



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/22/2020 | Report No: ESRSA00937



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Kenya	AFRICA	P174059	
Project Name	KENYA GPE COVID 19 LEARNING CONTINUITY IN BASIC EDUCATION PROJECT		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	5/13/2020	7/10/2020
Borrower(s)	Implementing Agency(ies)		
The National Treasury and Planning	Ministry of Education		

Proposed Development Objective(s)

To enhance access to online and distance learning for all students in primary and secondary schools and facilitate a smooth transition in the return to school for targeted vulnerable students.

Financing (in USD Million)	Amount
Total Project Cost	10.80

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

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

1. The COVID-19 pandemic threatens education progress worldwide through two major shocks: (1) the near-universal closing of schools at all levels, and (2) the economic recession sparked by the pandemic-control measures. Without major effort to counter their effects, the school closings shock will lead to learning loss, increased dropouts, and higher inequality; the economic shock will exacerbate the damage, by depressing education demand and supply as it harms households; and together, they will inflict long-run costs on human capital and welfare. But if countries do move quickly to support continued learning, they can mitigate the damage and even turn recovery into new opportunity.



2. On March 15, 2020 Kenya’s Ministry of Education (MoE) announced closure of the country’s 30,000 primary and secondary schools indefinitely to mitigate the impact of COVID-19. The tertiary level education institutions were also closed. Like in many other countries, the closure of schools was unexpected and unplanned. In Kenya, this decision means over 14 million pre-primary, primary and secondary students have their studies interrupted. More than 310,000 teachers are adapting to this new reality. Additionally, most MoE staff are working remotely, with only critical staff executing their duties from within the Ministry premises. Without major effort to counter the effects, the school closings will lead to learning loss, increased dropouts, and higher inequality.

3. The Kenya GPE COVID-19 Education Response is being prepared as a new project, with an objective to enhance access to remote learning (online and distance learning) for all students in primary and secondary schools and facilitate a smooth transition when schools reopen. The proposed grant financing is in the amount of US\$10.80 million, including supervision fees of US\$200,000, expected to be financed from an allocation from the Global Partnership for Education COVID-19 Accelerated Funding Window over an 18 months implementation period.

2. The proposed project activities are intended to mitigate the impact of COVID-19 on the education system and help recovery when schools reopen. The project aims to achieve the following:

- a) increase proportion of students in basic education with access to remote learning (online and distance programs);
- b) reduce potential school drop out for the most vulnerable students when schools reopen; and
- c) enhance capacity of MoE to coordinate interventions in basic education during the COVID crisis and beyond.

3. This project will have three components (with sub-components). Below is a brief explanation:

a) Component 1: Expanding existing remote learning opportunities for learning continuity for all students in basic education. This component has three sub-components:

- Sub-Component 1: Support access and delivery of online content to all students in primary and secondary school through: (i) enhancing existing radio education channels and partnerships to reach all regions; (ii) adding new programming to the existing Government-run Education Television (EDU TV) daily transmission schedule, and establish new partnerships with other faith based, community and privately-owned TV providers to include EDU TV; (iii) strengthening the Kenya Education Cloud (e-cloud) for curation of additional content to cover core subjects in all grades; and to upgrade the e-cloud portal to make it more efficient, and to increase its capacity to support over 15 million users; and (iv) adapting online content for access via mobile phones;

- Sub-component 2: Teacher training in interactive remote learning methodologies to ensure teachers play a role such as in design and delivery of the online lessons; developing activities for students to do remotely or at home; designing simple learning plans to support parents to home school; and being on call for interaction with students and parents; and

- Sub-component 3: Create an integrated monitoring and evaluation system for remote learning interventions, and to provide support for parents and caregivers to monitoring student learning to establish utilization of the remote education services through radio, TV and e-cloud, and to provide simple tips and help desks to parents and caregivers as they support learners at home, especially while using radio, TV and mobile phones.



b) Component 2: Facilitate smooth transition back to school for vulnerable students and girls. This component will support three sub-components:

- Sub-component 1: Support to the existing National School Meals program (SMP) with a 'top up' grant for targeted nutrition support of selected schools within informal settlements, arid and semi areas; and expand provision of school meals to additional schools within the informal settlements in urban centers, and special needs schools; and
- Sub-component 2: Provision of on online based Psycho-social support services to promote psycho-social well-being of learners, and to provide psycho-social support.

c) Component 3: Project Coordination, Communication, and Monitoring and Evaluation to support monitoring school attendance in all schools; to conduct a learning assessment to identify students who need targeted support, and to inform development of remedial programs for these children; to build capacity of MoE to conduct virtual meeting during the COVID-19 period; and to support overall project management, communication, monitoring and evaluation.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Project implementation will be national in scope and will contribute to building on existing government priorities and initiatives to mitigate the impact of COVID-19 in the education sector being focused on basic education. The project sites will be mainly primary and secondary schools across the whole country and will have a focus on the most vulnerable and particularly girls. There are similarly no impacts related to resettlement or cultural heritage anticipated. The project will be implemented countrywide including 14 counties where people meet the criteria under ESS 7. The proposed project, however, does not involve aspects which would require Free Prior and Informed Consent (FPIC)

Component one activities are related to expanding existing remote learning opportunities for learning continuity for all students in basic education through access and delivery of online content to all students in primary and secondary school through, teacher training in interactive remote learning methodologies and the creation of an integrated monitoring and evaluation system for remote learning interventions, and to provide support for parents and caregivers to monitoring student learning. Some of the targeted locations, such as Turkana county, will have challenges with access to radio, TV and internet.

Component two seeks to facilitate a smooth transition back to school for vulnerable students and girls through support to the existing National School Meals program (SMP) with a 'top up' grant for targeted nutrition support of selected schools within informal settlements, arid and semi areas; and expand provision of school meals to additional schools within the informal settlements in urban centers and special needs schools, and support for online based psychosocial support services for learners. GPE COVID-19 project will not finance activities related to cleaning and disinfection of schools used as quarantine facilities. This is being financed under the MoH project, Kenya COVID 19 Emergency Response Project (P173820. Project activities will be limited to safety audits of the schools used



as quarantine facilities to ensure students safety on return to school. The project will similarly not finance activities related to water and sanitation (WASH) and electricity.

Component 3 will support overall project management, communication, monitoring and evaluation including capacity building for MoE. Monitoring of school attendance will be key to identifying, understanding and mitigating social risks related to school drop-outs.

The primary social risks associated with the project relate to inadvertent exclusion and meeting the cultural requirements of the beneficiaries. Whereas all activities under component one apply to the entire basic education system, those under component 2 will require targeting with a focus on ensuring that the project benefits the poor, vulnerable and marginalised students, schools and communities. Key success factors for this component depends on the effectiveness of the targeting methodology, a robust monitoring process and a responsive grievance redress mechanism. Component 2 will focus on a variety of locations, from schools in informal settlements in urban and peri-urban settings, to remote rural schools in arid and semi areas of the country. Special considerations may be required for provision of school meals to special needs schools around the country.

There are minimal environmental impacts as the project is not expected to include civil works except possible small scale interior works to enable installation of ICT equipment therefore no sensitive environmental features would be impacted. Other risks relate to Occupational Health and Safety for ICT lab rehabilitation and the sourcing, handling and distribution of food to schools under the National School Meals program (SMP). To manage this, Occupational Health and Safety requirements will be included in the ESMF and ESMPs to ensure safe (and secure) sourcing and delivery of the meals to schools and further, protect ICT contracted workers.

D. 2. Borrower's Institutional Capacity

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

The capacity of the client to identify, understand and manage adverse environmental and social impacts and risks on the project is existing, but weak. This includes capacity for monitoring of environmental and social risks and impacts, stakeholder and community engagements, labor management, GBV/SEAH and redressing adverse impacts where harm has occurred. The MoE however, has some experience implementing projects under the World Bank Operational Policies ie: GPE-PRIEDE and SEQIP, but none under the ESF. To address this gap, significant efforts will be required to build their capacity. ESF trainings will be organised for the relevant staff in the PIU and additional environment and social specialist who will be seconded from other ministries, agencies or cross support from other projects.



The existing Kenya GPE PRIEDE PIU will be primarily responsible for the day to day project management and coordination, communication, environment and social risk management , fiduciary and monitoring and reporting. The PCU falls under the Directorate of Project Coordination and Delivery (DPC&D). Project activities will be executed by the Teachers Service Commission (TSC) and Kenyan Institute of Curriculum Development (KICD), both implementing entities of SEQIP and GPE-PREIDE.

The MoE does not have dedicated Environmental and Social (E&S) Specialist engaged. The E&S specialist supporting the ongoing World Bank supported projects: Kenya Global Partnership for Education (GPE) Primary Education Development Project (GPE-PRIEDE) P168142 and Secondary Education Quality Improvement Project (SEQIP) P160083, both under the Safeguards Policies, are short term contracted consultants. Others E&S specialist on the project have been seconded to the MoE from other government institutions. The Safeguards Performance on these project in the past one year has ranged from ‘Moderately Satisfactory’ to ‘Satisfactory’ mostly due to augmented safeguards support from the supervising consultant under SEQIP who have additional environmental and social safeguards specialists. This being the first time the Ministry is implementing a project under the ESF, dedicated E&S specialists will need to be engaged or seconded into the PCU and trained on the ESF to be able to support the PIU manage the E&S risks.

The project will adopt the Grievance Redress Mechanism (GRM) for SEQIP. The GRM covers a similar geographical scope and utilizes existing country systems and the sector organizational structure for effective grievance redress. This will be complimented by the contracting of a service provider for on-call psychosocial services which will include a hotline for reporting cases of GBV/SEAH and child abuse.

At the county and sub-county level , the MOE and TSC are represented by County and Sub-County Directors of Education who implement directives and provide oversight on education functions. With sustained training and sensitization, this reporting structure can be exploited for stakeholder engagements, information dissemination and monitoring of grievance redress.

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II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The proposed project activities will have significant positive impact on the education system. The project will not finance activities related to WASH, electricity supply and distribution of radios, TVs, phones and tablets to schools. Provision of ICT equipment and renovation activities will be limited to MoE. No physical or civil works are expected. However, small scale interior works in the MoE meeting room to enable installation of ICT equipment will be conducted with no sensitive environmental features expected to be impacted. Component 3 of the project will support the upgrading of the virtual meeting room with relevant ICT equipment and component 1 will support procurement of core ICT equipment to enhance an integrated monitoring and evaluation system for remote learning interventions. Therefore the overall anticipated environmental risks and potential negative impacts of the proposed activities will be limited to localized noise, dust, solid waste, occupational health and safety risk as well as potential electronic waste from the procured ICT related equipment. Component 2 activities may be related to health and



hygiene risk associated with safe sourcing, handling, delivery, distribution and storage of food in schools. These are not considered significant or irreversible impacts and can be addressed with straight-forward mitigation measures and good practices through proper enforcement of the ESMPs. The project will prepare an Environmental and Social Management Framework (ESMF) to further identify and assess the anticipated risks, as well as to develop mitigation measures as necessary to manage them. It is important to note that some of the schools are currently being used as quarantine facilities by the Ministry of Health (MoH) under the Kenya COVID-19 Emergency Response Project (P173820). An Infection Prevention and Control Waste Management Plan is being developed and the responsibility of implementation of this plan has been assigned to the Ministry of Health (MoH). MoH project (P173820) will be responsible for cleaning, disinfection and sanitization of the schools used as quarantine areas before hand over to MoE. MoE will collaborate with MoH to inspect the schools before re-opening using an audit checklist prepared under this project based on the IPCWMP(P173820) to verify on the general state of cleaning and disinfection of the school facilities used as quarantine areas to ensure schools are safe for learners. The audit checklist should also support an awareness program on health education including; hand hygiene and use of personnel protective equipment among other relevant areas.

The project will also require an Environmental and Social Commitment Plan (ESCP) to document material measures and actions that are required for the project to achieve compliance with the ESSs. With this in mind, the environmental risk rating is considered Moderate.

Social Risk Rating

Moderate

The social risk rating has been classified as moderate. Whereas project activities are expected to have significant positive impacts, there are adverse risks. Key social risks include: a) exclusion of vulnerable, marginalized and minority students, teachers and communities in hard to serve areas from project benefits due to the limited scope of the intervention and poor digital infrastructure in needy areas; b) exclusion of people with key disabilities from project benefits by developing digital modes of education without universal design principles; c) selection bias and elite capture where project interventions such as school meals are used in locations and on individuals who are easier to access, rather than the most needy; d) Sexual exploitation and abuse, sexual harassment (SEA/H) and other forms of gender-based violence (GBV) arising from exploitation of women and girls for project benefits or by supporting girls to attend schools where they are at risk of abuse; e) systemic weakness as the capacity of the PIU to identify, understand and prevent adverse social impacts on the project is only developing; and f) upsetting community dynamics caused by the project interventions such as school meals operating in a small number of sites relative to immense and widespread need thereby leading to harmful inward migration that could easily upset delicate community dynamics. All these risks are amplified by COVID-19 restrictions and challenges in the traditional access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The primary beneficiaries of the project would be students, teachers and communities with primary and secondary schools. The project is also designed to disproportionately benefit poor, vulnerable and marginalized populations through interventions seeking to keep poor and vulnerable students and especially girls, in school. The project is

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expected to have positive impacts aimed at supporting continued learning during the COVID-19 pandemic and to mitigate the deepened learning crisis beyond the pandemic.

Under component 1, the overarching social risk relates to exclusion. Expanding existing remote learning opportunities for learning continuity for all students in basic education leverages online and mass media delivery of education content. These includes through radios, television, e-cloud and mobile phones for student learning, online and distance learning for teacher training and remote monitoring and evaluation for parents and caregivers. For instance, with only 12.1%, 2.1% and 4.4% of households in Turkana county having access to radio, TVs and internet respectively, project interventions risk perpetuating exclusion. This is true for poor, vulnerable, marginalized and minority students, teachers and communities in hard to serve areas and for students and teachers with disability unable to easily leverage on digital modes of education content delivery. Exclusion through poverty and vulnerability also leads to school drop-outs for students unable to rejoin school and in particular exacerbated by Covid-19 impacts.

To mitigate these impacts, the MoE will seek partnerships with privately owned, community, and faith-based radio broadcasters to add to the existing radio education services and use of a government-run Education Television (EDU TV) on a free to air platform. This will be vital in spreading content coverage including to hard to serve areas. Access to radios, TVs and other online content for poor households remains a residual risks that the project will continue to seek solutions for, through monitoring and adaptive implementation as innovative ways for content delivery becomes known.

For students with disabilities, KICD will be required to adapt the online based lessons for learners with special needs. In this case, students with hearing impairments need to be provided with online lessons in sign language as well as same language closed captions. Those with hearing impairment will be provided with audio supported material. For locations that face insecurity and poor access to electricity and internet connectivity, KICD proposes to adopt a simple virtual learning environment (VLE) using the e-cloud platform to deliver lessons through live streaming and or pre-recorded interactive lessons on gadgets that can be used offline.

In addition, a Stakeholder Engagement Plan (SEP) has been prepared to detail modalities for robust stakeholder engagements, inclusion for marginalized and minority members of the targeted communities and information disclosure procedures. Robust community engagements will be conducted before commencement of project activities as well as sensitization on the availability of a project GRM to support the systematic uptake, processing and resolution of project related complaints and grievances

Environmental risks under Component 1 are associated with minor renovations to update their virtual lab, done on the ground of the existing facility, and any e-waste management during operational phase of the project. Although during the project implementation generation of e-waste is not expected, the project will ensure sustainable handover and ownership of the equipment procured under the project. This includes agreements on proper disposal of electronic equipment beyond the life of the project.

Key social risks under component 2 relate to selection bias, the risk of elite capture, GBV/SEAH and harmful inward migration. Whereas the component seeks to facilitate smooth transition back to school for vulnerable students and girls, when schools reopen, selection processes for these interventions can perpetuate and exacerbate social cleavages. For instance, where project interventions such school meals do not follow robust targeting methodologies



and guidelines, they risk being diverted to ineligible, less-deserving and/or easier to access locations and individuals. Similarly, in the absence of strong monitoring systems and responsive grievance redress mechanisms, sexual harassment and exploitation of women and girls for project benefits is a conceivable risk.

To address these risks, the project will; a) review the mapping process for the national school meals program and link it to the most recent poverty data, for equity and optimal use of existing resources for the program; b) expand provision of school meals to additional schools within the informal settlements in urban centers and special needs schools, and; c) centralize procurement of food commodities. These measures will help minimize the risk of harmful inward migration as the re-mapping process will ensure that the most deserving schools, communities and students benefit from the school meals including those that are currently not enrolled but are in need due to Covid-19 impacts.

Environmental risks under Component 2 activities may be related to Health and Hygiene risk associated with safe sourcing, handling, delivery, distribution and storage of the foods to school. To manage this risk, the ESMF will include procedures for food sourcing, handling and storage for suppliers and schools.

The project is preparing an Environmental and Social Management Framework (ESMF) that will provide the criteria and procedures for screening sub-projects, assessing institutional capacity and outlining risk mitigation strategies commensurate with the risks. The ESMF will include: (1) ESMP for minor renovations including updates of virtual labs and e-waste management, (2) Labor Management Plan (LMP) for PIU and contracted workers, (3) OHS requirements for project workers and suppliers, (4) a quality management system to anticipate and minimize risks and impacts from meal sourcing, preparation, delivery and distribution; and (5) school pre-opening audit checklist to review quality of disinfection, based on the Infection Prevention and Control and Waste Management Plan (IPC&WMP) prepared under the Kenya COVID-19 Emergency Response Project (P173820), for all facilities including schools that might be used as, quarantine and isolation centers.

A rapid analysis of the existing systems of accountability including any discrepancy between the protocol and practice will be done and documented in the LMP. This will include provisions to ensure proper working conditions and management of worker relationships, Codes of Conduct and occupational health and safety; and prevention of Sexual Exploitation and Abuse/Sexual harassment. The SEA/SH risks will be addressed during implementation through the ESMF, including screening and putting in the effective systems and corresponding measures to prevent and mitigate the SEA/SH risks. In addition, IEC material outlining the code of conduct and ethics for teachers and avenues for grievance redress for the school community will be publicized in the LMP and as part of the stakeholder engagement. The MOE, in the ESCP, will commit to the implementation of the Code of Conduct and Ethics for teachers which includes provisions for SEA/SH prevention. All E&S documents will be prepared, consulted upon and disclosed by the client in line with the requirements of the ESF and Environmental and Social standards (as per the project ESCP).

Other overall project risks include systemic weaknesses and the amplification of the general project risk profile due to COVID-19 restrictions where traditional access to beneficiaries for meaningful stakeholder and community engagements and grievance redress are limited. In this case, stakeholder engagements have been adapted to minimize close personal contact and follow the recommended hygiene procedures as outlined by the Government of Kenya directives. Strategies employed include smaller meetings and small focus-group discussions (FGDs) conducted as appropriate taking full precautions on staff and community safety. Where meetings are not permitted, traditional



channels of communications such as radios and public announcements will be implemented. Other strategies will include one on one interviews through phones and skype for community representatives, CSOs and other interest groups.

For monitoring E&S risks and impacts, the ESMF will include a generic ESMP with general mitigation measures, roles and responsibilities, time plans, cost and implementation agencies for each mitigation measures recommended. MoE has a designated full time safeguards (E&S) focal point supporting the project in managing environment and social risks and impacts. The safeguards focal point will require ESF training from the Bank.

ESS10 Stakeholder Engagement and Information Disclosure

A key risks and impact under this standard relate to inadequate, ineffective and/or inappropriate stakeholder and community engagements and disclosure of information leading to exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the limited resources available under the project versus the widespread need. Others include elite capture where project benefits are diverted to less-needy individuals and locations and poor access to beneficiaries for meaningful community engagements and difficulty in monitoring for social harm.

The MoE has prepared a Stakeholder Engagement Plan (SEP) which provides the framework for identification of stakeholders, gauging stakeholder interest and providing systematic means and processes of inclusive and meaningful engagements with the stakeholders and communities in away that influences project design and implementation under all components. Robust community engagements will be conducted before commencement of project activities as well as sensitization on the availability of a project GRM to support the systematic uptake, processing and resolution of project related complaints and grievances.

Consultations with ministries involved such as Ministry of Health and Ministry of Finance have been conducted. Others include departments, units and agencies such as KNEC, TSC, SEQIP, GPE PREIDE and KICD and development partners including UNICEF and UNESCO. With COVID-19 restrictions, consultations have been adapted to minimize close personal contact and follow the recommended hygiene procedures as outlined by the Government of Kenya directives. The SEP will be disclosed upon approval and prior to conclusion of appraisal.

Additional consultations will be conducted in adaptation to Covid-19 restrictions. Strategies employed include smaller meetings and small FGDs conducted as appropriate taking full precautions on staff and community safety. Where meetings are not permitted, traditional channels of communications such as radios and public announcements will be implemented. These consultations will include one on one interviews through phones and skype for community representatives, CSOs (including Disabled Peoples Organisations and vulnerable and marginalised groups organisations) as well as other interest groups.

A project wide Grievance Redress Mechanism (GRM) has been set up and adapted to the different project interventions, geographical scope of each intervention and in accordance with the existing procedures mostly borrowed from the SEQIP project. The GRM is designed to address concerns and complaints promptly and transparently with no cost or discrimination towards project affected communities, students and teachers. This will include the setting-up of a toll-free hotline for access by beneficiaries and affected persons and supplemented by



help desks when Covid-19 restrictions permit. The helpdesks will be based at the County, Sub-County and Zonal levels. This will be complemented by the contracting of a service provider for on-call psychosocial services which will include a hotline for reporting cases of GBV/SEAH and child abuse. The PIU will maintain a documented record of stakeholder engagement and GRM, including a description of the stakeholders consulted, a summary of the feedback/grievances received and a brief explanation of how the feedback was considered, or the reasons why the issue could not be resolved.

An ESMF that will comprise of; a) General Environment and Social Management Plan; b) Labor Management Procedures; c) School pre-opening audit checklist d) Gender Based Violence Action Plans; e) VMGP f) Plans and procedures for food sourcing, handling and storage for the suppliers and schools, and ;g) OHS requirements for project workers and suppliers will be prepared, consulted upon and disclosed.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Key risks under ESS 2 relate to security of workers, protection against child labor, occupational health and safety and ensuring that labor for the project will be sourced and managed responsibly including the set-up of a labor specific GRM. Project workers will mainly entail existing civil servants who will remain subject to the terms and conditions of their existing sector employment including relevant ESS 2 requirement applicable to civil servants including OHS requirements.

Other direct workers include experts working on content for online learning, those training teachers and for ICT delivery. It is yet to be established if these will be civil servants from relevant ministries and government agencies or consultants. For contracted and workers they will need to be engaged in line with national law and requirements of ESS2. This includes measures to protect them from the risk of working under pressure due to emergency nature of the project. Therefore the LMP (included in the ESMF), will be prepared to detail clear contracts for hours of work and modalities for overtime, rest periods and pay.

Procurement processes related to the engagement of supply chain workers for food for school meals will be managed in a way that minimizes the risk of child labor from agricultural activities. Modalities for supply of gadgets and associated labor risks is unknown and will be detailed in the LMP as details become clearer.

The LMP will be prepared before the commencement of project activities and will include procedures on incident investigation and reporting, recording and reporting of nonconformance, emergency preparedness and response procedures and continuous training and awareness to workers. It will be developed by the PIU and as specified in the ESCP and will include a Code of Conduct for project workers. The LMP will also look at safety concerns and OHS in terms of working environment for workers, and will include provisions on OHS to inform individual subproject ESMPs

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant as the project will include the procurement of ICT equipment. The relevance of ESS3 is mainly related to ensuring efficient energy consumption and adequate management of electronic waste. In terms of efficiency, the project will ensure that the equipment it procures is energy efficient to the extent possible. For any ICT equipment



that may be replaced it will have to be disposed off in a manner that follows the guidelines as articulated in the ESMF and subsequent ESMPs.

ESS4 Community Health and Safety

The use of some schools as quarantine and isolation centers under the Kenya COVID-19 Emergency Response Project (P173820) presents a potential risk of exposing the school community (teachers and students) to other communicable diseases and the possible continued spread of COVID-19. ESS4 is therefore relevant given the eminent risk to ensure both the schools and the schools host communities safety is guaranteed under P173820. An Infection Prevention and Control and Waste Management Plan (IPC&WMP) is being prepared under P173820 and will be enforced and closely monitored through the project school pre-opening audit checklist.

Other community risks include the possibility of harmful inward migration as school meals will be provided to a small number of schools relative to immense and widespread need leading to a possibility of population influx from neighboring district and locations. When it occurs, this may upset community dynamics and perpetuate clashes and animosity exacerbating social and environmental fragility. A primary mitigation measure is the faithful application of targeting methodologies linked it to the most recent poverty data.

Risks related to sexual exploitation and abuse and sexual harassment are a conceivable possibility. The GBV risk rating for the project is assessed to be substantial, necessitating integration of robust mitigation measures to manage these risks. Mitigation measures include develop and implement measures and actions to regularly assess and manage the risks of SEA/H and other forms of GBV extending from project activities. Implementation of the Code of Conduct and Ethics for teachers in relation to SEA/SH e.g through; communication on the Code of Ethics with clear guidance on how the code is enforced. Sensitization of learners/school community on SEA/SH and reporting mechanism's including a hotline number. Teachers would be made aware of and understand the Code of Conduct and Ethics for Teachers (which covers SEA/SH). This can be done during routine/regular meetings by management and complimented by the contracting of a service provider for on-call psychosocial services which will include the hotline for reporting cases of GBV/SEAH and child abuse. Requirements to ensure that the service provider selected has the capacity to deliver quality and comprehensive services commensurate with the geographical scope and level of risk will be built into the ToRs. A GBV Response Plan will be drafted and included in the ESMF to include measures for minimizing SEA/H and GBV.

As the project involves meal preparation and delivery to schools, the PIU will establish and implement a quality management system to anticipate and minimize risks and impacts from meal sourcing, preparation, delivery, distribution and storage. The project will also apply the concept of universal access; meaning unimpeded access for people of all ages and abilities in different situations and under various circumstances, as set out in GIIP, as appropriate, based on the specific subprojects design. This quality management system will be included as part of the ESMF.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Activities that will lead to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement not envisioned



ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is not considered relevant, no project activities are expected to have impact to the natural habitat and ecosystem services. Proposed small scale renovation activities will be within the existing facilities.

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

The project will be implemented countrywide including the 14 counties where people meet the criteria under ESS 7. Project activities that could lead to differentiated risks on VMGs/IPs include on component one on access to mass media and remote learning opportunities where VMGs may have greater challenges in accessing remote learning opportunities and on component two on interventions to facilitate smooth transition of vulnerable students to schools. . Understanding selection requirements and complying with application process will require a differentiated approach to information dissemination.

The VMGF for GPE-PREIDE which has a similar geographical scope and target will be the basis for preparation of a VMGP. This will be prepared, consulted upon and disclosed within one month of project effectiveness and before commencement of related project activities as stipulated in the ESCP. Consultations will be conducted through VMG organizations on differentiated project impacts on VMGs and the VMG plan prepared.

Updates to the SEP will include adequate coverage on stakeholder engagement and the differentiated impacts and culturally and linguistically appropriate consultations and information disclosure processes for the IP/SSAHUTLC context in Kenya

ESS8 Cultural Heritage

Project activities do not touch on tangible or intangible cultural heritage

ESS9 Financial Intermediaries

Project activities do not envision the use of financial intermediaries

B.3 Other Relevant Project Risks

Other overall project risks include systemic weaknesses and the amplification of the general project risk profile due to COVID-19 restrictions where traditional access to beneficiaries for meaningful stakeholder and community engagements and grievance redress are limited. In this case, stakeholder engagements have been adapted to minimize close personal contact and follow the recommended hygiene procedures as outlined by the Government of Kenya directives. Strategies employed include smaller meetings and small FGDs conducted as appropriate taking full precautions on staff and community safety. Where meetings are not permitted, traditional channels of communications such as radios and public announcements will be implemented. Other strategies will include one on one interviews through phones and skype for community representatives, CSOs and other interest groups

Some counties such as Garissa, Wajir, Mandera, Lamu, Tana-river and Turkana are facing severe insecurity challenges and most teachers deployed to schools in these counties are not able to access schools. MoE, through KICD, proposes



to adopt a simple virtual learning environment (VLE) using the e-cloud platform to deliver lessons through live streaming and or pre-recorded interactive lessons on gadgets that can be used offline

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Retain an experienced Environmental Specialist and Social Specialist, each with more than five (5) years of experience in carrying out environmental and social assessments of projects. This could be either from sister project (GPE PREIDE/SEQIP), secondment from other agencies or directly hired for the project	07/2020
Mobilize additional staff needed on short-term or long-term assignment in accordance with ESMF institutional assessment/needs, Social assessment. including subject matter specialists on GBV/SEA, VMGs, labor conditions (health & safety), medical waste management, and social inclusion.	08/2020
Scoping of key environmental and social risks and impacts of the Project and identify appropriate mitigation measures to be included in the Environmental and Social Management Framework (ESMF)	07/2020
Prepare, consult, disclose and implement; i) ESMF which includes; a) G-ESMPs; b) LMPs; c) School pre-opening audit checklist based on Infection Prevention and Control, Waste Management plan (IPCWMP) under the Kenya COVID-19 Emergency Response Project (173820), d) Gender Based Violence Action Plans; e) VMGP f) Plans and procedures for food sourcing, handling and storage for the suppliers and schools g) OHS requirements for project workers and suppliers;	07/2020
Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.	09/2020

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Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.	
Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.	08/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
Prepare and disclose SEP and continuously update.	07/2020
Update the SEP to upon consultations with DPOs and VMGP organizations and disclose	07/2020
Disclose the ESMF including all the auxiliary plans and instruments	07/2020
Develop the Project Grievance Redress Mechanism, as part of the SEP and maintain throughout project implementation	07/2020
ESS 2 Labor and Working Conditions	
Develop Labor Management Procedures (LMP)	07/2020
Develop and maintain a grievance redress mechanism (GRM) for direct project workers, including contracted and community workers as part of the LMP	07/2020
Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the ESMF	08/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
As part of the ESMP will include measures and procedures for managing e-waste impacts from ICT equipment to be prepared under action 1.3 above into the ESMP	07/2020
ESS 4 Community Health and Safety	
Implementation of the Code of Conduct and Ethics for teachers in relation to SEA/SH e.g. through; communication on the Code of Ethics with clear guidance on how the code is enforced, particularly for SEA/SH	07/2020
Sensitization of learners/school community on SEA/SH and reporting mechanism's including a hotline number.	07/2020
Contracting of a service provider for on-call psychosocial services which will include the hotline for reporting cases of GBV/SEAH and child abuse	07/2020
Prepare a GBV Action Plan included in the ESMF to include measures for minimizing SEA/H and GBV.	07/2020

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ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Conduct VMG appropriate consultations through VMG organizations on differentiated project impacts on VMGs and prepare VMG plans	08/2020
Prepare, adopt, and implement the arrangements for the grievance mechanism for indigenous people, as required under the VMGP if different from the SEP	08/2020
ESS 8 Cultural Heritage	
ESS 9 Financial Intermediaries	

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

Borrower framework not being considered

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: The National Treasury and Planning

Implementing Agency(ies)

Implementing Agency: Ministry of Education

V. FOR MORE INFORMATION CONTACT

Public Disclosure



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VI. APPROVAL

Task Team Leader(s): Ruth Charo

Safeguards Advisor ESSA Nathalie S. Munzberg (SAESSA) Concurred on 23-Jun-2020 at 15:23:18 EDT