quality Improvement Project (SEQIP, P160083) that became effective in December 2017, and a PforR Kenya Primary Education Equity in Learning (KPEELP, P176867) that became effective in August 2022. The E&S performance rating for SEQIP was downgraded from Moderately Satisfactory to Moderately Unsatisfactorily in June 2023 due to gaps in the adherence to Environmental, Social, Health and Safety (ESHS) provisions by the contractors for infrastructure investments. This is being addressed through replacement of contractors and capacity building of the MoE. KPEELP has a record of Satisfactory E&S performance. As such, the two institutions have familiarity and capacity in the identification and management of E&S risks and impacts using the Bank Operational Policies on E&S safeguards and the six E&S Core Principles for PforR operations. MoE has one environment and one social specialist who shall be retained to support the Program in the ESRM. MoE will hire specialists on GBV, labor and OHS on a need basis. In addition, the MoE has a Project Steering Committee (PSC) that is chaired by the Principal Secretary and has representation of two members of the VMG community, one male and one female.

Given the tiered government implementation model requiring implementation capacity at the sub-national level and other semi-autonomous government agencies, the MoE, under KPEELP and SEQIP has ensured a modicum of E&S skills and capacity to implement sub-projects similar to the proposed interventions. Trainings conducted include on ESHS,



stakeholder engagements, labor risk management and GBV/SEA-H. This capacity, although nascent, will be relevant in the implementation of the proposed Program.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

A.1 Environmental Risk Rating

Low

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]

The IPF component will not directly support any activity related to construction or rehabilitation of infrastructure, which would result in direct environmental risks or potential negative impacts on the biophysical environment, and/or valued environmental components. The environmental risk is assessed as Low, as both the anticipated direct and potential downstream environmental risks and impacts of the planned TA activities are negligible given the nature and scale of the activities. Direct risks and potential adverse impacts limit to negligible use of resources for TA activities and related travel and OHS aspects particularly related to travels. Potential negative downstream effects could mainly stem from inadequate ESRM of the PforR activities, in case responsible staff is not qualified/count with the necessary support and resources, and/or related training and capacity building gets implemented poorly, or from inadequate consideration of climate mitigation and adaptation measures in the design of the training curriculum for teacher training colleges.

A.2 Social Risk Rating

Moderate

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]

The IPF component's activities are not expected to result in widespread, complex or irreversible social risks and negative impacts as they mainly relate to TA. Key social risks are related to sexual exploitation and abuse and sexual harassment (SEA/SH) and labor related risks for direct investments. The indirect/downstream social risks and potential negative impacts relate mainly to SEA/SH, OHS, and security issues. Consequently, the social risk of the IPF component is assessed as Moderate.

[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 2,000]

B. Relevance of Standards and Policies at Concept Stage

B.1 Relevance of Environmental and Social Standards

ESS1 - Assessment and Management of Environmental and Social Risks and Impacts

Relevant

[Optional Explanation - Max. character limit 1,000]



The IPF component will finance TA activities not covered under SEQIP and KPEELP and will include type 2 and 3 activities on supporting strategies for future investments and strengthening borrower capacity. Key prevention and mitigation measures include: (i) ESHS mainstreaming in ToRs and bidding documents; (ii) capacity building for TA service providers on ESHS, including obligations to prevent and address cases of GBV/SEA/SH; (iii) adherence to relevant national laws and security protocols as per the ESCP; (iv) culturally appropriate approaches to stakeholder targeting and inclusion, including VMGs to participate and benefit from interventions; and (v) establishment of a functional workers' GRM, sensitive to SEA/SH issues, with multiple uptake channels and referral pathways. MoE will prepare a Stakeholder Engagement Plan (SEP) stipulating material measures and actions for ESRM. Relevant and summarized elements of labor risk management will be included in the ESCP and the SEP.

ESS10 - Stakeholder Engagement and Information Disclosure

Relevant

[Optional Explanation - Max. character limit 1,000]

Stakeholder consultations will be conducted to guide Program preparation, design, and targeting, based on an analysis of the stakeholders. Stakeholder engagements will be through key informant interviews, workshops, public meetings and focus group discussions, as applicable. Consultations will be culturally sensitive, inclusive and accessible to all Program stakeholders, including VMGs. The implementing entities will keep a record of the consultations carried out. Stakeholder engagement will address the Grievance Redress Mechanism (GRM), which will be locally available, culturally appropriate and accessible to all affected persons including VMGs. IPF resources will be used to support stakeholder consultations and implementation of the ESRM obligations of the PforR activities where applicable. The GRM will be sensitive to SEA/SH issues and provide for an appeal mechanism and anonymous feedback and reporting. The ESCP will outline applicable stakeholder engagement measures to be adopted

ESS2 - Labor and Working Conditions

Relevant

[Optional Explanation - Max. character limit 1,000]

The IPF component will include direct workers, contracted workers (consultants involved in the technical assistance and capacity building activities) and suppliers/service providers of information systems. Requirements to prepare Labor Management Procedures (LMP) in line with ESS2 and to comply with the national labor laws and regulations will be incorporated in the ESCP and SEP. Details of these procedures will be reflected in the project operational manual (POM), including a separate Grievance Redress Mechanism (GRM) for workers, conditions of employment, nondiscrimination and equal opportunity, worker's organizations, child labor, forced labor, code of conduct against SEA/SH in the workplace, and OHS aspects. Civil servants will be bound by their public sector contracts unless their contract has been transferred to the Program.

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

[Optional Explanation - Max. character limit 1,000]

MoE, TSC and the relevant SAGAs will ensure assessment of ESS3 risks in all advisory and TA products including the design of climate mitigation and adaptation measures in the education curriculum for TTCs and their roll-out.

ESS4 - Community Health and Safety

Relevant



[Optional Explanation - Max. character limit 1,000]

Potential risks may be related to (i) gender discrimination, GBV/ SEA/SH, and (ii) safety and security risks for workers and beneficiaries, depending on the location of the activities. For all TA and advisory support, MoE, TSC and the relevant SAGAs will ensure that the relevant aspects of ESS4 are included in the TORs and TA outputs and that community health and safety considerations are addressed throughout the implementation of the TA and related PforR activities.

ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

TA activities will not include aspects relevant to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

Technical Assistance activities will not create risks on biodiversity.

ESS7 - Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Relevant

[Optional Explanation - Max. character limit 1,000]

ESS7 is considered relevant as the IPF component activities presents an opportunity to address systemic gaps in management of social risks related to exclusion of Indigenous Peoples (IPs) and Vulnerable and Marginalized Groups (VMGs) including refugees. The ESCP will provide material measures for meaningful consultation, inclusion and access of VMGs to project benefits.

ESS8 - Cultural Heritage

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

The TA activities are not expected to imply risks or negative impacts on tangible or intangible cultural heritage such as objects, sites, structures, groups of structures, cultural practices, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.

ESS9 - Financial Intermediaries

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

TA activities will not include aspects relevant to Financial Intermediaries



B.2 Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways

No

OP 7.60 Operations in Disputed Areas

No

B.3 Other Salient Features

Use of Borrower Framework

No

[Optional explanation – Max. character limit 1,000]

Use of Borrower Framework is not envisioned.

Use of Common Approach

No

[Optional Explanation including list of possible financing partners – Max. character limit 1,000]

Use of Common Approach is not envisioned.

B.4 Summary of Assessment of Environmental and Social Risks and Impacts

[Description provided will not be disclosed but will flow as a one time flow to the Concept Stage PID – Max. character limit 5,000]

The proposed Program is nationwide with the TA activities being implemented across 19 counties that have high levels of inequality in secondary education. The counties include Wajir, Mandera, Turkana, Garissa, Samburu, Siaya, Bungoma, Bomet, Kisii, Narok, Tana River, Elgeyo Marakwet, Baringo, Migori, Laikipia, Kitui, Kericho, Embu, and Meru. No specific locations within these counties have been identified at concept note stage, but these are expected to be within established educational institutions, thus likely to present minimal or no risks or any mayor adverse impact on biodiversity or cultural heritage sites. Some of the targeted counties have a presence of Indigenous People, known as Vulnerable and Marginalized Groups (VMGs) in Kenya. Other counties such as Wajir, Mandera, Turkana, Garissa, and Samburu are considered hard to serve given their fragility, conflict and violence status.

The IPF component will finance targeted type 2 and type 3 TA activities, Supporting the formulation of policies, programs, plans, strategies or legal frameworks and Strengthening Borrower capacity, respectively, as per the World Bank's Operations Environmental and Social Review Committee (OESRC) Advisory Note on TA and the Environmental and Social Framework (ESF) of 2019. The preliminary TA gaps identified include: (i) insufficient information systems for inclusion and tracking of Out of School Children (OOSC), including refugees who are OOSC; (ii) design and implementation support for integrating climate mitigation and adaptation measures in the education curriculum for teacher training colleges; (iii) insufficient capacity building provided for key institutions with mandates for ongoing reforms (relevant semi-autonomous agencies under MoE); (iv) implementation of key ESRM and fiduciary actions as will be identified in the Program Action Plan (PAP); (v) insufficient capacity for Program management and implementation, including monitoring and evaluation (M&E); and (vi) lack of targeted assistance to support the transition of refugee schools managed by humanitarian aid agencies into national system/county management schools.



C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?

[Description of expectations in terms of documents to be prepared to assess and manage the project's environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 3,000]

For the E&S aspects of the IPF component, the TORs will be prepared and the TA outputs screened considering prevention of E&S risks, mitigation of potential negative impacts and maximizing potential positive impacts. Active stakeholder engagement and robust supervision and monitoring will be applied to contribute to said objectives. The ESCP and SEP will be developed as detailed above, including the necessary LMP provisions and provisions to prevent and address cases of GBV/SEA/SH.

III. CONTACT POINT

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V. APPROVAL

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