



Kenya Additional Financing FOR PRIMARY EDUCATION EQUITY IN LEARNING PROGRAM (P179670)

Environmental and Social System Assessment (ESSA) Addendum

September, 2022

1. In March 2022, the World Bank approved financing of the parent Primary Education Equity in Learning Program (PEELP), a hybrid Program-for-Results (PforR) and Investment Project Financing (IPF), to the Government of Kenya, in support of the Ministry of Education's National Education Sector Strategic Plan II (NESSP II 2022 - 2026). The unchanged operation's Program Development Objective (PDO) is to reduce regional disparities in learning outcomes, improve the retention of girls in upper primary education, and strengthen systems for delivering equitable education outcomes.
2. The operation's Additional Financing (AF), from a Global Partnership for Education (**GPE**) grant funding, will support the parent Program through a scale up of its scope. The parent Program's Theory of Change (ToC) remains valid therefore the Results Areas (RAs) are unchanged for the AF. The RAs for the Program are to: (i) equalize learning opportunities: improving learning outcomes in target counties; (ii) improve girls' participation in schooling; and (iii) strengthen capacity for implementing initiated reforms.
3. The AF will scale up on selected **Disbursement Linked Indicators (DLIs)**. These include a) In DLI #1 there will be an increase in the number of targeted primary schools (from 4,972 to 5,422) receiving school grants for completing priority areas in their approved school improvement plans resulting in improved learning conditions; b) DLI #4 will increase the number of vulnerable learners selected to receive a scholarship, school kits and mentorship support services; c) DLI #6 will increase the number of new classrooms constructed in existing schools as per the needs-based 2021 school infrastructure investment plan, using the established standards for classroom construction; and d) DLI #7: includes capacity building of target Teacher Training Colleges for implementation of Competency-Based Teacher Education (CBTE) in the 32 teacher training colleges. This will entail the establishment of functional ICT enabled learning resource centers and establishment of structured linkages with selected primary schools to enhance teaching practice practicum; DLI #1 and DLI #7 will contribute to PDO indicators for improved foundational literacy and numeracy while DLI #4 is expected to result in improved retention of girls and boys from poor and vulnerable populations particularly from informal settlements in upper primary, to access schooling and complete basic education.
4. In accordance with World Bank Policy for PforR financing, the World Bank conducted an Environmental and Social Systems Assessment (ESSA) for the parent Program, consulted and disclosed in March, 2022¹. The purpose of the ESSA was to review the existing borrower systems in terms of its capacity to plan and implement effective measures for management of environmental and social risks and impacts. Based on the Program scope of the AF, the parent ESSA remains valid & applicable. As per the AF PCN, the parent Program Action Plan (PAP) will be updated and an addendum to the original ESSA prepared to incorporate the activities under the AF.
5. The **ESSA Addendum Objectives** comprise: a) an assessment of the ongoing relevance of the parent ESSA, including progress on implementation of actions in the Program Action Plan (PAP); b) identify any new potential risks, impacts or benefits associated with new activities under the AF; c) changes to borrower environmental and social (E&S) systems; d) recommendations for actions to further strengthen the Environmental and Social (E&S) system.
6. **Environment and social effects of the AF Program.** Design of the AF does not introduce significant changes on areas of intervention of the parent Program and maintains institutional arrangements. Based on the overall proposed changes, the AF Program will result in positive benefits. The E&S risks rating of the

¹ World Bank, Program-for-Results, Primary Education Equity in Learning Program (PEELP) P179670 [Environmental and Social Systems Assessment \(ESSA\)](#)

proposed AF is maintained as moderate. The activities under the AF PforR will not generate significant negative impacts and risks as they are similar to the parent Program. They are included in the parent ESSA with measures already in place to manage AF E&S risks and impacts.

7. Environment impacts relate to the scale up of construction activities within schools, DLI #6. This mainly includes; i) construction related impacts: localized air & noise pollution, loss of vegetation, generation of construction waste and wastewater effluent, traffic disruptions and accidents, occupational and community health and safety risks including the spread of infectious diseases such as COVID-19; ii) generation and disposal of sanitary waste from supply of hygiene products for girls under DLI 4; and, iii) AF activities under DLI#7 present new environmental risks as part of the Program activities which will entail the establishment of functional ICT enabled learning resource centers (I-Hubs) in teachers training colleges, which may include renovation of I-hubs, procurement and installation of ICT equipment. This poses potential risk during renovation of I-hubs and generation of e-waste presenting adverse impacts through disposal of old or used electronic equipment that may result in soil and water contamination through the release of heavy metals and potential air pollution by release of hydrocarbons in the atmosphere. This potential risk is site specific and well manageable through proper enforcement of an electronic waste management plan.

8. Potential social risks include: (i) elite capture and exclusion of poor, vulnerable and minority learners and communities from access to Program benefits such as scholarship and the school meals program; (ii) selection bias where operation's interventions such as school meals and infrastructure end up in locations and on individuals who are easier to access, rather than the most deserving; (iii) Community Health and Safety (CHS) concerns related to Gender-based Violence/Sexual Exploitation and Abuse, Sexual Harassment GBV/SEA-SH including the risk of learner's exposure to drugs, alcohol, early pregnancy, COVID-19 and other transmissible diseases arising from influx of construction workers and suppliers in schools; (iv) GBV/SEA-SH arising from exploitation of women and girls for Program benefits or by supporting girls to attend schools where they are at risk of abuse; (v) upsetting community dynamics caused by Program interventions such as school meals and infrastructure activities 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; (vi) an ineffective Grievance Redress Mechanism (GRM) to handle conflicts and redress, and, (viii) child labor where learners and other minors get engaged on operation activities such as construction and preparation of school meals. All these risks are amplified by COVID-19 restrictions and challenges in the traditional access to beneficiaries for meaningful stakeholder and community engagements.

9. **Environmental and Social Management Systems.** Detailed descriptions on the country's E&S management systems are presented in the parent ESSA. Based on AF activities, other applicable policy, legal and regulatory framework governing E&S risk management include;

No.	Legislation	Provision /Relevance
1	Draft Environmental Management and Coordination Act (E-Waste Management)	<p>The e-waste regulation has been developed to streamline the procedures of handling and disposal of e-waste generated by various sectors. The e-waste regulations provide a framework for identification, collection, sorting, recycling, and disposing of electrical and electronic waste (e-waste).</p> <p>Relevance: All e-waste to be generated during procurement/installation of core ICT equipment and e-waste generated during the operational phase, and/or beyond project life will be handled, managed, and disposed off, in adherence to the requirements of this law.</p>

	Regulations, 2013	
2	Guidelines for E-Waste management in Kenya, 2010	<p>The e-waste Guidelines were developed to streamline the procedures of handling and disposal of e-waste generated by various sectors. The e-waste guidelines provide a framework for identification, collection, sorting, recycling, and disposing of electrical and electronic waste (e-waste).</p> <p>Relevance: All e-waste to be generated during the procurement/ installation of ICT equipment at teachers training colleges and e-waste generated during the operational phase, and/or beyond project life will be handled, managed, and disposed of in adherence to the requirements of this guideline. An E-waste management plan will be developed as part of the Program Environmental and Social Management System (ESMS).</p>

10. **The Parent program E&S safeguards performance** towards achievement of the PDO was rated as satisfactory in the latest Integrated Safeguards Rating (ISR). The MoE has made efforts in implementation of the ESSA PAP, although the progress is slow, as the Program achieved effectiveness in August 2022. Notable achievements include: a) preparation and validation of the parent Program Environmental and Social Management System (ESMS) manual in delivery of commitments in the PAP, and b) training and capacity building on the Environment and Social Framework (ESF) and the GRM. The ESMS manual of the parent Program will be updated to include the AF PforR and IPF activities, E&S risks and mitigation measures and will operationalize the PAP recommended actions.

11. **Stakeholder Engagement during ESSA Addendum preparation.** The ESSA process includes stakeholder consultations and disclosure in accordance with the World Bank Policy and Directive for PforR financing and Access to Information Policy (AIP). The parent ESSA was extensively consulted with a range of stakeholders engaged from national and county levels. The stakeholder records and feedback are presented in the parent ESSA and Stakeholder Engagement Plan (SEP).

12. During AF preparation, national stakeholder engagements took place which included representatives from: the Ministry of Education (MoE), Teachers Service Commission (TSC); government agencies (Kenya National Examinations Council (KNEC), Kenya Institute of Curriculum Development (KICD), Centre for Mathematics, Science and Technology in Africa (CEMASTEA), Kenya Institute of Special Education (KISE), Kenya Education Management Institute (KEMI) and National Council for Nomadic Education in Kenya (NACONEK); development partners (World Bank, Global Partnership for Education (GPE), United Nations High Commissioner for Refugees (UNHCR), Save the Children, Education Development Trust, United Nations Educational, Scientific and Cultural Organization (UNESCO), United Nations International Children's Emergency Fund (UNICEF), Foreign Commonwealth and Development Office). The consultations focused on: the achievements and priorities in Basic Education; previous engagements on GPE support to Kenya; priority focus areas of the approved GPE Compact; overview and status report on implementation of the parent Program; the MoE priorities on GPE funding under the Program AF, as per the approved compact; review of Independent, Technical Advisory Panel (ITAP) report and recommendations; Data

utilization and sector coordination; Monitoring, Evaluation and Learning (MEL); strengthening of governance and accountability in education institutions; status of implementation of pre-primary education; priority reforms for enhancing quality teaching and learning and pre-primary education; priority reform in achieving gender parity in education and access, equity and inclusion in education; and status on Special Needs Education (SNE).

13. The Program Stakeholder Engagement Plan (SEP) will be implemented and adapted throughout the cycle. In addition, the MoE has several regular channels for soliciting feedback from stakeholders such as parents, teachers, students and community associations, that will be used to consult on various Program aspects and E&S systems management, during implementation. The ESSA Addendum will be disclosed on the MoE and World Bank’s websites prior to appraisal.

14. **Recommendations to strengthen the country’s system** for environmental, social, health & safety (ESHS) management. The addendum to the ESSA recommends the following measures and actions. The Program will integrate these recommendations into the parent PAP to improve E&S management for the AF as presented in table 1 below;

Table 1: ESSA AF Action Plan

No	Action	Due date	Responsible
1.	Update the parent Environment and Social Management System (ESMS) manual to; <ul style="list-style-type: none"> a) Incorporate an E-Waste Management and Disposal Plan; b) Develop Standard Operating Procedures (SOPs) for: <ul style="list-style-type: none"> ● Operational phase ESHS aspects of school infrastructure ● Operation of mobile school lab kits ● Procurement and use on clean energy initiatives (energy saving cooking stoves or steam cooking stove system) for the school meals program ● Installation of biogas units in schools 	By AF effectiveness	MoE
2.	Carry out E&S monitoring on implementation of the program activities to ensure compliance with the ESMS guidelines and share quarterly reports with the World Bank.	Continuous	MoE
3.	Hiring of a GBV/SEA-SH specialist to enhance effective GBV/SEA-SH management at the MoE.	Continuous	MoE