



**THE REPUBLIC OF KENYA  
MINISTRY OF EDUCATION**

**PROJECT:  
KENYA GPE COVID-19 LEARNING CONTINUITY IN BASIC  
EDUCATION  
(P174059)**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**April 2020**

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## Acronyms and abbreviations

CLO - Community liaison officer

DFID		Department for International Development
EU	-	European Union
NGO	-	Non- Governmental Organization
GRM	-	Grievance Redress Mechanism
MoF	-	Ministry of Finance
OIPs	-	Other interested parties
PAPs	-	Project-affected parties
PDO	-	Project Development Objectives
PIU	-	Project Implementation Unit
SEP	-	Stakeholder Engagement Plan
USAID	-	United States Agency for International Development
UNICEF	-	United Nations Children’s Fund

## 1. INTRODUCTION

### a) Project background

The Ministry of Education (State Department of Early Learning and Basic Education) has developed a COVID -19 response and recovery plan with the following main objectives: (i) to provide access to quality, equitable and inclusive education to learners during and after the crisis to ensure continued learning; (ii) to facilitate production of online teaching and learning materials, and to expand existing distance learning programmes; (iii) to train teachers to effectively support distance learning, including monitoring and assessment; (iv) to develop, and implement intervention programmes targeting the marginalized and most vulnerable learners especially girls and learners with special needs; and (v) to provide psychosocial support

to learners, teachers, education officials and other stakeholders. This PAD covers selected interventions under these five objectives.

As of April 25, 2020, Kenya has reported three hundred and forty three (343) confirmed cases of COVID-19 and continues to be vulnerable to a more widespread outbreak. The Government of Kenya (GoK) has taken actions to control the spread of the pandemic by (i) suspending arrivals from all affected countries, and only citizens or foreigners with permits can enter the country; (ii) ordering those who enter the country to self-quarantine for 14 days; and (iii) closing all educational institutions; as well as on March 22, 2020 by (iv) suspending international passenger arrivals; (v) increasing quarantine requirements; (vi) restricting social gatherings; and (vii) imposing new standards for public transport. The GoK also urged organizations to adopt home based work and use of mobile money to avoid cash transactions.

On March 15, 2020 Kenya's Ministry of Education (MoE) announced the closing 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 closing of schools was unexpected and unplanned. In Kenya, this decision means about 18 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. The economic shock is expected to exacerbate the damage, by depressing education demand and supply as it harms households, exacting long-run costs on human capital and welfare

Kenya must ensure its overall resources in education are deployed efficiently, effectively and equitably to maximize the impact of its COVID-19 response. Kenya has some foundations in place that can be leveraged to support remote teaching and learning, including critical assessments. Additionally, Kenya is home to one of the most vibrant Education technology (EdTech) ecosystems in sub-Saharan Africa. While interactive online education services have potential to simulate the school experience, issues of inclusion and equity, and the critical role of teachers will need to be carefully considered. Extended school closures have begun to highlight non-academic challenges for students and families, particularly from poor and vulnerable households. For example, over 1.6 million learners rely on the Government supported school meals program, while most girls in public upper primary schools are supported with sanitary towels through the Government's sanitary towels programme. In addition, students benefit from existing psycho-social support from the guidance and counselling arrangements at the school level.

It is crucial for Kenya to move quickly to support continued learning to ensure that the achievements realized through recent education reform programs are not lost. Enrollment rates have increased in recent years. The country has also been able to increase girls' participation with gender parity at primary level and close to parity at lower secondary level. Kenya also performs well in regional learning assessments at the primary level compared with other African countries, second only to Mauritius. Kenya scored 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.

## b) Project Development Objectives

The Project Development Objective (PDO) is to enhance access to online and distance learning for all students in primary and secondary schools and facilitate a smooth transition when schools reopen

## c) Project Components

The project will have three components

1. **Component 1: Expanding existing remote learning opportunities for learning continuity for all students in basic education (US\$7.25 million).** MoE is looking into solutions to maximize its existing remote learning resources and strengths in line with emergent international good practices in remote learning in light of social distancing and other government restrictions due to COVID-19. Good practice models are emerging, which Kenya can draw on, as well as building on its own experiences to deliver effective remote learning. The project will not finance the distribution of radios, TVs, phones to schools and local communities as well as being involved in support on electricity supply in the long term. Electricity supply targeting schools is being achieved through the ongoing World Bank supported Kenya Off-Grid Solar Access Project, KOSAP (P160009) that is targeting facilities not served by the national grid to provide mini-grids, stand-alone solar systems and also under the digital learning programme (DLP) the Government targets to connect all primary schools with electricity
2. **Sub-Component 1.1: Support Access and Delivery of Online Content to all students in primary and secondary school (US\$4.75 million).** This sub-component will support the following four interventions<sup>1</sup>:
  - a) *Radio:* MoE proposes to enhance the existing radio education channels through expanded partnerships to reach all regions. MoE will seek partnerships with privately owned, community, and faith-based radio broadcasters to add to the existing radio education services. The broadcast hours are expected to increase from the current 4.5 hours to 8 hours per day. The radio transmissions will include interactive recorded classroom teaching, with additional new recordings added for grades and subjects that are not currently covered. Additional, existing and new content will be rebroadcast where feasible. Remedial or revision-focused interactive online lessons will also be added to focus on ‘weak’ areas highlighted in the national learning assessments. This intervention will support mechanisms to promote interactive online learning for both radio and TV platforms<sup>2</sup>. Expansion of radio coverage in all regions, is also expected to benefit over 72,000 children who are refugees;
  - b) *Television:* This intervention will support MoE to add new programming to EDU TV daily transmission schedule. MoE will work with Ministry of ICT to establish new partnerships with

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<sup>1</sup> Operational details for each intervention will be included in the project’s implementation manual.

<sup>2</sup> Such as WhatsApp group; questions and answers posted on the e-cloud; ‘toll free’ /reverse call options to teachers identified and contracted by TSC and KICD for this purposes, and or volunteers ; short text messages; dedicated websites which could be immediately established as webpages in existing KICD, TSC and MoE websites.

faith based, community and privately-owned TV providers to include EDU TV in their subscription packages. During the COVID -19 period, the project will pay for the subscription packages and offer these to households for 'free'. The radio and television content will be expanded to cover core subjects in all grades. The new content will include recordings of classroom teaching delivered by hand-selected, high-quality teachers. KICD will work closely with TSC to identify and facilitate these teachers. KICD will be required to adapt the online based lessons for learners with special needs. For example, students with hearing impairments need to be provided with online lessons in sign language as well as same language sub-titling;

- c) *The Kenya Education Cloud (e-cloud)*. The project will support acquisition of supplementary online teaching and learning materials from external partners and provide this for free to all learners through radio, EDU TV and e-cloud; and strengthening of the e-cloud in the following aspects: curation of additional content to cover core subjects in all grades; and upgrade of the e-cloud portal to make it more efficient, and to increase its capacity to support over 15 million users. This intervention will also support KICD to establish protocols for enhancing storage and digital rights management, to evaluate course and supplementary teaching and learning materials particularly from external partners, to strengthen the ability of the e-cloud to directly provide curriculum delivery in special situations, such as in COVID-19, and to put in place critical foundations for the long-term use of technology in education services-for example address security and cyber bullying.
- d) *The Kenya education cloud will be leveraged to lay critical foundations for the long-term use of technology in education services in counties such as Garissa, Wajir, Mandera, Lamu, Tana-river and Turkana*. The project will support MoE, through KICD, to adopt a simple virtual learning environment (VLE)<sup>3</sup> using the e-cloud platform to deliver lessons through live streaming and or pre-recorded interactive lessons on gadgets that can be used offline. These counties are facing severe insecurity challenges and most teachers deployed to schools in these counties are not able to access schools. Some of these counties have challenges in access to electricity and internet (Table 1). However, under the digital learning programme (DLP) the Government targets to connect all primary school with electricity. In addition, the ongoing World Bank supported Kenya Off-Grid Solar Access Project, KOSAP (P160009) is targeting facilities not served by the national grid to provide mini-grids, stand-alone solar systems, clean cooking solutions and solar water pumps. About 207 schools in these counties are targeted under this project. A new initiative by the Government and the private sector aims to provide wider internet coverage to institutions and households in the most rural regions, including these counties. Through this initiative, it is estimated a single internet balloon can provide internet

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<sup>3</sup> The project implementation manual will include operational details for the VLE intervention, including the target schools and scope-based on an ongoing rapid needs assessment, and findings of the VLE pilot conducted by KICD in Isiolo and Garissa. The proposed VLE includes the following program models, which will be described in detail in the PIM: (i) hybrid or blended learning, which combines face-to-face traditional classroom instruction methods and online learning opportunities based on the school learning conditions; (ii) online and distance learning using curated content on the e-cloud -the uplink includes decoders and modulators that allows all formats of digital content (radio, TV, interactive digital content); (iii) support to 'off line' learning through access to digital learning materials on devices such as Digital versatile discs (DVDs); (iv) mobile caravans fitted with relevant devices and internet to reach clusters of specific schools; and (v) the initiated schools 'twinning' programme, which aims to create an environment where good practices and sharing of online and off line resources among 'partner' schools.

connectivity across an eighty (80) kilometer-diameter area. In addition, the Government has partnered with the Kenya Publishers Association (KPA) to avail electronic copies of core textbooks for free on the e-cloud for all students. The proposed simple virtual learning environment may therefore work during the recovery period. Adopting this area-based approach for VLE, will also promote better learning opportunities for refugees children- the largest refugee camps are located in Garissa and Turkana counties.

- e) *Mobile phones*: The interactive content being developed for radio, TV and e-cloud will be adapted for and accessed via mobile phones, potentially increasing the reach of the resources developed. Mobile phones can be leveraged to provide three elements of support for distance learning:(i) Phones can be used to access content supplied through the e-cloud or (ii) other mediums such as YouTube, radio applications, or (iii) education focused mobile applications. Some learning applications have been explicitly designed for use on mobile phones-even those without smart phone capabilities can be used to access learning via short message service (SMS). KICD could also leverage on the mobile phones to send messages that provide behavioural nudges to parents. This might include prompting parents and care givers to provide encouragement to children or providing guidance on good tips to support home learning.
3. ***Subcomponent 1.2 (US\$2.0 million): Teacher training in interactive remote learning methodologies:*** This sub-component will support capacity building of teachers in online and distance learning methodologies to ensure teachers play a role in supporting remote learning. The teacher training intervention will build on the existing trainings for teachers for the digital learning programme (DLP) conducted by the TSC and Ministry of ICT, Information and Communication Technology Authority (ICTA) where over 92,000 teachers in early grades were trained. The TSC and ICTA, with relevant technical assistance, will review the existing training content to expand it to reflect new roles for the teachers in supporting remote learning (online and distance learning), during the COVID-19 crisis and beyond. The roles for teachers in primary and secondary schools might include design and delivery of the online lessons, developing activities for learners to do remotely or at home, designing simple learning plans to support parents to home school, being on call (or other relevant social media platforms) for interaction with learners and parents, hosting and online- or phone-based group learning conversations.
4. Under this component, TSC and ICTA will offer training (using the revised training content) to a total of 150,000 head teachers (and or their deputies), teachers and 100,000 curriculum support officers (CSOs). The project implementation manual (PIM) will include details for targeting of these officers, and mechanism for roll out of the training-the targeting will consider equity and inclusiveness. The new content is expected to be developed for online delivery mode for access by all teachers and CSOs at no fee. KICD will continue to offer the *Elimika*<sup>4</sup> online courses for teachers, which is part of the e-cloud. *Elimika* rolled out two<sup>5</sup> online self-paced courses for teachers focusing on curriculum delivery

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<sup>4</sup> <https://elimika.kec.ac.ke/> 'Elimika' is Kiswahili word for 'educated'.

<sup>5</sup> ICT Integration course for Teachers, and CBC Online Orientation Course. The courses are self-paced courses and aim to equip teachers with the required relevant competences to enable them integrate ICT in the teaching and learning process in line with the digital literacy competence in CBC.

using technology. The two online courses are not mandatory, about 5,299 teachers have enrolled in the *Elimika* ICT integration course.

5. ***Subcomponent 1.3 (US\$0.5 million): Create an integrated monitoring and evaluation system for remote learning interventions and provide support for parents and caregivers to monitoring student learning.*** This subcomponent will support the following two interventions:

- a) *Create an integrated monitoring and evaluation system for the remote learning interventions.* This intervention will support development of a readiness and decision support tool<sup>6</sup> to assist and guide Kenya as it implements remote learning interventions. KICD will contract a relevant firm or institution to support development of monitoring mechanisms for all online and distance learning interventions. The monitoring system is expected to leverage technology and online based monitoring tools. The monitoring among other aspects, will include the need to establish utilization of the remote education services through radio, TV and e-cloud, and to conduct semi-annual user satisfaction survey to inform areas needing adjustments. In addition, KICD will be required to deploy rapid small-scale assessments to both understand user satisfaction and investigate implementation fidelity. The integrated monitoring system is also expected to address monitoring and documentation of how teachers can support remote learning to inform insights in the immediate, medium and long term, and emergence of innovative practices; and
- b) *Provide support for parents and caregivers to support and monitor student learning.* Under this intervention, KICD will collaborate with partners to further develop and disseminate simple tips to support parents and caregivers as they support learners at home, especially while using radio, TV and mobile phones. The tips will include relevant contacts for ‘helpdesks’ at KICD. KICD will leverage on the partnerships for TV and radio to disseminate these tips. MoE will work with Ministry of ICT to ensure KICD adequately considers aspects of information and data security, including related data protection practices and safeguards and intellectual property issues, child protection and cyber-bullying mitigation.

6. Support under this component will include the following main activities:

- expand partnerships with radio and TV providers, and procurement of core ICT equipment to support the lessons recording and upgrading of the e-cloud;
- acquisition of online supplementary learning materials and development of additional online interactive lessons for all grades and subjects in basic education, including adaptation for learners with special needs;
- review of existing digital learning training packages for teachers, and capacity building of target teachers;
- procure of relevant consultancy services to develop a readiness and decision support tool for remote learning interventions;
- develop a multi-modal strategy, which includes child protection, information and data security aspects;
- strengthen the e-cloud;
- develop monitoring mechanisms for online and distance learning interventions;

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<sup>6</sup> This tool would include minimum and recommended standards related to infrastructure, content, teacher support, and institutional implementation capacity, including mechanisms to monitor and assess impact over time



- establish virtual learning environment in target schools in Garissa, Wajir, Mandera, Lamu, Tana-river and Turkana;
  - conduct semi-annual satisfaction surveys for remote learning services and disseminate findings; and
  - develop and disseminate simple tips to support parents and caregivers, including a helpdesk, as they support learners at home.
7. **Component 2: Facilitate smooth transition back to school for vulnerable students and girls, when schools reopen (US\$6.5 million).**
  8. ***Subcomponent 2.1: Support to the National School Meals Program (US\$3.5 million).*** This sub-component will support a top up grant for the existing National School Meals Program (SMP). The top up grant will support: (i) provision of a fortified meal each learning day for pre-school learners, and learners in grades 1, 2 and 3 in the existing selected schools under SMP, which are within informal settlements, arid and semi areas; (ii) expand provision of the fortified meal to additional schools within the informal settlements in urban centers, and special needs schools with a focus on pre-school learners and learners in grades 1, 2 and 3 ; and (iii) review the mapping process for the SMP, to link it to the most recent poverty data, for equity and optimal use of existing resources for the program. The existing SMP covers learners in pre-primary and primary schools in selected Counties (Annex 2) and has two interventions: (a) Centralized Procurement system (in-kind). Food commodities are procured centrally and distributed to target schools in ten (10) arid Counties; and (b) cash transfer to schools for the ‘home grown’ SPM on a per child cost of about US\$0.1 equivalent). The SMP will be undertaken as per the established standards for nutrition and hygiene, and the school health and nutrition policy. A memo seeking to finance grants including food expenditures has been prepared and cleared by the RVP.
  9. The School Meals Programme Committee (SMPC) does the procurement of food locally following the SPM regulations and guidelines. This intervention has a budget short fall of about US\$6.26 million for this academic year (January 2020 to December 2020). Funds allocation for the program has remained static over the past four years despite increased enrollment in target schools. This implies target students benefit from the SMP for about 70 learning days instead of the expected 195 learning days in one year. In some cases, this has led to irregular school attendance, dropouts and poor learning outcomes. Under this intervention, MoE will also review the existing mapping and targeting process for the SMP considering are substantial changes in poverty data at the sub-county level, changes in students’ enrollments, and the need for special consideration for schools located in the informal settlements in urban centers, and schools with special needs learners. In addition, MoE, will establish an online monitoring system for the SMP, linked to the National Education Information System (NEMIS).
  10. ***Subcomponent 2.2: Provision of scholarships and mentorship services to one cohort of at least 700 girls including girls with special needs and disability (US\$2.5 million).*** This subcomponent will support provision of scholarships and mentorship services to one cohort of at least 700 girls, including girls with special needs and disability, who are the best primary completers from within the 15 informal settlements in urban centers. The scholarship will include a school kit, transport and stipend, and mentorship activities. It is estimated that at least 400 of the 700 girls of the target girls will join boarding secondary schools, and the rest day secondary schools. This intervention complements the ongoing SEQIP supported scholarships and mentorship intervention, which mainly targets poor and vulnerable students from arid and semi-arid areas. This intervention will be implemented within the existing

framework agreement for the ELIMU Scholarship Programme by the MoE and the Equity Group Foundation, ‘Wings to Fly Programme’, under the SEQIP project. Annex 1 includes details of the existing ELIMU scholarship programme. Considering the project will run for eighteen months (18), and the target girls will be in school for four years, the Elimu contract arrangements will include the applicable FM arrangements and accountability for resources under this intervention.

11. ***Subcomponent 2.3: Provision of on online based psychosocial support services (US\$0.5 million).*** This intervention will provide support to MoE to design and pilot online based and toll-free psychosocial support services through an agreement with one or two relevant institutions. MoE will also leverage the radio and TV partnerships under Component 1, to disseminate to students and parents, key messages on psychosocial wellbeing that will be developed by the service provider. This service will initially target learners in primary and secondary schools from the poorest regions, and informal settlements. This intervention will complement the ongoing comprehensive interventions regarding student’s violence and gender based violence (GBV) under the SEQIP project, which among other activities, include establishment of GBV protocols at the school level, advocacy, appointment and training of gender champions at the school level.
12. Support under this component will include the following activities: (a) provision of scholarships and mentorship services to at least 700 girls; (b) procurement of online based Psychosocial support services; and (c) technical assistance for the SPM activities.
13. 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).The Project will only be involved in auditing of the schools used as quarantine facilities to ensure students safety on return to school. Hence the project will prepare pre-school audit checklist based on the ICP prepared under the MoH project (P173820)
14. **Component 3: Project Coordination, Communication, and Monitoring and Evaluation (US\$1.05 million).** This component aims to support project implementation, selected monitoring and evaluation activities, and to build capacity of MoE to conduct virtual meeting during the COVID-19 period and beyond. Although the project activities for this grant are delineated, overall, project management and coordination, will be implemented within the existing governance structures for the Kenya GPE PRIEDE project at MoE. The component will support the following activities:
  - a) *Monitoring school attendance in all schools (US\$0.05 million).* MoE will leverage the radio and TV partnerships under Component 1, to launch re-enrollment campaigns once schools re-open. MoE will also issue guidelines to school management and education officials at the County/Subcounty level, informing schools on how to deal with the monitoring of school attendance, end-of-academic year decisions on student assessment, grade promotion and the national examinations, so that the most vulnerable students, already likely to be hit by the COVID-19 pandemic, are not disadvantaged academically as well. MoE will collect and analyze weekly statistics to monitor number of students who have reported to school. The existing National Education Management Information System platform ( NEMIS) will be used to collect and analyze the data. The funds allocated for this intervention will therefore be used to support dissemination of the re-enrollment data, and targeted campaigns in areas lagging

with re-enrollment. Headteachers will be responsible for knowing and recording why any student is absent (by calling and following up with parents), and will update this information on NEMIS, and notify the sub-county director of education of any student absent from school for more than five days, and reasons for the same. Monitoring of school attendance will be key to identifying, understanding and mitigating social risks related to school drop-outs.

- b) *Conduct a learning assessment in all primary schools (US\$0.5 million).* Building on the NASMLA process and test items, the national assessment center (NAC) will conduct a learning assessment once schools reopen to identify students who need targeted support, and to inform areas of emphasis, particularly for learners lagging; and
- c) *Overall project management, coordination and communication, and capacity enhancement for virtual meetings in MoE's main board room (US\$0.5 million):*
  - Overall project management and coordination including preparation and execution of the 18 months' work plan and budget (AWP&B), and procurement plan; monitoring of the results framework and quarterly reporting; facilitate project communication; ensure compliance with fiduciary and safeguards requirements;
  - Enhance existing technical assistance arrangements by World Food Programme (WFP) and MoE to support MoE to timely implement and monitor expanded SMP activities; and
  - Procurement of a relevant firm to design and install relevant ICT enabled equipment for virtual meetings, conference calls, and web conferencing. The firm will also be required to train relevant staff at MoE on the use and maintenance of the equipment.

Support under this component will include the following main activities: (a) monitoring school attendance in all schools, analysis of the data and dissemination; (b) learning assessments when schools reopen, analysis of the data and dissemination; (c) activities directly related to the project management, coordination and communication; and (d) procurement of a firm to establish a functional virtual meeting room in MoE's main

#### **d) Project Context and Target Population**

The project will be implemented countrywide. Direct project beneficiaries are; a) about 70 percent of primary and secondary school students accessing online and distance learning; recruitment and deployment of contract teachers; b) about 1.7 million learners benefit from the school meals program; c) at least 700 secondary education girls; d) an estimated 150,000 teachers will benefit from teacher training in online and distance learning; e) students in need of online based psychosocial support services, and; f) parents and care takers in need of remote learning tips

### **e) Purpose of the SEP**

The Stakeholder Engagement Plan seeks to define a structured, purposeful and culturally appropriate approach to consultation and disclosure. The Government of Kenya through the Ministry of Education recognises the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making.

Overall, this SEP will serve the following purposes:

- i. stakeholder identification and analysis;
- ii. planning engagement modalities through effective communication, consultations and disclosure;
- iii. enabling platforms for influencing decisions;
- iv. define roles and responsibilities for the implementation of the SEP;
- v. define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.
- vi. defining role and responsibilities of different actors in implementing the Plan; and
- vii. elaborating the role of grievance redress mechanism (GRM).

## 2. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

### Key institutional stakeholder meetings and consultations

**Ministry of Education** undertook engagements and consultation on the project design and the planned activities and implementation arrangements with key institutional stakeholders, including the relevant Government agencies, development partners and other cooperating agencies. These engagements and consultations, which were held with key stakeholders identified as presented below, were undertaken in compliance with Kenyan Government social distancing and related COVID-19 requirements:

Stakeholder	Date	Participants	Key points Discussed
Ministry of Education (MoE)	April 11	<ul style="list-style-type: none"> <li>Ann Gachoya (Directorate of Policy, Partnerships &amp; EACA)</li> <li>Stephen Jalenga (Gender Desk Officer)</li> <li>Josephine Ondieki (Safeguards Officer-PCU)</li> </ul>	<ul style="list-style-type: none"> <li>Project scoping</li> <li>Strengthening of existing systems and structures of Education for Covid-19 response</li> <li>Planned activities, implementation arrangements</li> <li>Partnership with Education partners to support project interventions</li> </ul>
Ministry of Education (MoE)	April 12	<ul style="list-style-type: none"> <li>Ann Gachoya (Directorate of Policy, Partnerships &amp; EACA)</li> <li>Stephen Jalenga (Gender Desk Officer)</li> <li>Josephine Ondieki (Safeguards Officer-PCU)</li> </ul>	<ul style="list-style-type: none"> <li>Discussed Risk Management Matrix to be included in the COVID Emergency Plan</li> <li>Developed and agreed on Risk Management Matrix to be included in the COVID Emergency Plan</li> <li>Developed Mitigation measures to be included in the COVID Response Plan</li> </ul>

KENYA TROIKA PLUS (+)	April 15	<ul style="list-style-type: none"> <li>• UNESCO/Chair- EDPCG</li> <li>• Elijah Mungai- MOE</li> <li>• Ann Therese Ndong- Jatta Regional Director/ UNESCO</li> <li>• John Kimotho-KICD</li> <li>• Martha Ekirapa-MOE/DPCAD</li> <li>• Ruth Charo-World Bank</li> <li>• Andrew Kegode-UNESCO</li> <li>• Marilyn Hoar-UNICEF</li> <li>• Cynthia Achieng-UNESCO</li> <li>• Virginia Mumo-UNESCO</li> <li>• Michelle Chen-USAID</li> <li>• Lilian Gangla-USAID</li> <li>• Louse Agnes Mackongo-UNESCO</li> <li>• Enos Radeny-USAID</li> </ul>	<ul style="list-style-type: none"> <li>• GPE COVID 19 Response Discussions (DPC&amp;D)</li> <li>• Development of Project Document</li> <li>• GPE Application Grant</li> <li>• Grant Management Agency</li> <li>• MOE GPE funded COVID response Project ie Status</li> <li>• Lodging of GPE Application</li> </ul>
Ministry of Health	April 19	<ul style="list-style-type: none"> <li>• Martha Ekirapa- MOE</li> <li>• Ruth Karimi Charo-World Bank</li> <li>• Daniel Yumbya-MOH</li> <li>• Raymond Kirwa-World Bank</li> <li>• Agnes Njoroge-MOE</li> <li>• Diana Sirma-World Bank</li> <li>• Lydia Muchemi-MOH</li> <li>• Kennedy Buhere-MOE</li> <li>• Asumpta Matei-MOE</li> <li>• Samwel Siringi-MOE</li> </ul>	<ul style="list-style-type: none"> <li>• Key Environmental and Social Risks and Proposed mitigation measures</li> <li>• Input into Preliminary Safeguards Instruments</li> <li>• Disinfection and fumigation of educational institutions used as quarantine and Isolation Centre's</li> <li>• Implementation arrangements discuss collaboration between MoE and MOH.</li> <li>• Key inputs into a Risk and Communication Strategy, key messages targeting children</li> </ul>
MoE, MOH	April 23	<ul style="list-style-type: none"> <li>• Kennedy Buhere</li> <li>• Judith Sirma</li> </ul>	<ul style="list-style-type: none"> <li>• Corona Virus Disease Literacy Package</li> </ul>
MoE World Bank	April 24	<ul style="list-style-type: none"> <li>• Mary Nyamongo</li> <li>• Josephine Ondieki</li> </ul>	Labour Management Action

The emergency nature of the project and challenges brought about by restrictions related to COVID-19 combine to pose significant challenges in the effective consultation of the stakeholder, communities and affected parties. While ensuring compliance with Kenyan government COVID-19 social distancing and related requirements, project stakeholder consultation and engagement activities during the preparation phase will not be deferred, but rather will be designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. The presence of substantial numbers of students and their families who are members of vulnerable groups in this project merits a fit for purpose,

tailored approach to ensure meaningful consultations. Such an approach will use best efforts to ensure that these and other stakeholders have opportunities to provide inputs on project design and identify possible unknown project risks. Within the social distancing and other parameters set by the Kenyan Government, the **[MOE PIU]** will make all reasonable efforts to conduct meetings with stakeholders through diversifying means of communication, including based on type and category of stakeholders.

Upon project approval, additional engagements will be conducted with the stakeholders and communities with a focus on the vulnerable and minority groups within the communities (girls, marginalized communities and persons with disabilities), taking into particular account cultural sensitivities, literacy levels of stakeholders, and accessibility and other special needs of stakeholders with disabilities and those from other vulnerable groups.

### **3. STAKEHOLDER IDENTIFICATION, MAPPING AND ANALYSIS**

#### **Stakeholder Mapping and Analysis**

Stakeholder engagement is the interaction with, and influence of project stakeholders to the overall benefit of the project and its advocates. ESS 10 recognizes two broad categories of stakeholders; those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods (project affected parties) and other interested parties.

Stakeholder analysis will help identify and clarify the perceptions, interests, needs, and influence of actors on the project. Identifying the appropriate consultation methodology for each stakeholder throughout the project lifecycle is necessary to foster meaningful stakeholder engagement. In order to meet best practice approaches, including in line with COVID-19 restrictions and related parameters, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interface, coercion, and intimidation;
- **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate format that is accessible and understandable, taking into account cultural sensitivities, literacy levels, and special needs of stakeholders with disabilities and also stakeholders from other vulnerable groups; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and assure that stakeholder feedback is taken into consideration during decision making;
- **Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. The project will provide equal access to information to all stakeholders, paying particular attention to cultural sensitivities, accessibility needs and literacy levels. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, particularly women headed households, refugees, persons with disabilities, the poorest of the poor, youth, elderly persons, and the cultural sensitivities of members of diverse ethnic groups.

Stakeholders of the proposed project can be affected parties, interested parties and vulnerable groups and discussed below.

The project proponents, MoE will roll-out effective stakeholder engagements to obtain social license to operate, build mutual trust and foster transparent communication with the project beneficiaries, students, teachers and communities. The MoE will oversee and undertake a full impact and risk assessment on stakeholders as necessary and will update this SEP accordingly. The SEP and all stakeholder engagement activities will be undertaken in line with a review of the COVID-19 spread situation in the project area, and tailored to meet the requirements of the restrictions established by the Kenyan Government to contain the virus spread.

**i. Project Affected Parties**

Effective engagements with the project affected communities will be conducted upon project effectiveness and will be sustained throughout project implementation. Similar engagements in the parent project PREIDE and SEQIP currently implementing similar interventions in the sector has helped profile the community level stakeholders and the potential issues of concern for each.

Stakeholder	Description	Potential issues of concern
Beneficiary Schools and Students	Students and schools that are part of the 70 percent of primary and secondary school students accessing online and distance learning, 1.7 million learners benefit from the school meals program, 700 secondary education girls and an estimated 150,000 teachers will benefit from teacher training in online and distance learning	<ul style="list-style-type: none"> <li>• The potential for mainstreaming of these activities to regular education activities</li> <li>• Diversion of project benefits such as school meals to less deserving schools and areas</li> <li>• Inward migration- with limited benefits against widespread need, students from neighboring areas not covered by project interventions such as school meals will seek to migrate to the project areas to benefit from the project.</li> </ul>
Non-beneficiary Schools and Students	Schools and students that do not meet the criteria for inclusion into the project or cannot access and therefore does not benefit from the project interventions	<ul style="list-style-type: none"> <li>• Exclusion from project benefits in the face of widespread need</li> <li>• Inequalities perpetuated and entrenched by project interventions which may disproportionately put those than access project benefits at an undue advantage- assessments, national examinations, competition for university slots etc.</li> </ul>
Vulnerable Members of the community (widows, disabled, single women) including minorities	Community members and students that are comparatively unable to exploit project benefits due to various vulnerabilities including, poverty and prohibitive cost associated with remote learning- access to devices, internet, electricity.	<ul style="list-style-type: none"> <li>• Elite and clan capture</li> <li>• Inequalities perpetuated and entrenched by project interventions which may disproportionately put those than access project benefits at an undue advantage-</li> </ul>



		assessments, national examinations, competition for university slots etc.
Schools Boards of Management (BoM)	Management boards that govern primary and secondary schools and make decisions on key issues including admissions, provision of school meals and mobilization of additional resources	<ul style="list-style-type: none"> <li>• Inward migration from students in schools without school meals</li> <li>• Inequalities perpetuated and entrenched by project interventions which may disproportionately put those than access project benefits at an undue advantage- assessments, national examinations, competition for university slots etc.</li> </ul>
Parents and guardians with children with disabilities	Parents and guardians with children with disabilities unable to leverage on access to remote learning media	<ul style="list-style-type: none"> <li>• Inequalities perpetuated and entrenched by delivery of educational content in mediums not fully, and, or easily accessible which may disproportionately put those than access project benefits at an undue advantage- assessments, national examinations, competition for university slots etc.</li> </ul>
Vulnerable and Marginalized communities	Parents, teachers and community members in hard to serve areas characterized by marginalization, remoteness and security challenges	<ul style="list-style-type: none"> <li>• Elite and clan capture of project benefits</li> <li>• Diversion of project benefits such as school meals to less deserving schools and areas</li> <li>• Inward migration- with limited benefits against widespread need, students from neighboring areas not covered by project interventions such as school meals will seek to migrate to the project areas to benefit from the project.</li> </ul>

ii. **Other Interested Parties**

Stakeholder	Description	Potential issues of concern
Community leaders	Elected leaders, clan elders, religious leaders and opinion leaders from targeted communities	<ul style="list-style-type: none"> <li>• Potential for mainstreaming of these activities to regular education activities</li> </ul>

		<ul style="list-style-type: none"> <li>• Diversion of project benefits such as school meals to less deserving schools and areas</li> <li>• Inward migration- with limited benefits against widespread need, students from neighboring areas not covered by project interventions such as school meals will seek to migrate to the project areas to benefit from the project.</li> </ul>
Government officials and  Local Administration	Officials from administrative structures responsible target beneficiary communities and non-beneficiary communities	<ul style="list-style-type: none"> <li>• Sustainability of the project benefits and the potential for mainstreaming of these activities to regular education activities</li> <li>• Diversion of project benefits such as school meals to less deserving schools and areas</li> <li>• Inward migration- with limited benefits against widespread need, students from neighboring areas not covered by project interventions such as school meals will seek to migrate to the project areas to benefit from the project.</li> </ul>

#### 4. STAKEHOLDER ENGAGEMENT PLAN

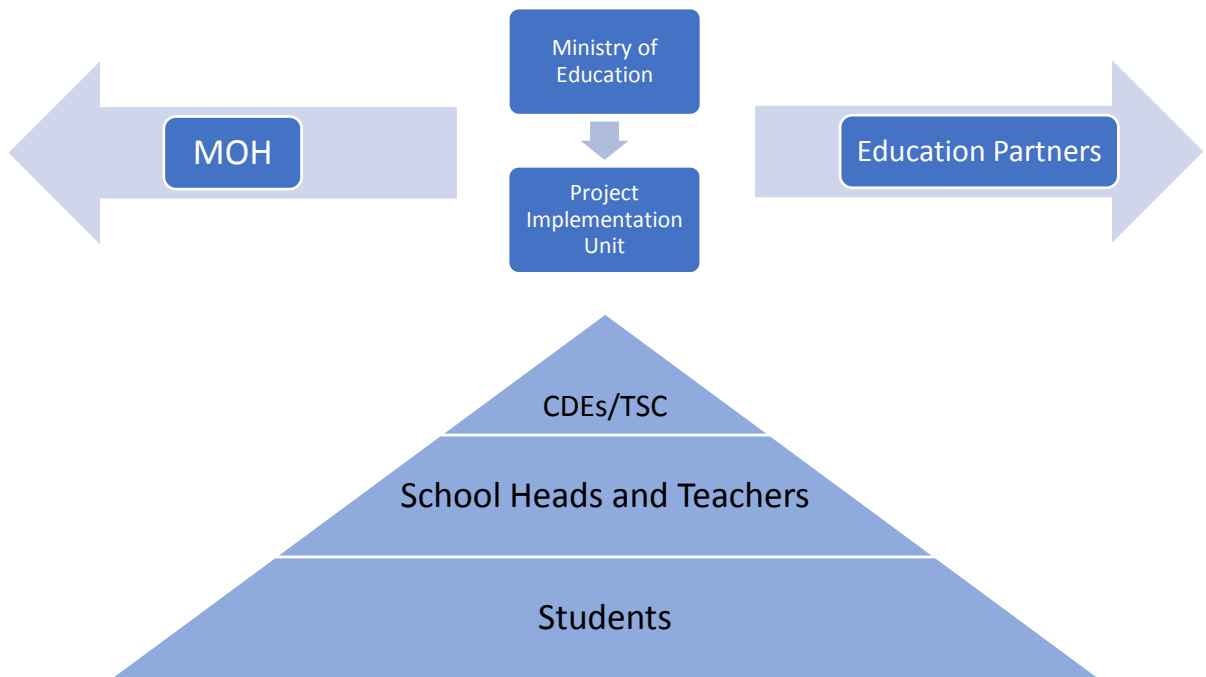
##### Planned stakeholder engagement activities

Project activities are being implemented countrywide with a focus on; a) about 70 percent of primary and secondary school students accessing online and distance learning; recruitment and deployment of contract teachers; b) about 1.7 million learners benefit from the school meals program; c) at least 700 secondary education girls; d) an estimated 150,000 teachers will benefit from teacher training in online and distance learning; e) Students in need of online based psychosocial support services, and; f) parents and care takers in need of remote learning tips. For additional engagements, effective mapping and identification of stakeholders will be conducted.

The Project will take a precautionary approach for consultations and other stakeholder engagement to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations the project will employ for selecting channels of communication, in light of the current COVID-19 situation, and in light of government requirements:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;
- If and when the government permits smaller meetings, conduct consultations in small-group sessions taking into account cultural and accessibility sensitivities, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement will need to clearly specify how feedback and suggestions can be provided by stakeholders.

**Schematic visualization of stakeholder engagement process.**



Activities on the horizontal level are assumed to improve awareness and coordination of efforts in the education sector in collaboration with Ministry of Health, Project implementation unit and other education partners such as UNESCO and World Bank

The vertical stream implies the application of cascading mode which will allow the project to establish communication with communities, teachers and students. Furthermore, the cascading approach will be applicable for capacity building at each project engagement level. Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views regarding project activities.

Details of the stakeholder engagement activities, channels and methods of engagement as well as the responsibilities are included in the table below.

Planned stakeholder engagement activities, noting that each of these will be conducted only where in compliance with Kenyan Government COVID-19 restrictions.

Stakeholder	With whom	Channels of Engagement	Frequency	Engagement methods	Purpose
Ministry of Education (MoE)	Ministry of Health	Official internal and external communications  Written requests via official letters and emails	Monthly	Project progress, budget and financing.	Sharing of information, reviews, clearance and seeking support.
	Education Partners	Official internal and external communications  Written requests via official letters and emails	Monthly	Project progress, budget and financing.	Sharing of information, reviews, clearance and seeking support.  Disclosure of project benefits, list of beneficiaries, documents and GRM process
	Community engagements	outreach campaigns, information campaigns	Continuous	Radios, TVs, leaflets, hand-outs, newspapers, word of mouth	Disclosure of project benefits, list of beneficiaries, documents and GRM process
	Community engagements (Vulnerable and Marginalized communities)	outreach campaigns, information campaigns	Continuous	Radios, community leaders, vehicles mounted with speakers, social media and online platforms, as well as TV, newspapers, dedicated phone-lines, public announcements, mail	Disclosure of project benefits, list of beneficiaries, documents and GRM process

Ministry of Education (MoE)	All stakeholders	Stakeholder awareness and consultations campaigns	Bi-monthly	Social media and online platforms, as well as TV, newspapers, dedicated phone-lines, public announcements, mail	To keep informed about the project achievements.  Disclosure of project benefits, list of beneficiaries, documents and GRM process
	County Directors of Education, TSC Directors of Education and other Education officials	Operational meetings	Monthly	Monitoring reports, virtual face-to-face meetings using skype/webex with regional employment departments.	To implement the project components.
	Teachers, Students and Community members	GRMs	Continuous	hotline, telephone, leaflets, hand-outs, radios, newspapers	To ensure beneficiaries are informed about the project level GRM.  Disclosure of project benefits, list of beneficiaries, documents and GRM process
Ministry of Health	MOE	Operational meetings	Bi-monthly	Monitoring reports, virtual Face-to-face meetings using skype/webex with ESCs and PAPs.	To implement the project components.
	All stakeholders including students, teachers and communities	outreach campaigns, information campaigns	Continuous	Social media and online platforms, as well as TV, newspapers, dedicated phone-lines, public announcements and mail, as well as virtual face to face meetings using webex/skype.	To increase awareness, provide consultations and collect feedback.  Disclosure of project benefits, list of beneficiaries, documents and GRM process

	County Directors of Education, TSC Directors of Education and other Education officials	Operational meetings	Bi-monthly	Monitoring reports virtual face to face meetings using webex/skype and/or dedicated phone-lines, with ESCs and PAPs.	To implement the project components.
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## 5. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

### Implementation Arrangements

The Ministry of Education through the Project Implementation Unit (PIU) will have full responsibility for engaging with the stakeholders with support from its structures at the County and Sub-county levels. The project will rely on GPE PREIDE which has a fully developed PIU including a safeguards specialist based within the PIU will be tasked with the coordination of the stakeholder engagement activities for the project and labor related grievance redress. The coordination will be through the decentralized networks of county directors of education, sub-county directors of education, education officers in every ward, head teachers and teachers. Ministry of Health has already established communication and engagement structures which the project will tap into as required.

### Roles and Responsibilities

Actor/Stakeholder	Responsibilities
Ministry of Education and Project Implementation Unit	<ul style="list-style-type: none"><li>• Planning and implementation of the SEP;</li><li>• Leading stakeholder engagement activities;</li><li>• Management and resolution of grievances;</li><li>• Coordination/supervision of contractors on SEP activities;</li><li>• Collaboration with MoH</li></ul>
County Directors of Education and TSC Directors of Education	<ul style="list-style-type: none"><li>• Inform PIU of any issues related to their engagement with stakeholders;</li><li>• Transmit and resolve complaints caused by the project interventions in close collaboration with and as directed by PIU and by participating in related school and community meetings;</li></ul>
Teachers, Students and community members	<ul style="list-style-type: none"><li>• Invited to engage and ask questions about the Project at Project Meetings and through discussions with Education officers where it is of interest or of relevance to them;</li><li>• Lodge their grievances using the Grievance Resolution Mechanism defined in the SEP</li><li>• Help the Project to define mitigation measures;</li></ul>
Other project stakeholders	<ul style="list-style-type: none"><li>• Engage with PIU regarding project design;</li><li>• Raise concerns to help the project to be inclusive.</li></ul>

### Stakeholder Engagement Methods to be used

#### i. Communication materials

Written information will be disclosed to the public through various communication means, including brochures, flyers, posters, newspapers, public announcements, online platforms, etc. Key project



information such as the hotline number for grievances, as well as project updates and reports on the project's performance, will be made available to the public in Swahili and English in newspapers and online among other communications media. Dedicated communication materials, specifically, MOHs hotline numbers is widely available through widely accessible media such as TVs, radios, posters and newspapers.

## ii. Information Desks

Once COVID-19 restrictions are lifted, information desks in each County will provide local communities and project beneficiaries with information on stakeholder engagement activities, project interventions, contact details of the focal points involved in project implementation. Brochures and fliers on various project related social and environmental issues will be made available at these information desks.

## iii. Training, workshops

With easing of COVID-19 social distancing regulations, in person training on a variety of social issues will be provided to staff at MoE, PIU, and the County and Sub-County Educational officers. Issues covered will include sensitization to project targeting and enrollment processes, risks related to inclusion and exclusion, cultural dynamics, disability and gender-based violence.

## iv. Grievance redress mechanism

To comply with ESS10, a project-specific grievance mechanism will be adopted to handle complaints and grievances for the project.

SEQIP categorize grievances received using the guidance summarized in the table below, which includes Basic information communication; public administration ethics and conduct; Governance; human rights; environmental compliance; corruption and economic crimes; and VMGs rights and interests. The project will build upon SEQIP's GRM as building blocks for up taking and resolving complaints and grievances.

Categories of grievances	Institutions	Constitutional provisions, Laws and legal provisions and Frameworks
<i>1. Basic information</i>	Project implementing and beneficially institutions	ESS 10
(a) Access to information <sup>7</sup>	MoE, KICD, KNEC, TSC, CEMESTEA	CoK 2010 Article 35 (1) ESS 10
<i>2. Public administration ethics and conduct</i>	CAJ, AC	
(a) State organs and all officer duty	CAJ	CoK, 2010 Article 21(3)
(b) Standards of administrative action:	CAJ	<b>CoK, 2010 Article 47(1)</b>
(c) Abuse of state or office power	CAJ	CoK, 2010 Article 59 (2)(i); CAJ Act 2011; LI Act, 2012.

<sup>7</sup> Information held by the state or another person for the exercise and protection of any right or fundamental freedoms. Also– non-disclosure, lack of clarity, misleading can be addressed under this constitutional provision

<b>3. Governance-related grievances<sup>8</sup></b>		
(a) Violation of code of ethics for State Officer	EACC	LI Act, 2012
<b>4. Violation and breach of codes of ethics</b>		
(a) Violation of codes of ethics;	Respective public entity <sup>9</sup> :	LI Act, 2012.
(b) Breach of the code of ethics by public officers:	See (b)(i) -Respective public entity	Public Service Ethics Acts, 2003
(c) Breach of Code of Conduct and Ethics by Public Officers	Public Service Commission; Teacher Service Commission EACC	EACC Article 11(1)(c)) or CAJ Act, 2011
<b>5. Violation of human rights and fundamental freedoms</b>		
(i) <b>Gender equality and general Equality matters.</b> (ii) Equality and freedom from discrimination, (iii) Non-discrimination of special needs groups, (iv) Economic and Social Rights	NGEC	CoK 2010 Article 21; 27; 59; and NGEC Act, 2011
<b>(a) Equality and freedom from discrimination:</b> -Equality -every person; Equality of men and women to opportunities in political, economic, cultural and social;	NGEC	CoK, 2010 Article 27
<b>(b) Non-discrimination of vulnerable groups:</b> – Vulnerable groups within the society legislative, other measures including affirmative programmes (see CoK 2010 for <i>special needs groups</i> Article 53 -Children rights, 54 -Persons with disability; 55 -Youth; 56 - Minorities and marginalized groups)	NGEC National Council for Children’s Services (NCCS) National Council for persons with disabilities (NCPWD)	CoK, 2010 Article 27 Children Act, NO. 8 OF 2001 <sup>10</sup> ESS 7
<b>(c) Economic and Social Rights:</b> - health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment);	NGEC	<b>CoK 2010 Article 43</b> Prohibition of Female Genital Mutilation Act No. 32 of 2011 ESS 4
<b>(d) All other human rights matters</b> (not within the jurisdiction of the	KNCHR	CoK 2010 Article 28; 59 (2) (b) KNCHR Act, 2011

<sup>8</sup> Procedural justice -fairness and transparency for decision-making processes -FPIC; Distributional justice -fairness in the distribution of rights and resources)

<sup>9</sup> Each public entity shall prescribe a specific Leadership and Integrity Code (Article 37), and have every state officer sign and commit to it (Article 40). Appropriate Commission (MoE, KNEC and KICD – Public Service Commission; Teachers and TSC workers -TSC), or EACC

<sup>10</sup> There is a proposed CHILDREN BILL - Draft - February 2018 at the <http://www.childrenscouncil.go.ke> but it’s not available on the bill tracker on <http://kenyalaw.org/>

project and not under CAJ, NGEC, EACC, DPP or courts) <sup>11</sup>		
<b>6. Corruption and Economic crimes: (Unethical conduct)</b>	EACC, DPP, DCI	<b>EACC Act, 2011<sup>12</sup> Article 11; ACEC Act No. 3 2003<sup>13</sup>.</b>
<b>7. Labor relations</b> Termination/Summary Dismissal, Breach of Employment Contract Terms, Conflicts with Trade Unions, Work Injury, Discrimination, Sexual Harassment, Service Pay, Termination for Cause: Reasons or No Reasons, Suspension, and Waiver of Claims	Trade Union and Labour Tribunals	The Constitution of Kenya, 2010; Employment Act, 2007 (No. 11 of 2007); Employment and Labour Relations Court Act, 2011 (No. 20 of 2011); Labour Relations Act (No. 14 of 2007); Labour Institutions Act (No. 12 of 2007); Occupational Safety and Health Act, (No.15 of 2007)  ESS 2
<b>8. Environmental compliance violations</b> EI/A, Air Quality, Noise and Excessive Vibration Pollution, and Water quality	NEMA, Land and Environmental Court	EMCA, 1999, The Environmental (EI/A) Regulations, 2003. Air Quality Regulations, 2014 <sup>14</sup> ; Waste Management Regulations, 2006 <sup>15</sup> ; Noise and Excessive Vibration Pollution- (Control) Regulations, 2009 <sup>16</sup> ; Water quality Regulations, 2006 <sup>17</sup>  ESS 3
<b>9. Occupational Safety and Health</b> Chemical substances, statutory examinations and tests of plant/equipment, Fire Risk, Medical Examination of Workers	DOSH	The Occupational Safety and Health Act (Cap 514); Fire Risk Reduction Rules, (LN 59/2007); Medical Examination Rules LN24/2005  ESS 2 ESS 4
<b>10. Safety schools</b>	BoM and MoE, County Government	School Safety Standards Manual <sup>18</sup>  ESS 4
<b>11. Civil wrongs and criminal offences</b>	Attorney-General Director of Public Prosecution (DPP) or	CoK CAP 75 -Kenya Criminal Procedure Code and Kenya Penal Code (revised 2012)

<sup>11</sup> CoK 2010 Article 28 -human dignity; 29 -freedom and security of person; 30 -slavery, servitude and forced labor; 31 -privacy; 32 -freedom of conscience, religion, belief and opinion; 33 -freedom of expression; 35 -Access to information; 41 -fair labor practices; 42 -Clean and health environment and (assault, rape, defilement, Child prostitution, Child pornography, etc); Prohibition of Female Genital Mutilation Act No. 32 of 2011

<sup>12</sup> Ethics and Anti-corruption Act No. 22 of 2011

<sup>13</sup> Anti-Corruption and Economic Crimes Act, No 3 of 2003

<sup>14</sup> Legal Notice No.34. Regulations, 2013

<sup>15</sup> Kenya Gazette supplement No 69. Legislative supplement No. 37)

<sup>16</sup> Legal Notice No. 61

<sup>17</sup> Legal notice No. 121


<sup>18</sup> downloadable at [cwsglobal.org/wp-content/uploads/2017/01/CWS-SSZ-Schools-Manual\\_Kenya.pdf](http://cwsglobal.org/wp-content/uploads/2017/01/CWS-SSZ-Schools-Manual_Kenya.pdf)

	Director of Criminal Investigation through the National Police Service	
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The GRM consist of six (6) value chain steps that include: (a) uptake; (b) sorting and processing; (c) acknowledging and follow-up; (d) verification, investigation and follow-up action; (e) monitoring and evaluation; and (f) feedback (see

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### GRM value chain

Steps	Details
<p>1.2.1 Uptake</p> 	<ul style="list-style-type: none"> <li>• The project will setup grievance uptake points, which include: (a) multiple barrier-free uptake locations (village, school, sub-county, county, and national); and (b) multiple barrier-free uptake channels (mail, e-mail, telephone, website, project staff, text messaging/SMS, complaints boxes)</li> <li>• SEQIP will maintain a grievance log that record <ul style="list-style-type: none"> <li>(i) # complaints received,</li> <li>(ii) Receipt/acknowledgement details</li> <li>(ii) Describe the issues</li> <li>(iv) Location of each complaint</li> <li>(v) # complaints resolved</li> <li>(vi) # complaints that have gone to mediation</li> </ul> </li> <li>• The number of grievance uptake locations and channels will be determined by available and affordable technology, funding and capacity constraints</li> <li>• The uptake point will be strategically established at multiple uptake locations and channels and operated as per allowable budget allocations while not compromising access by all beneficiaries and other relevant stakeholders.</li> <li>• The project will share and discuss with the World Bank the raw or summarized grievances data to receive support and help in responding quickly and effectively</li> </ul>
<p>1.2.2 Sorting and processing</p>	<ul style="list-style-type: none"> <li>• The project will: (a) sort received grievance into the categories and determine the most competent and effective level for redress and the most effective grievance redress approach ; (b) prioritize, based on risk rating, the responsive action for each category in a fair, objective and responsive <u>manner</u>; (c) assign timelines for follow-up steps of each grievance based on their priority; (d) make judgment and reassign each grievance to the appropriate institution at the various GRM level); (e) exclude grievances handled elsewhere (local court, mediation body, INT or the inspection</li> </ul>

	Panel of the World Bank) from the GRM; and (f) offer the complainant option/s for resolution of their grievances
1.2.3 Acknowledging and follow-up	<p>The project will provide a written response acknowledging receipt of each complaint. The response will include: (a) Cases of Sexual abuse, violence, harassment and exploitation MUST be reported immediately (72 hour or less) to National Police Service; (b) details of follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communication of outcomes and next steps based on outcome; (c) response on straight forward communication related grievances that require minimal checks and consultations (1 to 3 days); and (d) response that need minimal process to delete misleading information, collection of information, analysis of existing information, preparation of communication materials to disclose delayed information, clarify existing information, and correct misleading information. Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines 7 -14 days; (e) response that require investigation: access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches. Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response. 14 to 21 days; (f) response that require escalation to higher SEQIP implementation level: Acknowledge reception of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response. 7-14 days; and (g) response that require referral to other institutions (National Police Service, CAJ, NGECC, KNCHR, EACC, World Bank). Acknowledge reception of the grievance, provide the need for refer the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress (7 - 21days)</p>
1.2.4 Verification, investigation and redress action	<ul style="list-style-type: none"> <li>• The project will undertake activities related step in a timely manner. The activities will include: verifying, investigating, redress action and plan. <ul style="list-style-type: none"> <li>○ <b>Verification</b> <ul style="list-style-type: none"> <li>(a) Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project. Refer to the PAD, PIM, VMGF, EMSF, Procurement Manual, and Financial Manual to determine the validity of the grievance</li> <li>(b) Escalate, expeditiously, outright grievances that required high level within SEQIP</li> <li>(c) Refer, expeditiously, outright grievances that are outside SEQIP jurisdiction</li> </ul> </li> <li>○ <b>Investigation:</b> <ul style="list-style-type: none"> <li>(a) Appoint an independent investigator (Safeguards Experts, Professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation</li> <li>(b) Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)</li> <li>(c) Collect and preserve evidence</li> <li>(b) Analyze to establish facts and compile a report</li> </ul> </li> </ul> </li> </ul>

	<p style="text-align: center;"><b>○Grievance action plan</b></p> <p>(a) Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the SEQIP has no jurisdiction (Commission or Independent statutory bodies)</p> <p>(g) undertake mutually agreed follow-actions</p> <p style="text-align: center;">○Update of complainant and SEQIP implementing teams</p> <p>(i) Provide users with a grievance redress status update and outcome at each stage of redress, (iii) update SEQIP implementing team on grievance redress across the GRM value chain.</p>
<p>1.2.5 Monitoring and evaluation</p>	<ul style="list-style-type: none"> <li>• The project will undertake the following monitoring actions: <ul style="list-style-type: none"> <li>(a) develop indicators for monitoring the 6 steps of GRM value chain;</li> <li>(b) track grievances and assess the extent to which progress is being made to resolve them;</li> <li>(c) conduct a stakeholder’s satisfaction survey for the GRM services</li> <li>(d) under an analysis from the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact</li> <li>(e) provide a report on grievance redress actions pertaining to the 6 steps of GRM value chain including</li> </ul> </li> <li>• The project will evaluate the GRM by <ul style="list-style-type: none"> <li>(a) analyzing grievance data to reveal trends and patterns,</li> <li>(b) sharing GRM analysis in management meetings; and</li> <li>(c) taking corrective action on project implementation approaches to address the grievance</li> </ul> </li> </ul>
<p>1.2.6 Feedback</p>	<ul style="list-style-type: none"> <li>• The project will provide feedback to GRM users and the public at large about: <ul style="list-style-type: none"> <li>(a) results of investigations;</li> <li>(b) actions taken;</li> <li>(c) why GRM is important;</li> <li>(d) enhance the visibility of the GRM among beneficiaries; and</li> <li>(e) increase in users’ trust in the GRM</li> </ul> </li> <li>(f) Create demand for grievances.</li> </ul>

**GRM Appeal**

Where agreement on grievance resolution has not been reached, the project will offer the complainant with an appeal options and processes. The approaches will include an Independent Panel; internal or external offices or individuals with appreciable degree of independence, and third-party fact-finding, facilitation, and mediation missions as applicable.

Depending on the grievance, this will entail referring the aggrieved person the option to appeal through such statutory referral institutions as NGEC, CAJ, KNCHR, and NEMA.

Through MOH, the project will identify in advance community-level partners to provide Covid-19 related information in project areas of influence.

The project will also contract the services of a qualified and experienced national organization to offer psychosocial support to students and teachers as needed. Requirements for the safe and confidential reporting of cases of GBV and child abuse cases will be inbuilt into the service providers terms of reference. Uptake will be through a project hotline and where the Covid-19 restrictions are relaxed walk-ins and referrals as appropriate.

**v. World Bank Grievance Redress Service (GRS).**

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of the World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

**Proposed strategy to ensure that disadvantaged and vulnerable groups have equal opportunity to project benefits**

The project will take special measures to ensure that members of disadvantaged and vulnerable groups have equal opportunity to project benefits where they meet the targeting criteria, to access information, provide feedback, and submit grievances. A key approach being used by MOE in the SEQIP project is the adoption of community-based committees for such interventions as scholarships. In this case, the target communities identify their most vulnerable members through a participatory process. The selection is done through a community-based Scholarship Selection Board comprising of among other community leaders, faith-based representatives, MoE and parents' representatives. The shortlist of potential scholars is publicly disclosed at the community level for further review and feedback-to ensure the most deserving needy students benefit. Stakeholder and community engagement will be key in sensitization of structures and means by which complaints and grievances related to the project will be received, handled and addressed. The assumption is that communities have a better understanding of their own vulnerability than external actors and is most effective in such projects where administrative capacity is limited, and community empowerment and capacity-building align with the programme's objectives.

Processes in the community-based targeting which entrench participatory engagements help prevent elite capture and promote inclusion.

**STRATEGY FOR PARTICIPATION & CONSULTATION WITH VULNERABLE & MARGINALISED GROUPS**

Participation of VMGs in selection, design and implementation of project activities will largely determine the extent to which the VMGP objectives would be achieved. Where adverse impacts are likely,

GPE/PCU will undertake prior and informed consultations with the likely affected indigenous communities and those who work with and/or are knowledgeable of indigenous people’s development issues and concerns. The primary objectives would be to examine the following:

- 1) To seek their inputs/feedback to avoid or minimize the potential adverse impacts associated with the required works;
- 2) Identify culturally appropriate impact mitigation measures; and
- 3) Assess and adopt economic opportunities, which the EA could promote to complement the measures required to mitigate the adverse impacts.

Consultations will be carried out broadly in two stages. First, prior to commencement of any project activities in areas inhabited by VMGs, GPE/PCU will consult the VMGs about the need for, and the probable positive and negative impacts associated with project activities Second, after initial roll-out of scholarship and school meals related activities, a rapid assessment ascertain how the VMGs in general perceive these activities and gather any inputs/feedback they might offer for better outcomes, which would eventually be addressed in VMGPs as required and progressive cycles of project delivery.

GPE/PCU will:

- a) Facilitate widespread participation of VMGs with adequate gender and generational representation; customary/traditional VMG organizations; community elders/leaders; and civil society organizations VMGs development issues and concerns.
- b) Provide them with all relevant information about project activities including that on potential adverse impacts, organize and conduct the consultations in manners to ensure free expression of their views and preferences.
- c) Document details of all consultation meetings, with VMGs perceptions of project activities and the associated impacts, especially the adverse ones; any inputs/feedbacks offered by VMGs; and an account of the conditions agreed with indigenous people.

Consultation stages, probable participants, methods, and expected outcomes are suggested in the VMGs consultation matrix below.

<b>VMGs Consultation Matrix</b>				
<b>Consultation Stages</b>	<b>Consultation Participants</b>		<b>Consultation Method</b>	<b>Expected Outcome</b>
	<b>Project Authority</b>	<b>VMGs Community</b>		
<b>Reconnaissance &amp; ground verification of existing and location/sites for projects</b>	GPE/PCU, project consultants (Social Scientist) and other stakeholders	VMGs, including organizations, community leaders/elders	Social media and online platforms, as well as TV, newspapers, dedicated phone-lines, public announcements and mail, as well as virtual face to face meetings using webex/skype.	First-hand assessment of VMGs’ perception of potential social benefits and risks



<b>Screening of the proposed projects</b>	GPE/PCU, APs, consultants (Social Scientists) & other stakeholders	VMGs, including likely affected IPs, IP organizations, community leaders/elders, key informants	Social media and online platforms, as well as TV, newspapers, dedicated phone-lines, public announcements and mail, as well as virtual face to face meetings using webex/skype. .	Identification of major impact issues, feedback from VMGs and would-be affected persons
<b>In-depth study of risks and benefits taking into consideration, inter alia the conditions that led to community consensus</b>	GPE/PCU, project consultants (Social Scientist), NGOs /CBOs, Other knowledgeable persons	Would-be affected VMGs, VMGs, organizations, Community leaders/elders, key informants	Formal/informal interviews; focus group discussions; hotspot discussion on specific impacts, alternatives, and mitigation; etc.	More concrete view of impact issues & risks, and feedback on possible alternatives and mitigation and development measures
<b>Social Assessment (SA)</b>	GPE/PCU, project consultants (Social Scientist)	Adversely affected individual VMGs/households	Structured survey Questionnaires covering quantitative & qualitative information	Inputs for VMGP and Identification of issues that could be incorporated into the design of project
<b>Preparation VMGP</b>	GPE/PCU, GPE/PCU, project consultants (Social Scientist), NGOs /CBOs, Other knowledgeable persons	VMGs, including organizations, community leaders/elders and Adversely affected individual VMGs/households	Social media and online platforms, as well as TV, newspapers, dedicated phone-lines, public announcements and mail, as well as virtual face to face meetings using webex/skype.	Preparation of VMGP and incorporation of SA inputs
<b>Implementation</b>	GPE/PCU, GPE/PCU, project consultants (Social Scientist), NGOs /CBOs	Individual VMGs, organizations, community leaders/elders & other	Implementation monitoring committees (formal or informal)	Quick resolution of issues, effective implementation of VMGP

		stakeholders		
<b>Monitoring &amp; Evaluation</b>	GPE/PCU, APs, consultants (Social Scientists), NGOs & CBOs	VMGs Organizations /groups and individuals	Formal participation in review and monitoring	Identification & resolution of Implementation issues, effectiveness of VMGP

Once the VMGs are identified in the project area, the VMGPs will ensure mitigation of any adverse impact of the project. The project should ensure benefits to the VMGs by providing, in consultation with the VMGs themselves, opportunity to get them involved in various income earning opportunities and activities

The following issues need to be addressed during the implementation stage of the project;

- a) Provision of an effective mechanism for monitoring implementation of the VMGF and any VMGPs
- b) Development of accountability mechanism to ensure the planned benefits of the project are received by indigenous people;
- c) Involve suitably experienced NGOs to address the VMGs’ vulnerability through developing and implementing action plans;
- d) Ensuring appropriate budgetary allocation of resources for the VMGs’ development plans;
- e) Provision of technical assistance for sustaining the VMGF;
- f) Ensure that VMGs traditional social organizations, cultural heritage, traditional political and community organizations are protected;

## Stakeholder Engagement Plan – Estimated Budget

Stakeholder Engagement Activities	Q-ty/pe r years	Unit Cost, USD	of year s/M ont hs	Total cost (USD)
GRM, MIS case management process, data base (including running of hotline, record keeping etc.)	6	200	18	1200
Travel expenses of staff on Stakeholder Engagements )	6	30	18	180
Communication materials (leaflets, posters,)	6	20	18	120
Project press conferences (twice per year)	2	100	18	200
Trainings (Social issues, outreach, GRM, etc.) for PIU, County	2	50,000	18	100,000
Project hotline to receive complaint and grievance related to the project (TA and Airtime)	1	100,000		100,000
<b>Subtotal</b>				<b>201,700</b>
Contingency				10,085
<b>Total</b>				<b>211,785</b>