



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 10/20/2020 | Report No: ESRSC01543



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Kenya	AFRICA EAST	P170941	
Project Name	Kenya Digital Economy Acceleration Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Digital Development	Investment Project Financing	1/25/2021	3/25/2021
Borrower(s)	Implementing Agency(ies)		
National Treasury	Ministry of ICT		

Proposed Development Objective

Expanding digital inclusion and fostering development of the digital infrastructure, institutions and capabilities for the economy, jobs and government of the future

Financing (in USD Million)	Amount
Total Project Cost	350.00

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

No

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

The proposed program (MPA) harnesses opportunities to develop a vibrant, safe and inclusive digital economy in Kenya as a driver of growth and job creation and leveraging digital technologies to improve service delivery and resilience. It also supports efforts to promote digital inclusion and mitigate growing digital era risks of data protection and cybersecurity to ensure that every individual and business has the opportunity to engage in the digital economy confidently, safely and securely. It follows a Multi-Phased Programmatic Approach (MPA) structured under two separate but interlinked phases. Phase I focuses on expanding digital inclusion and fostering development of the digital infrastructure, institutions and capabilities for the economy, jobs and government of the future. Phase II focuses on contributing to a technology and data enabled transformation of public services and spurring digitally



enabled innovation and commerce in strategic sectors including Health, Agriculture and Judiciary (building on the interventions from Phase I of the program)

D. Environmental and Social Overview

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

The Project will be implemented across the Country with all the forty seven counties participating. The Project will focus in improving digital connectivity to primary and secondary schools, health facilities, constituency innovation hubs, constituency offices, huduma centres and other government facilities. The Project will upgrade and expand the existing National Optic Fibre Backbone Infrastructure (NOFBI) and Government Common Core Networks, this will include minor construction works.

D. 2. Borrower’s Institutional Capacity

The Program will be implemented by the Ministry of Information, Communication and Technology (MICT), Information and Communication Technology Authority (ICTA), the Ministry of Education, the Ministry of Health , Judiciary and Communication Authority. Program will establish a Project Steering Committee (PSC) with representation across the stakeholder groups to facilitate coordination and strategic planning. MICT will have a dedicated Project Implementation Unit (PIU) supporting the Project. While ICTA has experience in implementing World Bank finance projects, neither ICTA nor MICT have established capacity on environmental and social risk management. Therefore, both the MICT and ICTA will be required to each hire two qualified and experienced specialist i.e. one environmental specialist and one social specialist to support the MICT and ICTA respectively on environmental and social risks management under the PPA prior to appraisal.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Moderate

The environmental risk for the Program is considered Moderate. The Program will involve minor civil works on upgrading and rehabilitating the existing National Optic Fibre Backbone Initiative (NOFBI) and excavation and trenching for the last mile digital connectivity to primary and secondary schools, health facilities, constituency innovation hubs, constituency offices, Huduma centres and other government offices. The environmental risks and impacts anticipated include: (i) soil erosion and sedimentation through vegetation clearance and trenching; (ii) noise and excessive vibration near sensitive receptors from machinery and transportation of materials; (iii) e-waste generation; (iv) utilities service disruption during construction activities; (v) Safety hazards for workers and local communities where construction is occurring; (vi) potential traffic congestion, obstruction to access of residential, businesses and institutions during trenching and cable laying operations; (vii) Optic Fibre Cable (OFC) installation may lead to eye for damage to workers due to laser light during cable connection; (viii) workers may be exposed to minute/microscopic glass fibre shards that can penetrate human tissue through skin or eye or ingestion; (ix) release of hazardous materials associated with construction and maintenance activities; (x) solid waste generation; and (xi) security and community conflicts. It is anticipated that the adverse environmental risks and impacts are likely to be low-moderate magnitude, localized, temporary, reversible, easily avoided, managed or can easily be mitigated by enforcement of Environmental and Social Management Plans (ESMPs) and Occupational Health and Safety (OHS)

Public Disclosure



Plans. Since the specific scope and locations for the Project are unknown the Borrower will prepare an Environmental and Social Management Framework (ESMF) prior to appraisal. The ESMF will set out the principles and guidance and procedures to assess environmental and social risks and impacts during implementation. The ESMF will include an Environmental Code of Practice (ECOP) on e-waste management under the Program and will utilize the World Bank Group EHS Guidelines on Telecommunications.

Social Risk Rating

Substantial

The social risk is classified as substantial due to the project risks related to gender-based violence and the project large physical footprint that covers areas with VMGs. The project development objective is to expand access to high speed internet, improve the efficiency of government services, and strengthen the enabling environment for digital technology adoption. The project will result in social benefits of (i) social inclusion that ensures access to all people in the urban and rural areas to prevent further digital divide between the urban-rural areas, marginalized areas, income levels, gender, age and disability; through increased connectivity; (ii) access to information in particular in terms of access to education, jobs and employment opportunities and health and (iii) decentralization of government services through the Huduma center which is a digital government platform. The social impacts will include (i) risks related to unequal access to local communities based on ability to pay, gender, age, disability, rural and urban areas that will increase the digital divide and access to government services; (ii) increase in cyber security risks that include cyber bullying, addition and exposure to illicit materials; (iii) poor management of labour within the civil works and project units; (iv) gender based violence for women and girls the risk is high for construction sites within schools and hospitals; (v) poor stakeholder engagement leading to poor management of expectations by local communities; (vi) poor management of grievances; (vii) land acquisition and resettlement, though, physical works will not involve activities that have high potential for negative risks and impacts to the local communities, people or the environment. These impacts are expected to be of low magnitude, site specific, predictable, temporary and reversible. Civil works will be confined and limited within wayleaves, selected public facilities, optic cables will be buried within the public land and along the right of way of roads and sidewalks without likelihood of impact no compulsory land acquisition expected however, livelihood impacts are expected.

ESMF, SMP and RPF will be prepared prior to project appraisal. A SEP will be prepared prior to appraisal to support the project design, strengthen project ownership and prevent potential conflicts between beneficiaries. A project specific grievance redress mechanism will be put in place. A cultural appropriate GRM will also be established. SA, VMGF and VMGP will be prepared and incorporated onto the design of the project.

In Kenya, a digital divide between rural and urban areas as well as along the lines of income, gender, age and disability status still exists and there is need to ensure that all Kenyans have access to the internet and to digital services to prevent exclusion as more social and economic activity and public service move online. Social inclusion will be supported by continued public sector investment to facilitate rollout, affordability, and access to broadband in rural areas and among the most geographically, socially and financially vulnerable populations including through provision of broadband connectivity to health centers and schools, constituency level hubs for free public access, expansion of public infrastructure to more rural areas and policy and regulatory reforms to improve affordability of services. Women remain underrepresented in technology and persistent gender gaps remain in relation to mobile internet penetration (4%), mobile money, awareness of mobile internet (16%) as well as spending on mobile services (29%). Several studies also point to a gender gap in access to digital tools and services with some suggesting the gender gaps in internet use may be as large as 60%. A gender assessment will be carried out to facilitate support in closing of gender gaps in the design of the project as part of the ESMF.

Public Disclosure



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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project will have mostly positive impact including but not limited to improved digital connectivity, improved access to information, job creation via Information Technology Enabled Services, improved access and services delivery, improved productivity both in public and private sector and facilitation of digital transactions. The beneficiaries will include public institutions, private sector businesses and communities in marginal areas with limited digital connections.

Component 1: The Component will support upgrading and rehabilitation of the National Optic Fibre Backbone Infrastructure covering approximately 2500 kilometres, last-mile digital connections to all public primary and secondary schools, health facilities, constituency innovation hubs, constituency offices, Nairobi metro and other Counties metro areas with digital optic fibre connectivity and also, the installation of fiber optic cables and provisional of electronic equipment. This will involve minor civil works that entail excavation, trenching, backfilling and compaction of trenches, and installation of the cables on the conduit. In addition, the works will require machines and equipment such as backhoe, shovels, picks etc. The anticipated potential Social and Environmental Impacts:

- soil erosion and sedimentation through vegetation clearance and trenching;
- noise and excessive vibration near sensitive receptors from machinery and transportation of materials;
- e-waste generation, as part or repair or equipment replacement works;
- utility services disruption during construction activities;
- potential traffic congestion, obstruction to access residential, businesses and institutions during trenching and cable laying operations;
- solid waste generation.
- release of hazardous materials associated with construction and maintenance activities;
- Community/Occupational Health and Safety
- Safety hazards for workers and local communities where construction is occurring:
- OFC installation may lead to eye damage to workers due to laser light during cable connection and workers may be exposed to the minute /microscopic glass fibre shards that can penetrate human tissue through skin or eye or ingestion, and;
- Community health and safety risks and impacts are related to the generation of hazardous material.
- Security risks are foreseen and will be assessed during project preparation.
- Land acquisition and resettlement, though, the civil works will involve way leaves within selected public facilities with limited or not much land acquisition expected.
- cybersecurity related to cyberbullying, addition and exposure to illicit material;
- unequal access based on ability to pay, gender, disability, age, rural and urban;
- poor management of labour within the civil works and project units;
- gender-based violence;
- poor stakeholder engagement leading to poor management of expectations;
- poor management of grievances.



Physical works will not involve activities that have a high potential for adverse risks and impacts to communities, people or the environment. These impacts are expected to be of low magnitude, site-specific, predictable, temporary and reversible.

Component 2: This component will enhance government digital services by supporting ICT infrastructure, establishing a disaster recovery ICT center and supporting the judiciary with ICT equipment and installation to enhance service delivery. The potential negative environmental and social impacts anticipated include :

- generation of solid waste;
- e-waste generation;
- soil erosion and sedimentation through vegetation clearance and trenching;
- noise and excessive vibration near sensitive receptors from machinery and transportation of materials
- community/occupational health and safety
- Safety hazards for workers and local communities where construction is occurring;
- unequal access based on ability to pay, gender, disability, age, rural and urban;
- poor management of labour within the civil works and project units;
- gender-based violence;
- poor stakeholder engagement leading to poor management of expectations;
- poor management of grievances.

Component 3: The Program will provide electronic equipment to all public secondary schools, equip teachers and school administrators and support selected secondary schools with talent development laboratories. The procurement and installation of new electronic equipment will lead to the generation of e-waste as a result of the decommissioning of old electronic equipment. Given the scale of the electronic equipment to be procured and supplied to the secondary schools, the Program will prepare an ESMF to guide the management of e-waste to be generated under the Program. In addition, the project will work in collaboration with another Bank operation focusing on the management of e-waste in Kenya Africa Environmental health and pollution management program (P167788), which will provide support to address e-waste management within project activities in a sustainable manner. The potential environmental and social impacts include:

- e-waste generation
- solid and hazardous waste generation
- cyber security related to cyber bullying, addition and exposure to illicit material;
- unequal access based on ability to pay, gender, disability, age, rural and urban;
- poor management of labour within the civil works and project units;
- gender-based violence especially for the school going children;
- poor stakeholder engagement leading to poor management of expectations;
- land acquisition and resettlement;
- poor management of grievances.

The project design involves multiple stakeholders that include, the Ministry of Information, Communication and Technology (MICT), Information and Communication Technology Authority (ICTA), mobile operators, County Governments, Indigenous Groups Organizations, Disabled Persons Organizations, Ministry of Health, Ministry of Education, Indigenous Peoples etc. A stakeholder engagement plan includes government agencies, National Government Ministries, beneficiaries, directly impacted project-affected persons.



As the project locations are not known thus, ESMF and RPF will be prepared. A separate Social Management Plan will also be prepared prior to project appraisal. The ESMF will incorporate an Environmental Code of Practice and WBG EHS Guidelines on Telecommunications to manage e-waste to be generated under the Program. The ESMF will also screen out substantial and high-risk sub-projects and will contain provisions to ensure labour aspects that include child labour and labour influx are properly addressed in the supplementary safeguards documents to be prepared during program implementation, including ESMPs, bidding documents, and civil works contracts and ensures proper consultations with project beneficiaries. The ESMF will incorporate Environmental Code of Practice to manage e-waste and will utilize Good International Industry Practice (GIIP) to inform implementation process, including preparation of sub-project specific ESIAAs and ESMPs.

In addition, the ESMF will include:

- ESMP for minor civil works,
- Guidance on the preparation of Waste Management Plans,
- Labor Management Procedures (LMP) for contracted workers.

Additional documents to be prepared prior to appraisal will include:

- Security Management Plan (SMP),
- Gender Assessment as part of the ESMP,
- Gender Based Violence (GBV) Action Plan,
- Resettlement Policy Framework (RPF),
- Stakeholder Engagement Plan (SEP),
- Vulnerable Marginalized Groups Framework and VMGP
- Social Assessment (SA)

During implementation, the Borrower will prepare sub-project specific ESIAAs/or ESMPs and RAPs. A culturally appropriate project grievance redress mechanism will be developed and implemented. The GRM will be established after a stakeholder engagement process.

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

The Kenya Environment and Social Framework will be considered to be relied on in whole or in part.

ESS10 Stakeholder Engagement and Information Disclosure

The Project Stakeholder Engagement Plan will include both other interested parties (OIPs), various beneficiaries vulnerable groups, directly impacted project affected parties (PAPs), Vulnerable and Marginalized Groups and their organizations, persons living with disability and their organizations. The primary stakeholders include; Ministry of Information, Communication and Technology (MICT), Information and Communication Technology Authority (ICTA), Communication Authority of Kenya, Ministry of Education, Ministry of Health, Council of Governors and the forty seven (47) County Governments. Other stakeholders will include the mobile communication operators, civil society organization involved in representing Vulnerable and Marginalized Groups, People Living with Disability, Gender Affairs, Education and Health , and vulnerable groups.



Due to the stakeholders engagement challenges associated with COVID-19 and the directive on Government on social distancing and public meetings, the project will establish a structured approach to engagement of stakeholders that is based on meaningful consultations and disclosure of the project instruments prepared.

The project implementing agencies will prepare a project Stakeholder Engagement Plan (SEP) prior to Project Appraisal consistent with the requirement of ESS10. Stakeholder engagement project will ensure that the Client builds and maintains constructive relationships over time. This will be an ongoing project between the Client process between the Client and the project stakeholders to be extended throughout the life of the project and will encompass a range of activities and approaches, from information sharing and consultation, to participation, negotiation, and partnerships. The nature and frequency of this engagement will reflect the level of project risks and impacts. The SEA will describe the implementing agencies' strategy and program for engaging with stakeholders in a culturally appropriate manner. The goal will be to ensure the timely provision of relevant and understandable information and also to create a process that provides opportunities for stakeholders to express their views and concerns, and allows the Implementing Agencies to consider and respond to them. The SEP will ensure that the IAs will:

1. Provide meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s).
2. Provide information in advance of consultation activities and decision-making.
3. Disseminates information in ways and locations that make it easy for stakeholders to access it.
4. Respects local traditions, languages, timeframes, and decision-making processes.
5. provides for two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed
6. Inclusiveness in representation of views, including women, vulnerable and/or minority groups
7. the consultation process is free of intimidation or coercion.
8. There is a clear mechanisms for responding to people’s concerns, suggestions, and grievances
9. That feedback is incorporated feedback into project or program design, and reporting back to stakeholders.

The draft SEP will be disclosed as early as possible before appraisal to allow meaningful stakeholder consultation and inputs before it is finalized for appraisal. The ESCP will include an action that ensure that the SEP will be completed. The ESMF and RPF will include procedures for external communications and disclosure project on environmental and social matters proportionate to the risks and impacts of the project activities consistent with the requirement of ESS10. The ESMF will also include a project-level grievance mechanism to respond to public enquiries and concerns.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

This standard is relevant for this Program, given the fact that the Program has the potential for hiring specialized personnel and laborers for different aspects and phases of its implementation. Worker categories under this standard that may be relevant for the Program will entail existing civil servants who will remain subject to the terms and conditions of their existing sector employment including relevant ESS 2 requirement applicable to civil servants,



direct contracted and primary supply workers. Program-level Labor Management Procedures (LMP) will be prepared prior to appraisal and will identify the different types of Program workers that are likely to be involved in the Program, as well as worker management procedures. It is anticipated that the Program will result to labour influx into areas where construction will be carried out, that may include skilled and semi-skilled workers. The Program will ensure adequate and appropriate measures are put in place for Contracted workers including establishing and maintaining safe working environment, implementation of OHS requirements (including hiring of health and safety officers), training on OHS requirements and provision of Personal Protective Equipment (PPE). These procedures will also include requirements for working conditions and terms of employment, nondiscrimination and equal opportunity, workers organizations, child labour and minimum age, forced labour, workers grievance redress mechanism. These procedures will be guided by the requirements of national laws and ESS2. The Implementing Agencies will ensure that the bidding and contract documents include clauses that ensure compliance with the requirements of this ESS together with appropriate non-compliance remedies.

The LMP will include an Occupational Health and Safety Plan (OHSP) that is in line with the ESMF, the World Bank Group EHS Guidelines and the Industry Specific EHS Guidelines for Telecommunications and to ensure health and safety conditions of workers during construction activities. Some OHS hazards identified with the project activities include, but not limited to: (i) falls from heights; (ii) Working on confined spaces during trenching and manual boring operations; (iii) risks from microscopic glass fiber shards penetrating human tissue through skin or eyes, or by ingestion or inhalation; (iv) risk of permanent eye damage due to exposure to laser light during cable connection; and (v) injuries due to failure to use proper protective equipment during the installation of hardware, equipment, and construction. The LMP will include measures to address potential risks and impacts that may arise from the interaction between Program workers and local communities. The Program will establish GRM for workers to channel their grievances.

The LMP will include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and continuous training and awareness to workers on OHS. It will be developed by the Borrower and as specified in the ESCP and will include a Code of Conduct for Program workers. The LMP will address occupational, health and safety concerns for workers, and will include provisions on OHS to inform individual sub-project ESMPs.

The Implementing agencies will incorporate the requirements of ESS2 into contractual agreements with Contractors together with appropriate noncompliance remedies. The LMP will be prepared as part of the ESMF prior to appraisal.

ESS3 Resource Efficiency and Pollution Prevention and Management

The Program will procure and install ICT equipment for schools, upgrade and rehabilitate existing NOFBI and GCCN. The relevance of ESS3 is mainly related to ensuring efficient energy consumption, adequate management solid waste and electronic waste generated. In terms of efficiency, the program will ensure that the equipment it procures is energy efficient to the extent possible. For any ICT equipment that may be replaced it will have to be disposed of in a manner that follows the ECOP as articulated in the ESMF and ESMPs.



Contractor(s) will be required to prepare Waste Management Plans (WMP) that provide temporary storage on site for all hazardous or toxic substances in safe containers labelled with details of composition, properties and handling information. The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching. The wastes shall be transported by reputable licensed vendors, disposed in a licensed facility (ies) and as per statutory requirements.

The e-waste generated as part of the Program activities of decommissioning and replacement of old electronic devices and other digital devices will be removed and properly stored under leak proof conditions until it is transported by reputable licensed and disposed in a licensed facility (ies) for recycling or are sold for certified refurbishment facilities. The Borrower will ensure that the chain of custody documentation are updated and maintained from transport site to the disposal sites. The Project will undertake Greenhouse Gas (GHG) emission screening and estimation .

ESS4 Community Health and Safety

Community health and safety issues are associated to typical risks and impacts of construction sites as vehicle traffic, dust, noise and vibrations, hazardous material, labour influx and structural and site access issues and driver safety. The risk relating to gender based violence are high, GBV to the community as a result of migrating labor / labor camps and the infrastructure installation in schools and health centers. A standalone GBV Action Plan will be prepared.

Key risks associated with this ESS include security issues, the Northern parts of the Country are prone to perennial inter/intra community conflicts based on natural resources and boundary demarcations, banditry and the North Eastern Parts are affected by terrorist attacks from Al Shabab elements crossing the border from Somalia. The project will prepare a standalone Security Management Plan (SMP). Thus, Contractor workers working in these insecure areas will require escort and embedded armed security personnel.

The ESMF will incorporate Emergency Preparedness and Response Plan (EPRP) for the workers involved in rehabilitating the and upgrading the NOFBI, GCCN and the last mile digital connectivity. The EPRP will be made available to the members of communities and other local authorities through awareness.

The Program ESMPs will put in place mitigation measures to protect the community (ies) from hazards related to the civil works that include excavation of trenches .The Contractors will ensure that construction areas are safeguarded with fences, reflective safety tape and safety barriers to keep the workers on the site safe from trespassers, interruptions, and other inconveniences, and prevent pedestrians, community members and animals from accidentally entering the open trenches and excavated areas. All open trenches and excavated areas shall be back filled as soon as possible after cable laying and construction has been completed. The Borrower will ensure that Contractor (s) will comply with the WBG General EHS guidelines and Industry specific EHS Guidelines on Telecommunications.



A project-level GRM as required by ESS10 will be instituted and will be equipped to respond to grievances the community may have on Projected-related issues, including those related to security and the use of security personnel. The stand alone SMP and the GBV Action Plan will be prepared prior to Project appraisal.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Project Components 1, 2 and 3 will invest in: (1) laying of underground optic cable; (ii) construction of transmission towers, and, (iii) buildings/construction/rehabilitation for server rooms and huduma centers are likely to induce land acquisition, resettlement and livelihood restoration. Land needs will be in schools, hospitals and public land thus land acquisition will be limited and site specific. Civil works such as laying optic cables and construction of various structures will be confined within selected public facilities. Optic cables will be buried in the right of way of roads and side walks, without the likelihoods of impacts beyond the actual footprint of the works; these risks and impacts will be mitigated in a predictable manner. There will be likely minimum impacts relating to physical and economic displacement of structures, households and business encroaching and squatting onto the road reserves. Minimum land acquisition is expected and it is highly unlikely that it will induce physical displacement; partial economic displacement, however, cannot be excluded. Fourteen (14) counties in Kenya are within land that is community owned or under customary rights, thus, voluntary land donation processes will be expected in this areas. Wayleaves land access process will apply for the last mile connections.

A Resettlement Policy Framework (RPF) will be prepared prior to appraisal appraisal. At this stage it is not possible to estimate the number of project affected persons since:

1. the project covers the entire county and 47 counties.
2. location of the project's physical investments are yet to be identified.
3. detailed technical designs of the infrastructure are yet to be carried out.

The National Land Commission incharge of public land and land acquisition will be involved in this process. NLC also is responsible for carrying out due diligence of public land and use of alternative dispute resolution mechanism in grievance resolution. RPF will provide guidance for the development of Resettlement Action Plans, Voluntary Land Donation, stakeholder engagement, and grievance redress mechanism.

While during implementation, the Borrower will prepare sub-project specific Resettlement Action Plans. A culturally appropriate project grievance redress mechanism will be established guided by stakeholder engagement process.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The last mile connections to the schools , health facilities and government institutions will be done within existing road reserve and the upgrading and rehabilitation of the NOFBI will be done on the existing infrastructure. Thus, this ESS is not relevant . The ESMF will provide a screening mechanism to identify sub-project designs which have a risk of negatively affecting a natural habitat in order to establish relevant mitigation measures.



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

The project will be implemented country wide in all the forty seven counties (47). In Kenya there are thirty one (31) counties with the presence of Vulnerable and Marginalized Groups (VMGs). Out of these fourteen (14) counties have VMGs as the overwhelmingly majority. A Vulnerable and Marginalized Groups Framework and Social Assessment will be prepared prior to Appraisal consulted on with the VMGs and disclosed in accordance with ESS7 and the cultural needs of the VMGs.

The social assessment will be prepared prior to project Appraisal that will cover the 14 counties that have overwhelmingly majority of VMGs and VMGF will cover the 17 counties that have VMGs as minority groups. A project VMGP will be prepared prior to project Appraisal.

Elements of the SA, VMGF and VMGP will be incorporated into the project design and SEP.

The project design and the implementation process will be carried out in a manner that provides the VMGs with equitable access to project benefits, taking into account their concerns and preferences addressed through meaningful consultations and documentation of the consultations that will summarize the consultation results and describe how issues identified by VMGs have been addressed in project design and implementation.

The stakeholders engagement plan will ensure adequate coverage of VMGs in a culturally appropriate manner for the VMGs and in a language that is appropriate. The SEP operation and steps of communication and outreach will ensure in the benefits of the informed and can share in the benefits of the project in an inclusive and culturally appropriate manner. A culturally appropriate Grievance Redress Mechanism will be established after a consultation process with the project beneficiaries and project affected persons.

No activities that require Free Prior and Informed Consent or forced eviction of VMGs are anticipated for this project.

ESS8 Cultural Heritage

The Program will involve excavation works along the road reserves. It is not anticipated that tangible and non-tangible cultural material will be encountered. The ESMF will include 'Chance Find Procedures' and the procedure will be included on all contracts undertaking the civil works. Contractors must ensure that provisions are put in place so that any "chance finds" encountered in excavation or construction are noted and registered, and responsible authorities contacted, and works activities delayed or modified to account for such finds.

ESS9 Financial Intermediaries

This ESS is not relevant to this program.

B.3 Other Relevant Project Risks

Yes, risk related to security and access to areas in Mandera County.



C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

There will no financing partners.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

Prepare Stakeholder Engagement Plan (SEP)

Prepare Environmental and Social Management Framework (ESMF) with a Labour Management Procedure and Gender Assessment

Prepare Social Management plan

Prepare a Security Management Plan (SMP)

Prepare GBV Action Plan

Prepare Resettlement Policy Framework (RPF)

Prepare Social Assessment, VMGF and VMGP. Elements of VMGP will be incorporated into the project design and the SEP.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Both MICT and ICTA to recruit two qualified Environmental and Social specialist each to support environmental and social risk management

Preparation and Implementation of the ESMF, SMP and RPF

Preparation and Implementation of ESIA/or ESMP

Preparation and Implementation of RAP/or ARAP

Preparation of a Gender Assessment as part of the ESMF

Preparation of a Social Assessment, Vulnerable and Marginalized Groups Framework and Vulnerable and Marginalized Group Plan. Elements of the VMGP will be incorporated into the project design and the SEP.

Preparation of Security Management Plan.

Establishment of a cultural appropriate grievance redress mechanism.

Public Disclosure



C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

30-Sep-2020

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: National Treasury

Implementing Agency(ies)

Implementing Agency: Ministry of ICT

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Benqing Jennifer Gui, Casey Torgusson

Practice Manager (ENR/Social) Helene Monika Carlsson Rex Recommended on 15-Sep-2020 at 06:58:35 GMT-04:00

Safeguards Advisor ESSA Peter Leonard (SAESSA) Cleared on 20-Oct-2020 at 16:01:3 GMT-04:00