

THE REPUBLIC OF KENYA



**MINISTRY OF EDUCATION
STATE DEPARTMENT OF EARLY LEARNING AND BASIC
EDUCATION**

**KENYA GPE COVID-19 LEARNING CONTINUITY IN BASIC
EDUCATION PROJECT**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

SEPTEMBER 2020

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ABBREVIATIONS AND ACRONYMS

ASAL	-	Arid and Semi-Arid Lands
BoM	-	Board of Management
CAJ	-	Commission for the Administration of Justice
CAS	-	Chief Administrative Secretary
CBK	-	Central Bank of Kenya
CDE	-	County Director of Education
CEMASTEIA	-	Center for Mathematics, Science, and Technology Education in Africa
CoK	-	Constitution of Kenya
COVID-19	-	Coronavirus disease – 2019
CPC	-	County Project Coordinator
CS	-	Cabinet Secretary
CSO	-	Curriculum Support Officer
DFID	-	Department for International Development
DOSH	-	Director of Occupational Safety and Health
DPC&D	-	Directorate of Projects Coordination and Delivery
DPCAD	-	Directorate of Projects Coordination and Delivery
DPE	-	Directorate of Primary Education
DQAS	-	Directorate of Quality Assurance
EACC	-	Ethics and Anti-Corruption Commission
ECDE	-	Early Childhood Development Education
EDPCG	-	Education Development Partners Coordination Group
EDPCG	-	Education Development Partners Coordination Group
EGM	-	Early Grade Mathematics
EGR	-	Early Grade Reading
EMIS	-	Education Management Information System
ESF	-	Environment and Social Framework
ESQAO	-	Education Standards Quality Assurance Officer
ESS	-	Environmental and Social Standard
FAQs	-	Frequently Asked Questions
GBV	-	Gender-Based violence
GEM	-	Geo-enabling Initiative for Monitoring and Surveillance
GoK	-	Government of Kenya
GPE	-	Global Partnership for Education
GRFC	-	Grievance Redress Feedback Committee
GRM	-	Grievance Redress Mechanism
GRS	-	Grievance Redress System
HT	-	Head teacher
HUTLCs	-	Historically Underserved Traditional Local Communities
ICT	-	Information Communication Technology
ICTA	-	Information and Communication Technology Authority
IDA	-	International Development Association
IDSR	-	Integrated Disease Surveillance and Response
IEC	-	Information Education and Communication
INGOs	-	International Non-Governmental Organizations
KCPE	-	Kenya Certificate of Primary Education
KEMSA	-	Kenya Medical Supplies Authority
KICD	-	Kenya Institute of Curriculum Development
KNCHR	-	Kenya National Commission on Human Rights
KNEC	-	Kenya National Examination Council

STAKEHOLDER ENGAGEMENT PLAN – LEARNING CONTINUITY IN BASIC EDUCATION PROJECT (2020)

KPIs	-	Key Project Indicators
MIS	-	Management Information System
MoE	-	Ministry of Education
MoH	-	Ministry of Health
NAC	-	National Assessment Center
NASMLA	-	National Assessment for Monitoring Learner Achievement
NESP	-	National Education Sector Plan
NGEC	-	National Gender and Equality Commission
NGO	-	Non-Governmental Organization
OHS	-	Occupational Safety and Health
PAD	-	Project Appraisal Development
PAI	-	Project Area of Influence
PCU	-	Project Coordination Unit
PIM	-	Project Implementation Management
PIM	-	Project Implementation Manual
PPEs	-	Personal Protective Equipment
PRIEDE	-	Primary Education Development Project
PS	-	Principal Secretary
PSC	-	Project Steering Committee
PTA	-	Parents Teachers Association
SACMEQ	-	Southern Africa Consortium for Monitoring Educational Quality
SDELBE	-	State Department of Early Years and Basic Education
SEA	-	Sexual exploitation and abuse
SEQIP	-	Secondary Education Quality Improvement Project
SH	-	Sexual Harassment
SMS	-	Short Message Service
SPM	-	School Meals Program
SPMC	-	School Meals Program Committees
TSC	-	Teachers Service Commission
UNICEF	-	United Nation International Children’s Fund
USAID	-	United States International Development Agency
VMG	-	Vulnerable and Marginalized Group
WFP	-	World Food Program
WHO	-	World Health Organization

EXECUTIVE SUMMARY

Background

1. The GPE has allocated the Government of Kenya (GoK) US\$11 million, including a grant agent supervision fee of US\$200,000, from the GPE COVID-19 accelerated funding window designed to capacitate governments to mitigate the impact of COVID-19 on their education systems and help recovery. 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 on-line teaching and learning materials, and to expand existing distance learning programs; (iii) to train teachers to effectively support distance learning, including monitoring and assessment; (iv) to develop, and implement intervention programs targeting the marginalized and most vulnerable learners especially the girls and learners with special needs; and (v) to provide psychosocial support to learners, teachers, education officials and other stakeholders.

2. The aim of this Plan is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of communities is essential to the success of the project in order to ensure smooth collaboration between project staff, stakeholders and local communities, and to minimize and mitigate environmental and social risks related to the proposed project activities.

Project Description

3. The project interventions are conceptualized within an existing education ecosystem, where key education reforms are still ongoing despite the COVID-19 crisis. The project is therefore not conceived as just an emergency short-term response; instead, in line with the MoE's COVID-19 plan, it also includes a medium-term set of interventions to protect the education system and to build additional resilience for a crisis that is still unfolding and that will affect Kenya's society and economy for an uncertain period.

Project Development Objective

4. PDO Statement: To enhance access to on-line and distance learning for all students in primary and secondary schools; and facilitate a smooth transition in the return to school for targeted vulnerable students.

5. *PDO Level Indicators:*

- i. Percentage of students supported with remote learning interventions (online and distance programs) (male, female);
- ii. Number of teachers trained in using remote learning methodologies (online and distance learning methods).;
- iii. Percentage of students, previously enrolled in pre-school, primary and secondary schools, who return to school once the school system is reopened, disaggregated (male, female); and
- iv. Number of students provided access to school meals and nutrition for at least 151 learning days in a year (male, female).

6. As required by GPE, these indicators will be further reported in numbers (for number of students supported with remote learning, and students who return to school) and percentages (for number of teachers trained, and students accessing school meals), and disaggregated by grades (pre-

school, grades 1 to 12), by sub-county, and by subject specialization to provide more granular reporting on progress towards achieving the objectives.

Project Components

7. **Component 1:** Expanding existing remote learning opportunities for learning continuity for all students in basic education (US\$6.25 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 the context of 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.

8. **Component 2:** Facilitate smooth transition back to school for vulnerable students and girls, when schools reopen (US\$3.0 million). This component supports two sub-components: grant for the existing National School Meals Program (SMP) and Provision of on-line based psychosocial support services.

9. **Component 3:** Project Coordination, Communication, and Monitoring and Evaluation (US\$1.55 million). This component aims to support project implementation, selected monitoring and evaluation activities, and to build capacity of MoE to conduct virtual meetings 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.

Project Beneficiaries

10. The Project will directly benefit the following: (a) about 60 percent of primary and secondary school students accessing online and distance learning; (b) about 1.75 million learners from the school meals program; (c) an estimated 150,000 head teachers, teachers and curriculum support officers will benefit from teacher training in online and distance learning; (d) students will benefit from the online based psychosocial support services; and (e) parents and caretakers reached with remote learning tips.

World Bank Requirements for Stakeholder Engagement

11. The Kenya GPE COVID-19 Learning Continuity in Basic Education Project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10 on *Stakeholders Engagement and Information Disclosure*, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

Stakeholder Identification and Analysis

12. Criteria used to identify and analyze stakeholders under the ongoing parent projects (PREIDE and SEQIP) has helped generate a list of potential project stakeholders at the national, regional/county and community levels including an analysis of the potential issues of concern for each. This list has further been enhanced through a consultation held on June 17, 2020. The list of stakeholders will

however be reviewed and updated on a continuous basis, informed by consultations during project implementation with the various stakeholders.

13. Following the project approval, a virtual consultation was held on June 17, 2020 during which the draft SEP was consulted upon. The online meeting brought together 35 participants, mainly drawn from the national and county education offices. The consultation was augmented by a questionnaire that sought to gather information on google platform on the various aspects of the project that needed to be consulted upon. The questionnaire was completed by over 700 participants drawn from all parts of the country involving Board of Management (BoM), Education Officers at the county level, head teachers and teachers. The results of the consultations helped concretize information on the consultation measures for the SEP and the key stakeholders.

14. The directly affected parties for this project include: learners; teachers; head teachers; Boards of Management; parents, school sponsors (including faith based organizations), Members of County Assembly (MCAs) and VMGs/HUTLCs in the project area of influence (PAI). The other directly affected parties are the management MoE (national and county), school meals program (SMP) and the service providers (psychosocial support and GBV) who will be involved in the implementation of project activities. The other interested parties (OIPs) for this project include the contractors for the MoE communication system, the suppliers for SMP, the implementing partners including ICT & Treasury, Teachers Service Commission (TSC), Kenya Institute for Curriculum Development (KICD), Kenya National Examination Council (KNEC), Information and Communication Technology Authority (ICTA), and WFP among others. The project team up with the civil society organizations (CSOs) and non-governmental organizations (NGOs) to deliver some of the interventions including the GBV action plan and vulnerable and marginalized groups plan (VMGP).

Stakeholder engagement

15. The project targets a substantial numbers of learners and their families, who are part of the vulnerable and marginalized groups (VMGs) and/or historically underserved traditional local communities (HUTLCs), therefore it 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 Project Coordination Unit (PCU) will make all reasonable efforts to conduct meetings with stakeholders through diversifying means of communication, based on type and category of stakeholders.

16. Project communication will be structured and offered regularly but with the flexibility of responding to issues as they emerge. It is envisaged that there will be more engagement at the MoE level but since this project will be implemented by the team responsible for GPE PRIEDE, the key responsibilities will be borne by the GPE/PCU. Given that the Project is building on existing interventions, the stakeholders will be informed about the additional activities from the current funding and all planned activities with potential impact on them. It is important that the following information is provided regularly and on need-basis:

- i. Number of learners directly under project support;
- ii. Number of learners accessing e-learning materials (broken down into the different channels);
- iii. Number of head teachers/senior teachers trained and from which schools;
- iv. Perceptions of the public towards the project;
- v. Grievances received and resolved; and
- vi. Status of project implementation.

Strategy to engage disadvantaged and vulnerable groups

17. The vulnerability for this project may stem from a person's location, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities, marginalized groups or migrants), dependence on other individuals or natural resources, etc. Engagement with the VMGs/HUTLCs often requires the application of specific measures and assistance aimed at facilitating them to participate in the project-related decision making so that their awareness of and input into the overall process are commensurate to those of the other stakeholders. The VMGP prepared for this project makes provisions and recommends strategies for ensuring meaningful involvement of the VMGs/HUTLCs in the project processes and ensuring that they benefit from the interventions.

18. The project will take special measures to ensure that members of disadvantaged and vulnerable groups have equal opportunity to project benefits if they meet the targeting criteria, to access information, provide feedback, and submit grievances. The project will use data on poverty index to identify schools in need of enrollment into the SMP. The project will work with School Meals Program Committees (SMPCs) at the local level in making decisions on Component 2. An additional and affirmative strategy will be to use community engagement modalities that influence the selection of beneficiaries and distribution of project beneficiaries where a select sub-set of beneficiaries requires enhanced or dedicated support e.g. SMP and psychosocial support.

19. The participation of VMGs/HUTLCs in the 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, the GPE/PCU will undertake prior and informed consultations with the likely affected local communities and those who work with and/or are knowledgeable of VMGs/HUTLCs' development issues and concerns. The primary objectives would be to:

- i. Seek their inputs/feedback to avoid or minimize the potential adverse impacts associated with the required activities;
- ii. Identify culturally appropriate impact mitigation measures; and
- iii. Assess and adopt economic opportunities, which the MoE could promote to complement the measures required to mitigate the adverse impacts.

Grievance redress mechanism

20. The grievance redress mechanism (GRM), which is a management system through which grievances will be resolved following a standard operating procedure (SOP) aligned to other management systems (communication, resourcing, reporting), has also been developed; the GRM is based on existing SEQIP mechanism. A grievance can be defined as a concern or complaint raised by an individual or a group of stakeholders affected by real or perceived project induced impacts. A grievance mechanism provides a way to reduce risk for the proposed projects offers stakeholders an effective avenue for expressing concerns and achieving remedies, and promotes a mutually constructive relationship.

21. The GRM for this project is aimed at:

- i. Providing a predictable, transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting;
- ii. Building trust as an integral component of broader stakeholders' relational activities; and
- iii. Enabling more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement.

Gender-Based Violence (GBV) Action Plan

22. The risk of GBV was identified during the consultations for this project. A Plan has been developed to accompany the implementation of the project GRM to ensure that the Project does not

have any negative impacts or further perpetuate GBV/sexual exploitation and abuse (SEA)/sexual harassment (SH). It presents operational activities as well as recommendations for GBV/SEA risk mitigation that build on existing mechanisms in the MoE, and the National and County Governments involved in the project. The Plan is based on existing protection, prevention and mitigation strategies and measures developed by the WB and coordinated through the MoE and its partners at the implementation level. GRM will be accompanied by the service provider for on-call psychosocial services which will include a hotline for reporting cases of GBV/SEA and child abuse.

Management and monitoring of the SEP

23. The existing Kenya GPE PRIEDE PCU, which is under DPC&D will be primarily responsible for the day-to-day project management and coordination, communication, safeguards, fiduciary and monitoring and reporting. The GPE/PCU is functional and has the capacity to also implement this project and oversee the implementation of this SEP, considering that some of the key project activities will be directly executed and monitored by the TSC, KNEC and KICD. These agencies are implementing entities of the PRIEDE and SEQIP projects, therefore have experience with World Bank procedures. A budgetary allocation of USD 223,485 has been allocated for the implementation of the SEP.

24. The SEP will be periodically revised and updated as necessary in order to ensure that the information and the methods of engagement remain appropriate and effective in relation to the project context and spread of COVID-19. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. Monthly/quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the project.

1. INTRODUCTION

1.1 Background

1. An outbreak of coronavirus disease (COVID-19) caused by the 2019 novel coronavirus (SARS-CoV-2) has been spreading rapidly across the world since December 2019, from Wuhan, Hubei Province, China to 212 countries and territories. As of September 02, 2020, the outbreak had already resulted in over 25 million cases and over 860,000 deaths. The outbreak has resulted in significant loss of life, unprecedented interruptions in global supply chains, disruption in manufacturing operations, lower commodity prices, economic losses and social disruption in both developed and developing countries.

2. In Kenya, the first COVID-19 case was reported on March 13, 2020. As of September 2nd, 2020 the country had 34,315 cases with 577 deaths and 20,211 recoveries. In an effort to contain the virus, the National Government introduced several measures including the closure of all schools and learning institutions. Other measures include night curfews, travel restrictions in specific areas considered to be hotspots (including Nairobi, Mombasa and Mandera), social distancing, wearing of masks, respiratory etiquette and increased emphasis on hand washing/sanitizing.

1.2 Impact on the education sector

3. The COVID-19 crisis threatens education and human capital accumulation. The learning crisis is likely to deepen, as more children may drop out of school potentially widening the opportunity gap between the rich and the poor. The immediate priority is therefore to protect the welfare and potential of students during the crisis - keep them safe and healthy and ensure that they remain engaged in school and continue to learn. As learning institutions plan to reopen gradually from September 2020 in line with His Excellency President Uhuru Kenyatta's directive, there is a need to plan for and manage continuity through appropriate recovery strategies.

4. The education system is already facing a learning crisis. If the Government and development partners do not respond well, the COVID-19 outbreak is highly likely to further deepen the learning crisis and widen gaps between rich and poor in access to quality and equitable education. The impacts will be the greatest for poor, vulnerable and marginalized students. Learners' dropout rates are likely to rise, especially for the most disadvantaged groups, and households are likely to spend less on education inputs and school fees particularly for families hit by COVID-19 through illness and job losses. Cuts in education investments by the Government could worsen quality of education and deepen the already existing dearth of quantity and quality of teachers. Even if the Government responds well, recovery will be necessary to mitigate the impact of school closures, economic shocks, and possible permanent effect on human capital.

5. The proposed project will complement and leverage other relevant ongoing education projects supported by the World Bank and other development partners. The project interventions complement the ongoing national level interventions under the Kenya GPE PRIEDE (US\$98.1 million, P146797) and Secondary Education Quality Improvement Project (SEQIP US\$200 million, P160083) aimed at: (i) improving the overall teacher management and development systems; (ii) reform procurement and distribution of textbooks and provision of core textbook to all learners; (iii) improve basic school infrastructure including sanitation facilities in target schools; (iv) provision of sanitary towels to girls in school; (v) interventions for learners with special needs education, competency-based curriculum reforms and associated teacher trainings; (iv) improvements in national assessments to align process and test items to international assessments; and (vi) school-based teacher support initiatives to improve teacher proficiency and learning outcomes. This project is also complemented by technical assistance to MoE for Early Childhood Development (ECD) strategy and policy development.

6. The MoE, through KICD, has identified key challenges with the remote learning initiatives, within the CBC framework for sustainability and the practical steps of re-opening schools that would need to be addressed through this project:

- i. High dependency on ‘traditional’ classroom teaching and learning methods, and slow adaptation of educational technologies;
- ii. Inadequate access to remote learning implying that teaching and learning are interrupted when traditional classroom methods are not available;
- iii. Inequality between the public and private schools that have adopted a system of learner-teacher remote interaction for continued curriculum delivery and assessment during the COVID-19 period, and inequality among learners from various regions and households;
- iv. Return to normal schooling after the current COVID-19 pandemic will find learners at different levels of learning, which has implications on school level assessment, and performance in the high stake national examinations;
- v. Re-opening will require schools to put in place measures to protect learners, teachers and workers from contracting the virus (distancing, handwashing, sanitizing and wearing masks);
- vi. Inadequate monitoring and evaluation (M&E) arrangements for the existing remote learning and targeted interventions for the unreached students; and
- vii. The emergence of content, applications and platforms that have not been verified by Kenya Institute of Curriculum Development (KICD) and are being marketed and offered to Kenyans. This is likely to create some confusion in curriculum delivery and assessment.

1.3 Project description

7. The project interventions are conceptualized within an existing education ecosystem, where key education reforms are still ongoing despite the COVID-19 crisis. The project is therefore not conceived as just an emergency short-term response; instead, in line with the MoE’s COVID-19 plan, it also includes a medium-term set of interventions to protect the education system and to build additional resilience for a crisis that is still unfolding and that will affect Kenya’s society and economy for an uncertain period.

8. The Project Development Objectives (PDO) Statement: *To enhance access to online and distance learning for all students in primary and secondary schools and facilitate a smooth transition in the return to school for targeted vulnerable students.* PDO Level Indicators¹ are:

- i. Percentage of students supported with remote learning interventions (online and distance programs) (male, female);
- ii. Number of teachers trained in using remote learning methodologies (online and distance learning methods);
- iii. Percentage of students, previously enrolled in pre-school, primary and secondary schools, who return to school once the school system is reopened, disaggregated (male, female); and
- iv. Number of students provided access to school meal and nutrition for at least 151 learning days in a year (male, female).

9. The project, to be implemented over an 18-month period, will have three (3) components as summarized in Table 1 (the full description of the components can be found in the Project Appraisal Document).

¹These indicators will be further disaggregated by grades (pre-school, grades 1 to 12), by sub-county, and by subject specialization to provide more granular reporting on progress towards achieving the objectives.

Table 1: Project components and sub-components

#	Component	Sub-components
1.	Expanding existing remote learning opportunities for learning continuity for all students in basic education (US\$6.25 million).	1.1: Support access and delivery of online content to all students in primary and secondary school (US\$3.75 million)
		1.2 Teacher training in interactive remote learning methodologies (US\$2.0 million)
		1.3 Create an integrated M&E system for remote learning interventions and provide support for parents and caregivers to monitoring student learning (US\$0.5 million):
2.	Facilitate smooth transition back to school for vulnerable students and girls, when schools reopen (US\$ 3 million)	2.1: Support to the National School Meals Program (US\$2.0 million)
		2.2: Provision of on online based psychosocial support services (US\$ 1 million)
3.	Project Coordination, Communication, and Monitoring and Evaluation (US\$1.55 million)	Monitoring attendance in all schools (US\$0.05 million)
		Conduct a learning assessment in all primary schools (US\$1 million)
		Overall project management, coordination and communication, and capacity enhancement for virtual meetings in MoE’s main board room (US\$0.5 million)

10. Table 2 presents the key activities to be implemented under each of the three components.

Table 2: Project activities by component

Component	Support under the components
1. Expand existing remote learning opportunities for learning continuity for all students in Basic Education	<ul style="list-style-type: none"> 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 and disabilities Review of existing digital learning training packages for teachers, and capacity building of target teachers Procurement 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 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 Develop and disseminate simple tips to support parents and caregivers, including a help desk, as they support learners at home Implement Occupational Safety and Health requirements during installation of ICT equipment Implement E-Waste Management Plan implementation during installation of ICT equipment
2. Facilitate smooth transition back to school for vulnerable students and girls	<ul style="list-style-type: none"> Procurement and provision of online based psychosocial support services Technical assistance for the SMP activities Occupational Safety and Health requirements for project workers and suppliers Implement the Plan and Procedure for School Food Sourcing, Handling and Storage for Suppliers and Schools
3. Project Management, Coordination, Communication and	<ul style="list-style-type: none"> Monitoring school attendance in all schools, analysis of the data and dissemination Learning assessments when schools reopen, analysis of the data and dissemination

Component	Support under the components
Monitoring and Evaluation	<ul style="list-style-type: none"> • Activities directly related to the project management, coordination and communication • Procurement of a firm to establish a functional virtual meeting room in MoE’s main office • Implement Environment and Social Management Plans for the project.

1.4 Project Beneficiaries

11. The Project will directly benefit the following:
- i. About 60 percent of primary and secondary school students accessing online and distance learning;
 - ii. About 1.75 million learners from the school meals program;
 - iii. An estimated 150,000 head-teachers, teachers and curriculum support officers will benefit from teacher training in online and distance learning;
 - iv. Students will benefit from the online based psychosocial support services; and
 - v. Parents and care takers reached with remote learning tips.

1.5 Objective of the Stakeholder Engagement Plan

12. The overall objective of the SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of communities is essential to the success of the project in order to ensure smooth collaboration between project staff, stakeholders and local communities, and to minimize and mitigate environmental and social risks related to the proposed project activities. Specifically, the SEP will:

- i. Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice;
- ii. Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- iii. Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation;
- iv. Develop a stakeholders’ engagement process that provides stakeholders with an opportunity to contribute to project planning and design;
- v. Define a clear communication and feedback plan;
- vi. Establish formal grievance/resolution mechanisms;
- vii. Define roles and responsibilities for the implementation of the SEP; and
- viii. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

1.6 World Bank Requirements for Stakeholder Engagement

13. The Kenya GPE COVID -19 Learning Continuity in Basic Education is being prepared under the World Bank’s Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10 on *Stakeholders Engagement and Information Disclosure*, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports

the development of strong, constructive, and responsive relationships that are important for successful management of a project’s environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management, and monitoring of the project’s environmental and social risks and impacts.

2. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

14. The emergency nature of the project and challenges brought about by restrictions related to COVID-19 have combined to pose significant challenges in the effective consultation of stakeholders, communities and affected parties. While ensuring compliance with national guidelines on social distancing and related requirements, project stakeholder consultations and engagement activities during the preparation phase have, however, not be deferred, but have been designed to be fit for purpose to ensure effective and meaningful consultations to meet the project’s and stakeholders’ needs.

15. The project targets a substantial numbers of learners and their families, who are part of the vulnerable and marginalized groups (VMGs) and/or historically underserved traditional local communities (HUTLCs), therefore it 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 GPE/PCU will make all reasonable efforts to conduct meetings with stakeholders through diversifying means of communication, based on type and category of stakeholders.

2.1 Key institutional stakeholder meetings and consultations on the project

16. In preparation for this project, the MoE undertook engagements and consultations on the design and 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 presented in Table 3, were undertaken in compliance with Kenyan Government social distancing and related COVID-19 requirements. Some of the key issues raised during the consultations included access to training for educators, access to equipment and learning materials especially in remote rural areas and equitable consideration of all learners in distribution of project resources. The specific concerns raised are addressed in the various documents produced for this project including the Environment and Social Management Framework (ESMF), Gender-Based Violence (GBV) Action Plan, Vulnerable and Marginalized Groups Plan (VMGP) and Labour Management Procedures (LMP). It is notable that in view of the limitations in movement imposed due to COVID-19 across the country, the project team was not able to consult community members at this stage.

Table 3: Consultations on project risks and mitigation measures

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

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

2.2 Additional consultations of stakeholders

17. Following the project approval, a virtual consultation was held on June 17, 2020 during which the draft SEP was consulted upon. The online meeting brought together 35 participants, mainly drawn from the national and county education offices (see Annex 1 for the list of participants). The consultation was augmented by a questionnaire that sought to gather information on a google platform on the various aspects of the project that needed to be consulted upon. The questionnaire was completed by over 700 participants drawn from all parts of the country involving Board of Management (BoM), Education Officers at the county level, head teachers and teachers. The questions included:

- i. Which key stakeholders need to be consulted on the project?
- ii. What are the potential risks envisioned in implementing this project? And how can we resolve them?
- iii. What measures should the project put in place when addressing vulnerable, marginalized and minority groups?
- iv. How should grievances related to this project be handled?
- v. What is the most effective way to share information and get feedback in the context of COVID-19?
- vi. Which other intervention is being implemented in the context of COVID-19?
- vii. What experiences and lessons have you learnt in implementing similar interventions (especially those funded by the World Bank funded)?

18. The key outcomes of the consultations include the following:
- i. Additional stakeholders identified during the consultations included the Members of County Assembly (MCAs) and sponsors of schools (including faith-based groups);
 - ii. The key risks anticipated by the participants included the risk to COVID-19 infections (due to overcrowding in classrooms, lack of masks) and lack of infrastructure to enable the use of e-learning tools. Poor network and lack of ICT equipment were also cited;
 - iii. Building more classrooms, providing PPEs (masks), increasing access to water and sanitation and enhanced community education were identified as key mitigation measures;
 - iv. The most effective means of sharing information were identified as WhatsApp, phone and email;² and
 - v. The need to retain a social safeguards officer attached to the project was also raised given his/her critical role in ensuring that the project beneficiaries are protected and receive maximum benefits from the project (summary results are presented in Annex 2).
19. During the project implementation and once the COVID-19 restrictions are lifted, additional tailor-made engagements will be conducted with the stakeholders and communities with a focus on the VMGs/HUTLCs within the communities (including girls, marginalized communities and persons with disabilities), taking into particular consideration cultural sensitivities, literacy levels of stakeholders, accessibility and other special needs of stakeholders with disabilities and those representing other vulnerable groups.

2.3 Identified potential project impacts

20. **Positive impacts:** The proposed project activities will have significant positive impacts on the education system in the following ways:
- expanded remote learning opportunities for learning continuity for all students in basic education;
 - expanded partnerships with radio and TV providers, and procurement of core ICT equipment to support the lessons recording and upgrading of the e-cloud;
 - acquired 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;
 - updated digital learning training packages for teachers, and capacity building of targeted 150,000 teachers Curriculum Support Officers;
 - developed materials for readiness and decision support tool for remote learning interventions;
 - developed multi-modal strategy, which includes child protection, information and data security aspects;
 - strengthen the e-cloud by providing self-paced online courses for the teachers and CSOs at no fee;
 - developed integrated monitoring and evaluation system for the remote learning interventions;
 - Developed tips that support parents and caregivers, including a helpdesk, as they support learners at home especially while using radio, TV and mobile phones;
 - Direct employment of the workers for the contractor and suppliers of SMP;
 - Increased enrolment due to smooth transition back to school for vulnerable students especially girls from the vulnerable areas (informal settlements and arid and semiarid areas), when schools reopen as a result the SMP; and

²It should be noted that most of the respondents were from the Ministry of Education at the National and County levels hence the preferred means of communication.

- Availability of the online band toll-free based psychosocial support services to students and parents/caretakers.

21. **Negative impacts:** the overall anticipated environmental risks and potential negative impacts of the proposed activities will be limited to localized noise, dust emissions, solid waste (including e-waste), occupational health and safety, community health and safety (during the operational phase of the project), with the most notable risk related to possible spread of infectious diseases – in particular COVID-19 and associated waste management issues. Key social risks include: a) insecurity for project operations and associated workers; b) exclusion of vulnerable, marginalized and minority members of the community as well as the migrants from project benefits, which is amplified by the context of limited resources against widespread need; c) selection bias and elite capture, where project benefits are diverted to less-vulnerable individuals and locations; d) poor access to beneficiaries for meaningful community engagements and difficulty in monitoring social impacts; e) SEA and other forms of GBV (such as sexual abuse of learners and sexual harassment of workers during the refurbishment of the offices at the MoE); and f) cyber bullying due to the increased presence of learners and teachers online.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Project Stakeholders

22. Project stakeholders are defined as individuals, groups or other entities who are interested in the Project at different levels. Engagements with the project affected communities will be conducted upon project effectiveness and will be sustained throughout project implementation. For effective engagement, project stakeholders are categorized into three main groups as described below.

- i. **Affected Parties:** persons, groups and other entities within the Project Area of Influence (PAI) that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project. Such stakeholders are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. This category of stakeholders may include community members living in areas within the project planned activities, government officials, business entities and individual entrepreneurs in the project area that can benefit from employment/business opportunities, community-based organizations (CBOs) and local non-governmental organizations (NGOs) that represent local interest groups, among others.

The directly affected parties include: learners; teachers; head teachers; BoM; parents, school sponsors (including faith based organizations), MCAs and VMGs/HUTLCs in the PAI. The other directly affected parties are the management MoE (national and county), SMP and the service providers (psychosocial support and GBV) who will be involved directly in the implementation of project activities.

- ii. **Other Interested Parties (OIP):** constitute individuals/groups/entities whose interests may be affected by the project and who have the potential to influence project outcomes. OIP may not experience direct impacts from the Project but they may consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Such stakeholders include civil society organizations (CSOs) and NGOs who may become project partners. Others include business owners and providers of services, goods and materials within the project area who may be considered for the role of project suppliers; mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations, among others.

The OIPs for this project include the contractors for the MoE communication system, the suppliers for SMP, the implementing partners including ICT & Treasury, TSC, KICD, KNEC, Information and Communication Technology Authority (ICTA), and WFP, mass media, among others. The GPE/PCU may team up with the CSOs and NGOs to deliver some of the interventions including the GBV action plan and VMGP.

- iii. **Vulnerable Groups:** persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerability and that may require special efforts to ensure their equal representation in the project consultation and decision-making processes. The vulnerable groups are described in detail in the VMGP while some of the key measures for engagement are also provided in Section 4 further below.

23. It is particularly important to understand whether the project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express

their concerns or understand the impacts of the project. Therefore, it is critical to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups on access to education materials and technology in particular, are adapted to take into account such groups or individuals and to ensure a full understanding of project activities and benefits.

24. The vulnerability for this project may stem from a person’s location, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities, marginalized groups or migrants), dependence on other individuals or natural resources, etc. Engagement with the VMGs/HUTLCs often requires the application of specific measures and assistance aimed at facilitating them to participate in the project-related decision making so that their awareness of and input into the overall process are commensurate to those of the other stakeholders. The VMGP prepared for this project makes provisions and recommends strategies for meaningful involvement of the VMGs/HUTLCs in the project processes and ensuring that they benefit from the interventions.

25. Within this Project, the vulnerable or disadvantaged learners (who are the primary targets from this project) may include but not limited to those:

- i. With a chronic illness (who are more susceptible to COVID-19 infection);
- ii. With special needs and disabilities;
- iii. From poor households (both urban and rural areas) with limited access to the tools being used for e-learning including radios, TV, phones, laptops and tablets;
- iv. From homes with illiterate parents/guardians who cannot provide adequate learning support;
- v. From homes with a history of domestic violence and/or abuse;
- vi. From child-headed households;
- vii. From homes with older persons and/or those with chronic illnesses who need additional care and support;
- viii. From homes and regions with a history of child labor - they are likely to be more engaged in economic activities than remote learning; and
- ix. Those who have been victims of early and forced marriages and teenage pregnancies.

26. The vulnerable individual learners and groups within the PAI communities will be further confirmed and consulted throughout the project implementation using dedicated means, as appropriate. A description of the methods of engagement to be adopted by the project is provided in Section 4.

3.2 Approaches to Stakeholder Engagement

27. In order to implement best practice approaches, the project will apply the following principles for stakeholder engagement:

- i. *Openness and lifecycle approach*: consultations for the project will be held during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- ii. *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; and opportunities will be provided for communicating stakeholders’ feedback for analysis and addressing comments and concerns;
- iii. *Inclusivity and sensitivity*: stakeholder identification will be undertaken to support better communication and build effective relationships. The participation process for the project will be inclusive. All stakeholders at all times will be encouraged to get involved in the consultation processes; and

- iv. *Sensitivity to stakeholders’ needs:* this will be necessary to ensure that the consultation processes adopt culturally acceptable norms of engagement. In addition, measures will be put in place to protect all people engaged in the project from COVID-19.

28. Special attention will be paid to vulnerable groups, in particular the urban poor, refugees and students with special needs and disabilities. Particular attention will also be given to HUTLCs as defined in ESS7³, also known as traditional minorities or VMGs including those from the six counties identified for as needing additional support (Garissa, Mandera, Wajir, Tana River, Lamu and Turkana counties), which have been found to have limited access to technology with attendant poor education outcomes.

3.3 Stakeholder Identification and Analysis

29. Criteria used to identify and analyze stakeholders under the ongoing parent projects (PREIDE and SEQIP) has helped generate a list of potential project stakeholders at the national, regional/county and community levels including an analysis of the potential issues of concern for each. This list has further been enhanced through the consultations held on June 17, 2020, as summarized in Table 4. The list of stakeholders will however be reviewed and updated on a continuous basis, informed by consultations held during project implementation with the various stakeholders.

Table 4: Stakeholder groups and concerns/interest

Stakeholder	Description	Potential issues of concern
Beneficiary Schools and Students: -Learners -Teachers -Head teachers -School management -School administration -BoM -Parents/guardians	- Students and schools that are part of the 60 percent of primary and secondary school students accessing online and distance learning -1.75 million learners to benefit from the school meals program - About 150,000 teachers to benefit from teacher training in online and distance learning -Parents/guardians and learners who will benefit from the psychosocial support	<ul style="list-style-type: none"> • Inadequate mainstreaming of the project activities to regular education activities • Diversion of project benefits such as school meals to less deserving schools and areas • Inward migration of students from neighboring areas not covered by project interventions such as school meals who will seek to migrate to the project areas to benefit from the project • Inequitable distribution of benefits with the risk of further marginalizing of the poor and vulnerable
Non-beneficiary Schools and Students	Schools and learners that do not meet the criteria for inclusion into the project or cannot access the services, therefore, they do not benefit from the project interventions	<ul style="list-style-type: none"> • Exclusion from project benefits in the face of widespread need • Inequalities perpetuated and entrenched by project interventions which may disproportionately put those accessing project benefits at an undue advantage including continuous assessments, national examinations, competition for university slots, etc.
Vulnerable members of the community (widows, disabled, single mothers,	- Community members and students that are comparatively unable to exploit project benefits due to various vulnerabilities including poverty and prohibitive	<ul style="list-style-type: none"> • Elite and clan capture • Inequalities perpetuated and entrenched by project interventions which may disproportionately put those that access project benefits at an undue advantage, including

³The CoK (2010) defines marginalized groups as a distinct social and cultural group possessing the following characteristics in varying degrees: (a) Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and (b) Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas; and (c) Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and (d) A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

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Stakeholder	Description	Potential issues of concern
illiterate parents) including minorities	costs associated with remote learning - access to devices, internet, electricity - Parents who are expected to fully engage and help their children to take advantage of the learning innovations yet they do not have adequate literacy and know how (e.g. those with no education)	assessments, national examinations, competition for university slots, etc. <ul style="list-style-type: none"> Parents who are unable to meaningfully benefit from the tips provided by the MOE or take advantage of the psychosocial support due to inadequate knowledge and capacity and whose children will lose out on the project benefits
Boards of Management (BoM) for schools	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"> Inward migration from learners in schools not offering school meals Inequalities perpetuated and entrenched by project interventions which may disproportionately put those that access project benefits at an undue advantage including assessments, national examinations, competition for university slots, etc.
Parents and guardians with children with disabilities and special needs	Parents and guardians with children with disabilities unable to leverage on access to remote learning media	<ul style="list-style-type: none"> Inequalities perpetuated and entrenched by project interventions which may disproportionately put those that access project benefits at an undue advantage including assessments, national examinations, competition for university slots, etc. Negative psychosocial impacts on the learners and their parents
VMGs and HUTLCs	Parents, teachers and community members in hard to reach areas characterized by marginalization, remoteness and security challenges	<ul style="list-style-type: none"> Elite and clan capture of project benefits Diversion of project benefits such as school meals to less deserving schools and areas Inward migration of 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
Community and elected leaders at the county level including MCAs	Elected leaders, clan elders, religious leaders and opinion leaders from targeted communities	<ul style="list-style-type: none"> Limited potential for mainstreaming these activities to regular education activities Diversion of project benefits such as school meals to less deserving schools and areas Using the project for political gains
Government officials (national and county) and local administration	Officials from administrative structures responsible for targeting beneficiary individuals and communities and non-beneficiary communities	<ul style="list-style-type: none"> Elite capture, more so on the allocation of SMP beneficiaries Sustainability of the project benefits and the potential for mainstreaming of these activities to regular education activities Diversion of project benefits such as school meals to less deserving schools and areas Inward migration, of students from neighboring areas not covered by project interventions such as school meals who will seek to migrate to the project areas to benefit from the project
Implementing partners	- Ministries: MoE, ICT & Treasury - TSC - KICD - KNEC - Information and Communication Technology Authority (ICTA) -WFP	<ul style="list-style-type: none"> Lack of a coordinated approach Late delivery of project interventions and results Inadequate attention to the various needs of the counties and schools engaged in the project Lack of adherence to labor management issues with all category of workers – direct, contract and primary suppliers

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Stakeholder	Description	Potential issues of concern
	Ministry of Health	<ul style="list-style-type: none"> Inadequate and untimely clearing of schools that have been used as isolation and/or quarantine centres Inadequate support with COVID-19 response in schools Late and inappropriate management of cases if they emerge
	- EDU TV, private, community & faith-based radio/TV stations	<ul style="list-style-type: none"> Inadequate capacity to tailor make the content to reach all learners Inadequate approaches to meet the needs of learners with special needs and disabilities
	County Education Leadership	<ul style="list-style-type: none"> Inadequate support to all project components Inadequate identification of VMGs/HUTLCs and ensuring that they are reached with project information and have equal access to project benefits
	School Meals Program Committees (SMPCs)	<ul style="list-style-type: none"> Biased selection in membership to the committees Inadequate inclusion of VMGs and other vulnerable groups Biased selection of beneficiary schools
Service providers	<ul style="list-style-type: none"> - UWEZO - TUSOME - SACMEQ - NASMLA - WFP 	<ul style="list-style-type: none"> Lack of adherence to the provision of services based on laid down agreements and protocols Lack of adherence to project instruments including the LMP, ESMP, GBV action plan, VMGP, among others Lack of sensitivity to the needs of VMGs/HUTLCs
Interested parties including CSOs, development partners and community groups	-Save the children, Care in Kenya and other CSOs -National Council for persons with disabilities	<ul style="list-style-type: none"> Inadequate involvement of the CSOs in information sharing and distribution in the counties where they work Weak partnerships in project implementation Lack of timely feedback on the project
	- UNICEF, USAID, DFID, WHO, UNESCO, among others	<ul style="list-style-type: none"> Unwillingness and inability to support the project in the various activities Inability to share best practices on similar activities in Kenya and other jurisdictions

4. STAKEHOLDER ENGAGEMENT PROCESS

30. This project will build on the existing frameworks for stakeholder engagement by the MoE supported by the World Bank and other development partners. The SEP will specifically complement ongoing national level stakeholder engagement efforts under the Kenya GPE PRIEDE (P146797) and SEQIP (P160083) to improve the overall project performance. The SEP will be updated as new partners and information emerges that needs to be factored into project implementation.

4.1 Stakeholder Engagement Methods and Tools

31. Stakeholders will be kept informed as the project develops and evolves, including reporting on project environmental and social performance, GBV Action Plan, implementation of the VMGP, SEP and GRM. This will be important for the wider public, but equally and even more so, for learners and schools receiving direct support from the project (e.g. learners accessing online teaching and those on the SMP).

32. To ensure that the project maintains continuous and effective interaction with stakeholders, a number of methods will be used including:

- i. Early notification for consultation sessions and preferably sending out invitations to the stakeholders with a clear agenda for discussion;
- ii. Providing adequate time for preparation prior to consultative sessions;
- iii. Sharing information for public consumption well in advance and providing opportunity for feedback and comments;
- iv. Choosing appropriate methods of communication especially for remotely located stakeholders. This includes the use of radio, television, distribution of printed materials, visual presentations, notice boards, internet, telephone, public address system, etc.; and
- v. Ensuring concise documentation of all stakeholder engagement sessions with a record of minutes, lists of attendance (signed) and photographs from the consultative processes.

33. Table 5 presents the key methods/tools to be used by the project to ensure effective stakeholder consultation and participation. It is notable that the responsibility for execution will lie solely with the MoE.

Table 5: Stakeholder engagement plan: Methods, tools and target groups

Topic of consultation/ message	Method used	Target stakeholders	Responsibilities
After appraisal			
Publicity on project approval and roll out plans	<ul style="list-style-type: none"> - Audio-visual messages on project information (radio, TV in different languages) - Newspaper stories/supplement - Printed materials on project information - Social Media (twitter, Facebook, Instagram, WhatsApp) -Emails - Press releases - Speeches - Mobile phone block message alerts - Website 	-All key project stakeholders	<ul style="list-style-type: none"> -CS/PS -GPE/PCU/CPCU -Communication expert -Social safeguards officer
Disclosure of the project documents	- Websites - MoE and World Bank	- MoE and all teams involved in the project	-World Bank Team GPE/PCU/CPCU

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	<ul style="list-style-type: none"> - Brief summaries of the main features of the project SEP - Audio-visual messages on project information (radio, TV in different languages) - Newspaper stories/supplements - Social Media (twitter, Facebook, Instagram, WhatsApp) -Emails - Press releases - Speeches - Mobile phone block message 	<ul style="list-style-type: none"> - Open access to all interested parties - Distribution of flyers to schools and other institutions 	-Implementing partners
During implementation			
Roll-out of direct support to learners and schools	<ul style="list-style-type: none"> - Key informant interviews with key stakeholders - Community discussions (through public meetings and call-in radio sessions/activations) - Newsletters - TV - Newspaper stories/supplement - Social Media (twitter, Facebook, Instagram WhatsApp) -Emails - Press releases - Speeches - Mobile phone block message 	<ul style="list-style-type: none"> -Learners -School administrators and managers -Communities (including VMGs/HUTLCs) -Implementing partners 	<ul style="list-style-type: none"> -MoE communication expert -GPE/PCU/CPCU
Highlights on project activities, achievements and lessons learned	<ul style="list-style-type: none"> - Radio spots/activations and announcement - Printed materials (newsletters and flyers) - Town hall meetings - TV - Newspaper stories/supplement - Social Media (twitter, Facebook, Instagram WhatsApp) -Emails) - Press releases - Speeches - Mobile phone block message 	<ul style="list-style-type: none"> -Project beneficiaries (learners, teachers, BoMs) -Implementing partners -Other interested parties 	<ul style="list-style-type: none"> -GPE/PCU/CPCU -Project Coordinator
Update on project process	<ul style="list-style-type: none"> - Printed materials (newsletter, flyers, etc.) - Project progress reports - Town hall meetings 	<ul style="list-style-type: none"> - All stakeholders 	<ul style="list-style-type: none"> -PS -GPE/PCU/CPCU
Discussions with VMGs/HUTLCs on the project and generate feedback	<ul style="list-style-type: none"> - Open day with VMGs/HUTLCs - Public meetings - Call-in on radio using local languages - Rapid assessment of community perception towards the project activities 	<ul style="list-style-type: none"> - VMGs/HUTLCs 	<ul style="list-style-type: none"> -CPCU -Social Safeguards Officer
Complaints/Compliments about the project implementation	<ul style="list-style-type: none"> - Logs and reports from the national GRM focal person, County GRM focal persons 	<ul style="list-style-type: none"> Receivers of information and services. Information or Data managers 	<ul style="list-style-type: none"> GPE/PCU/CPCU - Social Safeguards Officer/GRM Officer

	(GRM complaints focal points in schools, county offices, etc.)		
	Survey and direct observation of the project beneficiaries	-Different stakeholders -VMGs/HUTLCs	-Communication officer -M&E Officer -Social Safeguards Officer
Monitoring and reporting			
Feedback of effectiveness of different channels of communication	- Semi-structured interviews - Online survey - Satisfaction surveys	-Project primary beneficiaries	-M&E Officer

34. The county and sub-county education offices will continue to play a key role in facilitating, coordinating, and ensuring stakeholder engagement at the school level. At the county level, the existing County Project Coordination Unit (CPCU), set up under the GPE-PRIEDE Project and each having a County Project Coordinator (CPC), will be responsible for facilitating project coordination, implementing and monitoring at the school level, and submitting reports to the GPE/PCU. In coordination with the GPE/PCU, the CPCUs will support stakeholder engagement efforts and reporting on tasks that need to be undertaken at the school level such as campaigns, public forums and other stakeholder engagement efforts.

4.2 Strategy to engage disadvantaged and vulnerable groups

35. The project will take special measures to ensure that members of disadvantaged and vulnerable groups have equal opportunity to project benefits if they meet the targeting criteria, to access information, provide feedback, and submit grievances. The project will use data on poverty index to identify schools in need of enrollment into the SMP. The project team will ensure that VMGs/HUTLCs and other marginalized groups and migrants are part of the SPMC. In addition, an affirmative action would be to use community engagement modalities that influence the selection of beneficiaries and distribution of project beneficiaries where a select sub-set of beneficiaries requires enhanced or dedicated support e.g. SMP and psychosocial support.

36. Stakeholder and community engagement will be key in the 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 are most effective in such projects where administrative capacity is limited.

37. The participation of VMGs/HUTLCs in the selection, design and implementation of project activities will largely determine the extent to which the VMGP objectives will be achieved. Where adverse impacts are likely, the GPE/PCU will undertake prior and informed consultations with the likely affected local communities and those who work with and/or are knowledgeable of VMGs/HUTLCs’ development issues and concerns. The primary objectives will be to:

- i. Seek their inputs/feedback to avoid or minimize the potential adverse impacts associated with the required activities;
- ii. Identify culturally appropriate impact mitigation measures; and
- iii. Assess and adopt economic opportunities, which the MoE could promote to complement the measures required to mitigate the adverse impacts.

38. Consultations will be carried out broadly in two stages: (i) prior to commencement of any project activities in areas inhabited by VMGs/HUTLCs, the GPE/PCU will consult the VMGs/HUTLCs about the need for, and the probable positive and negative impacts associated with project activities; and (ii) after initial roll-out of the school meals related activities, a rapid assessment will be conducted

to ascertain how the VMGs/HUTLCs in general perceive these activities and gather any inputs/feedback they might offer for better outcomes, which would eventually be addressed in VMGP, as required, during the progressive cycles of project delivery.

39. The GPE/PCU will:
- i. Facilitate widespread participation of VMGs/HUTLCs with adequate gender and generational representation; customary/traditional VMG/HUTLC organizations; community elders/leaders; CBOs and CSOs on VMG/HUTLC development issues and concerns;
 - ii. Provide them with all relevant information about the project activities including that on potential adverse impacts, organize and conduct the consultations in a manner to ensure free expression of their views and preferences; and
 - iii. Document details of all consultation meetings with VMGs/HUTLCs including their perceptions on project activities and the associated impacts, especially the adverse ones; any input/feedback offered by VMGs/HUTLCs; and an account of the conditions agreed with consulted individuals and/or groups.

40. Consultation stages, probable participants, methods, and expected outcomes with a reference to the VMGs/HUTLCs are summarized in Table 6.

Table 6: VMGs/HUTLCs consultation matrix

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	VMGs Community		
Reconnaissance and ground verification of existing and location/sites for projects	GPE/PCU, project consultants (social safeguards specialist) and other stakeholders	VMGs/HUTLCs, 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/zoom	First-hand assessment of VMGs/HUTLCs' perception of potential environmental and social benefits and risks
Screening of the proposed projects	GPE/PCU, APs, consultants (social safeguards specialist) and other stakeholders	VMGs/HUTLCs, including likely affected groups, VMG 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/zoom.	Identification of major project impacts, feedback from VMGs/HUTLCs and would-be affected persons
In-depth study of risks and benefits taking into consideration, inter alia the conditions that led to community consensus	GPE/PCU, project consultants (social safeguards specialist), NGOs /CBOs, Other knowledgeable persons	Would-be Affected VMGs/HUTLCs 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 project impacts and risks and feedback on possible alternatives and mitigation and development measures
Social Assessment (SA)	GPE/PCU, project consultants (social safeguards specialist)	Adversely affected individual VMGs/HUTLCs /households	Structured survey Questionnaires covering quantitative and qualitative information	Inputs for VMGP and identification of issues that could be incorporated into the design of project

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Preparation VMGP	GPE/PCU, project consultants (social safeguards specialist), NGOs /CBOs, Other knowledgeable persons	VMGs, including organizations, community leaders/elders and Adversely affected individual VMGs/HUTLCs /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/zoom	Preparation of VMGP and incorporation of SA inputs
Implementation	GPE/PCU, project consultants (social safeguards specialist), NGOs /CBOs	Individual VMGs/HUTLCs, organizations, community leaders/elders and other stakeholders	Implementation monitoring committees (formal or informal)	Quick resolution of issues, effective implementation of VMGP
Monitoring and Evaluation	GPE/PCU, APs, consultants (social safeguards specialist), NGOs & CBOs	VMGs/HUTLCs Organizations /groups and individuals	Formal participation in review and monitoring	Identification and resolution of implementation issues, effectiveness of VMGP

41. Once the VMGs/HUTLCs are identified in the project area, the VMGPs will be prepared and implemented in a timely manner. The project should ensure benefits accrue to the VMGs/HUTLCs by providing, in consultation with the VMGs/HUTLCs themselves, opportunity to get them involved in various income earning opportunities and activities.

42. The following issues need to be addressed during the implementation stage of the project:

- i. Provision of an effective mechanism for monitoring implementation of the VMGF and any VMGPs;
- ii. Development of accountability mechanisms to ensure the planned benefits of the project are received by VMGs/HUTLCs;
- iii. Involve suitably experienced CBOs and/or NGOs to address the VMGs/HUTLCs' vulnerability through developing and implementing action plans;
- iv. Ensuring appropriate budgetary allocation of resources for the VMGPs;
- v. Provision of technical assistance for sustaining the VMGF; and
- vi. Ensure that VMG/HUTLC traditional social organizations, cultural heritage, traditional political and community organizations are protected.

5. ENGAGEMENT PLAN

43. Part of managing stakeholder relationships is keeping track of who is speaking on the Project's behalf and what is being said on third parties' behalf, and what is being said by third parties. Communication under the SEP will be aligned with relevant sections of the existing PRIEDE and SEQIP communication strategies. The formulation of communication messages and decisions on the channels to be used will be guided by the following key considerations:

- i. The involvement of the affected parties in the PAI and beneficiaries in the design and dissemination of information;
- ii. Use of multiple channels of communication including radio, newsletters, social media, fact sheets, frequently asked questions (FAQs), pamphlets, etc. based on the needs and access needs of the target audience. All documents will be presented in English, Kiswahili and other vernacular languages as appropriate and will include visual depictions to reach young learners and the non-literate people;
- iii. Ability to communicate to a broad range of people, which will be achieved through the use of media that is easily understood, such as local radio stations that use local languages (especially in communities with low literacy levels) and reach the particular groups of interest;
- iv. Sensitivity to GoK policies and regulations, the financiers (WB and others) and other communication requirements to safeguard the integrity of the process and the authenticity of the messages; and
- v. Evidence-based media engagement - the Communication officer or the assigned focal point in the GPE/PCU will be required to monitor and evaluate the effectiveness of the information shared and the channels used and adjust as necessary.

5.1 When to communicate with stakeholders

44. Project communication will be structured and offered regularly but with the flexibility of responding to issues as they emerge. It is envisaged that there will be more engagement at the MoE level but since this project will be implemented by the team responsible for GPE PRIEDE, the key responsibilities will be borne by the GPE/PCU. Given that the Project is building on existing interventions, the stakeholders will be informed about the additional activities from the current funding and all planned activities with potential impact on them. It is important that the following information is provided regularly and on need-basis:

- i. Number of learners directly under project support;
- ii. Number of learners accessing e-learning materials (broken down into the different channels);
- iii. Number of head teachers/senior teachers trained and from which schools;
- iv. Perceptions of the public towards the project;
- v. Grievances received and resolved; and
- vi. Status of project implementation.

5.2 Targets, messages and communication channels

45. Effective targeting and community consultations are important features of the project. The GPE/PCU will devise ways by which all learners will be included with innovative modifications and adaptations being continuously made as new information become available. This will include information on the project objectives, progress and sensitization on the availability of a project GRM where students, parents and communities could channel their complaints if they feel excluded from project benefits.

46. Table 7 presents a list of key stakeholders who will receive information on the Project, the regularity of engagement and the level of interaction. It is notable that the communication specified

here is over and above the use of media to channel information on the project and COVID-19 to all citizens (see also Annex 3 on national actions on COVID-19). This list will be reviewed and adjusted from time to time based on the prevailing contexts and emerging communication needs.

Table 7: Engagement matrix

Stakeholder	Specific org / agency	Message	Communicator	Delivery method	Schedule
<i>Who will you communicate to?</i>	<i>Who exactly will be targeted at this level?</i>	<i>What is the purpose of communication?</i>	<i>Who will the communication be from?</i>	<i>How will the communication be delivered?</i>	<i>When will it happen and how often</i>
Primary stakeholders (school and community level)	Learners	- Update on the project objectives - The beneficiary selection process - Protection measures from COVID-19	GPE/PCU, CPCU Communication Officer	-TV/Radio (used for education) -Pamphlets	Weekly and on need basis
	Head teachers, deputies, BoM and PTA	- Update on the project objectives - Expectations - Progress on all school-based activities - GRM - COVID-19 prevention activities	Project Coordinator	-TV/Radio -SMS -WhatsApp	Bi-weekly and on-need basis
	Parents and caregivers	- Update on the project objectives - Project expectations - GRM - Availability of targeted support – skills to help the learners and psychosocial support - COVID-19 matters	- Social Safeguards Officer - Project coordinator - County focal point for the project	-TV/Radio -SMS -Pamphlets -FAQs	Monthly and on need basis
	Community leaders	- Relevant project activities (e.g. identification of VMGs/HUTLCs, and learners for support) - GRM - COVID-19 prevention activities	- VMG focal point - Project Coordinator - CPCU	- TV/Radio - SMS -WhatsApp - Pamphlets - FAQs	Monthly and on need basis
Key implementing partners	-Ministries: MoE, ICT & Treasury -TSC -KICD -KNEC -ICTA -WFP	-Update on the project -Role assignment and responsibilities -Work plan of activities -GRM -Project progress (M&E results) -Stakeholder perceptions -COVID-19 situation and updates	Project Coordinator	- E-technology (Zoom, Teams, Skype, etc.) - SMS - WhatsApp - Newsletter - Briefing reports - Phone calls	Monthly
	Ministry of Health	-Preparedness of schools for COVID-19 mitigation -Reported cases of COVID-19 infections in the schools being supported by the project -Key challenges being experienced by schools with handling COVID-19 protocols -GRM	Project Coordinator	- Detailed reports -Phone calls -WhatsApp -E-technology (Zoom, Skype, Teams)	Bi-weekly and on need basis
	-EDU TV, private, community & faith-based	-Update on the project -Role assignment and responsibilities -Work plan of activities -Project progress (M&E results)	Project Coordinator	-E-technology (Zoom, Teams, Skype, etc.) -SMS -WhatsApp	Monthly and on need basis

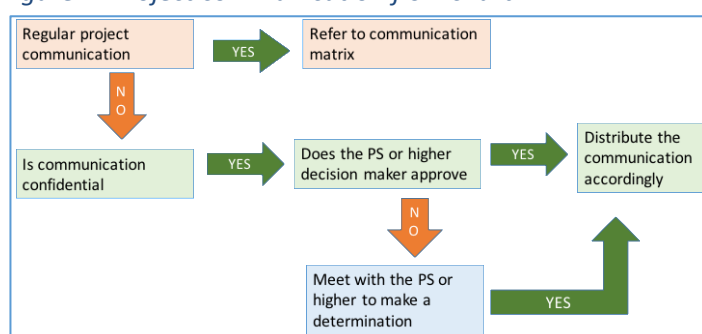
Stakeholder	Specific org / agency	Message	Communicator	Delivery method	Schedule
	radio/TV stations -SMPC	-Stakeholders’ perceptions		-Newsletter -Briefing reports	
	County Education Leadership	-Update on the project -Schools/learners being supported -Work plan of activities -Project progress (M&E results) -Stakeholders’ perceptions -County COVID-19 situation	- Project Coordinator	-SMS -WhatsApp -Newsletter -Monitoring reports -Briefing reports -FAQs	Monthly and on need basis
Other partners	Service providers -UWEZO -TUSOME - SACMEQ - NASMLA	-Update on the project -Expectations/deliverables -Work plan of activities -Project progress (M&E results) -Stakeholders’ perceptions	Project Coordinator	-Project reports -FAQ --Newsletter -Monitoring reports -Briefing reports -FAQs	Monthly and on need basis
	-UNICEF -USAID -DFID -WHO, among others	-Project progress -Updates on COVID-19 in the education sector	Project Coordinator	-Newsletter -Briefing notes -Status update reports	Quarterly and on need basis

*The information will be presented in languages (translations will be done in the dominant local languages including Kiswahili) and formats that are understandable by the target groups, especially the VMGs/HUTLCs.

5.3 Communication escalation process

47. Communication can be an extremely complex process depending on the size and scope of the project and the number of stakeholders. The flowchart presented in Figure 1 provides the key stakeholders with a simplified way of understanding the steps involved in sharing project information. It is notable that there may be occasions or situations which fall outside of the communication flowchart where additional clarification is necessary. In such situations, the Principal Secretary (PS) will be responsible for discussing the issues with the PCU to decide on how to proceed.

Figure 1: Project communication flow chart



48. The social safeguards and communication team will review and refine the communication plans regularly. The monitoring tools for the SEP will include indicators such as preferred source of information, most effective channels of communication and people’s perceptions of the SEP.

6. GRIEVANCE REDRESS MECHANISM

49. Grievance Redress Mechanisms (GRM) defines institutions, instruments, methods and processes established by an entity to receive and address complaints and/or grievances raised by the project stakeholders. GRMs are intended to be accessible, collaborative, expeditious, and effective in resolving concerns through dialogue, joint fact-finding, negotiation and problem solving. GRMs provide a system for managing project level complaints to ensure that they are identified early, mitigated and addressed where legal action is not yet warranted, and enables project improvements to prevent further complaints. By design, GRMs are intended to complement, not replace, formal legal channels for managing grievances.

50. Grievances may arise from stakeholders who are dissatisfied with the consultations during project planning or actual project implementation. There may be complaints about the distribution of the SMP, the selection of schools, access to e-learning, access to psychosocial support, discrimination of individuals and groups, and cyber bullying of both learners and teachers on the online platforms. From practice, early disclosure of project information from the onset helps to significantly reduce grievances. It is at this time that stakeholders need to be made aware of the project objectives, the potential positive and negative impacts, and provided with copies of grievance procedures as a guide on how grievances will be managed by the project.

51. Specifically, the GRM:

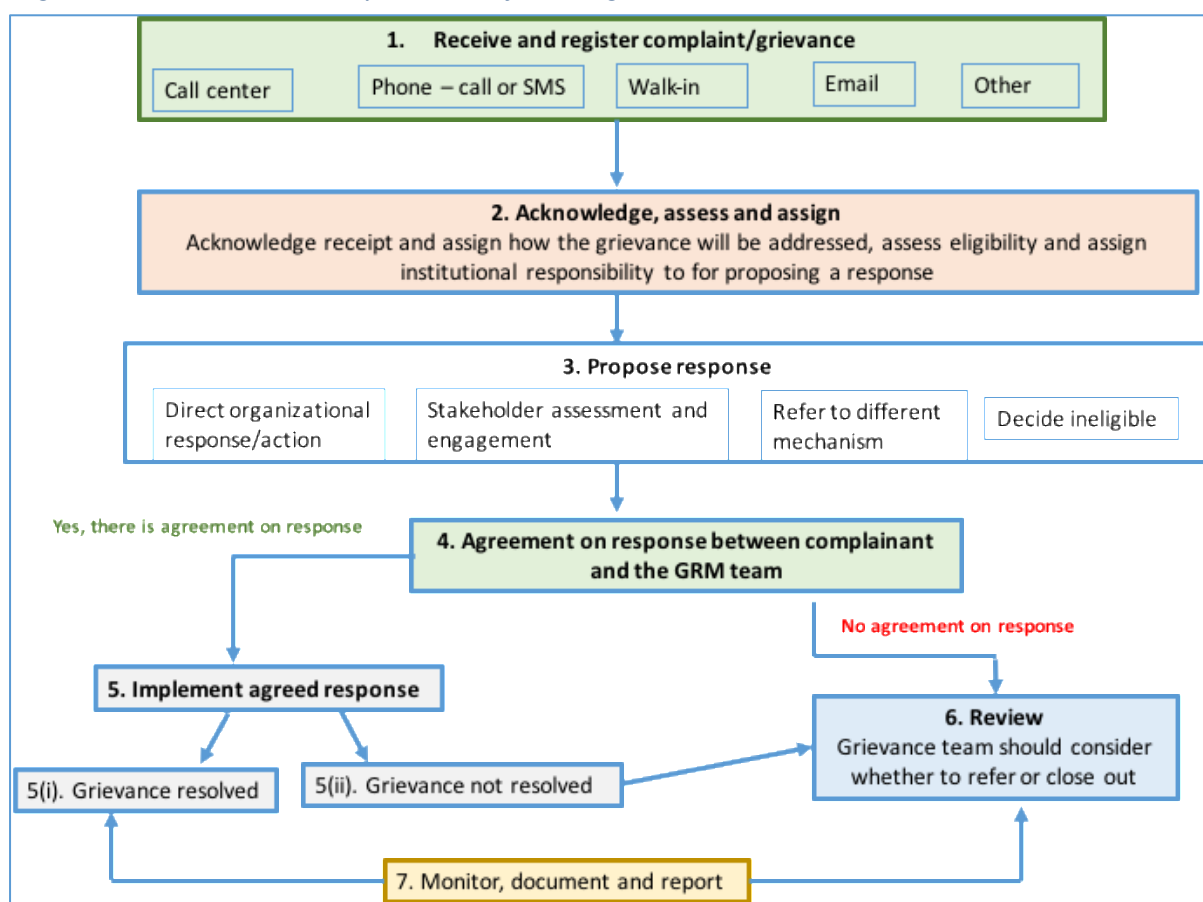
- i. Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of project implementation;
- ii. Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- iii. Avoids the need to resort to judicial proceedings.

52. All staff are responsible for the functioning of the GRM in order to improve project outcomes and should forward complaints whenever they come across them to the GRM focal point. Complaints may be raised formally or informally and all should be acknowledged by the person receiving them, referred to the appropriate focal points for logging (county and national levels), followed-up and resolved, if possible (see Annex 4 for the national redress structures).

6.1 Description of the project GRM

53. The SEQIP GRM will be adapted to address the grievances and complaints from this project. The project categorizes grievances received using the guidance summarized in Table 8, which includes communication of basic information; public administration ethics and conduct; governance; human rights; environmental compliance; corruption and economic crimes; and VMGs/HUTLCs rights and interests. The project GRM consists of seven (7) key steps, as summarized in Figure 2.

Figure 2: Grievance Redress System Workflow Diagram¹



6.2 GRM structural approach

54. The GRM structure will be explained in detail to the GPE/PCU members and specifically to those engaged in the day-to-day management of the project including the environment and social safeguards officers. The County team, specifically members of the CPCU, will also be sensitized on the additional safeguards issues, including those related to protection against COVID-19. The detailed description of the structure is presented in Table 8.

Table 8: The GRM operational structure

Steps	Details
Grievance receipt and processing	<ul style="list-style-type: none"> • The project will setup grievance receipt areas for people who would want to walk in and make a complaint, 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) • The project will have GRM focal points at the schools, education offices at the Sub-County and County and national levels. The contacts of these focal points will be shared with the local people and beneficiaries to facilitate communication as necessary • SEQIP will maintain a grievance log that will record: <ul style="list-style-type: none"> (i) # complaints received, (ii) Receipt/acknowledgement details (ii) Describe the issues (iv) Location of each complaint (v) # complaints resolved (vi) # complaints that have gone to mediation

	<ul style="list-style-type: none"> • The number of grievance physical reporting sites (schools, administration offices, etc.) and channels will be determined by available and affordable technology, funding and capacity constraints • The reporting sites 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 • The project will share and discuss with the World Bank the raw or summarized grievance data to receive technical support in responding quickly and effectively
Sorting and processing	<ul style="list-style-type: none"> • The project social safeguards officer/GRM officer will: (a) sort received grievances into 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 manner; (c) assign timelines for follow-up steps of each grievance based on the priority; (d) make judgment and reassign each grievance to the appropriate institution at the various GRM levels; (e) exclude grievances handled elsewhere (local court, mediation body, or the inspection Panel of the World Bank) from the GRM; and (f) offer the complainants option/s for resolution of their grievances
Acknowledging and follow-up	<p>The project social safeguards officer/GRM Officer will provide a written response acknowledging receipt of each complaint (see annexes 4, 5 and 6 for the reporting tools). The response will include:</p> <p>(a) Cases of Sexual abuse, violence, harassment and exploitation MUST be reported immediately (72 hour or less) to the GBV service provider and the survivor guided appropriately on where to get care</p> <p>(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;</p> <p>(c) response to straight forward communication related grievances that require minimal checks and consultations (1 to 3 days)</p> <p>(d) response that needs 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 receipt of the grievance, detail the steps to be followed, and provide the appropriate practical timelines - 7 -14 days;</p> <p>(e) response that requires 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 receipt of the grievance, provide follow-up steps and set timelines for a comprehensive response - 14 to 21 days;</p> <p>(f) response that requires escalation to higher SEQIP implementation level: Acknowledge receipt of the grievance, explain the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response – 7-21 days; and</p> <p>(g) response that requires referral to other institutions (National Police Service, Commission of Administration of Justice (CAJ), National Gender and Equality Commission (NGEC), Kenya National Commission of Human Rights (KNCHR), Ethics and Anti-Corruption Commission (EACC). Acknowledge receipt of the grievance, explain the need for reference to an appropriate institution, and set timelines for a comprehensive response on referral progress - 7-21days</p>
Verification, investigation and redress action	<p>The activities will include: verifying, investigating, redress action and plan.</p> <p>Verification</p> <p>(a) The social safeguards officer/GRM officer will check for eligibility (objectively based on set standards and criteria) of a complaint in terms of relevance to the project (refer to the PAD, PIM, VMGP, EMSF, GBV Action Plan, Procurement Manual, and Financial Manual to determine the validity of the grievance)</p> <p>(b) Escalate, expeditiously, grievances that required high level decision-making within SEQIP</p> <p>(c) Refer, expeditiously, grievances that are outside SEQIP jurisdiction</p> <p>Investigation</p>

	<p>(a) Appoint a member of the PCU to work with the social safeguards officer/GRM Officer to investigate (this should be a neutral investigator with no stake in the outcome of the investigation)</p> <p>(b) Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)</p> <p>(c) Collect and preserve evidence</p> <p>(d) Analyze to establish facts and compile a report</p> <p>(e) If there is a need for an independent investigator, the GPS/PCU will agree on who to engage and the terms of reference (ToR)</p> <p>Grievance action plan</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 department or officer to handle the grievance, where the project has no jurisdiction engage the Commission or Independent statutory bodies (such as KNHCR, CAJ)</p> <p>(b) undertake mutually agreed follow-up actions</p> <p>(c) Update of complainant and project implementing teams</p> <p>(d) Provide users with a grievance redress status update and outcome at each stage of redress</p> <p>(e) update the GPE/PCU on grievance redress across the GRM value chain</p>
Monitoring and evaluation	<p>The project will undertake the following monitoring actions:</p> <p>(a) develop indicators for monitoring the 7 steps of the GRM value chain;</p> <p>(b) track grievances and assess the extent to which progress is being made to resolve them;</p> <p>(c) conduct a stakeholders’ satisfaction survey for the GRM services;</p> <p>(d) undertake an analysis of the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with the actions taken, and number of grievances resolved at first point of contact; and</p> <p>(e) provide a report on grievance redress actions pertaining to the 7 steps of GRM value chain including: channels of communication most used by the complainants; the nature of main complaints received; resolution timeframe; alternative justice systems used; weaknesses and challenges encountered; etc.</p> <p>The project will evaluate the GRM by:</p> <p>(a) analyzing grievance data to reveal trends and patterns,</p> <p>(b) sharing GRM analysis in management meetings; and</p> <p>(c) taking corrective actions on project implementation approaches to addressing grievances</p>
Feedback	<p>The project will provide feedback to GRM users and the public at large about:</p> <p>(a) results of investigations;</p> <p>(b) actions taken;</p> <p>(c) why GRM is important;</p> <p>(d) enhance the visibility of the GRM among beneficiaries;</p> <p>(e) increase in users’ trust in the GRM; and</p> <p>(f) Create demand for grievances.</p>

55. The GPE/PCU will explore the possibility of operating an online platform for the GRM. There are operational examples including the Regional Pastoral Livelihoods Resilience Project (RPLRP) that the team could learn from. The online platform will allow for an expedited review and response process for the complaints and grievances.

56. Information on GRM will be provided to all stakeholders during public meetings (whenever this will be conducted), sensitization forums, over the radio and social media platforms to ensure that all people know the multiple ways in which complaints can be delivered. In addition, the GRM process will be clearly described on posters displayed at every school, administration offices and health facilities in the project areas. The consultations with the VMGs/HUTLCs will identify the most appropriate mechanisms for their members to channel complaints on the project. This could be

through their local leadership structures, phone calls, or CBOs. The project will then support these processes to ensure that their issues are heard and addressed in a timely manner.

6.3 Addressing GBV/SEA cases

57. The risk of GBV was identified during the consultations for this project. A GBV Action Plan has been developed to accompany the implementation of the project GRM to ensure that the Project does not have any negative impacts or further perpetuate GBV/SEA. The Plan presents operational activities as well as recommendations for GBV/SEA risk mitigation that build on existing mechanisms in the MoE, and the National and County Governments involved in the project. The Plan is based on existing protection, prevention and mitigation strategies and measures developed by the WB and coordinated through the MoE and its partners at the implementation level. The implementation of this GRM will be supported by the service provider for on-call psychosocial services which will include a hotline for reporting cases of GBV/SEA and child abuse. Requirements for the safe and confidential reporting of cases of GBV and child abuse will be inbuilt into the service provider's ToR.

58. To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GRM will have a sensitive approach to GBV-related cases, which will be survivor centered and managed according to the complainant's informed consent. Where such a case is reported, the complainant will be provided with information about the available services including: confidential appropriate medical and psychological support; emergency accommodation; and any other necessary services as appropriate including legal assistance. Staff will immediately refer the survivor/complainant to the GBV service provider or to a health center which specializes in free post-GBV health support (within 72 hours of the incident). All staff and GRM focal points will be informed that if a case of GBV is reported to them, the only information they will establish is if the incident involves a worker on the project, the nature of the incident, the age and sex of the complainant and if the survivor/complainant was referred to service provision. If a worker on the project is involved the incident will be immediately reported to the Program Manager who will provide further guidance after consulting with the World Bank.

6.4 Project Workers Complaints

59. Each worksite/contractor will form a GRM Committee and appoint a GRM focal point, whose contacts will be shared with the staff on recruitment, as detailed in the Labor Management Procedures (LMP) for this Project. The complaints will be sent to the GRM focal point at the workplace by email, text, phone, letter or in person. The complaints will be collated into a complaints form and logged into the register. The grievance committee at the workplace comprised of the in-charge, departmental heads (as necessary) and GRM focal point (who will act as the secretary), will review the complaints and provide guidance on the course of action and ensure follow-up on previous complaints. Anonymity will be assured when handling workers' grievances.

60. For complaints raised through alternative means, i.e. those raised through social media, print media or not formally lodged, the committee will deliberate upon them to decide whether to investigate based on the substance and potential impact/reputational risk. No disciplinary or legal action, or retaliation of any kind, will be taken against anyone raising a complaint in good faith. A monthly report of complaints resolution will be provided to the GPE/PCU and the World Bank (as per the reporting format in Annex 6). The workers will also be sensitized on the overall Project GRM and given information on how to channel complaints using the various channels outlined above.

6.5 GRM Appeals and Escalation Mechanisms

61. Where agreement on grievance resolution has not been reached, the project team will offer the complainant with 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 appeal may entail offering the aggrieved person the option to seek redress through such statutory referral institutions such as NGEC, CAJ, KNCHR and NEMA as appropriate.

6.6 World Bank Grievance Redress Service (GRS)

62. Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level GRMs 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 complaints to the World Bank's independent Inspection Panel which determines whether harm occurred or could occur as a result of World Bank's 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), 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, visit www.inspectionpanel.org.

7. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING THE SEP

7.1 Management

63. Similar to the Kenya GPE PRIEDE project, the project implementation will be mainstreamed into the government education management system. The MoE, SDELBE, will be the main implementing agency for the project. The PS in charge of the SDELBE, who is also the MoE's accounting officer, will have the primary responsibility for efficient and effective implementation of the project. All the key decisions, including financial and procurement, related to the project implementation will be vested with the PS.

64. The Directorate of Projects Coordination and Delivery (DPC&D) will oversee the overall project implementation. The DPC&D will be instrumental in the project's operational matters: it will coordinate with the National Treasury, Central Bank of Kenya (CBK) and the MoE's internal Finance Department for timely flow of funds and processing of withdrawal applications; ensure compliance with fiduciary and safeguard requirements of the projects; and carry out necessary M&E. The DPC&D is empowered by the PS to take some day-to-day decisions required for project implementation.

65. The existing Kenya GPE PRIEDE PCU, which is under DPC&D will be primarily responsible for the day-to-day project management and coordination, communication, safeguards, fiduciary and monitoring and reporting. The GPE/PCU is functional and has the capacity to also implement this project and oversee the implementation of this SEP, considering that some of the key project activities will be directly executed and monitored by the TSC, KNEC and KICD. These agencies are implementing entities of the PRIEDE and SEQIP projects, therefore have experience with World Bank procedures.

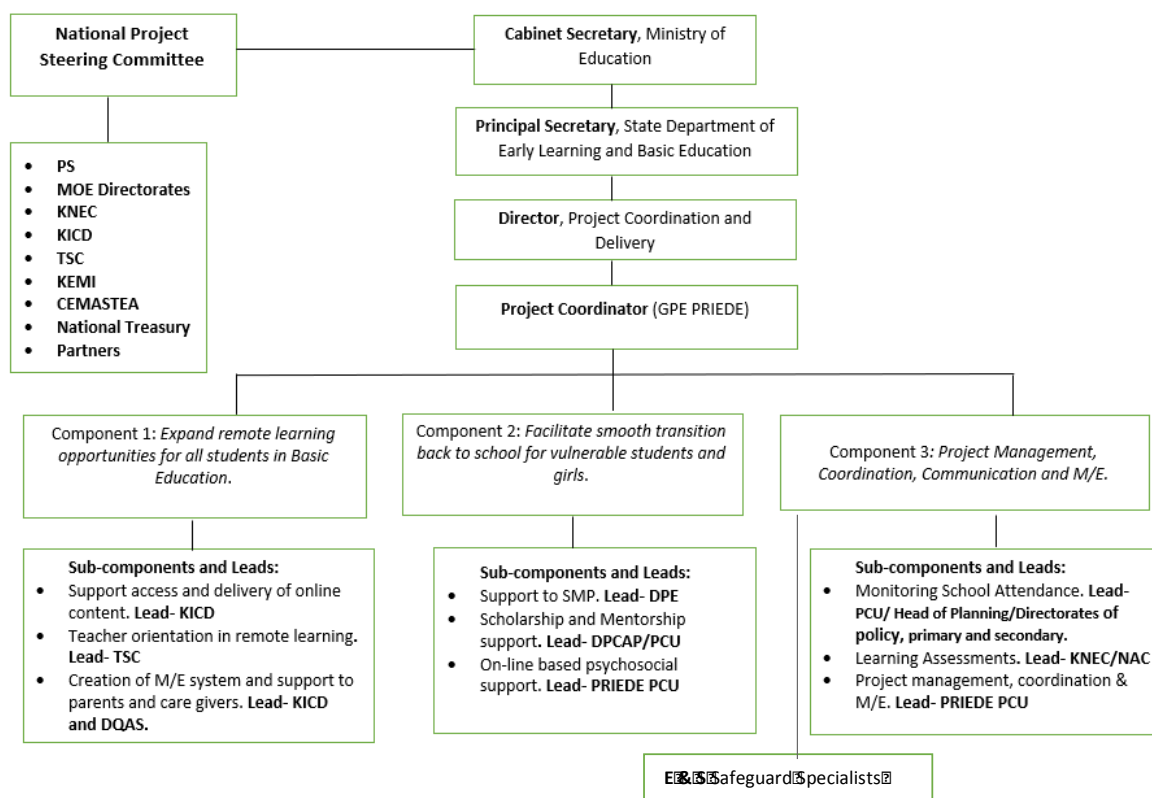
66. The PRIEDE GPE/PCU is currently composed of a National project coordinator; technical component leads and their deputies; accountants; procurement officers; a communication officer; an ICT officer; and a social safeguards officer. The project will acquire the services of an environmental officer from National Environment Management Authority (NEMA) on need basis. The coordinator manages day-to-day operations of the GPE/PCU. Each component lead will be assigned the responsibility to coordinate with a relevant implementing agency or Directorate to collect monitoring data to inform project progress reports and updating of the results framework. The social safeguards officer will be responsible for providing oversight over the implementation of the SEP including the GRM.

67. The Project Steering Committee (PSC) for the GPE PRIEDE Project, the SEQIP Project and USAID funded Tusome Project will continue to execute the overall Governance function of this project. The PSC is chaired by the Education Cabinet Secretary (CS) whereas the PS, SDELBE, serves as the Secretary of the PSC. Other key PSC members include relevant Directors from various Directorates at MoE; MoE's Heads of Finance, Accounts and Procurement; Chief Executive Officers of KNEC, KICD, TSC, KEMI⁴ and CEMASTEAS⁵; and representatives from the National Treasury, Education Development Partners Coordination Group (EDPCG), the Teachers Union, the Head Teachers Associations, and Parents Associations. The PSC will provide strategic direction, endorse the Annual Work Plan and Budget, ensure effective coordination among the project implementation agencies, and review the implementation progress. The institutional and implementation arrangements are summarized in Figure 3.

⁴KEMI: Kenya Education Management Institute.

⁵CEMASTEAS: Centre for Mathematics, Science and Technology Education in Africa.

Figure 3: Institutional and implementation arrangements



68. EdTech COVID-19 Help Desk support will also be involved in the implementation of this project. Regarding implementation of Component 1 interventions for radio, TV, the Kenya education cloud, and establishment of monitoring system for remote learning, MoE (through KICD) will reach out for technical support from the newly created EdTech COVID-19 Help Desk of the EdTech Hub⁶ for additional support to conceptualize a detailed implementation and monitoring plan for the specified activities in the Project Implementation Manual (PIM). Kenya is one of the target countries for this support. Table 9 presents a list of the key implementing units/agencies and their partners.

⁶EdTech COVID-19 Help Desk of the EdTech Hub <https://edtechhub.org/helpdesk/>; [EdTech Hub Help Desk online request web site](#) The EdTech Hub is jointly supported by the World Bank, DFID and the Gates Foundation to provide dedicated research and technical support to target countries on ‘edtech’ topics including use of radio and television.

Table 9: Leadership of various sub-components and activities

Component	Sub-component	Implementer	Potential partners /collaborators
1. Expand existing remote learning opportunities for learning continuity for all students in Basic Education	1.1: Support access and delivery of online content to all students in primary and secondary schools	KICD	-Privately owned community & faith-based radio broadcasters -Education Television (EDU TV) on a free to air platform
	1.2: Teacher training in interactive remote learning methodologies	TSC	KICD on the ICT course under the Elimika
	1.3: Create an integrated monitoring and evaluation system for remote learning interventions and provide support for parents and caregivers to monitoring student learning.	KICD, in collaboration with DQAS	
2. Facilitate smooth transition back to school for vulnerable students and girls	2.1: Support to the National School Meals Program (SMP)	DPE	WFP
	2.2 Provision of on online based psychosocial support services	GPE PRIEDE PCU	-CPCU -KICD Radio and TV
Project Management, Coordination, Communication and Monitoring and Evaluation		GPE PRIEDE PCU	KNEC & National Assessment Centre (NAC) for specific activities (e.g. learning assessments)

7.2 Resources for the implementation of the SEP

69. The project has set aside funds to ensure that the planned stakeholder engagement activities are implemented and monitored effectively. The summary budget is presented in Table 10.

Table 10: Summary budget for implementing the SEP

Stakeholder Engagement Activities	Q-ty/per years	Unit Cost, USD	of years/ Months	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	3000	18	18000
Communication materials (leaflets, posters,)	6	200	18	1200
Project press conferences (twice per year)	2	1000	18	2000
Training (Social issues, outreach, GRM, etc.) for GPE/PCU/CPCU	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
Subtotal				222,400
Contingency				10,085
Total				223,485

8. MONITORING AND REPORTING

70. The SEP will be periodically revised and updated as necessary in order to ensure that the information and the methods of engagement remain appropriate and effective in relation to the project context and spread of COVID-19. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. Monthly/quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the project.

71. The monthly/quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address these in a timely and effective manner. Information on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders in two possible ways:

- i. Publication of a stand-alone annual report on project's interaction with the stakeholders; and
- ii. A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis and reported on.

72. The project team will conduct surveys on World Bank supported components at mid-point. The results from these surveys will be used to inform the World Bank on the necessary steps to take towards meeting the project goals.

73. The ESMF, ESIA/ESMPs, LMP, VMGP and updated SEP will be disclosed on the MoE website and at the local level in the County and sub-county offices. The SEP will be translated into Kiswahili and other local languages for ease of reference by the VMG/HUTLC and school communities. Table 11 shows the list of documents to be disclosed.

Table 11: Disclosure of project documents

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Before appraisal	Health stakeholders and the general public	PAD, SEP, ESCP	WB and MoE website The SEP will also be availed at County Offices in multiple languages, including Kiswahili for ease of reference
Within one month of effectiveness	All stakeholders identified above	Updated SEP, LMP, ESMF, VMGP	WB and MoE website
Quarterly	Implementing partners	Progress report including summaries of complaints and resolution	WB and MoE website
Before key activities	Key stakeholders for specific activities	ESIA or ESMP	WB and MoE website

REFERENCES

- IDA: (2019). Stakeholder Engagement Plan, Higher Education Project, Ministry of Education Culture and Research.
- UNDP (2017). Social and Environmental Standard: Guidance Note on Stakeholder Engagement and Supplemental Guidance on Grievance Redress mechanism.
- WB (2020) Project Appraisal Document (PAD). Kenya GPE COVID-19 Learning Continuity In Basic Education Project
- WB (2018). Stakeholder Engagement Plan: Environmental health and Pollution Management Project. <http://documents.worldbank.org/curated/en/910131581016525682/pdf/Stakeholder-Engagement-Plan-SEP-Africa-Environmental-Health-and-Pollution-Management-Program-P167788.pdf>
- World Bank (2018) Environment and Social Framework. <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>.

ANNEXES**Annex 1: List of Participants Stakeholder Engagement Plan (June 17, 2020)**

S/NO	NAME	COUNTY
1	Elijah Mungai	Nairobi
2	Martha Ekirapa	Nairobi
3	Peter Gachathi	Nairobi
4	Victoria M.	CDE Kiambu
5	Margaret Mwirigi	CDE Nyamira
6	Atebe Isaac Myangau	CDE Kisumu
7	Sifuna Nelson Mabele	CDE Nyandarua
8	Njogu Jane Wajira	CDE Kwale
9	Moses Gachungi Mureithi	CDE Makueni
10	Josephine Ondieki	NAIROBI
11	Julie Omolo	SEQUIP
12	Juma Mwangi	NAIROBI
13	Irene Ochieng	NAIROBI
14	Adan Mohammed Robe	CDE Samburu
15	Daniel K. Cheruiyot	Nyandarua
16	Robinson Kiarie	Makueni
17	Leruso M. Philip	Samburu
18	Ledama K. Kudik	Narok
19	Nancy W. Munga	Kirinyaga
20	Nyankira Orina	Kisumu
21	Clare E.Kusa	Nandi
22	Eunice Bweya	Vihiga
23	James Kimotho	Nairobi
24	Kennedy Dimba	Nyamira

STAKEHOLDER ENGAGEMENT PLAN – LEARNING CONTINUITY IN BASIC EDUCATION PROJECT (2020)

25	Serafino Samuel	Meru
26	Hulbai Gedij	Wajir
27	Abdia Dohia	Mandera
28	Patrick Vasi	Isiolo
29	Josiah Kilei Mwawana	Kwale
30	Samuel C. Ondieki	Siaya
31	Susan C Mitei	Baringo
32	Shumi Ali Muhamed	Lamu
33	Emily M. Nyaga	Kiambu
34	Elizabeth Chesang Marangach	Busia
35	Catherine Cheboiwo	Nairobi

Annex 2: A Summary results from online consultations

The questionnaire further below was sent to respondents mainly drawn from about 20 counties across the country. In total, about 700 questionnaires were completed and returned. Below is a summary of the key issues captured from the open ended questions.

Q: What are the potential risks envisioned in implementing this project?

- i. No learning, movement, interaction. Most of the schools does not have proper equipment in taking e-learning
- ii. Rejection of community due to competing demands of parents and program activities.
- iii. Inadequate funding, misplaced priorities, conflict of interest, uncompleted projects, poor record keeping and lack of transparency.
- iv. Insecurity.
- v. Retrogressive culture, sparsely populated population, language barrier, tough and inaccessible terrains.
- vi. Risk of COVID-19 infections with limited access to health facilities.
- vii. Cost of the project, lack of ICT and power in other rural areas, lack of water for hand washing as this is the new norm, sanitization of physical facilities before usage, capacity building the implementers, lack of sensitization, and proper management of resources.
- viii. Loss of digital equipment.

Q. How can these risks be mitigated?

- i. Sensitization and awareness raising
- ii. Effective planning
- i. Put in place measures to mitigate against COVID-19 infection and death.
- ii. Use community leaders and teachers to track and trace all learners for online or distance learning and school feeding.
- iii. Enable stakeholders to ICT connectivity.
- iv. Conduct a lot of sensitization to all the stakeholders on measures that have been put in place to curb the spread of COVID-19.
- v. Provide water tanks and tents for open air classes.
- vi. build more classrooms, provide more desks, provide masks, sanitizers, etc.
- vii. Gradual opening of schools as you put facilities in place.
- viii. Capacity building of teachers, parents and other stakeholders, provision of adequate resources, ensure prompt and adequate delivery of the digital content, provision of school meals to curb truancy.
- ix. Proper supervision of learners as they continue with online learning.
- x. Address teachers' attitude, install a software blocking other irrelevant sites, and provide solar powered gadgets.
- xi. Use of multi-sectoral approach, engage all the stakeholders, facilitate field officers to undertake monitoring and evaluation.

Q. What measures should the project put in place when address vulnerable, marginalized and minority groups?

- i. Provide requisite preventive facilities and infrastructure.
- ii. Ensure access to facilities.
- iii. Engage them in all aspects of project rollout right from implementation have their representative in the committee.
- iv. Advocacy, monitoring of vulnerable, marginalized and minority groups.
- v. Avail materials required including masks, soap, running water and self-hygiene
- vi. Embrace affirmative action.

- vii. Assess and understand the nature of vulnerability, major issues making the groups to be marginalized, long term/sustainable intervention measures, community/groups involvement in getting solutions to their own problems.
- viii. There should be enhanced psychosocial support in these areas.
- ix. Increased partnerships with CBOs and other non-governmental agencies to improve sanitation facilities in the institutions of learning.
- x. Budgetary allocation through the FPE/FDSE capitation for provision of water and sanitation facilities.
- xi. Training parents on child protection measures against cultural practices that may render them vulnerable and marginalized.
- xii. Training learners on how to take care of themselves and measures to take in case they fall ill or feel vulnerable to abuse.
- xiii. Provide meals for the shift classes.
- xiv. Identify and mobilize parental social communication forums e.g. WhatsApp groups.
- xv. Give priority to the vulnerable and marginalized and minority groups in all project benefits.

Q. How should grievances be handled?

- i. Establish a grievance redress mechanism.
- ii. Through reporting grievances to the persons running the project.
- iii. The different levels engaged should be empowered to handle grievances, i.e. sub-county, county, region and national levels. Issues that the field team cannot handle to be escalated to the national office.
- iv. Establish a toll free sms to a central center.
- v. Involve the stakeholders in carrying out social accounting
- vi. Establish an online platform for raising complaints e.g. website.
- vii. Grievance registers to be maintained at sub-county, county, and ministry headquarters.
- viii. Issues could also be raised through public barazas and radio transmission in local languages.

Q: What experiences and lessons have you learnt in implementation of similar interventions (especially those funded by the world bank funded)?

- i. Need to for transparency, accountability and ensure safeguards measures are in place.
- ii. Accountability, monitoring and evaluation. There is need to use resources availed and used prudently.
- iii. If the PCU is well coordinated then project implementation will be coordinated.
- iv. Strict adherence to procedures and policies.
- v. Stratified information and transparent records keeping including receiving and managing feedback.
- vi. More sensitization/training is required before implementation.
- vii. Success of project is highly dependent on participatory engagement of key stakeholders from inception.
- viii. Attention needs to be focused on monitoring and evaluation so that gaps in the project can be identified and dealt with real time.



MINISTRY OF EDUCATION
State Department of Early Learning & Basic Education
DIRECTORATE OF PROJECTS COORDINATION AND DELIVERY

STAKEHOLDER ENGAGEMENT TOOL

To enable the Ministry of Education State Department of Early Learning and Basic Education under the leadership of Directorate of Projects Coordination and Delivery develop an effective stakeholder engagement plan, we intend to get feedback from all our stakeholders in respect to the implementation of.....Please fill this form and email the response to

KEY QUESTIONS

BACKGROUND INFORMATION		
Name of the Ministry/ Organization / Community		
Department		
Position		
Name of the Respondent *(Optional)		
Physical location	County:	
	Sub-County	
	Location/Zone	

KEY AREAS OF ENGAGEMENT	
1. Identify the Key stakeholders that we need to consult?	
2. What are the potential risks envisioned in implementing this project? And how can we resolve them?	Potential risks
	How to resolve/ mitigation measures
3. What measures should the project put in place when address vulnerable, marginalized and minority groups?	
4. How should grievances related to this project be handled?	
5. What is the most effective way to share information and get feedback in the context of COVID-19?	
6. Which other intervention is being implemented in the context of COVID 19	
7. What experiences and lessons have you learnt in implementation of similar interventions (especially those funded by the World Bank funded)?	

8. Which other	
----------------	--

Thank you for your feedback!

Annex 3: National actions on COVID-19

Step	Actions to be taken
1	<ul style="list-style-type: none"> <li data-bbox="296 367 1398 427"><input type="checkbox"/> Implement national risk-communication and community engagement plan for COVID-19, including details of anticipated public health measures (use the existing procedures for pandemic influenza if available) <li data-bbox="296 439 1398 499"><input type="checkbox"/> Conduct rapid behaviour assessment to understand key target audience, perceptions, concerns, influencers and preferred communication channels <li data-bbox="296 510 1398 539"><input type="checkbox"/> Prepare local messages and pre-test through a participatory process, specifically targeting key stakeholders and at-risk groups <li data-bbox="296 551 1398 611"><input type="checkbox"/> Identify trusted community groups (local influencers such as community leaders, religious leaders, health workers, community volunteers) and local networks (women's groups, youth groups, business groups, traditional healers, etc.)
2	<ul style="list-style-type: none"> <li data-bbox="296 636 1398 696"><input type="checkbox"/> Establish and utilize clearance processes for timely dissemination of messages and materials in local languages and adopt relevant communication channels <li data-bbox="296 707 1398 786"><input type="checkbox"/> Engage with existing public health and community-based networks, media, local NGOs, schools, local governments and other sectors such as healthcare service providers, education sector, business, travel and food/agriculture sectors using a consistent mechanism of communication <li data-bbox="296 797 1398 857"><input type="checkbox"/> Utilize two-way 'channels' for community and public information sharing such as hotlines (text and talk), responsive social media such as U-Report where available, and radio shows, with systems to detect and rapidly respond to and counter misinformation <li data-bbox="296 869 1398 929"><input type="checkbox"/> Establish large scale community engagement for social and behaviour change approaches to ensure preventive community and individual health and hygiene practices in line with the national public health containment recommendations
3	<ul style="list-style-type: none"> <li data-bbox="296 949 1398 1010"><input type="checkbox"/> Systematically establish community information and feedback mechanisms including through: social media monitoring; community perceptions, knowledge, attitude and practice surveys; and direct dialogues and consultations <li data-bbox="296 1021 1398 1081"><input type="checkbox"/> Ensure changes to community engagement approaches are based on evidence and needs, and ensure all engagement is culturally appropriate and empathetic. <li data-bbox="296 1093 1398 1122"><input type="checkbox"/> Document lessons learned to inform future preparedness and response activities

Annex 4: Institutional mandates for managing grievances in Kenya

Categories of grievances	Institutions	Constitutional provisions, laws and legal provisions and frameworks
1. Basic information		
(a) Access to information ⁷	Project implementing and beneficiary institutions	ESS 10
	MoE, KICD, KNEC, TSC, CEMESTEA	CoK 2010 Article 35 (1) ESS 10
2. Public administration ethics and conduct		
(a) State organs and all officer duty	CAJ	CoK, 2010 Article 21(3)
(b) Standards of administrative action	CAJ	CoK, 2010 Article 47(1)
(c) Abuse of State or office power	CAJ	CoK, 2010 Article 59 (2)(i); CAJ Act 2011; LI Act, 2012.
3. Governance-related grievances⁸		
(a) Violation of code of ethics for State Officer	EACC	LI Act, 2012
4. Violation and breach of codes of ethics		
(a) Violation of codes of ethics	Respective public entity ⁹	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	PSC, TSC, EACC	EACC Article 11(1)(c) or CAJ Act, 2011
5. Violation of human rights and fundamental freedoms		
(i) Gender equality and general Equality matters (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
(a) Equality and freedom from discrimination: -Equality every person; Equality of men and women to opportunities in political, economic, cultural and social;	NGEC	CoK, 2010 Article 27
(b) Non-discrimination of vulnerable groups: – Vulnerable groups within	NGEC	CoK, 2010 Article 27 Children Act, NO. 8 OF 2001 ¹⁰

⁷Information 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

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

⁹Each 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.

¹⁰There 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/>

Categories of grievances	Institutions	Constitutional provisions, laws and legal provisions and frameworks
the society legislative, other measures including affirmative programs (see CoK 2010 for <i>special needs groups</i> Article 53 -Children rights, 54 -Persons with disability; 55 -Youth; 56 -Minorities and marginalized groups)	National Council for Children’s Services (NCCS) National Council for persons with disabilities (NCPWD)	ESS 7
(c) Economic and Social Rights: health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment)	NGEC	CoK 2010 Article 43 Prohibition of Female Genital Mutilation Act No. 32 of 2011 ESS 4
(d) All other human rights matters (not within the jurisdiction of the project and not under CAJ, NGEC, EACC, DPP or courts) ¹¹	KNCHR	CoK 2010 Article 28; 59 (2) (b) KNCHR Act, 2011
6. Corruption and Economic crimes: (Unethical conduct)	EACC, DPP, DCI	EACC Act, 2011¹² Article 11; ACEC Act No. 3 2003¹³.
7. Labor relations 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
8. Environmental compliance violations 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 ¹⁴ ; Waste Management Regulations, 2006 ¹⁵ ; Noise and Excessive Vibration Pollution- (Control) Regulations, 2009 ¹⁶ ; Water quality Regulations, 2006 ¹⁷ ESS 3

¹¹CoK 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

¹²Ethics and Anti-Corruption Act No. 22 of 2011

¹³Anti-Corruption and Economic Crimes Act, No 3 of 2003

¹⁴Legal Notice No.34. Regulations, 2013

¹⁵Kenya Gazette supplement No 69. Legislative supplement No. 37)

¹⁶Legal Notice No. 61

¹⁷Legal notice No. 121

Categories of grievances	Institutions	Constitutional provisions, laws and legal provisions and frameworks
<p>9. Occupational Safety and Health Chemical substances, statutory examinations and tests of plant/equipment, Fire Risk, Medical Examination of Workers</p>	<p>DOSH</p>	<p>The Occupational Safety and Health Act (Cap 514); Fire Risk Reduction Rules, (LN 59/2007); Medical Examination Rules LN24/2005 ESS 2, ESS 4</p>
<p>10. Safety schools</p>	<p>BoM and MoE, County Government</p>	<p>School Safety Standards Manual¹⁸ ESS 4</p>
<p>11. Civil wrongs and criminal offences</p>	<p>Attorney General, Director of Public Prosecution (DPP) or Director of Criminal Investigation through the National Police Service</p>	<p>CoK CAP 75 - Kenya Criminal Procedure Code and Kenya Penal Code (revised 2012)</p>

¹⁸ downloadable at cwsglobal.org/wp-content/uploads/2017/01/CWS-SSZ-Schools-Manual_Kenya.pdf

Annex 5: Complaints form

1. Complainant’s Details:

Name (Dr / Mr / Mrs / Ms) _____
ID Number _____
Postal address _____
Mobile _____
Email _____
County _____
Age (in years): _____

2. Which institution or officer/person are you complaining about?
Ministry/department/agency/company/group/person

3. Have you reported this matter to any other public institution/ public official?

Yes No

4. If yes, which one?

5. Has this matter been the subject of court proceedings?

Yes No

6. Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

7.. What action would you want to be taken?

Signature _____

Date _____

Annex 6: Complaints log

Date and complaint from	Complaint e.g. non-issuance of ID	Officer/ department complained against	Nature of complaint/ service issue, e.g. delay	Type of cause – physical (e.g. system failure), human (e.g. inefficient officers, slow, unresponsive) or organization (e.g. policies, procedures, regulations)	Remedy granted	Corrective/ preventive action to be taken	Feedback given to complainant

Annex 7: Complaints reporting template

No. of complaints received	Main mode complaint lodged	No. of complaints resolved	No. of complaints pending	Duration taken to resolve, e.g. spot resolution, 1 day, 7 days, 14 days, 1 month, quarterly, annual	Recommendations for system improvement

Note that this form could be replaced with the use of the GEMS system following the training of project officers by the World Bank.