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

Appraisal Stage | Date Prepared/Updated: 10-Jul-2017 | Report No: PIDISDSA19960
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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</thead>
<tbody>
<tr>
<td>Kenya</td>
<td>P160083</td>
<td>Kenya Secondary Education Quality Improvement Project</td>
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<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<td>28-Sep-2017</td>
<td>Education</td>
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<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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<tr>
<td>Investment Project Financing</td>
<td>National Treasury</td>
<td>Ministry of Education, Teachers Service Commission</td>
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Proposed Development Objective(s)

The project development objective (PDO) is to improve student learning in secondary education and transition from primary to secondary education, in targeted areas.

Components

(a) Component 1: Improving quality of teaching in targeted areas
(b) Component 2: Improving retention in upper primary school and transition to secondary school in targeted areas
(c) Component 3: System reform support
(d) Component 4: Project management, coordination and monitoring and evaluation

Financing (in USD Million)

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<thead>
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Total Project Cost

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<th>Amount</th>
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<tr>
<td></td>
<td>200.00</td>
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Environmental Assessment Category

B - Partial Assessment

Have the Safeguards oversight and clearance functions been transferred to the Practice Manager? (Will not be
B. Introduction and Context

Country Context

1. **Kenya is a lower-middle income country in East Africa. It is the economic and transport hub of the sub-region, with a diverse young population.** Kenya attained the lower-middle income status in 2014. The country’s Gross Domestic Product (GDP) has recently seen expansion, with particularly strong performance in the services sector, enhanced construction, and increased public investment in energy and transport, although agriculture still accounts for about one third of GDP and three quarters of the labor force.¹ The population is estimated to be 46 million, covering an area of 582,646 km², with 70 percent 30 years or younger. At the current population growth rate, the country is adding about 1 million to its population annually.

2. **Kenya has experienced a considerable decline in poverty in the past decade, but progress has been uneven and inequality remains high.** Between 2006 and 2016, poverty measured against the official national poverty line is estimated to have dropped from 46 to 36 percent. However, economic gains have not spread evenly across the country, with severe incidence and depth of poverty in many of the Northern and North Eastern counties. Many of these disadvantaged counties have arid and semi-arid climate, and some of those adjacent to international borders are also subject to cross-border insecurity linked to terrorist groups, violence and internal conflicts arising from competition for resources and land issues.

3. **Medium-term growth prospects remain in line with recent experience, with strong momentum required to achieve Kenya’s Vision 2030.** In the short term, economic growth may be negatively affected by the ongoing drought and weak credit expansion exacerbated by interest rate controls. However, in the medium term, the benefits of completed infrastructure projects, renewed fiscal consolidation, reduced recurrent spending after the 2017 elections, and continuing structural reforms are expected to encourage private investment and improve GDP growth to an annual rate of 6 percent. In order for Kenya to achieve the goal of upper-middle income status, as laid out in its Vision 2030, it is essential that the country strongly build on these medium-term growth prospects. It is encouraging that Kenya ranked among the top 5 countries with the greatest improvement in performance on the Doing Business indicators in 2015/16. The establishment of a new and independent Ethics and Anti-Corruption Commission is also expected to support stronger governance, enforcement of laws and regulations, and public investment management.

¹ Economic Survey 2017
4. **Kenya puts human resource development at the center of its development strategy.** The social pillar of Vision 2030 has ‘investing in the people of Kenya’ at its core, along with a commitment to addressing issues of access, equity, quality, and relevance of social service delivery. The government targets an increase in the country’s Human Development Index from 0.47 in 2005 to 0.7 in 2030, and places great emphasis on education as the primary means of economic development, social mobility, and national cohesion. The focus on education is key to addressing the high rate of unemployment and under-employment estimated at around 40 percent, which is a critical challenge in the economy and society.

5. **Kenya’s Vision 2030 conveys the country’s clear commitment to education and training.** Its Social Pillar singles out the education and training system as a vehicle to drive Kenya's efforts towards becoming an upper-middle income economy. Consequently, the country's five-year Medium Term Plans have highlighted education as a top priority. Public spending on education has been sustained at close to 6 percent of GDP, or a quarter of its total national budget on education for the last 5 years. To improve access, quality and equity of education, the Government of Kenya (GoK) has introduced new legal and institutional policy frameworks covering basic education, technical/vocational education and training, university education, and science and technology during the past four years, which complement earlier Acts establishing Universal Free Primary Education and Free Day Secondary Education (FDSE). A National Education Sector Plan (NESP 2013/14 - 2017/18) has been formulated to underpin the investments and policy reforms that are required to achieve Vision 2030 education priorities.

6. **Kenya has made good progress in primary education completion and transition to secondary education compared to many other sub-Saharan African countries, and this progress can be accelerated if remaining inequalities in education are addressed.** Kenya’s current school education system comprises 2 years of early childhood education (ECD), 8 years of primary and 4 years of secondary. Students take the Kenya Certificate of Primary Education (KCPE) examination at the end of primary school, and the Kenya Certificate of Secondary Education (KCSE) examination at the end of secondary school. Participation in ECD increased from a net enrollment rate (NER) of 56 percent in 2009 to 52 percent in 2016. The primary school NER was 89 percent in 2016, and the transition rate from primary to secondary was 81 percent, a remarkable improvement from 55 percent in 2009. Although NER at the secondary education level was a modest 51 percent in 2016, this was an encouraging improvement from 33 percent in 2009. A prominent issue, however, is the jump in the dropout rate at grades 7 and 8 compared to lower grades, as demonstrated in Figure 1 below. At the ECD as well as primary and secondary levels, there was little overall difference in school participation between boys and girls. Nevertheless, there was significant variation in school participation across counties, especially at the

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2 The first five-year plan (MTP-1; 2008-2012) identified two top priorities for education: (i) enhancing transition from primary to secondary education, along with retaining students in school up to age 18; and (ii) improving education quality with greater emphasis on developing students' critical thinking, communication, problem solving, digital literacy and learning to learn competencies. MTP-2 (2013-2017) expanded the education pillar to include mainstreaming Early Childhood Development and Education (ECDE) to ensure on time enrollment in grade 1 and reduce overage and repetition in the system.


4 Kenya Economic Survey 2017
secondary level. Secondary school NER in 2014 was below 15 percent for the bottom 5 counties, while it was above 80 percent for the top 5 counties, out of 47 counties. (Disaggregate statistics are not yet available for 2015 and 2016). Importantly, gender disparity in school participation is concentrated in the most educationally disadvantaged counties.

7. **Kenya has also made investments in improving quality and learning outcomes at the primary level; nevertheless, achievement on basic skills appears low in relation to countries in other regions.** For example, at the lower primary level where school access is universal, Kenyan students have attained language and math scores that have ranked among the top of sub-Saharan African (SSA) countries on regional-scope assessments and surveys such as the four Southern and Eastern Africa Consortium for Monitoring Educational Quality (SACMEQ) assessments during 1998-2014, and the Service Delivery Indicators (SDI) survey of 2012. Kenyan primary-school teachers have similarly shown better content and pedagogical knowledge than their regional peers. Yet, 66 percent of Kenyan urban adults performed at level 1 or below out of a scale of 5 levels on the Skills toward Employability and Productivity (STEP) reading proficiency test in 2015, indicating very rudimentary skills which were lower than their peers’ in 6 of the other 7 low- and middle-income countries surveyed in South East Asia, Eastern Europe and Latin America.

8. **At the secondary level, Kenya does not participate in international learning assessments such as TIMSS (Trends in International Mathematics and Science Study) or PISA (The Program for International Student Assessment), but national assessment data indicate deficiencies and inequities in learning outcomes.** For example, the 2014 national Monitoring Learner Achievement (MLA) assessment at Form 2 found that, in mathematics, almost 90 percent of students did not have minimum competency in algebra and geometry, and about 30 percent did not have minimum competency in measurement, numbers and statistics. The
Form 2 MLA also revealed remarkable variation in student achievement between genders, between urban and rural areas, and across counties. Boys outperformed girls on every assessed mathematical skill on the MLA, and the share having minimum competency was at least 5 percentage points higher for boys than for girls for 7 of the 9 assessed mathematical skills. Urban students also demonstrated significantly better achievement in each assessed mathematical skill than their rural peers. In algebra, geometry and trigonometry, the share of students with minimum competency in urban areas was twice that in rural areas. Similarly, counties differed markedly on the Form 2 MLA outcomes. For example, with regards to numerical skills, less than 5 percent of students in Kwale, Tana River, Lamu, Marsabit, Garissa and Wajir had minimum competency, while the highest shares were as high as 53 and 57 percent in Baringo and Trans Nzoia, respectively.

9. **Both supply and demand-side factors contribute to inequalities in completion of primary education, and transition to and completion of secondary education, as well as in student learning outcomes.** On the supply side, the poorer counties tend to have fewer secondary schools relative to primary schools, with both primary and secondary schools more likely to lack basic infrastructure, including water and sanitation which affect girls in particular. Moreover, many teacher posts, especially in mathematics and sciences, are vacant in the poorer counties, and many of those teachers that are in place lack adequate content knowledge and pedagogical skills. In certain subjects, such as mathematics and science subjects, only a small share of teachers is female, which may pose a particular constraint to girls’ participation. Weak governance and accountability mechanisms have resulted in poor education outcomes. On the demand side, many children from poor families cannot attend boarding schools due to high school fees and cost of accommodation, and the poorest may not even have the means to attend secondary day schools due to school fees and transportation costs. Other costs include the high costs of textbooks, which are among the highest in SSA, and the implicit costs of low net returns to education due to low teaching and learning quality. Girls may also be constrained by unfavorable social expectations and opportunities related to mathematics and science subjects. Many girls in the most educationally and economically disadvantaged areas are furthermore subject to early marriage and motherhood.

10. **Recent reforms introduced by GoK provide the opportunity to improve quality and redress inequalities in education.** Gender equity has been enforced in all education programs. Re-entry policy has also been enforced to address dropout cases of young mothers who enter motherhood while in school. FDSE has improved access particularly in rural and marginalized areas. In addition, GoK through the Constituency Development Fund (CDF) continues to provide bursaries. Education is an area of focus in the 2016 National Policy for the Sustainable Development of Northern Kenya and other Arid Lands, which is supported by the Ministry of Education (MoE) in the most recent strategic plan by means of infrastructure investments and scholarships. Moreover, as part of the Digital Learning Program, GoK is in the process of providing electricity to all public primary schools through connection to the grid or micro solar systems, and plans to provide the same to public secondary schools. In addition, in 2016, a landmark 4-year Collective Bargaining Agreement was negotiated for the first time between the Teachers Service Commission (TSC) and the teachers’ unions. The agreement provides a basis for constructive dialogue and prevention of loss of school days due to teacher strikes, as well as for improved governance and accountability in school-level service

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5 The Digital Learning Program is one of the key flagship programs of the Government of Kenya. The main aim of the program is to integrate ICT into teaching and learning in primary schools. The program components include: improvement of ICT infrastructure, development of digital content, and capacity building of the teachers and procurement of ICT devices.
delivery through expansion of career paths for teachers in public service, standardization of basic pay and benefits for every job, and institutionalization of annual teacher performance management and evaluation.

11. **In line with the Sustainable Development Goals, GoK intends to provide a compulsory 9-year basic education cycle, and also revise the school curriculum moving to a competency-based curriculum (CBC).** The government is reorganizing the education structure from the current 2+8+4 to a 2+6+3+3 system.\(^6\) The reorganization of the system will require mapping of schools and teachers, and a detailed assessment of available and required infrastructure and teachers. Implementation of the new CBC, which is a major shift from the current teacher-centered and content-based one, will require skills and knowledge upgrading for teachers; capacity building for school managers, national and sub-national education administrators (under MoE, TSC, and affiliated agencies); development of new teaching-learning materials; and institutionalization of new student assessment systems to replace the current examinations system. The CBC will be rolled out in a phased manner, starting with the lower grades and expected to be completed by 2025 for the whole basic education cycle.

### C. Proposed Development Objective(s)

**Development Objective(s) (From PAD)**

The project development objective (PDO) is to improve student learning in secondary education and transition from primary to secondary education, in targeted areas.

**Key Results**

### D. Project Description

12. **The project incorporates lessons from many countries on measures to improve education quality, with a focus on gender and socio-economic equity, including evidence from the latest comprehensive meta-analysis of education impact evaluations in developing countries.**\(^7\) The critical factors that have been found to contribute to improved student learning are: (i) teachers having requisite content knowledge and pedagogical skills; (ii) addressing accountability and incentive issues in teacher management so that teachers are deployed where required and effectively use instructional time; (iii) a “structured pedagogy” approach, defined as a package of teacher training, ongoing teacher support, resources for teachers, and learning materials for students, all of which are well-aligned with each other; (iv) a learning environment, including appropriate class size, that enables all students to engage in learning; (v) adequate and timely provision of learning preparations or remediation to students; and (vi) an appropriate curriculum, with regular assessments that are linked to expected curricular outcomes. The project also explicitly addresses\(^6\) The current 2+8+4 system includes 2 years of pre-primary, 8 years of primary (6 years of lower primary and 2 years of upper primary) and 4 years of secondary education (comprising Forms 1 to 4). The proposed new structure 2+6+3+3 includes 2 years of pre-primary, 6 years of primary, 3 years of lower secondary and 3 years of higher secondary.

\(^7\) This meta-analysis (Snistviet et al., 2015) indicates that interventions targeted at the school and teacher, as well as “multi-level” interventions, have the greatest impact on improving learning in SSA countries.
the educational and socio-economic needs of students, especially girls, at risk of dropping out at the end of the primary cycle to facilitate their transition to secondary school, as well as during secondary school to improve their chances of completing basic education.

13. The project comprises the following components and sub-components.

(a) Component 1: Improving quality of teaching in targeted areas:
   (i) Sub-component 1.1: Reducing teacher shortage
   (ii) Sub-component 1.2: Enhancing teacher professional development
   (iii) Sub-component 1.3: Provision of textbooks

(b) Component 2: Improving retention in upper primary school and transition to secondary school in targeted areas:
   (i) Sub-component 2.1: Improving school infrastructure
   (ii) Sub-component 2.2: Improving retention in upper primary school and transition to secondary school of poor and vulnerable learners

(c) Component 3: System reform support
   (i) Sub-component 3.1: Development and introduction of a Competency Based Curriculum
   (ii) Sub-component 3.2: Strengthening of National System for Monitoring Learning Progress and national examination

(d) Component 4: Project management, coordination and monitoring and evaluation
   (i) Sub-component 4.1: Project management, coordination, and communication
   (ii) Sub-component 4.2: Research, and monitoring and evaluation

E. Implementation

Institutional and Implementation Arrangements

14. The implementation arrangements of SEQIP have been designed keeping in mind the lessons learnt from other externally-funded projects and capacity needs of MoE for planning, management and monitoring and evaluation.

15. For SEQIP, at the National level, MoE in general, and the State Department of Basic Education, in particular, will be responsible for the overall project delivery. The Principal Secretary (PS) in-charge of the State Department of Basic Education, who is also MoE’s accounting officer, will have the primary responsibility for efficient and effective implementation of the project for achievement of the stated development objectives. All the key decisions, including financial and procurement, related to the project implementation will be vested with the PS.

16. A PSC chaired by the Education Cabinet Secretary, which is already functioning well for the GPE-PRIEDE Project and USAID and DfID funded TUSOME Project, will continue to play the same role for SEQIP. The PS, Basic Education, functions as the Secretary of the PSC. The PSC includes key MoE directorates such as Policy, Planning, Basic Education, Secondary Education, Quality Assurance, School Audit, ICT, and Chief
Finance and Chief Procurement Officers, Chief Executive Officers of KNEC, KICD, TSC, other senior officials, and the chair of the Education Development Partners Core Group. The PSC will provide strategic direction to the project, endorse the AWPB, ensure effective coordination among the implementing agencies at the national level for smooth implementation, review the implementation progress, and resolve any policy and coordination issues requiring high level interventions. The PSC will normally meet once in a quarter, but can be convened by the Chair as and when required.

17. The DPC&D will be directly responsible for SEQIP implementation. The Directorate is expected to be well positioned to forge inter-departmental, inter-institutional and inter-Ministerial coordination and convergence. The core functions of the DPC&D are: (i) preparation of the AWPB, and present it to the PSC; (ii) coordination with the National Treasury and Central Bank of Kenya and MoE’s internal Finance Department for timely flow of funds; (iii) submit withdrawal applications to the Bank for timely disbursement; (iv) ensure compliance with fiduciary and safeguard requirements of the projects; (v) plan and organize need based capacity building activities for MoE officials using project funds; (vi) conduct assessments and policy research; (vii) carry out necessary monitoring and evaluation under the project in a timely manner; and (viii) prepare and implement communication strategy for communicating with internal and external stakeholders regarding the project. The DPC&D will be appropriately empowered by the PS to take all day-to-day decisions required for the Project implementation.

18. SEQIP will involve several agencies, both autonomous and semi-autonomous, in implementation of project activities, as mentioned in the Project Description (Annex 2) in the project appraisal document (PAD). The key implementing agencies are: TSC (an autonomous agency), KNEC, KICD and CEMASTEA, which are semi-autonomous agencies. TSC will be responsible for implementation of Sub-components 1.1 and 1.2; MoE through DPC&D will be responsible for implementation of Sub-components 1.3, 2.1, 2.2, and Component 4; KICD and KNEC will be responsible for implementation of Sub-components 3.1 and 3.2 respectively. However, inter-agency coordination and collaboration is critical for implementation of the project for achievement of the PDO. The DPC&D will work closely with the respective agency for ensuring necessary coordination and collaboration. Each agency will designate a high level competent staff as the Project Focal Point. The Project Focal Point person will be assisted by some designated officials, including finance officer, accountant and procurement officer.

19. The county and sub-county education offices will play a key role in facilitating and monitoring project implementation at the school level. At the county level, the existing County Project Coordination Unit (CPCU), each having a County Project Coordinator, set up under the GPE PRIEDE Project will be responsible for facilitating SEQIP implementation and monitoring. SEQIP will support CPCUs with relevant operational costs. The CPCUs will coordinate with MoE following the well-established mechanisms under GPE PRIEDE. The TSC county and sub-county offices will work along with the CPCU for implementation of activities related to alleviation of teachers shortage and teachers professional development.

Note to Task Teams: The following sections are system generated and can only be edited online in the Portal.
F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The proposed project will target the 30 counties in Kenya namely Baringo, Bomet, Busia, Elgeyo Marakwet, Garissa, Homa Bay, Isiolo, Kajiado, Kakamega, Kilifi, Kisii, Kitui, Kwale, Laikipia, Machakos, Makueni, Mandera, Marsabit, Migori, Muranga, Nandi, Narok, Samburu, Taita Taveta, Tana River, Tharaka-Nithi, Turkana, Wajir and West Pokot.

G. Environmental and Social Safeguards Specialists on the Team

Lilian Wambui Kahindo, Ben Okindo Ayako Miranga

SAFEGUARD POLICIES THAT MIGHT APPLY

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<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>The project is assigned as a category B Partial Assessment- on the assumption that no major civil works will be funded and no physical or economic displacement will take place. The following project related activities are likely to result in environmental and social impacts, they are (a) new physical infrastructure that includes (i) construction of the additional classrooms, science laboratories, multi-purpose rooms/libraries, dormitories, toilets, water facilities in secondary schools (ii) construction of toilets, water facilities and replacement and of highly unsafe structures in primary schools (iii) construction of a modern training Centre and (b) procurement of ICT equipment and (c) potential installation of micro solar PV system for lighting schools, and these could result in environmental risks and social impacts, although the impacts are reversible, localized, and easily and cost effectively mitigated. Because the specific locations and sites for implementing these activities are not yet known at this stage of project preparation, the Borrower has prepared an Environmental and Social Management Framework (ESMF) which has been consulted upon, reviewed and cleared by the Bank, disclosed in country and in the World Bank InfoShop.</td>
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### The Policy on Natural Habitats (OP/BP 4.04)

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<td>Natural Habitats OP/BP 4.04</td>
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The Policy on Natural Habitats (OP/BP 4.04) is not triggered as none of the proposed works has the potential to cause significant conversion or degradation of the natural habitats, whether directly or indirectly. The ESMF has provided detailed procedures to screen subprojects for potential adverse environmental and social impacts, and to take measures to avoid, minimize and mitigate impacts on natural habitats. Project funds will not finance any activities that could result in adverse risk to ecologically sensitive, fragile ecosystem and natural habitats.

### Forests OP/BP 4.36

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### Pest Management OP 4.09

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### Physical Cultural Resources OP/BP 4.11

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<td>Physical Cultural Resources OP/BP 4.11</td>
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Subprojects may involve excavation activities which can lead to impacts on physical and cultural resources. Although, the project has no foreknowledge of any potential cultural and historical sites or resources of significance, it has incorporated “Chance Find” provisions in the Environmental and Social Management Framework (ESMF) to ensure that the appropriate preventive and mitigation measures are formulated and executed in the event any such physical cultural resources are encountered during project implementation.

### Indigenous Peoples OP/BP 4.10

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<tr>
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The OP 4.10 was triggered because groups that meet criteria of WB OP 4.10 are present in the project area.

A vulnerable and marginalized framework was prepared that provide for the screening and review of sub projects with a view to ensuring that (a) VMG affected by the project receive culturally appropriate social and economic benefits in a manner that is gender, disability, and inter-generationally inclusive; (b) When potential adverse effects on VMG are identified, those adverse effects are avoided, minimized, mitigated, or compensated for; and (c) Opportunities are taken to document collected data within the affected area for future VMG project activities (inclusive of demographics associated with women, youth, persons with disabilities, children,
and older persons.

This VMGF for the Kenya Secondary Education Quality Improvement Project (SEQIP) has been prepared by the borrower (Government of Kenya) based on the requirements of OP 4.10 of the World Bank and the applicable National and County laws and regulations of the Government of Kenya.” The VMGF will guide the preparation of the specific vulnerable and marginalized groups plans (VMGPs) of the SEQIP sub-projects that may affect VMGs in the proposed project counties.

The primary beneficiaries of the project will be pupils drawn from grades 7 and 8; and students who will be identified from 110 sub counties in 30 counties nation-wide. A key principle of the project, is targeting and inclusion – for every pupil in grades 7 and 8 will have three text books: science, mathematics and English while the students will have five text books each: chemistry, physics, biology, mathematics and English. And therefore, the Vulnerable and Marginalized Groups Framework (VMGF) will focus on how to ensure that these categories of beneficiaries are aware of the project, involved in decision-making and fully participate through the free prior informed consultation (FPIC) principle leading to broad community support.

Project counties, and schools will screen for the VMGs using a participatory methodology and the FPI Consultation principle; then undertake a Social Assessment/audit and formulate VMGPs that are specific for the needs of the various VMGs. The VMGF was regionally consulted upon in 10 sampled counties, a national disclosure workshop was held on June 30, 2017 while in-country disclosure was done on July 7, 2017 (http://education.go.ke/index.php/downloads/category/29-announcements).

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<th>Involuntary Resettlement OP/BP 4.12</th>
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The project will not involve land acquisition leading to involuntary resettlement or restrictions of access to resources and livelihoods. All planned constructions or expansion activities will be limited.
to existing schools and land that is owned by the MoE and held in trust by the School Board of Managements (BoMs). No land acquisition will be undertaken under this project.

<table>
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<th>Safety of Dams OP/BP 4.37</th>
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<td>Projects on International Waterways OP/BP 7.50</td>
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<td>Projects in Disputed Areas OP/BP 7.60</td>
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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:

The project will deliver positive impacts to the benefiting schools communities, it will result in improved access to education and provision of quality education with required facilities. The positive impacts of the projects include connection to grid electricity and potential connection to micro solar PV systems would replace lighting systems that are either fossil fuel-based such as diesel generators and kerosene lamps or woody biomass, which are detrimental to the biophysical environment. The Project will also provide water and sanitation facilities that will go a long way to improve the public health in the targeted schools and reduce communicable diseases among the school going children. There are practically no risks to landscapes and ecology during operation. On the social side, the project will result on increased attendance, retention and completion of the girl child in the schools more so in the marginal counties where negative cultural practices such early marriages have hampered the progress of the girl child in the country, and the illiteracy levels are high than the average national levels.

The following project related activities are likely to result in environmental and social impacts, they are (a) new physical infrastructure that includes (i) construction of the additional classrooms, science laboratories, multi-purpose rooms/libraries, dormitories, toilets, water facilities in secondary schools (ii) construction of toilets, water facilities and replacement of highly unsafe structures in primary schools (iii) construction of a modern training centre and (b) procurement of ICT equipment and (c) potential installation of micro solar PV system for lighting schools, and these could result in environmental risks and social impacts, although the impacts are reversible, localized, and easily and cost effectively mitigated.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

The project targets improved infrastructure for both primary and secondary schools in targeted counties that are considered deficient of good infrastructure, the project will lead to increased access to education for both the upper primary and secondary going children, in the long term it will result in increased access to education, increased retention and completion rates among school going children and more persons playing meaningful role in the socio economic development of the Country. Specifically, some of the main risks associated with this project are (a) potential beneficiaries have little knowledge about the social support and scholarship programs and (b) nepotism in the selection of eligible candidates for the programs. To mitigate the first risk, the MoE will develop and implement a communication strategy to disclose information on the programs to all the stakeholders/beneficiaries in the targeted
sub-counties and schools, drawing on the extensive grassroots network of the MoE’s partner agencies for this project. With respect to the second risk, mitigation measures include identification of eligible candidates by the implementing agencies (IAs) through a rigorous community-based selection process, validation of selected beneficiary households against the single registry for cash transfers, and establishment of a grievance redressal mechanism to address complaints about program processes.

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

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.

The Borrower has prepared the Environmental and Social Management Framework (ESMF) and the Vulnerable and marginalized groups framework (VMGF) in a participatory and consultative manner. These safeguards instruments will establish a process of environmental and social screening and will guide the MoE to identify, assess and mitigate the environmental and social impacts of subproject investments. Both frameworks (ESMF and VMGF) also determine the institutional measures to be taken during implementation, including capacity building activities to ensure environmental and social impacts are identified and assessed and that mitigation measures are incorporated in the designs and implementation of subprojects including providing for the screening and review of sub projects with a view to ensuring that (a)VMG affected by the project receive culturally appropriate social and economic benefits in a manner that is gender, disability, and inter-generationally inclusive.

Capacity to manage safeguards issues will be built at the DPC&D as the implementing entity in the MoE. A capacity assessment conducted on the MoE for planning, designing, implementing, and monitoring of the safeguards has revealed standards to be inadequate. In this regard, the World Bank has recommended that the MoE recruits environmental and social safeguards experts to support the DPC&D in the implementation of the project.

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

The preparation of the safeguard instruments has involved extensive consultations involving the relevant key stakeholders that include: the national level participants in the education sector, county governments, local communities and Non-Governmental Organizations active in the education sphere, minutes of stakeholder meetings and discussion points have been included as annexes in the safeguard instruments. The project potential positive and negative impacts, as well as mitigation measures were explained to the stakeholders. Both frameworks (ESMF and VMGF) were regionally consulted upon in 10 sampled counties, a national disclosure workshop was held on June 30, 2017 while in-country disclosure was done on July 7, 2017 (http://education.go.ke/index.php/downloads/category/29-announcements).
B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

**Environmental Assessment/Audit/Management Plan/Other**

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<thead>
<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Date of receipt by the Bank</th>
<th>Date of submission to InfoShop</th>
<th>For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors</th>
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"In country" Disclosure

| 07-July-2017 |

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**Indigenous Peoples Development Plan/Framework**

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"In country" Disclosure

Kenya

07-July-2017

Comments

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

**OP/BP/GP 4.01 - Environment Assessment**

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

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

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

**OPS_PCR_COMP_TABLE**

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

OPS_IP_COMP_TABLE

OP/BP 4.10 - Indigenous Peoples

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

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

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?

OPS_PDI_COMP_TABLE

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank's Infoshop?

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?

All Safeguard Policies

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

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

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

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
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| Task Team Leader(s): | Issa Thiam  
Nalin Jena |

Approved By

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