



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 11-Dec-2019 | Report No: PIDISDSA26892



BASIC INFORMATION

A. Basic Project Data

Country Kenya	Project ID P167814	Project Name Kenya Informal Settlements Improvement Project 2	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 09-Dec-2019	Estimated Board Date 18-Feb-2020	Practice Area (Lead) Urban, Resilience and Land
Financing Instrument Investment Project Financing	Borrower(s) Republic of Kenya	Implementing Agency State Department of Housing and Urban Development	

Proposed Development Objective(s)

To enhance access to basic services and tenure security of residents in participating urban informal settlements and to strengthen institutional capacity for slum upgrading in Kenya.

Components

Integrated settlement upgrading
Socio-economic inclusion planning
Institutional capacity development for slum upgrading
Program management and coordination

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	165.00
Total Financing	165.00
of which IBRD/IDA	150.00
Financing Gap	0.00

DETAILS

World Bank Group Financing



International Development Association (IDA)	150.00
IDA Credit	150.00

Non-World Bank Group Financing

Counterpart Funding	15.00
Borrower/Recipient	15.00

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

1. **Kenya has achieved strong economic growth contributing to expansion in its GDP per capita over the last five years.** The economy expanded at an average of 5.7 percent over the period 2013-2018. Growth in real GDP was broad based, coming from agricultural output which accounted for about 1 percentage points of the average growth, industry (1.2 percentage points), and services sector which accounted for about 3.0 percentage points of the average GDP growth. More importantly, growth is translating into improved livelihoods as reflected by the increase in per capita GDP from US\$ 1,130 in 2013 to US\$ 1,620 in 2018. This places Kenya within the low middle-income group of countries. The growth in services sector (including whole sale and retail, accommodation, transportation, and real estate-activities that are predominantly associated with urban and cities economic activity) has routinely accounted for at least half-and often more than two thirds-of GDP growth. This is in part due to its larger share in output (approximately 58.5 percent of GDP in 2018) and due to its high average growth rates (of about 6.6 percent in 2018).

2. **Robust growth was translated into a reduction in the poverty incidence rate, whether measured by the national or international poverty line.** The proportion of the population living beneath the national poverty line fell from 46.8 percent in 2005/06 to 36.1 percent in 2015/16, showing a modest improvement in the living standards of the Kenyan population. Similarly, poverty under the international poverty line of US\$ 1.90 a day declined from 43.6 percent in 2005/06 to 35.6 percent in 2015/16. At this level, poverty in Kenya is below the average in sub-Saharan Africa and is amongst the lowest in the East African Community. However, when considering Kenya’s lower middle-income class status, poverty is relatively high, approximately twice as high than the average for this group. In addition, the country’s elasticity of poverty reduction to economic growth is low at 0.57, below that of Tanzania, Ghana and Uganda. Thus, the translation of economic growth into poverty reduction is weak.



Sectoral and Institutional Context

3. **Kenya is rapidly urbanizing, with the urban population growing at about 4.3 percent a year. In 2016, about 25–27 percent of Kenyans lived in urban areas.** Kenya's five largest urban areas (Nairobi, Mombasa, Kisumu, Nakuru, and Eldoret) account for approximately 34 percent of the urban population. By 2050, about half of the population will be living in cities. Urbanization if well managed presents a key opportunity to change the structure and location of economic activity from a basis in rural agriculture to more diversified and larger urban industrial and service sectors. But growth will be weaker if uneducated migrants are forced to leave rural areas for the city by a combination of rapidly growing population density and scarcity of agricultural land.

4. **Kenya's urbanization is taking place within a major shift toward political, fiscal, and administrative devolution.** Devolution through the 2010 constitution provides for two autonomous but interdependent levels of government: national and 47 county governments with mainly elected assemblies, elected governors, and governor-appointed cabinet members ratified by the assembly. The constitution eliminated the previous third tier of government, the urban and rural local authorities, and transferred their revenues and functions to the county governments. Thus, all urban centers are now under the management of county governments, and county administrations with varying capacity now manage Kenya's urban areas. With a guaranteed unconditional transfer of national revenue, called the 'equitable share,' the county governments are expected to address local needs for devolved services, including urban infrastructure and services. The national government is now expected to focus on national issues such as foreign affairs, national public works, policy-making (such as housing policy), development of national-level strategies, and guidance and capacity support of subnational governments.

5. **As Kenya urbanizes an increasing share of Kenya's poor live in urban areas, up from 14 percent in 2005/06 to 23 percent in 2015/16.** Moreover, the proportion of the urban population living in poverty with inadequate living conditions has remained unchanged over the past decade. While the proportion of people living in urban centers with access to improved sanitation facilities and electricity increased in all parts of the country during the past decade, the share of those with improved access to water dropped in some places, indicating that urbanization outpaced infrastructure provision there. Moreover, the gap in access to basic services between the poor and non-poor remains wide. High food and housing costs in urban areas squeeze the budgets of the poor. The poor spend over 50 percent of their budgets on food, leaving little for all other needs, including housing, education, transportation, and health care. Unemployment rates dramatically dropped in urban areas, in tandem with increasing labor force participation rates. However, a large fraction of the urban poor, women, and the youth are unemployed, or working in informal jobs with no security. In Nairobi, for example, more than 20 percent of the poor are unemployed. Poverty—both in monetary and non-monetary dimensions—is still concentrated in informal settlements. Nairobi is home to more than 60 percent of Kenyans living in informal settlements. Nearly a third of them are poor, while only 9 percent of people living in formal settlements are. They suffer from over-crowding, poor quality of dwelling, sporadic access to services, and environmental degradation. Many residents of informal settlements also live far from jobs, which limits their opportunities for employment.

6. **Urban Kenya is unequal, and the expanding urban population is being absorbed in informal settlements with poor living conditions, poor infrastructure, and high poverty rates.** Rapid urbanization, poor management, and absence of planning has left Kenya's urban areas with huge backlogs in critical infrastructure. Roughly 60 percent of Kenya's urban households live in housing that would be defined as a slum under the Millennium



Development Goals. Because formal housing supply is not keeping pace with the growing urban population, informal housing has become the only housing choice for most urban Kenyans. Not only is the full potential of productive and inclusive cities not being realized, the glaring inequality causes its own problems and tensions, one manifestation of which is urban violence and insecurity.

7. **Acknowledging the need to directly tackle the problem of poor living conditions in slums, the Government of Kenya (GoK) initiated the Kenya Slum Upgrading Program (KENSUP) in 2005.** The program aims at improving living conditions in informal settlements in Kenya by 2025 and included participatory planning and development, strengthening of tenure security for residents, and provision of housing and infrastructure services. A key focus of the program is regularization of tenure to enhance tenure security to alleviate poverty. Tenure regularization legalizes interests in land which lack legal status, such as in informal settlements. The National Land Policy 2009 recognizes the need for tenure security for all Kenyans, including residents of informal settlements.

8. **The first phase of the Kenya Informal Settlements Improvement Project (KISIP1) built on KENSUP.** KISIP1 financed tenure regularization to improve tenure security and financed infrastructure upgrading to improve access to basic services. KISIP1 regularized 80 settlements providing tenure security to approximately 125,000 persons. The project also provided an integrated infrastructure package in 36 informal settlements in 11 urban centers, benefiting 1.2 million people. Investments were made primarily in roads, drainage, walkways, high-mast security lights, water and sanitation systems. While progress has been good under KISIP1, this coverage represents only a small fraction of the total households in informal settlements in Kenya today.

9. **Building on the first phase of the Kenya Informal Settlements Improvement Project (KISIP1), phase 2 will provide interventions similar to KISIP1.** The proposed project will support the interventions that have been successful under KISIP: tenure regularization and infrastructure upgrading. Infrastructure upgraded under the project will improve and expand access to services and build community resilience. Upgraded roads improve connectivity linking informal settlements to other areas of socio-economic opportunities. Rehabilitated water and sanitation systems expand access to clean and safe water, as well as hygiene. Street lighting improves human security and economic activities in settlements through reduced crime. Upgraded drainage networks and landslide protection structures are both essential in advancing the resilience of communities in instances of disasters. Regularization also enhances the tenure security of informal settlement residents and benefits include increased property values, access to credit for the title-holder which can then be used for productive uses, increased tax revenues for the local administration and access to urban infrastructure services.

10. **KISIP2 will also introduce new interventions to deepen its overall impact.** The project aims to strengthen the national and county institutions to support scaling up of slum upgrading. It will help the government to strengthen the national slum upgrading program and strategy and will increase the institutional capacity of counties to upgrade and prevent slums. Unlike KISIP1 which was designed before devolution, counties are explicitly involved in project implementation in KISIP2. The project will also enhance socio-economic inclusion by linking vulnerable people (elderly, orphans, disabled, and others) of informal settlements to government programs aimed at reducing poverty and vulnerability, and to link at-risk youth to programs focused on building skills and creating opportunities for employment and self-employment. Socio-economic inclusion planning will be integrated into the settlements receiving infrastructure to provide both socio-economic and infrastructure benefits to the same community. KISIP2 has increased focus on resilience to natural hazards and on crime and violence prevention.



11. **KISIP2 will also use differentiated approaches to tenure regularization.** Experiences from KISIP1 indicate clearly that a one-size-fits all approach to tenure regularization is challenging as settlements have different characteristics. The approach for very high-density urban settlements (such as those found in Nairobi) was determined as first providing the minimum tenure security to the whole settlement, upgrading existing infrastructure to an intermediate or full urbanization level (roads, paths, water/sanitation, waste collection, etc), and support to existing community actions (e.g. collective savings, income generation, community-led crime and violence prevention, etc). Low-density peri-urban informal settlements (such as those found in smaller secondary cities) should maximize the use of land, can move directly to individual titling, and improve infrastructure incrementally (basic to intermediate urbanization level). A third approach is also needed which combines the two previous approaches for settlements that are medium-density (for example the KISIP1 settlements in Eldoret and Nakuru

12. **KISIP2 will support the government's affordable housing agenda, one of "Big 4" priorities under the current administration.** Cross-country experience shows that strengthening security of tenure and investing in infrastructure in informal settlements induces significant private investment in housing and businesses. Indeed, many of the informal settlements that have benefited from upgrading under KISIP1, have experienced an investment boom, with new multi-story buildings replacing poorly constructed informal housing units.

13. **The proposed Project complements the World Bank's existing and past urban operations in Kenya which address the urban infrastructure deficit and urban institutional challenges.** The World Bank financed the three urban projects in Kenya: the Kenya Municipal Program (KMP; US\$100m; started in 2010 and closed 2017). It currently finances the Kenya Urban Support Program (KUSP; US\$300m, started in 2017) which builds on KMP, the First Kenya Informal Settlements Improvement Project (US\$100m; started in 2011, closing in November 2019), and the Nairobi Metropolitan Services Improvement Project (NAMSIP; US\$300m; started in 2012, closing March 2020). The World Bank-financed Kenya Urban Support Program (KUSP) provides capacity building and institutional support to the relatively new 47 county structures and aims to establish and strengthen urban institutions to deliver improved infrastructure and services. All three projects are being implemented by the Ministry of Transport, Infrastructure, Housing, and Urban Development (MTIHUD), which will also be the main implementing agency for the Project, and are helping to improve urban management, urban infrastructure, and urban service delivery. The proposed Project has emerged in the context of continuing demand for basic services in informal settlements in urban areas.

Climate Change Vulnerability Context

14. **Extreme climatic events have long posed a significant risk to Kenya and contribute to increasing levels of vulnerability of the poor.** Of concern are floods and droughts, with major droughts occurring about every 10 years, and moderate droughts or floods every three to four years¹. While usually more localized, floods have led to the greatest loss of human lives². Droughts have affected the most people and had the greatest economic impact – on average, a 0.6 percentage point decline in Gross Domestic Product (GDP) growth is observed in Kenya in years of poor rains³. The 2008-2011 drought is estimated to have cost Kenya US\$12.1 billion, including US\$805.6 million for the destruction of physical and durable assets, and US\$11.3 billion for losses in the flows of

¹ AEA Group (2008). Final report. Kenya: Climate screening and information exchange (ED 05603, Issue 2).

² UNDP. Kenya natural disaster profile. Enhanced Security Unit.

³ World Bank Group. Kenya Economic Update. October 2016, Edition No. 14.



the economy across all sectors⁴. To respond to disasters, the GoK has in the past relied on ad-hoc donor support. Between 2002 and 2012, international donors have provided on average US\$276 million per year to Kenya in humanitarian assistance.

15. **Global climate change is projected to alter Kenya’s mean annual climatic conditions as well as its pattern of climate extremes.** Global temperatures are expected to continue to rise in all seasons, with models suggesting that warming of about 1o C will occur by the 2020’s, and 4o C by 2100⁵. Warming will vary from region to region within Kenya. Greater uncertainty persists regarding how precipitation patterns might be altered by CC. Analysis by the Intergovernmental Panel on Climate Change (IPCC) using global circulation models projects that East Africa will likely become wetter, particularly during the rainy seasons⁶. Greater rainfall has been observed during the short rains of October to December, and the long rains of March to April are increasingly unreliable in locations such as Eastern Province⁷.

16. **Economic losses triggered by disasters in Kenya can hamper poverty reduction efforts and threaten advances in shared prosperity.** An increasing share of Kenya’s poor live in urban areas, up from 14 percent in 2005/06 to 23 percent in 2015/16. Historical factors underpinning land ownership have led to urban land market distortions and, today, these markets are having difficulty supporting sustainable urbanization. In addition, there is low technical capacity to enforce and to build resilient infrastructure. Evidence of this is the proliferation of substandard buildings with poor services and insufficient infrastructure, with the collapse of more than 26 buildings in the last 20 years. Equally important is the exposure of urban areas to moderate seismic risk, due to the East African Rift running through west Kenya and fault lines that are present south of Mombasa. The interventions in this project are aimed at reducing vulnerability in poor urban settlements to disaster and climate risks and to catalyze economic growth, improving the livelihoods of the most vulnerable. This will support the sustainability of development programs and the Government’s efforts to reduce extreme poverty and boost shared prosperity.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

To improve access to basic services and tenure security of residents in participating urban informal settlements and strengthen institutional capacity for slum upgrading in Kenya.

Key Results

- People provided with improved urban living conditions under the project, by gender
- People benefiting from enhanced security of tenure under the project
- Number of counties where next generation of County Integrated Development Plans (CIDPs) include slum upgrading strategies which incorporate key elements of the national strategy and KISIP1 experience

⁴ Kenya Post Disaster Needs Assessment 2008-2011 Drought

⁵ UNDP (2012): Climate Risks, Vulnerability and Governance in Kenya: A review.

⁶ Boko, M et al (2007). Climate change: Impacts, adaptation and vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.

⁷ Awuor, C. (2009). Increasing drought in arid and semi-arid Kenya. In J. Ensor & R. Berger (Eds.), Understanding climate change adaptation: Lessons from community-based approaches



D. Project Description

Component 1: Integrated settlement upgrading (IDA US\$120 million; anticipated US\$40 million from AFD for infrastructure works)

17. **KISIP2 has built on the lessons learned from KISIP1 and has combined tenure regularization and infrastructure into one integrated upgrading approach.** This approach aims at saving both money and time, ensuring better coordination between the two interventions in a settlement and deepening the project's overall impact on the participating communities by supporting tenure regularization and infrastructure upgrading in the same communities. Thus, two main interventions have been identified under this component: (i) tenure regularization; and (ii) infrastructure upgrading. Settlements will benefit from one or both interventions depending on the initial condition of the settlement.

Subcomponent 1.1: Tenure regularization (IDA US\$30 million)

18. **This subcomponent will finance the chain of activities required to regularize tenure for people living on uncontested public lands.** In Kenya, the regularization process is (i) development of a local physical plan for the settlement which lays out land parcels and infrastructure (roads, drainage, walkways, etc.); (ii) surveying with physical placement of beacons (pegging) to demarcate the parcels as per the plan; (iii) preparation and issuance of letters of allotment based on the survey plan; and finally (iv) issuance of titles. A census and socio-economic survey will support the preparation of the plan and provide the foundation of the socio-economic inclusion activities under component 2. Climate resilient principles will be followed in the planning exercise as informal settlements are sometimes in low-lying, environmentally sensitive areas. The planning process will identify these sensitive areas and residents living in these areas will be resettled. As the infrastructure (drainage, etc.) can be designed only after tenure regularization is completed, regularization is important to realize climate resilience within the settlement.

19. **The subcomponent will follow the experience of KISIP1 to minimize displacement of residents in planning.** Based on the KISIP1 experience, the Government is now following an 'adoptive' planning⁸ approach to minimize displacement of residents in informal settlements. Adoptive planning is an approach that lays out infrastructure and plots in close alignment with the existing layout of the settlement. For example, adoptive planning permits roads that are four meters wide, rather than the standard nine meters. These one-way roads allow access to emergency and other vehicles, while also minimizing the displacement that would occur if roads of the standard width were constructed. Under KISIP1, adoptive planning has reduced displacement by up to 85 percent in some settlements, compared with what would have occurred had the normal standards been applied. It is expected that use of the adoptive approach in KISIP2 will result in minimal displacement.

⁸ Adoptive planning is a term developed by the Government of Kenya in response to the KISIP1 experience where the extent of displacement from using standard planning standards were found to be extensive. Adoptive planning is an approach that **adopts** to the prevailing situation in the affected settlement and emphasizes parcel boundaries and road widths that adhere as much as possible to the existing situation on the ground. For example, in standard planning regulations, a road size would be planned to a width of 9m. Application of these standard regulations in informal settlements would lead to massive impacts and displacements and prohibitive compensation and replacement costs. Adoptive planning introduces flexible standards including one-way roads of 4m to provide for adequate accessibility while reducing the impacts. Under KISIP1, adoptive planning has reduced displacement in some cases upto 85%.



20. **The component will assess the feasibility of providing direct tenure security to tenants given the high number of tenants versus structure owners in some urban informal settlements.** The experience from a community upgrading project in the highly-densified Huruma settlement in Nairobi will provide a starting point. Here, tenure regularization has been conceptualized as a continuum, starting from administrative recognition (in this case, an MoU between the communities and the City Council at that time) to legal titling. The simple recognition of the informal settlement by relevant authorities reduced the fear of eviction which provided confidence for the communities to organize themselves, establish collective savings, and invest in more permanent housing. This project also incorporated both the structure owners and tenants. A study will be done to determine the impact of slum upgrading on tenants in both KISIP1 and non-KISIP1 settlements. Under KISIP1, renters were included as beneficiaries of the infrastructure upgrading and KISIP2 will continue to do so.

21. **The component will also experiment on a pilot basis to enhance tenure security for informal settlements on private land.** The focus in KISIP1 was on settlements on public land but a many poor settlements in Kenya are on private land. While the KISIP2 cannot intervene directly on private land, it is envisioned that mechanisms piloted by NGOs can also be tried in KISIP2, and if proven successful, can be scaled up through the project. For example, Nairobi City County together with Akiba Mashinani are piloting a legal approach to providing tenure security to residents of Mukuru kwa Njenga, a large slum in Nairobi that sits on private land. There are a few examples in the Coast region in Kenya.

Component 1.2: Infrastructure Upgrading (IDA US\$90 million; anticipated US\$40 million from AFD)

22. This subcomponent will finance feasibility studies, detailed engineering designs, bidding documents and works that have been prioritized by settlement residents. Resettlement Action Plans (RAPs) and Environmental and Social Impact Assessments (ESIAs) that arise from these designs will be developed at this stage.

23. **The subcomponent will support the same types of investments in KISIP1 settlements and there is a pipeline of ready investments from KISIP1.** The investment menu will continue to include: roads, bicycle paths, pedestrian walkways, street and security lighting, vending platforms, solid waste collection and settlement sorting, stormwater drainage, water and sanitation systems, public parks, and green spaces. The menu will also include investments related to prevention of crime and violence, including but not limited to community centers. Like the first phase of KISIP, the second phase will support an integrated package of investments to comprehensively upgrade settlements. KISIP1 has financed the preparation of detailed designs and bidding documents for upgrading plans for a number of settlements. These settlements will be subjected to the eligibility criteria and those that qualify will ensure that KISIP2 is able to provide relatively quick and high-impact results.

24. **Under KISIP2, most of the infrastructure will contribute to climate resilience.** Under KISIP1, 83% of the financing for infrastructure went to roads & drainage (one contract; all roads had drainage on either one side or both sides of the road); 11% went to water supply and sanitation and 6% went to floodlights. It is expected that KISIP2 funds will be similarly allocated ensuring that most of the financing for infrastructure will be towards climate resilient infrastructure. Additionally, counties who benefitted from high-mast lighting have requested for energy efficient options in KISIP2 as the cost of keeping the lights on has been high⁹. KISIP2 will be implementing

⁹ In Mombasa, each mast is costing approximately KES 13,000-15,000 (US\$130-150) per month. Nakuru spends approximately KES 18 million (US\$ 180,000) per month on all its street lighting.



energy efficient options in lighting.

25. **The subcomponent will have substantial climate change adaptation and mitigation co-benefits.** All settlement roads will be designed and constructed to take into account changing climate conditions, thus ensuring connectivity and enabling communities to recover more rapidly to disruptions caused by climatic conditions. In the dry seasons, the paved surface will also reduce dust and its consequences on the settlement population. Many informal settlements are susceptible to flooding during the two annual rainy seasons (March-May and October-November) as they are often situated in low-lying areas. Rainfall is expected to increase in frequency and intensity due to climate change, thus the improved drainage infrastructure will also provide climate change adaptation benefits. Pedestrian footpaths will provide climate change mitigation co-benefits as they will promote a modal switch to alternative transportation and will enable pedestrian mobility, resulting in reduction of emissions from vehicular traffic. Water supply and sanitation infrastructure will mitigate the expected impact of increasing frequency of droughts. Finally, the project will also include energy-efficient street lighting, which has significant climate mitigation co-benefits. Counties have been requesting this switch to energy-efficient sources of electricity.

26. **Eligibility.** Criteria to determine eligible settlements under this component have been developed to ensure that the work has a high impact. The criteria are developed to ensure that the project has maximum impact for the targeted beneficiaries. Counties with eligible settlements will be expected to demonstrate county readiness.

27. **Given the anticipated scale of the unmet need and possible oversubscription, KISIP2 is developing a formula to allocate infrastructure funds to eligible settlements.** The key principle of the formula is that the chosen infrastructure investments are economically justifiable. Key variables of this formula are the cost per capita or per hectare, settlement population (from 2019 National Census), poverty index, and other data that contribute to justifying the economic viability and ensuring maximum impact on targeted beneficiaries. The formula will be in place by negotiations.

28. **The cost of the investment per capita and per hectare for infrastructure varies from settlement to settlement.** The KISIP1 averages conceal a wide variation in unit cost¹⁰. Initial analysis indicates that population density plays a major role in the cost/capita in a settlement. Deeper analysis on the underlying causes for the variation for cost/ha is underway. This analysis will be utilized to further develop the formula to allocate funds to eligible settlements. The formula will ensure that the funds are used to provide maximum impact to beneficiaries.

Component 2: Socio-economic inclusion planning (IDA US\$10 million)

29. **This component will finance activities to enhance social and economic inclusion.** The census and socio-economic survey done during planning in component 1 will provide the foundation of the socio-economic inclusion activities under this component. Community development plans will be prepared to identify together

¹⁰ The cost per capita for infrastructure ranges from a low figure of US\$35/capita for Nairobi to maximum of US\$600/capita for Machakos. The cost of the investment per hectare varies from settlement to settlement depending on the size of the settlement. The lowest cost per hectare was for Eldoret (US\$11,100/ha), and the highest (US\$ 772,472.31/ha) for Embu. The cost per density ranges from US\$ 400/people/ha for Embu to US\$ 153,000/people/ha (Eldoret2).



with the communities their socio-economic needs and then address how best the needs can be met. These plans will determine activities that will take place in new or existing community centers and will also determine how best to raise awareness on the benefits of public spaces and green zones and how to provide these within the settlements. Vulnerable community members will be prioritized as key beneficiaries in these plans. This component will be implemented only in settlements undergoing infrastructure upgrading so as to provide both socio-economic and infrastructure benefits to the same community.

30. **As financing will be limited in the project, these community-level socio-economic plans will focus on increasing access to opportunities (e.g. job skills training) rather than financing the opportunities themselves.** Through county social development and community development officers, the project will link vulnerable community groups, including those at risk of violence, to existing World Bank and government safety nets programs. Capacity building of county community and social development officers will be done to strengthen their ability to link settlement populations to existing opportunities. Social infrastructure identified through planning could be financed under component 1.

31. **The component will identify beneficiaries who fit the eligibility criteria of government programs but are excluded because they have limited participation in normal development activities, may lack adequate political representation and/or have limited awareness of the existence of these programs.**¹¹ Government programs ensure that gender and disability inclusion is built into their eligibility criteria and the component will follow the same criteria to identify potential beneficiaries. Collecting data to determine eligibility criteria for these projects would form a core part of the community census/enumeration questionnaire. In target informal settlements, KISIP 2 will identify young people who (a) qualify for training and work experience in the formal and informal sector (b) require startup financing; managerial and entrepreneurial skills; business-start up grants, business development services, and exposure and networks for starting and growing a business and link them to KYEOP. The project will also identify households in target informal settlements that qualify to (a) receive the nutrition-sensitive cash transfer, (b) be registered in National Safety Net Programs of the country and KISIP will work with the Kenya Social and Economic Inclusion Project (P164654).

32. **Select CSOs would also be used to supplement the development and implementation of the socio-economic inclusion plans.** CSOs with a track record in socio-economic interventions targeting elderly, orphans, disabled, at-risk youth will participate in this component. Among others, the roles of these CSOs would be facilitating the drawing up of socio-economic plans, supporting the implementation of identified socio-economic activities, and piloting any innovative community economic activities.

33. **The component will also finance a community-based solid waste management (SWM) mechanism.** Based on the KISIP1 experience, SWM requires a concerted focus when upgrading settlements. The community-based solid waste management (SWM) mechanism will focus on raising community awareness on settlement-level SWM practices, the refuse collection obligations of communities and the income-generating potential of SWM. Previous experience indicates that a key part of the SWM solution will be youth groups leading the collection within settlement as a revenue generating activity. Supporting SWM had both climate adaptation and mitigation co-benefits. Further, capacity development will primarily focus on organizing communities in drainage

¹¹ Some alignment of the KISIP census and socio-economic survey instruments to the programs' Harmonized Targeting Methodology (HTM) tool is envisioned, followed by registration of beneficiaries identified by KISIP2 in the safety nets' Single National Registry.



stretches committees, community-led collection and management of waste and the O&M of drainage infrastructure.

34. **The component will also support crime and violence mapping activities.** Participatory crime and violence mapping will be done to identify hotspots so that investments are made in infrastructure to make hotspots safer (such as in energy efficient lightings, gates, rehabilitation of public spaces, and others following the principals of crime prevention through environmental design (CPTED). Investment in facilities such as community centers, as sites for where programs on youth skills development and conflict mediation, could be considered. In KISIP1, a pilot on crime and violence prevention was conducted which applied the CPTED methodology to conduct a participatory mapping of safety and security in Kayole Soweto. There is strong demand from the client for scaling up the experiences from the Kayole Soweto pilot, and on World Bank experience in other countries, and integrating into the infrastructure intervention in KISIP2 settlements.

35. **This component will monitor the employment of local labor.** In KISIP1, contractors employed local labor from within the settlement for unskilled tasks and this practice will continue in KISIP2. Vulnerable and unskilled members of the community will be prioritized under this arrangement. This serves to provide income for households, transfer of skills and help the local community in understanding operation and maintenance of upgraded infrastructure. In KISIP1, unskilled laborers included both men and women and in some settlements there were more women than men employed.

36. **Community capacity building and awareness raising will be a focus of this component.** The SECs and GRCs at settlement level have proven to be fundamental institutions in the implementation of KISIP1. Beyond SECs and GRCs, community capacity building will focus on planning literacy, county-community engagement and solid waste management. Providing hard infrastructure is not sufficient if it is not combined with awareness raising of the importance of maintaining the infrastructure. Hence, a comprehensive approach to awareness raising and communication will be applied for sustainability and realization of the benefits envisaged from the investment. The engagement of communities through informal planning studios is also envisaged to improve community understanding on aspects of planning. The component will also focus on strengthening mechanisms of engagement between communities and counties.

Component 3: Institutional capacity development for slum upgrading (IDA US\$15 million)

37. **The component will finance institutional and policy development at national and county levels.** The starting point for the Project is the review of the 2005-2020 National Slum Upgrading and Prevention Strategy which was started with UN-Habitat. Once finalized, the component will finance the development of county-specific slum upgrading and prevention strategies. The strategies will identify measures to ensure that climate resilience principles are followed, such as ensuring that people living in environmentally hazardous areas are relocated. These strategies will go into the County Integrated Development Plans (CIDPs) as an Annex in order to attract county funding. Other interventions such as developing financing mechanisms for slum upgrading at county level, and developing strategies to plan for urban growth, prevent crime and violence and to ensure adoptive planning in informal settlements will also be supported. Informal settlement growth will be addressed in strategies developed under this component.

38. **The component will develop a capacity building plan for national and county levels to implement the Strategy.** The capacity building in this component will, firstly, enhance understanding of the national policy and



strategy. Second, it will enhance county capacity to improve their capacity to lead the implementation of slum upgrading. The upgrading process will be embedded into county systems in order to help counties in O&M and general informal settlement management and upgrading. A key focus will be building the capacity towards climate resilient planning when upgrading settlements.

39. The component will also support technical assistance, training, workshops and learning events, experience sharing and peer-learning activities with other counties, and other capacity building activities aimed at enhancing the ability of national, county, and community teams to exercise their roles and responsibilities. Safeguards, fiduciary and contract management capacity building/support will also be provided. Capacity building plans for each level of government will be developed.

Component 4: Program management and coordination (IDA US\$5 million)

40. This component will finance activities of the NPCT and the CPCTs related to national and county-level project management and coordination, including planning, surveying, engineering, fiduciary (financial management and procurement), safeguards compliance and monitoring, monitoring and evaluation (M&E), and communication and community development.

41. **A communication strategy will also be developed in this component.** Communications expertise from the onset is needed to facilitate internal and external information flow; communicate objectives and achievements, inspire behavioral change, ensure adherence of World Bank's Disclosure Policy and feedback gathering. The Project will develop and deploy within six months of effectiveness a comprehensive communications strategy designed to address all important issues identified that might affect project implementation, considering all stakeholders in the public and private sectors, beneficiary communities, civil society, and the media to ensure consistency of messages to targeted audiences. To strengthen communications capacity of both levels of government to carry out their communications responsibilities, the NPCT will prepare a capacity building plan for communications focal persons which will be integrated in the overall project capacity building plan.

E. Implementation

Institutional and Implementation Arrangements

42. **The Project will be implemented through institutional arrangements at the national level and county level.** The division of responsibilities between the national and county levels is laid out in the 2010 constitution which stipulates that the national and county governments should conduct their affairs in consultation and with coordination. It confers the higher authority to formulate national policies on the national government, while the implementation of the policy as well as of core urban planning and development functions are devolved to the sub-national level. The lead implementor for each activity is assigned according to the legal and policy framework of the country, beginning with the Constitutional mandates of county and national governments. Annex 1 provides a breakdown of the lead implementor by activity with the associated legal and policy underpinnings. Counties have specific mandates relevant to the Project's objectives and activities, such as basic services delivery and planning.

43. **National-level roles and responsibilities.** The SDHUD will have the overall project implementation responsibility. SDHUD has established a Project Coordination Team (NPCT) which is a continuation of the KISIP1



PCT and is composed of a Project Coordinator, a Financial Management Specialist, a Procurement Specialist, a Monitoring and Evaluation Specialist, technical specialists in planning, surveying, engineering, and community development, Communication Specialist, Social Safeguards Specialists, and Environmental Safeguards Specialists.

44. The NPCT will provide technical assistance and advise to counties to perform in accordance with the Bank policies and guidelines and will lead the coordination, capacity building and backstopping of the interventions. The SDHUD will consolidate the planning and budgeting of funds by counties and will trigger disbursement of funds to the eligible county governments once conditions have been met. Further, the SDHUD will be responsible for compiling interim financial reports and quarterly progress reports, based on inputs from the counties. SDHUD will liaise closely with the Council of Governors (CoG) in order to ensure effective coordination and communications with county governments. While planning and infrastructure provision are county functions, the consultancies for tenure regularization, preparation of detailed engineering designs and supervision of works will cut across multiple counties and therefore will be procured and coordinated by the NPCT and implemented jointly with the CPCTs. This approach will ensure efficiency gains and economies of scale in consultancies. Activities in component 2 and 3 will also be procured and coordinated by the NPCT and implemented jointly with counties. Implementation of component 4 activities will be shared between NPCT and CPCT. Water Works Development Agencies and water utilities may also play a role in implementation of water and sanitation subprojects.

45. **County-level roles and responsibilities.** Counties will sign a county participation agreement to participate in the project. Each participating county is required to establish a County Project Coordination Team (CPCT), reporting to the CEC in charge of urban and/or housing. This team will comprise of a Coordinator, a Financial Management Specialist, a Procurement Specialist, a Monitoring and Evaluation Specialist, technical specialists in planning, surveying, engineering, and community development, Social Safeguards Specialists, and Environmental Safeguards Specialists. The team should consist of full-time focal persons from the relevant departments. Counties that have participated in KISIP1 also have county project coordinators, which are likely to form the core of strengthened teams for implementation of KISIP2. However, counties will also have substantially increased responsibilities under the proposed Project and many are likely to need technical assistance and advise to perform in accordance with the Bank policies and guidelines, which will be provided by NPCT.

46. The CPCT will be responsible for day-to-day coordination of the county-level project activities, working closely with relevant offices of the county to implement county-level activities supported by the project. Infrastructure works will be procured and implemented by the CPCTs with technical assistance and quality assurance provided by the NPCT. The CPCT will implement the environmental and social safeguards instruments, and be responsible for monitoring, reporting and disseminating information about the Project (including contract awards, physical and financial progress of works contracts, and so on). The transition period prior to commencement of KISIP2 will be used to build the capacity of the counties in procurement, FM, Safeguards and induction into slum upgrading approaches and lessons learnt in KISIP1.

47. **A Steering Committee (PSC) will be established to provide overall strategic guidance and project supervision.** The Project Steering Committee will be chaired by the Principle Secretary (PS) of Housing and Urban Development, and it will comprise PS of Treasury and Chair of the Council of Governors. The Steering Committee will meet on an ad-hoc basis and will be responsible for reviewing the workplans from the counties and reviewing whether settlements and counties have met the required criteria to become eligible for KISIP2 financing. The



KISIP2 Project Coordinator will act as the Secretariat to the Steering Committee.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

KISIP2 will support investments in infrastructure and services in urban informal settlements. The proposed project activities are consistent with activities implemented under KISIP 1 and will comprise of subprojects that have potentially moderate environmental and social risks. The investments will be bound by a settlement footprint and incorporate and settlements not conforming to adoptive planning to minimize displacement will not be selected. Thus, land acquisition is unanticipated. All counties are eligible to participate (no selection has been conducted yet) but some may not meet the criteria required to participate. Additional information on the overall geographical and physical characteristics relevant to safeguards will be elaborated once the counties are identified. Potential impacts are expected to be site-specific, largely reversible, and readily addressed through mitigation measures. Developing ESIA/ESMPs and RAPs will be based on the readiness of the designs for each investment and the capacity to manage programmatic ESIA at County level considered in conjunction with capacity to monitor contractors' ownership of the site-specific ESMPs. Detailed eligibility criteria will be established to ensure that the work has high impact. A Stakeholder Engagement Framework (SEF) has been prepared to improve community ownership of project activities. The SEF was disclosed in-country on November 16, 2019 and by the Bank on November 27, 2019. The locations are expected to be in urban areas that can be often densely populated, poorly managed and with limited or no basic services. Project investments shall be designed to (1) avoid locations which are prone to natural disasters or cause adverse impact on natural environment and human health (e.g. locations on wetlands and landslides); and (2) incorporate such vulnerabilities into the design. Design solutions (with corresponding budget provisions) include (a) set up and management of riparian zones, where applicable; (b) establishment of waste management arrangements to support sustainability of project infrastructure; and (c) provisions for safety of the project activities during construction and operation (e.g. security barriers, community sensitization, etc).

G. Environmental and Social Safeguards Specialists on the Team

Svetlana Khvostova, Environmental Specialist
Adrian Howard Cutler, Social Specialist
Raymond Simon Maina Kirwa, Social Specialist



SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>As settlements and sites for these interventions are not fully identified or details of sub-project interventions that may have negative environmental impacts are not yet available, a framework approach has been adopted for safeguards during project preparation.</p> <p>However, it is expected that the specific infrastructure investments to be taken up in the selected informal settlements may have some negative environmental impacts depending upon the type of infrastructure to be implemented. While the impacts of community-led settlement planning and upgrading interventions are expected to be largely beneficial, some minor to moderate impacts may occur during the construction phase which are mostly site-specific and can be avoided or minimized through modifications in the design and diligent implementation of project safeguards instruments. Once investments are identified, the Environmental and Social Impact Assessment (with ESMP) will be carried out, consulted upon and publicly disclosed.</p> <p>An overall project-specific Environmental and Social Management Framework (ESMF) has been prepared and details the mechanisms for screening, assessment, and management of environmental and social issues related to the project. The ESMF for KISIP1 was rewritten to reflect the change in design and scope of KISIP2 and incorporating lessons learned from KISIP1. Additional coverage of emerging issues (including the topics suggested) was included in the document.</p> <p>The ESMF includes provisions requiring that settlement-specific Environmental and Social Management Impact Assessments and Management Plans (ESIA/ESMPs) be prepared as required per GoK regulations and the World Bank's OP 4.01. The appropriate regulatory clearances shall be obtained prior to commencement of any works. The</p>



		preparation of ESIA/EMPs will be by integrated package of investment similar to KISIP1.
		The ESMF was disclosed in-country and by the Bank on November 28, 2019.
Performance Standards for Private Sector Activities OP/BP 4.03	No	The project is fully financed by the Bank and GoK counterpart financing. Private sector activities and financing not envisioned.
Natural Habitats OP/BP 4.04	No	Natural habitats are not expected to be impacted by the project. However, any projects that would affect natural habitats are not eligible for funding under this project, based on the result of subproject screening, per the exclusion criteria delineated in the ESMF.
Forests OP/BP 4.36	No	None of the project components and/or activities will be near forests or potentially affect forest resources or their management since all projects will be located in settled urban areas.
Pest Management OP 4.09	No	The project components and/or activities will not involve purchase or use of pesticides or finance any activities that could lead to use of pesticide or pest management practices.
Physical Cultural Resources OP/BP 4.11	Yes	There are no known physical cultural resources in anticipated project areas, as the project is located in informal settlements, however ESMF and ESIA documents will include a “chance find” procedure to guide any cases of discovery of PCRs during civil works. The policy is triggered, as the project involves construction and excavations and soil movement, and there may be a chance of finding physical cultural resources. During the first phase of the KISIP project there were no chance finds during implementation of the project works.
Indigenous Peoples OP/BP 4.10	Yes	As selection of sites for project intervention is not complete, the confirmation of the IPs presence and potential impacts both positive and adverse on them is yet to be finalized. Consequently, measures to manage such impacts will be done upon site identification. In anticipation of this, the project has prepared a Vulnerable and Marginalized Group Framework (VMGF) to apply relevant aspects of OP 4.10 should sites with VMGs be selected.



		The VMGF was disclosed in-country and by the Bank on November 21, 2019.
		Whereas displacement of people for infrastructure development will be avoided to the extent feasible, resettlement, displacement and adverse impacts on vulnerable communities is likely. To mitigate this, the PCT and the participating counties have jointly developed a Resettlement Policy Framework (RPF) that incorporates relevant aspects of OP 4.12 and is commensurate with the level of social risk in prospective settlements. They will also ensure that all subprojects comply with applicable national and local laws and regulations.
Involuntary Resettlement OP/BP 4.12	Yes	During implementation, effort will be made to ensure application of 'adoptive standards' regulations in informal settlements. This will lead to decreased impacts and displacements. For any cases when resettlement, loss of access to resources or economic displacement and livelihoods loss is unavoidable, the project will prepare and publicly disclose a RAP or ARAP, guided by the project RPF. The RPF will be disclosed prior to appraisal.
		The RPF was disclosed in-country and by the Bank on December 10, 2019.
Safety of Dams OP/BP 4.37	No	Dam related activities not envisioned in the project scope of activities
Projects on International Waterways OP/BP 7.50	No	None of the project components and activities involves potential international water rights issues
Projects in Disputed Areas OP/BP 7.60	No	No project component or activities envisioned in disputed areas. Proposed criteria for selection of settlements for KISIP 2 interventions and screening reports eliminates any settlement in disputed areas.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

Overall, KISIP2 the project is envisioned to improve the environmental and socio-economic conditions of the selected informal settlements. The project will support investments in infrastructure and services in urban informal settlements. Proposed project activities have potentially moderate environmental and social risks . Potential impacts



are expected to be site-specific, largely reversible, and readily addressed through mitigation measures. The project will apply the framework approach to safeguards instruments since the exact locations and site-specific details of activities and scope of works will not be identified at the time of appraisal. Investments will be bound by each settlement footprint and settlements not conforming to adoptive planning to minimize displacement or investments with negative impacts on natural habitats will not be selected.

The impact of labor influx and risks of gender-based violence (GBV) including sexual exploitation and abuse (SEA) is assessed as low to medium, based on the predominantly urban sites, proposed scope of works, and relatively high absorption capacity. Whereas the GBV Guidance Note risk rating tool identified the risk of SEA for the project as 'low risk', the risk of SEA being aggravated by higher expandable incomes in informal settlements cannot be ignored. Activities to mitigate these risks include (a) contractor's contractual obligations to prepare and enforce code of conduct for workers addressing their conduct in the workplace and vis-a-vis the community; (b) strengthening two separate Grievance Redress Mechanisms to effectively handle SEA and SH complaints respectively, (c) capacity building of KISIP NPCT on SEA; and (d) an enhanced monitoring mechanism. Activities to mitigate GBV/SEA will be built into the capacity building plan for counties.

It is unlikely that the project would affect, or benefit IP/ VMG communities as most informal settlements are located in urbanized and developed urban areas. However, once the informal settlements and subproject locations are identified based on the selection criteria, the project will verify the IPs/VMGs presence and if any, will assess the potential positive and adverse impacts and develop measures in accordance with the ESMF and VMGF.

While the nature of activities alone has (in general) moderate risks, the E&S risk will be maintained as Substantial because the specific sites and investments to be done are not yet known.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: In the long-term, the project will have positive impacts due to the improvement of basic services and infrastructure in the informal settlements. People's health quality will be improved.

Risk of economic displacement of waste pickers is low as care will be taken to retain them in the proposed in-site small scale solid waste management interventions. Economic displacement of waste pickers is therefore unanticipated although the project will enlist the help of an expert on waste pickers to ensure that this does not happen. The project will also ensure no long term impacts for vendors and other Project Affected Persons (PAPs) whose livelihoods might be impacted.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

Project investments will be selected and implemented with the view of avoiding impacts on natural habitats and minimal land take and displacement of communities, businesses and services. In some cases, the displacement of households and expropriation of land has been avoided, minimized and/or managed through a negotiated flexibility of planning standards (adoptive planning) and active community participatory planning, implementation and maintenance processes.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower



capacity to plan and implement the measures described.

Project investments shall be designed to (1) avoid locations which are prone to natural disasters or cause adverse impact on natural environment and human health; and (2) incorporate such vulnerabilities into the design. Design solutions (with corresponding budget provisions) include (a) set up and management of riparian zones, where applicable; (b) establishment of waste management arrangements to support sustainability of project infrastructure; and (c) provisions for safety of the project activities during construction and operation. Following disclosure of the ESMF prior to project appraisal, the NPCT will develop an ESIA, ESMP and RAP for each of the investments once the designs are prepared, based on the investment safeguards screening.

The project will be implemented by the KISIP 1 Project Coordination Team (NPCT) that has over the years developed a good level of awareness and improved capacity to address Environmental and Social (E&S) risks. In addition, task mapping and capacity assessment of those responsible for implementation of safeguards in both the NPCT and the participating Counties is being conducted. The findings will inform measures to strengthen staffing and safeguards capacity. Whereas specific implementation modalities and institutional arrangements for KISIP 2 will be agreed and detailed in the Project Operations Manual (POM), it is essential that the Client commits to dedicated resourcing in NPCT to manage environmental and social risks.

Findings from the assessment national capacity (completed) and of county capacity (linked to site identification) will be reflected in the Project Operations Manual (POM) and capacity building plan as appropriate.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Key stakeholders for this project are project management staff, consists of KISIP NPCT and participating counties. A set of stakeholders consultations for the draft ESMF was carried out on September 26 to October 3, 2019. Participants were representatives of county governments, Council of Governors, urban practitioners, urban consultants, facilitators, and PCT staff. The prepared framework instruments have benefitted from both stakeholder and community consultations.

The requirements and provisions from ESMF, RPF and VMGF will be included into the Operational Manual which will be reviewed and approved by the Bank.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
11-Nov-2019	15-Nov-2019	

"In country" Disclosure



Kenya
28-Nov-2019

Comments

Ministry of Transport, Infrastructure, Housing and Urban Development website.

Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank
11-Nov-2019

Date of submission for disclosure
22-Nov-2019

"In country" Disclosure

Kenya
10-Dec-2019

Comments

Ministry of Transport, Infrastructure, Housing and Urban Development website.

Indigenous Peoples Development Plan/Framework

Date of receipt by the Bank
11-Nov-2019

Date of submission for disclosure
15-Nov-2019

"In country" Disclosure

Kenya
21-Nov-2019

Comments

Ministry of Transport, Infrastructure, Housing and Urban Development website.

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes



OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?

NA

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

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APPROVAL

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Country Director:	Camille Lampart Nuamah	15-Dec-2019