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**MINISTRY OF EDUCATION
STATE DEPARTMENT FOR BASIC EDUCATION**

DIRECTORATE OF PROJECTS COORDINATION AND DELIVERY

**KENYA SECONDARY EDUCATION EQUITY AND
QUALITY IMPROVEMENT PROGRAM
(SEEQIP)
(P501648)**

**DRAFT STAKEHOLDER ENGAGEMENT PLAN
(SEP)**

(MAY, 2024)

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ABBREVIATIONS

A-ESRS	Appraisal Environmental and Social Review Summary
AEPs	Accelerated Education Programmes
ASALs	Arid and Semi-Arid Lands
BETA	Bottom-up Economic Transformation Agenda
BOM	Board of Management
CAJ	Commission on Administrative Justice
CB	Capacity Building
CBA	Competency-Based Assessment
CBC	Competency-Based Curriculum
CBOs	Community-based Organizations
CEMASTEA	Centre for Mathematics and Science and Technology Education in Africa
CKA	Centralized Kitchen Approach
COG	Council of Governors
CoK	Constitution of Kenya
CSACs	Community-based Scholarship Selection Advisory Committees
CSOs	Civil Society Organizations
DLI	Disbursement Linked Indicator
DOSH	Directorate of Occupational Safety and Health
DPCAD	Directorate of Project Coordination and Delivery
DQAS	Directorates of Quality Assurance and Standards in
DRS	Directorate of Refugee Services
EARCs	Educational Assessment and Resource Centers
EMCA	Environmental Management and Coordination (Amendment) Act
ESA	Environmental and Social Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
FBOs	Faith-based Organizations

FDE	Free Day Secondary Education
FDSEs	Free Day Secondary Schools
FGDs	Focused Group Discussions
FPE	Free Primary Education
GBV	Gender-based violence
GoK	Government of Kenya
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IAs	Implementing Agencies
ICTA	Information and Communication Technology Authority
IP	Indigenous Peoples
IPF	Investment Project Financing
IPs	Indigenous Peoples
JKF	Jomo Kenyatta Foundation
JS	Junior School
JSS	Junior Secondary Education
KEMI	Kenya Education Management Institute
KEPSHA	Kenya Primary Schools Heads Association
KESSHA	Kenya Secondary Schools Heads Association
KICD	Kenya Institute of Curriculum Development
KISE	Kenya Institute of Special Education
KNCHR	Kenya National Commission on Human Rights
KNEC	Kenya National Examination Council
KNUT	Kenya National Union of Teachers
KPEELP	Kenya Primary Equity in Learning Program
KPIs	Key Performance Indicators
KPSA	Kenya Private Schools Association
KUPPET	Kenya Union of Post Primary Education Teachers (KUPPET)
LCBS	Low-cost Boarding Schools
MCAs	Members of the County Assembly
MoE	Ministry of Education
NACONEK	National Council for Nomadic Education in Kenya
NCPWD	National Council for Persons with Disabilities
NEMA	National Environmental Management Authority

NEMIS	National Education Management Information System
NESSP	The National Education Sector Support Plan
NGEC	National Gender and Equality Commission
NGOs	Non-government Organizations
NPGD	National Policy on Gender and Development
NSC	National Steering Committee
OOSC	Out-of-School Children
PAI	Project Area of Influence
PAPs	Project Affected Areas
PCU	Project Coordinating Unit
PDO	Program Development Objective
PEELP	Primary Education Equity in Learning Program
PforR	Program-for-Results Financing
PIU	Project Implementation Unit
PforR	Program-for-Results
PTCTs	Projects Technical Coordinating Teams
PWDs	Persons living with Disabilities
RAs	Result Areas
SAGA	Semi-Autonomous Government Agencies
SEA	Sexual Exploitation and Abuse

SEA-H	Sexual Exploitation, Abuse, and Harassment
SEEQIP	Secondary Education Equity and Quality Improvement Program
SEP	Stakeholder Engagement Plan
SEQIP	Secondary Education Quality Improvement Project
SH	Sexual Harassment
SIPs	School Improvement Plans
SME	Sciences, Mathematics and English
SMP	School Meals Program
SMS	Short Message Service
SOPs	Standard Operating Procedures
TA	Technical Assistance
ToRs	Terms of References
TSC	Teacher Service Commission
TTCs	Teacher Training Colleges
UNHCR	United Nations High Commissioner for Refugees
USAID	United States Agency for International Development
VMGs	Vulnerable and Marginalized Groups
WASH	Water, Sanitation and Hygiene
WB	World Bank
WFP	World Food Programme

EXECUTIVE SUMMARY

Education is a key enabler of the Bottom-up Economic Transformation Agenda (BETA) with a target to address inequalities in the country's education system to benefit all children irrespective of their backgrounds, and to provide adequate human capital that is responsive to the demands of the labor market. Specifically, the BETA priorities and capital projects in the education sector include expansion of infrastructure, training on digital skills, funding of Junior School (JS) learners, reforming higher education funding model, expansion of school feeding programme and the operationalization of the Open University of Kenya. The reforms and programs in basic education are the launch of Free Primary Education (FPE) in 2003 and Free Day Secondary Education (FDE) in 2008, the rollout of the Competency-Based Curriculum (CBC) and Competency-Based Assessment (CBA) in 2017, and the implementation of a 100 percent transition policy from primary to secondary education.

It is against this backdrop that the Government of Kenya (GoK) through the Ministry of Education (MoE), is embarking on the Kenya Secondary Education Equity and Quality Improvement Program (SEEQIP) [herein the Program], with support from the World Bank [herein the Bank]. The Program will be supported through a hybrid Program-for-Results Financing (PforR)¹ and Investment Project Financing (IPF)². The Program Development Objective (PDO) is to improve equitable access to quality secondary education, and strengthen systems for delivering equitable education outcomes through three key result areas, that is; (i) expand equitable access to quality Junior Secondary Education (JSS); (ii) improve teaching quality in Junior School; and, (iii) strengthen systems for equitable service delivery in secondary education (Junior School and Senior School in January 2026).

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a roadmap for stakeholder engagement, including public information disclosure and consultation, throughout the entire Program cycle. This SEP for the proposed SEEQIP has been prepared to establish a functioning platform for effective interaction and meaningful consultations with potentially affected parties and persons, who have interests in the implementation, and outcomes of the operation. With the conviction that effective stakeholder engagement is a prerequisite for the smooth implementation of the Program, the SEEQIP shall build trust with stakeholders through engagements on intervention activities, solicit feedback on implementation whilst managing beneficiaries' expectations and interested parties, on outcomes.

The SEP has reviewed existing policies, legal and regulatory frameworks; the Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, of the World Bank's Environmental and Social Framework

¹ World Bank, Program-for-Results Financing (PforR), available at: <https://www.worldbank.org/en/programs/program-for-results-financing>

² World Bank, Investment Project Financing (IPF), available at: <https://www.worldbank.org/en/what-we-do/products-and-services/financing-instruments/investment-project-financing>

(ESF); outlined previous stakeholder engagement activities; and categorized the identified stakeholders into various groups including the Vulnerable and Marginalized Groups (VMGs) and Indigenous Peoples (IPs). A summary of the Program and responsible persons, procedures, and mechanisms to ensure meaningful consultations and timely disclosure of information has also been outlined.

In addition, the SEP has proposed to leverage the existing grievance redress mechanism (GRM) for the Secondary Education Quality Improvement Project (SEQIP) P160083, which offers stakeholders an opportunity to seek and receive grievance redress, and strengthen Program's team to identify, track, resolve and refer eligible grievances, thereby enhancing program's efficiency. Resources required for implementing SEP activities for the whole Program lifecycle have been included in the SEP. The SEP also lays out a monitoring mechanism to ensure effective implementation of the activities and to enable the program to take corrective measures if required. This SEP is a "living document" and will be periodically updated.

1. INTRODUCTION

1.1. Background

1. The Kenya Secondary Education Equity and Quality Improvement Program (SEEQIP) builds on the ongoing objectives and interventions under the Kenya Secondary Education Quality Improvement Project (SEQIP P160083), and Kenya: Primary Education Equity in Learning Program (KPLEEP, P176867) Operations. The Program aims to address gaps in secondary education under the existing National Education Sector Strategic Plan (NESSP II, 2023/2024 to 2027/2028). Specifically, three of the NESSP II sub-programs covered include the Sector Governance and Accountability and Cross Cutting and Contemporary Issues (aspects related to secondary education); Teacher Education, Professional Development; and, Management and Secondary education.
2. The Key challenges that the Program aims to address include; disparities in access and gender disparities in secondary school participation; fast growing number of students transition to secondary education; significant number of refugee children, out of school children, and children with special needs; teacher shortages; low learning achievements in secondary education particularly in Sciences, Mathematics and English (SME); gender disparities in performance and attendance; key reforms not institutionalized; inability of schools to meet basic operational costs; national level system needs to expand with quality and equity; and, weaknesses in service delivery for children with special needs.
3. The Program will aim to support enhancing conditions to absorb the growing demand of secondary education, with targeted interventions for the most vulnerable population groups including Special Needs children, refugees' children, children from Arid and Semi-Arid Lands (ASALs), and those in informal settlements and other remote locations.

1.2. Program description

4. The Proposed Kenya Secondary Education Equity And Quality Improvement Program (P501648) emphasizes on result-oriented strategies and aims to improve equitable access to quality secondary education, improve teaching quality, strengthen systems and capacities of relevant oversight institutions to improve overall policy implementation and service delivery.
5. The Program Development Objective (PDO) is to improve equitable access to quality secondary education, and strengthen systems for delivering equitable education outcomes.

Progress towards the PDO will be measured through the following PDO indicators:

- i. Retention rate of learners in Junior Schools in target Counties (Percentage, disaggregated by gender, refugees, and host communities). (DLI).
- ii. Transition rate of learners from Junior School to Senior School in target Counties (Percentage, disaggregated by gender, refugees, and host communities). (DLI).
- iii. Average learner test score in integrated Science, Mathematics and English at Junior school, Grade 8, in targeted Counties. This indicator includes sub-indicators on subject-specific baselines and targets for test scores, and disaggregated by boys/girls, refugees, and host communities.

- iv. Share of teachers in Junior School who master the subject matter content and pedagogy in Science, Mathematics, and English. (DLI).
6. The SEEQIP comprises the following Result Areas (RAs) for the Program: (A)RA 1: Expand equitable access to quality Junior School; (B) RA 2: Improve teaching quality in Junior School; and (C) RA 3: Strengthen Systems for equitable Service Delivery in Secondary Education (Junior and Senior Schools).

Result Area 1 (RA 1): Expand equitable access to quality Junior and Senior School Education (JS). The primary focus of this RA is to support the development of improved school conditions to allow for increased enrollment and retention in Junior schools (JS), and better conditions for effective delivery of the Competency-Based Curriculum (CBC) and Competency-Based Assessment (CBA), in JS, including for refugee learners following an expert’s review that highlighted key gaps of the CBC and CBA under the Presidential Working Party on Education Reform (PWPER, 2023³). This intervention builds also on the ongoing interventions under Kenya Primary Education Equity in Learning Program (PEELP) which includes registering of camp-based refugee schools in the National Education Management Information System (NEMIS) and advancing dialogue for full integration of refugee learners in the public education systems through the proposed Shirika Plan. The specific interventions in this RA aim to address critical gaps in school infrastructure through:

- Expanding infrastructure development to support CBC roll out in Junior and Senior School including: minimum essential facilities (permanent classrooms, laboratories and WASH facilities) in target Free Day Secondary Schools (FDSEs)⁴; pilot infrastructure expansion⁵ in 10 existing low-cost boarding schools (LCBS) in ASAL areas; and rehabilitation of selected schools affected by heavy rains and flooding events of April and May 2024.
- Provision of core textbooks and teachers’ guides aligned with the revised and consolidated learning areas for CBC.
- Support for camp-based JS during the transition period to the Shirika plan through School grants to finance school improvement plans (SIPs), school meals, Advocacy, mentorship, and social support.
- Reduce percentage of Out-of-School Children (OOSC) in selected ASAL Counties by expanding about 10 existing low-cost boarding schools (LCBS) to target learners from counties with the highest OOSC.
- Improving access to education for children with special needs and disabilities including in JS, by enhancing the capacity of the Kenya Institute of Special Education (KISE) and its network of 10 regional Educational Assessment and Resource Centers (EARCs).

Result Area 2 (RA 2): Improve teaching quality in Junior School This area focuses on a set of interventions aimed at addressing key aspects of teacher professional development and management to optimize teacher utilization and meet the specific needs of all students, including those with special needs and refugees. The Program will support;

- Reinforcement mastery of subject matter content and improved pedagogies for Integrated Science, Mathematics and English, for 78,000 teachers teaching JS.
- Scaling up lesson livestreaming initiative to mitigate impact of teacher shortage, including in regions facing security challenges and lack of access to schooling due to climate events. Targets scaling up the livestreaming intervention from 12 pilot to an additional 200 satellite free day secondary schools.

³ PWPER report 2023

⁴ All FDSE schools in refugee host communities in Turkana and Garissa Counties will be targeted

⁵ Improvements in infrastructure will entail a minimum essential package including school fencing, classrooms, WASH, and boarding facilities, all of which will be climate resilient

- Upgrading teaching and learning conditions in 35 Pre-service Teacher Training Colleges (TTCs) conducting pre-service teacher training for JS as well as primary school teachers. Based on a needs assessment, the interventions will include WASH infrastructure expansion, removal of asbestos roofing materials and installation of rainwater harvesting facilities. The intervention will also pilot a scholarship program for teacher trainees from poor and vulnerable households in Mandera, Wajir, Garissa and Turkana to join the TTCs in these Counties;
- Further supporting teacher management following roll out of the CBC reforms and the associated changes in the education structure.

Result Area 3 (RA 3): Strengthen Systems for Equitable Service Delivery in Secondary Education (Junior School and Senior School in January 2026). This RA complements key system level interventions in basic education under the PEELP such as the CBC and CBA reforms, data management, transition of the scholarship administration at the Jomo Kenyatta Foundation (JKF), teacher management, and policy dialogue on refugee education. This intervention therefore prioritizes strategic further systems strengthening and institutional building to improve equitable service delivery for all learners in secondary education including refugee learners. Specific RA interventions are:

- Institutionalizing ongoing reforms to ensure majority of learners have access to equitable and quality secondary education through development of a Sessional Paper and the associated draft Basic Education Bills⁶ by MoE.
- Establishment of an e-assessment resource center at the Kenya National Examination Council (KNEC) in line with reforms in CBA
- Strengthening Directorates of Quality Assurance and Standards in Basic Education (DQAS), and School Audit (DSA).
- Aligning Accelerated Education Programmes (AEPs) to the CBC and CBA reform
- Initiate transition to clean cooking energy and a sustainable national School Meals Program (SMP). This intervention proposes to introduce at MoE a Centralized Kitchen Approach (CKA) for the SMP in three major urban cities with the highest number of learners, including learners from the informal settlements and refugees (Kisumu, Nakuru and Eldoret).

Further details on the Program description are included in the Program Appraisal Document.

1.3. Program beneficiaries

7. The proposed operation will target the following beneficiaries:
 - i. Approximately 1,867,488 (929,561 girls, 937,927 boys) learners in 19 counties⁷ in the two bottom quintiles to consolidate and scale up targeted interventions in secondary education to these lagging regions.
 - ii. About 78,000 teachers teaching in Public Junior schools
 - iii. About 19,956 headteachers in JS (4,810 females)
 - iv. Over 24,200 teacher trainees (67% female, 33% Male) in pre-service teacher training colleges.
 - v. About 20, 300 refugee learners in camp-based Junior Schools.
 - vi. About 14,390 learners enrolled in the Accelerated Education Programs (AEPs).

⁶ Basic Education Bills will anchor information on tree planting in all schools nationwide and include instruction and learning expectations on climate education and climate concepts in school subjects as appropriate and in line with the Kenya Climate Change Amendment Act 2023

⁷ The Counties in the two bottom quintiles are: Wajir, Mandera, Turkana, Garissa, Samburu, Siaya, Bungoma, Bomet, Kisii, Narok, Tana River, Elgeyo Marakwet, Baringo, Migori, Laikipia, Kitui, Kericho, Embu, and Meru.

1.4. Program Management

8. The Ministry of Education (MoE) and the Teacher Service Commission (TSC) are the main implementing entities. MoE will implement the Program with support from relevant Semi-Autonomous Government Agencies (SAGA) agencies including the Centre for Mathematics and Science and Technology Education in Africa (CEMASTEA), Kenya Education Management Institute (KEMI), National Council for Nomadic Education in Kenya (NACONEK), Kenya Institute of Curriculum Development (KICD), Kenya National Examinations Council (KNEC), Jomo Kenya Foundation (JKF), and Kenya Institute for Special Needs (KISE). The MoE and relevant SAGAs will mainly implement RA 1 (Expand equitable access to quality Junior School), and RA 3 (Strengthen Systems for Equitable Service Delivery in Secondary Education); while TSC is the main implementor for RA 2 (Improve teaching quality in Junior School), except for pre-service teacher training in TTCs which is under MoE.
9. Key interventions at camp-based schools will be implemented in close consultation with the Directorate of Refugee Services (DRS) and United Nations High Commissioner for Refugees (UNHCR).
10. The overall strategic leadership, and implementation oversight for the Program, including the IPF Component, rests with the existing MoE's Directorate of Project Coordination and Delivery (DPCAD) and the joint National Steering Committee (NSC) for SEQIP, PEELP and USAID literacy project. The existing and functional SEQIP PCU, under DPCAD, will be expanded with additional MoE technical support to continuing overseeing day to-day implementation of the Program. The NSC is Chaired by the Cabinet Secretary or the Principal Secretary MoE, and includes Senior management from the implementing agencies (IAs), DRS, some development partners including UNHCR, representatives from the teacher's union and the head teacher's association, representatives the umbrella body for civil society organization in the education sector, among other members. The NSC shall meet quarterly and mainly ensure the Program is aligned with any changes in policy and reforms; review and approve annual work plans and budgets; ensure adequate staffing to support operations and facilitate linkages of interventions with relevant Directorates and agencies; and follow-up on implementation of key actions for fiduciary and safeguards. The Program will continue to leverage the existing Projects Technical Coordinating Teams (PTCTs) at KISE, NACONEK, KNEC, CEMASTEAs, KICD, JKF, KEMI and TSC. In addition, the MoE established county-based education project teams (composed of existing MoE and TSC staff at the lower levels) will provide close oversight to all key projects' implementation, at the targeted schools.

1.5. The Investment Project Financing (IPF) Component

11. The IPF component will cover the following key areas:
 - a) Program management, policy dialogue, communication, monitoring and evaluation, safeguards and fiduciary, and verification;
 - b) Support implementation readiness for a smooth transition from Junior School to Senior School; and
 - c) Key Technical Assistance /Consulting Services/Workshops
12. The key activities under IPF are presented in Annex 1. In addition, the IPF component will further support capacity building (CB) activities to complement the IPF component under PEELP, particularly on systems strengthening. Priority CB activities will focus on refugee secondary education, system readiness for Competency-Based Curriculum (CBC) and Competency-Based Assessment (CBA) implementation in Senior

School, climate change and education, and training of education officials on key education areas in secondary education through a three-year CB plan.

13. The IPF component of the Program, as guided by the OESRC Advisory Note Technical Assistance and the Environmental and Social Framework (2019), will include two types of technical assistance (TA): Type 2 supporting the formulation of policies, programs, plans, strategies or legal frameworks and Type 3 strengthening borrower capacity. The implementing entities will undertake adequate environmental and social assessments for all TAs, with key prevention and mitigation measures mainstreamed as consistent with the ESF.

1.6. World Bank Requirements for Stakeholder Engagement

14. The SEEQIP is being prepared under the World Bank's Environment and Social Framework (ESF) which sets out its commitment to sustainable development and mandatory requirement for financed projects. The Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, the implementing agencies will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

The main objectives of ESS10 are to:

- i. Establish a systematic approach to stakeholder engagements to assist Borrowers to identify stakeholders, build, and maintain a constructive relationship with them, particularly project-affected parties.
 - ii. Assess the level of stakeholder interest and support for the project and enable stakeholders' views be considered in project design and environmental and social performance.
 - iii. Promote and provide the means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
 - iv. Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
 - v. Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond and manage such grievances.
15. The Bank prepared an Appraisal Environmental and Social Review Summary (A-ESRS) which included information on the scope, potential risks, and impacts of the Program. The Programs' Environmental and Social (E&S) risks have been preliminary classified as Low, based on proposed interventions. The Program is expected to result in positive environmental and social impacts by reducing inequalities in access and learning achievements, in basic education. TA activities will be screened for E&S risks and impacts, and managed through embedding E&S considerations in ToRs, and robust supervision and monitoring.

2. OBJECTIVES OF THE SEP

16. The overall objective of this SEP is to define a plan for stakeholder engagement, including public information disclosure and consultation throughout the entire Program cycle. The SEP outlines the ways in which the program team will

communicate with stakeholders and includes a mechanism by which people can raise concerns, complaints or provide feedback, about program activities or any related activities.

17. Specific objectives of the SEP include;

- i. Outline stakeholder engagement requirements as provided under the national regulatory frameworks and World Bank ESF;
- ii. Provide guidance for stakeholder engagement to meet the requirements of ESS10;
- iii. Identify the most effective methods and structures for dissemination of Project information, and ensure regular, accessible, transparent, and appropriate consultations with key stakeholders including VMGs;
- iv. Map, identify, build and maintain meaningful relations with key Project stakeholders that are affected, and/or able to influence Project activities;
- v. Provide means for effective and inclusive engagement with Project Affected Areas (PAPs) and other interested parties throughout the Project cycle;
- vi. Provide PAPs with accessible and inclusive channels to raise grievances and facilitate their closure by the Project;
- vii. Identify resources needed and stipulate the timeframe for effective stakeholder engagement; and,
- viii. Define reporting and monitoring measures for periodical reviews and ensure effectiveness of the SEP.

3. POLICY, LEGAL AND REGULATORY FRAMEWORKS

18. The policies and laws provide that public participation is the process by which citizens, civil society organizations (CSOs) and government are involved in policy making, decision making, acknowledges diverse aims and values, fostering collaboration to achieve more legitimate results. The Constitution of Kenya (CoK) 2010, Article 10, requires public participation as one of the national values and principles of governance that binds all state organs, state and public officers and all persons in its application and interpretation. Article 69, 1(d) empowers the State to encourage public participation especially in the management, protection, and conservation of the environment. Chapter 4 of the Bill of Rights makes clear provisions on the rights and privileges of the vulnerable and marginalized groups. Article 56 (b) provides that the State shall provide minorities and marginalized groups with special opportunities in education. Articles 21.3, 27.6, 7, 44.2, 100 and 204 presents the minority and marginalized groups as a unique category of the Kenyan population that deserve special attention, representation, and equal access in the provision of services, including education. This is aligned to the ESFs ESS7 on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, as the Project presents an opportunity to address systemic gaps in management of social risks related to exclusion of Indigenous Peoples (IPs) and Vulnerable and Marginalized Groups (VMGs) including refugees. Kenya's development blueprint, Vision 2030, provides on good governance under the political pillar, as aligned with the CoK.

19. The National Policy on Culture and Heritage, 2009 and Kenya National Policy on Gender and Development (NPGD), 2000, advocate for enhancement of stakeholder participation

and engagement. The National Environment Policy, 2013, proposes strengthening and promotion of collaboration, cooperation, and partnerships in environmental management. The Environmental Management and Coordination Act (EMCA 1999, Amendment 2015), sets out principles of public participation in the development of policies, plans and processes for management of the environment. Specifically, Section 6 (b), mandates the submission of documentation on public involvement in the development of policies and environmental action plans. Public engagement and project information sharing are mandated by the Environmental and Social Impact Assessment (ESIA) Guidelines and Administrative Procedures during ESIA processes. Similarly, the County Government Act 2012, stipulates gender equity and minority rights must be respected in county level planning, development, resource mobilization and resources allocation.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

20. Project stakeholders are defined as people, organizations, or other entities that may be affected by Project interventions, who may have an interest or can influence its outcomes either positively or negatively. The analysis identifies the appropriate methodology for each category of stakeholders throughout the Project cycle.

4.1. Approaches to stakeholder engagement

21. In order to meet best practice approaches, the project will apply the following approaches to stakeholder engagement:
- **Openness and life-cycle approach:** Public consultations for the Program will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
 - **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
 - **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
 - **Flexibility:** If social distancing, cultural context or governance factors inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

4.2 Project Affected Parties (PAPs)

22. Project Affected Parties (PAPs) comprise persons, groups, and other entities within the Project Area of Influence (PAI) that are affected by the Project or are likely to be affected by it directly, indirectly, favorably, or unfavorably. Engagement with PAPs is key in identifying their significance and impacts in decision-making for appropriate mitigation and management measures. Effective engagements with target beneficiaries/communities will be conducted upon Program effectiveness and

sustained throughout implementation. Experiences from the SEQIP and KPEELP will be useful in accurate stakeholders profiling.

23. Specifically, the following parties fall within this category in SEEQIP: Ministry of Education (MOE); Teachers Service Commission (TSC); Kenya Institute of Curriculum Development (KICD); Kenya National Examination Council (KNEC); Centre for Mathematics, Science and Technology in Africa (CEMASTEAM); National Council for Nomadic Education in Kenya (NACONEK); Kenya Institute of Special Education (KISE); Jomo Kenyatta Foundation (JKF); Kenya Education Management Institute (KEMI); National Treasury; County Education Board; Board of Management (BOM); Kenya Primary Schools Heads Association (KEPSHA); Kenya Secondary Schools Heads Association (KESSHA); Kenya Private Schools Association (KPSA); Teachers; VMGs/IPs including Learners with Special Needs and, marginalized communities; community-based organizations (CBOs) and Civil Society Organizations (CSOs) including Non-government Organizations (NGOs) in the education sector.

4.3 Other Interested Parties

24. They include stakeholders who may not experience direct impacts from the Program. Stakeholder in this category include: i) business owners, service providers, and project suppliers of goods and materials; ii) mass media (local, regional, and national print and broadcasting) and associated interest groups; iii) contractors; iv) mainstream media. Others may also include the implementing partners such as the Information and Communication Technology Authority (ICTA), and World Food Programme (WFP), civil society organizations (CSOs) and NGOs, Development partners/ Sponsors, National Council for Persons with Disabilities (NCPWD), National Environmental Management Authority (NEMA), Ministry of Labour and Social Protection (Directorate of Occupational Safety and Health (DOSHS), Department of Social Development, Department of Children Services, Ministry of Public service, Youth and Gender Affairs, Ministry of Interior and Coordination of the National Government Functions, Ministry of Land, Housing and Urban Development (State Department for Public Works), Universities and teacher training institutions, Kenya National Commission on Human Rights (KNCHR), National Gender and Equality Commission (NGEC), Teachers Unions - Kenya National Union of Teachers (KNUT) and Kenya Union of Post Primary Education Teachers (KUPPET), Parents/ Guardians/caregivers, Publishers, Faith-based Organizations (FBOs), Council of Governors (COG), Community Based Organizations (CBOs), and Elected /Political Leaders (Senators, Members of Parliament and MCAs).

4.4 Disadvantaged/Vulnerable Individuals or Groups

25. Within the SEEQIP, vulnerable or disadvantaged groups may include persons who may be disproportionately impacted or further disadvantaged by the interventions as compared with any other groups due to their vulnerability status⁸, and those who may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Therefore, awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups should be adapted to consider such groups or individuals' sensitivities, concerns and cultural appropriateness and to ensure full understanding of the project activities, benefits and opportunities.

⁸Vulnerable status may emerge from an individual's or group's race, ethnic or social origin, national, color, gender, religion, language, political or other opinion, property, age, culture, sickness, literacy, physical or mental disability, poverty levels or economically disadvantaged, and dependence on unique natural resources.

26. In the context of SEEQIP, this category of stakeholders includes vulnerable or disadvantaged learners with the following; special needs and disabilities; from homes with a history of domestic violence and/or abuse; with a chronic illness; from homes with illiterate parents/guardians who cannot provide adequate learning support; from poor households (both urban and rural areas) with limited access to the tools being used for e-learning; from child-headed households; from homes with older persons and/or those with chronic illnesses who need additional care and support; from homes and regions with a history of child labor - they are likely to be more engaged in economic activities than remote learning; and who have been victims of early and forced marriages and teenage pregnancies; from minority clans and or indigenous groups; and Orphans and vulnerable children from low-income families.
27. Vulnerable groups within communities affected by the Program will be consulted through dedicated means, as appropriate. The SEEQIP team will obtain gender-disaggregated data, where possible, for contextualization and enhancing participation in community decision making. Meetings will be conducted in accessible locations and within flexible hours of the day to ensure their voice and opinions on Program implementation is heard and recommendations considered. Upon effectiveness, the SEEQIP shall carry out an analysis of the inclusion of disability issues through an Environmental and Social Assessment (ESA) as guided by principles underlying the ESF.
28. The SEEQIP will adopt sound mitigation measures for Program inclusivity, demonstrating good international practice. The awareness on disability issues and accommodating needs of vulnerable groups will be raised through this intervention. Measures adopted, while designed for persons with disabilities, often benefit other groups of society, as well.

5 STAKEHOLDER ENGAGEMENT PROCESS

The SEP has been developed in accordance with ESS10 requirements and serves as guidance for meaningful dialogue, informing Program interventions and facilitating that strategies, mechanisms, platforms, plans, and systems for community engagement, development, empowerment, and protection are enhanced. The SEEQIP will complement the SEQIP and KPEELP stakeholder engagement efforts to improve overall performance. In addition, the SEP will be updated as new partners and information emerges during Program implementation.

29. The SEEQIP stakeholder participation will be critical in fostering consensus, timely implementation of interventions, access to project benefits to the most deserving and monitoring and evaluation. It will also facilitate the management of potential social tensions and improve targeting and inclusion of VMGs/IPs.
30. Planning for stakeholder involvement ensures that information is relevant, timely, available to all relevant parties, and due considerations given for cultural appropriateness language, illiteracy and impairments barriers. Considerations will be accorded to regional and socio-economic disparities for targeted, meaningful, appropriate and timely engagements, as well as an effective grievance and feedback mechanism resulting in access and equity among different groups.

5.1 Summary of undertaken stakeholder engagements

31. During project preparation, the following public consultation meetings were conducted with key institutional stakeholders as indicated below in Table 1. A team comprising the MoE and World Bank Staff undertook consultations with key stakeholders at the national and county levels. The consulted stakeholders, included the relevant Government agencies, development partners and representatives from Indigenous Peoples (IP) and Vulnerable and Marginalized Groups (VMGs). During the consultations, the discussion focused on the proposed Program and gave opportunity to raise and address concerns and comment on mitigation measures relating to the impacts likely to be experienced.

			<p>implementation</p> <ul style="list-style-type: none"> Challenges impeding education and, management of grievances at community level, consideration of cultural appropriateness⁹ 	<p>of Program interventions.</p> <ul style="list-style-type: none"> Community engagement will be enhanced throughout project phases.
9 th April, 2024	Physical meeting at Kenya Institute of Curriculum Development.	<ul style="list-style-type: none"> Ministries at National level (NEMA, Social Protection, DOSH, ICT, WORLD BANK TSC KNEC KICD CEMASTE A KISE KEMI NACONEK JKF 	<ul style="list-style-type: none"> Achievements and Priorities in Basic Education Overview and Status of implementation of SEQIP project (Progress report, challenges, gaps, lessons learnt and recommendations). Overview of the proposed SEEQIP. The role of the stakeholder in implementation of Program. Capacity (human, financial, E&S management) assessment in implementation of the Program. Analysis of stakeholder targeting in facilitating inclusion and targeting of IPs/VMGs. Best practices that could be adopted in Program implementation. Systems in place for management of social conflicts and grievances. Engagement amongst stakeholders for synergy in Program implementation. 	
10 th April 2024	Virtual Meeting	Consultation with MoE Senior Management	<ul style="list-style-type: none"> Systems in place for management of emergencies and disasters in schools. 	
11 th April, 2024	Physical meeting at Kenya Institute of Curriculum Development.	47 representatives of indigenous communities.	<ul style="list-style-type: none"> Extent of compliance monitoring, evaluation, and reporting. Equitable access to benefits of existing Bank Funded Program in the proposed SEEQIP Stakeholder's technical, financial, and human resource capacity in management of environmental and social effects associated with Program activities, gaps identified and appropriate measures for strengthening proposed. 	
12 th April, 2024	Physical meeting at Kenya Institute of Curriculum Development.	Consultation with Program Implementation Units (PIUs)		

⁹ In-depth discussions on stakeholder assessments are presented in the Kenya Secondary Education Equity Quality Improvement Program Environmental and Social System Assessment (ESSA) report.

5.2 Summary of engagement methods, tools, and techniques

32. Different engagement methods are proposed and cover different stakeholder needs when selecting consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group. A variety of appropriate stakeholder engagement techniques will be used during SEEQIP implementation to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders. Table 2 indicates a list of different consultation techniques and the most appropriate application of these techniques that SEEQIP will use.

Table 2: The methods, tools, and techniques for stakeholder engagement

Stakeholder Engagement/ Information Dissemination Technique	Most appropriate technique application
Structured Agendas	Establish Boards and Committees in the targeted Project area
Correspondence by Telephone Calls / email/ Text	<ul style="list-style-type: none"> • Distribute project information multi-agencies and line Ministries, Non-governmental organizations • Invite stakeholders to meetings
Print media, social media and radio announcements <ul style="list-style-type: none"> ▪ Reports, pamphlets, newsletters, Posters, Brochures ▪ Newspaper/magazines / radio ▪ Visual presentation aids including models and videos 	<ul style="list-style-type: none"> • Disseminate project information to the public and illiterate stakeholders • Inform stakeholders about consultative meetings
One-on-one/ face to face interviews	<ul style="list-style-type: none"> • seeking views and opinions from stakeholders • Enable stakeholders to speak freely and confidentially about contentious and sensitive issues • Building relations with various stakeholders • Recording of interviews
Formal meetings	<ul style="list-style-type: none"> • Present project information to a specific group of stakeholders • Allow stakeholders to provide their views and opinions • Build impersonal relations with high level stakeholders • Distribute technical documents • Facilitate meetings using PowerPoint presentations • Record discussions, comments/questions raised and responses
Public meetings/ Community Consultations during Barazas	<ul style="list-style-type: none"> • Present project information to a large audience of stakeholders, and in particular communities • Allow the group of stakeholders to provide their views and opinions • Build relationships with neighboring communities • Distribute non-technical project information • Facilitate meetings using presentations, posters and pamphlets or project information documents. • Record discussions, comments/questions raised and responses.
Consultative Workshops <ul style="list-style-type: none"> ▪ Virtual meetings ▪ Workshops ▪ Retreats 	<ul style="list-style-type: none"> • Present project information to a group of stakeholders • Allow stakeholders to provide their views and opinions • Use participatory exercises to assist in group discussions, brainstorm on contentious issues, analyze information, and develop recommendations and strategies • Progress recording of responses

Focus Group Discussions	<ul style="list-style-type: none"> • Allow a smaller group of between 9 and 12 people to provide their views and opinions of targeted baseline information • Build relationships with the target communities • Use a focus group interview guideline to facilitate discussions • Record responses
Surveys	<ul style="list-style-type: none"> • Collect opinions and views from individual stakeholders • Collect baseline data • Documentation/ Recording of data • Develop a baseline database for continuous monitoring of impacts
Roundtable discussions	<ul style="list-style-type: none"> • Use prepared questions or collect preliminary questions to assist in group discussions • Each person is given equal chance and right to participate • Documentation of the responses
Site visit	<ul style="list-style-type: none"> • Gather opinions and observations from stakeholders through visiting targeted project site.

5.3 Plan for stakeholder engagement

33. As set out in ESS10, stakeholder engagement is an inclusive process, SEEQIP will build on the existing MoE stakeholder engagement frameworks to improve the overall Program performance. The SEP will be reviewed and updated during Program lifecycle. The plan for engagement is presented in table 3 below:

Table 3: Stakeholder Engagement Plan

Project Stage	Agenda/messages	Means of Communication	Target Stakeholders	Responsibilities
After Appraisal	Publicity on Program approval and roll out plans	<ul style="list-style-type: none"> • Audio-visual messages on Program information (radio, TV in different languages) • Newspaper stories/ supplement • Printed materials on project information • Press releases Speeches • Website • Emails 	<ul style="list-style-type: none"> • National and County government officials • Communities • VMGs and IP communities. 	MoE TSC Implementing Agencies
	Disclosure of the project documents	<ul style="list-style-type: none"> • Websites (MoE and W. Bank) • Brief summaries of the main features of the Program SEP • Audio-visual messages on Program information (radio, TV in different languages) • Newspaper stories • Social Media (twitter, Facebook, Instagram, WhatsApp) Emails • Press releases, Speeches • Mobile phone block message 	Open access to interested parties	<ul style="list-style-type: none"> • World Bank • MoE • National Treasury
During Implementation	Roll-out of direct support to learners and schools	<ul style="list-style-type: none"> • Key informant interviews with key stakeholders • Community discussions (through public meetings and call-in radio sessions) • Newsletters/ Newspaper stories/supplement • Social Media (twitter, Facebook). • TV 	Learners <ul style="list-style-type: none"> • School administrators and managers • Communities (including VMGs/IPs) • Implementing partners 	MoE Communication Expert SEEQIP PCU National Coordinator
	Update on Program process	<ul style="list-style-type: none"> • Printed materials (newsletter, flyers). • Public Baraza • Program progress reports 	All stakeholders	PS, SEEQIP /PCU/ Coordinator

	Discussions with VMGs/IPs on the Program with feedback generated	<ul style="list-style-type: none"> • Open day with VMGs/IPs • Public meetings • Call-in on radio using local languages • Rapid assessment of community Perception towards the Program activities. 	VMG/IPs	PCU Social Safeguards Specialist
	Complaints about the Program implementation	<ul style="list-style-type: none"> • Logs and reports from the national & county GRM • GRM complaints focal points in schools and county offices • Survey and direct observation of the Program beneficiaries. 	<ul style="list-style-type: none"> • Receivers of information and services • Information or data managers 	<ul style="list-style-type: none"> • SEEQIP/PCU/CPCU • Social Safeguards & Communication & GRM officer • M&E officer
Monitoring, evaluation, and reporting	Feedback of effectiveness of different channels of communication	<ul style="list-style-type: none"> • Semi-structured interviews • Online surveys • Satisfaction surveys 	Program primary beneficiaries	M&E Officer

5.4 Strategy for Inclusion of Indigenous Persons (IPs) and Vulnerable and Marginalized Groups (VMGs)

34. Based on SEEQIP stakeholder analysis, there are several IPs and vulnerable groups within the program coverage. The vulnerable groups comprise learners with special needs and disabilities, girls, vulnerable boys, the elderly and women, female headed households, PWDS and the poorest of the poor, who may be less able to participate in stakeholder engagement activities. It is essential that they are invited and given equal opportunity to participate in activities under the SEEQIP Program, in line with the requirements of the ESS10. The following measures will be applied to ensure their participation:

- i. Community-based committees (currently adopted by the MOE under the SEQIP project), for interventions such as scholarships. Accordingly, targeted communities identify their most vulnerable members through a participatory process. The selection is done through a community-based Scholarship Selection Advisory Committees (CSACs) comprising community leaders, faith-based representatives, MoE and parents' representatives. The shortlist of potential scholars is publicly disclosed at the community level for further review and feedback to ensure the most deserving needy students benefit. Stakeholder and community engagement will be key in sensitization of structures and means by which complaints and grievances related to the Program will be received, handled and addressed.
- ii. People living with disabilities will be provided with information in accessible formats. Additionally, learners will be provided with information and communication materials in a child-friendly manner.
- iii. Grievance Redress Mechanisms will be designed for identified vulnerable groups to have access to information. Affected parties will be able to submit their grievances and receive feedback as prescribed in the GRM.
- iv. Group discussions will be held with vulnerable individuals in communities where Program interventions are being undertaken ensuring their participation. The nature of group discussions will depend on the target IPs and vulnerable groups/individuals in the community. Group discussions will accommodate sensitive topics.
- v. Meetings shall be held in central locations which are easily accessible and at appropriate timings to facilitate maximum attendance without interfering with

economic and/or household activities. Meetings will be timely announced, and documents shared in advance for stakeholder's planning and participation.

vi. All information will be shared in a culturally appropriate manner. Meetings should be undertaken in language(s) understood by stakeholders and translation provided as needed. Similarly, documents will be presented and made available in hard copies, at easily accessible locations such as village offices and centers. The needs of vulnerable groups shall be considered such as the use of non-technical language and local languages (other than Kiswahili).

vii. In addition, based on stakeholder consultations held with VMGs and IPs communities, the following recommendations were proposed to enhance effective engagements under the SEEQIP:

- ❖ Ensure IPs/VMG communities are represented in the various scholarship committees.
- ❖ Ensure full involvement of parents and school management in the identification of needy students to benefit from the scholarship program. Where feasible the head teachers should be engaged in the beneficiary's identification phase as they are more familiar with the socio-economic status of the learners at school level.
- ❖ Ensure adequate sensitization of the community and parents on Program interventions such as disclosure and scholarship information.
- ❖ Adoption of an inclusive scholarship awarding strategy to accommodate candidates from VMG and IP communities. An inclusive targeting criterion will be adopted, and adjustments made to make services more acceptable to VMGs, such as, lowering the entry criteria (cut off points) may be a measure that can be adopted instead of performance ranking.
- ❖ The scholarship program should consider needy students studying in private schools as some may be sponsored. In the past, such learners have been excluded on the assumption they are from well off families.
- ❖ Solicit feedback on service delivery and the extent to which VMGs are satisfied with the benefits of the Program.
- ❖ Conduct routine monitoring of the scholarship program on progress, challenges and remedial measures adopted, for effective implementation.

35. As a standard practice, all key documents prepared under SEEQIP (for example SEEQIP SEP; relevant E&S documents; Grievance Redress Mechanism (GRM) procedures; and regular updates on program developments) will be publicly disclosed according to the constitution of Kenya and the World Bank disclosure policy to inform stakeholders and local communities on the general implication of the program. Given the interest that the SEEQIP will trigger across the country, all appropriate and acceptable disclosure pathways shall be used.

36. Distribution of the disclosure materials will be through making them available as hard copies, in institutional/school/MoE meetings, public notices, press releases, consultation meetings; information leaflets and brochures; separate focus group meetings with vulnerable groups) and National and County consultative workshops. Electronic copies will also be placed on MoE website (Program website page) for disclosure to stakeholders.

37. Program Information will be disclosed in a form and language appropriate to the relevant stakeholders and in a reasonable timeframe to allow stakeholders to process the information being communicated and raise concerns if necessary. Accountability is

required in sharing information about the project, planned activities as well as and clear procedures used in requesting for information.

5.5 Information disclosure to stakeholders

38. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance, implementation of the stakeholder engagement plan, Grievance Mechanism, and the project’s overall implementation progress. The results of the stakeholder engagement activities including results and outcomes of monitoring and evaluation of SEP implementation will be reported back to the stakeholders through website and/or formal communications. The MoE will collate all monitoring and evaluation results and produce bi-annual reports to be submitted to the World Bank. This will be part of program monitoring reports.

6 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 Resources

39. The MoE will be the main implementing entity and charged with leading the implementation of the SEEQIP SEP. Adequate budget for stakeholder engagement implementation will be allocated from the overall program cost. The cost will include cost for organizing meetings, workshops and training, field visits, translation of key messages and printing of relevant materials, operating the Grievance Redress Mechanism (GRM) and review of SEP. The estimated budget for the SEP is US\$ annual is included in the operational expenses of the Program. The list of proposed costed activities for implementation of the SEP and estimated budget are presented in table 4 below.

Table 4: SEP Budget

Activity	Quantity	Unit Costs (USD)	Frequency Per Year	Total Costs (USD)	Remarks
1. Estimated staff related expenses					
1. Staff travel costs for stakeholder engagements meetings	3	5,000	4	60,000	On need basis in every quarter
2. Events					
2a. County sensitization meetings	2	5,000	2	20,000	As planned on need basis
3. Information, Education and Communication materials (IEC) materials					
3a. Posters, flyers	1	10,000	1	10,000	Annually
3b. Social media campaign	1	10,000	1	10,000	Annually
3c. Program press conferences	1	10,000	1	10,000	Annually
4. Trainings					
4a. ESHS sensitization/training for PIU, contractors, contractor’s staff, VMGs representatives.	1	30,000	1	30,000	Annual
4b. Training of county education focal persons on safeguards.	2	4,500	2	18,000	As planned activities
5. Monitoring of SEP activities					

5a. Implementation support monitoring mission	1	10,000	1	10,000	As planned activities
5b. Quarterly monitoring of safeguards	1	5,000	3	15,000	At the Mid and End of Program
5c. Mid and End Program surveys (Customer Satisfaction Surveys)	1	3,500	2	7,000	At the Mid and End of Program
6. Grievance Redress Mechanism (GRM)					
6a. Training of GRM and GM communication materials	1	23585	2	47,170	
6c. MIS Grievance case management	1	23,585	1	23,585	This will be continuous
7. Other expenses					
7a. Review of the SEP including stakeholder consultations	1	28,302	1	28,302	Mid-year
7b. Contingency	1	2,000	1	2,000	Annually
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				291,057	

6.2 Management functions and responsibilities

40. The entities responsible for carrying out stakeholder engagement activities are the Ministry of Education through the Project Implementation Unit (PIU) which will have full responsibility for engaging with the stakeholders with support from its structures at the county and sub-county levels. The Program will rely on the SEQIP which has a fully developed PIU including an in-house safeguards specialist who will be tasked with the coordination of the stakeholder engagement activities and labor related grievance. The coordination will be through the decentralized networks of county directors of education, sub-county directors of education, education officers within the sub counties, School Principals, head teachers and teachers. The Ministry of Education has already established communication and engagement structures which can be adopted, as required.
41. Institutional and Implementation Arrangements the Program will be implemented by MoE and the TSC as the main implementing agencies, with support from the Semi-Autonomous Agencies (SAGAs). As detailed in the Program, MoE may engage other agencies in the implementation of the activities including Centre for Mathematics, Science and Technology Education in Africa (CEMASTEA), Kenya Education Management Institute (KEMI), National Council for Nomadic Education in Kenya (NACONEK), Kenya Institute of Curriculum Development (KICD), Kenya National Examination Council (KNEC), Jomo Kenya Foundation (JKF), and Kenya Institute of Special Education (KISE).

Table 5: Roles and Responsibilities

Actor/Stakeholder	Responsibilities
Ministry of Education and Project Implementation Unit	<ul style="list-style-type: none"> • Planning and implementation of the SEP • Leading stakeholder engagement activities • Management and resolution of grievances • Coordination/supervision of contractors on SEP activities. • Collaboration with other stakeholders.
County Directors of Education and TSC Directors of Education	<ul style="list-style-type: none"> • Inform PIU of any issues related to their engagement with stakeholders. • Transmit and resolve complaints caused by the project interventions in

	close collaboration with and as directed by PIU and by participating in related school and community meetings.
Teachers, students, and community members	<ul style="list-style-type: none"> • Invited to engage and ask questions about the Program during Meetings and through discussions with Education officers where it is of interest or of relevance to them. • Lodge their grievances using the Grievance Resolution Mechanism defined in the SEP. • Help the Program to define mitigation measures.
Other project stakeholders	<ul style="list-style-type: none"> • Engage with PIU regarding project design. • Raise concerns to help the project to be inclusive.

7 GRIEVANCE REDRESS MECHANISM (GRM)

42. A grievance is an issue, concern, or claim (either perceived or actual) that an individual, group or community needs to be considered/resolved by the project. These may include compliments or complaints of impacts, damages or harm caused by the Project or related activities. In accordance with ESS10 of the WB ESF and the national regulations of the participating nations, a GRM will be formed by the Project to provide a formal process for grievances management from stakeholders (the public, employees, and partners).

7.1 Description of GRM

43. The SEEQIP Grievance Redress Mechanism will provide guidance, guidelines and modalities for managing and addressing grievances that may emerge the program implementation process whether the concerns and complaints are real or perceived. It will also provide modalities for raising awareness, visibility, and understanding on SEEQIP and providing feedback on its implementation.

44. The SEEQIP GRM will offer project stakeholders an opportunity to seek and receive grievance/ complaints and strengthen the Programs' team to identify, track, resolve and refer eligible grievances thereby enhancing its efficiency and development of outcomes.

45. For the mechanism to be effective, it must be clear, gender-responsive, culturally acceptable, easily accessible, and available, cost-free, without retribution, and with an appeals process. All complaints will be promptly recorded, examined, addressed, and closed.

7.2 Objective of the GRM

46. The GRM will seek to improve SEEQIP operational efficiency by identifying and addressing project-related complaints and grievances before they become more serious and/or widespread, thereby preserving the program funds and the reputation of Government of Kenya and World Bank. The current Operation will adopt the existing GRM at the MoE, under the SEQIP and KPEELP, to be scaled-up and operationalized in the Program.

47. The GRM specifically:

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

- iii. Ensures compliance with laws and regulations and reduces exposure to litigation and the need to resort to judicial proceedings;
- iv. Ensures prompt, consistent, and respectful receipt, investigation, and response to complaints;
- v. Ensures proper documentation of complaints and implementation of actions;
- vi. Contributes to continuous improvement in performance through lessons learned; and
- vii. Enhances trust and positive relationships with stakeholders.

48. SEQIP GRM had several levels where project-related grievances can be redressed. These include: Beneficiary community or target schools; Governance levels mainly at sub-county and county levels, and national levels; Other relevant national systems (referral statutory institutions such as NGECC, CAJ, KNCHR, NEMA, Kenya Police Service, Tribunals, and courts), and World Bank internal levels and the Inspection Panel.

Table 6: The GRM value chain includes the following steps

Step	Description of Process	Time	Responsibility
GM implementation structure	<ul style="list-style-type: none"> A. The National Multi-Agency GRM Committee B. The County Multi-Agency GRM Committee C. The Sub-County Multi-Agency GRM Committee D. The school-based GRM Committee E. The VMGs GRM Committee 		<p>The committee consists of:</p> <ul style="list-style-type: none"> a. MoE; KICD, TSC, KNEC, and CEMASTE; and potential Statutory grievance referral institutions including: NGECC, CAJ, NEMA and KNCHR. b. CPCs, CDEs, and TSC-CD and co-opted member of the VMGs c. S-CDEs, SCQASO, and TSC-SCD and co-opted member of the VMGs d. BoM, Principal or Head Teachers or their Deputies, Heads of Guidance and Counselling, and Gender Champions and co-opted members of the VMGs. e. 5 representatives of relevant VMGs customary institutions, including Man, Women, two (2) Youths -male and female, and Persons with Disability and where they do not exist, democratically elected reps. of the same composition.
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> • Toll-free telephone hotline/Short Message Service (SMS) line. • E-mails • Letter to Grievance focal points at local facilities • Complaint form to be lodged via any of the above channels • Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box. 	Upon receipt of complaint	grievance focal points at various levels indicated
Sorting, processing	Any complaint received is forwarded to Logged, and categorized according to the most competent, effective level of redress and prioritize.	Upon receipt of complaint	Local grievance focal points

Step	Description of Process	Time	Responsibility
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by uptake receipt channel used. In cases of Sexual abuse, violence, harassment, and exploitation MUST be reported immediately (72 hour or less).	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by lead focal GM point. A proposed resolution is formulated by [the committee and communicated to the complainant.	Within 10 working days	Complaint Committee
Monitoring and evaluation	Data on complaints are collected in raw form and reported on the average time to resolve grievance. The first point of contact to provide a report on grievance redress actions.		Committee at various levels indicated
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected and action taken.		Grievance focal points at various levels indicated
Training	Training needs for staff/consultants in the PIU, Contractors shall be done	on need basis	Officers in the PIU

49. The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

50. When relevant, the project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. Gender-based violence (GBV) and sexual exploitation, abuse, and harassment (SEA-H) of women, girls, vulnerable boys, and men, may arise from Program activities. Associated risks may emanate from abuse from employment opportunities under school construction related activities; abuse and harassment by teachers and school personnel; and access to Program benefits such as scholarships. For efficiency in management of grievances and complaints of the Program there is need for strengthening and mainstreaming of existing guidelines for management of GBV risks in schools-including mapping out of survivor service providers and referral pathways for GBV/SEA-H prevention and response.

51. The Environmental and Social Management System (ESMS) manual will provide guidelines and Standard Operating Procedures (SOPs) for prevention and management of GBV/SEA-H. These will be built on experiences from SEQIP and other best practice. Where agreement on grievance resolution has not been reached, the Program will offer the complainant with appeal options and processes. The approaches will include an Independent Panel, internal or external offices or individuals with appreciable degree of independence, and third-party fact-finding, facilitation, and mediation missions as applicable.

52. The Program will also contract the services of a qualified and experienced national organization to offer psychosocial support to students and teachers as needed. Requirements for the safe and confidential reporting of cases of GBV and child abuse cases will be inbuilt into the service providers' terms of reference.
53. Depending on the grievance, the aggrieved person/s will be offered the option of appeal through statutory referral institutions such as the National Gender Equality Commission (NGEC), Commission on Administrative Justice (CAJ), Kenya National Commission on Human Rights (KNCHR), and National Environmental Management Authority (NEMA).
54. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects. Communities and individuals who believe that they are adversely affected by the Program may submit complaints to existing Program-level grievance redress mechanisms or the World Bank's Grievance Redress Service (GRS) through the World Bank Inspection Panel www.inspectionpanel.org.

8. MONITORING AND REPORTING

8.1. Monitoring and Reporting on SEP Implementation

55. Information on public engagement activities undertaken by the Program during its life cycle may be conveyed to the stakeholders in two possible ways, that is, Publication of annual reports on Program stakeholder engagements and Monitoring of Key Performance Indicators (KPIs). The program will use a variety of methods and tools for monitoring and evaluation including review of project documents and progress reports, stakeholder interviews and group, discussions, feedback surveys, site visits.
56. The PIU will coordinate and facilitate documentation of the monitoring and evaluation results and outcomes including the maintenance of records of all consultations and meetings conducted with stakeholders, types of information disclosed, issues and concerns raised at consultations/meetings, public comments/feedback received for disclosed documents, informal feedback, decisions made, and reporting back to the stakeholders. The monitoring framework in Table 7 provides a set of indicators that will guide the monitoring processes.

Table 7: Monitoring of the SEP

No.	Monitoring indicators	Method	Timeframe
1.	No. of affected parties, other stakeholders and vulnerable groups engaged in SEP implementation	Review of reports on consultations and progress reports	Quarterly
2.	Type of information shared/disclosed	Review of information material shared and their content	Quarterly
3.	Type of methods used for information dissemination and their effectiveness	Review of communication methods used observations and feedback interviews and consultations with information recipients	Quarterly
4.	Accessibility to information and language used for communication	Records of persons who sought information; observations and feedback interviews and FGDs	Quarterly

		with stakeholders, feedback survey (annual).	Annually
5.	Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential impacts	Focus group discussions and individual interviews with a cross-section, feedback survey (annual)	Bi-annually
6.	No. consultations conducted with affected parties, other stakeholders, and vulnerable groups	Review of reports on consultations by project and its partners	Bi-annually
7.	Type of issues/concerns raised and discussed at consultative meetings	Review of reports on consultations	Quarterly
8.	Type of decisions made based on consultation outcomes	Review of progress reports	Quarterly
9.	Feedback sessions conducted with affected parties, other stakeholders, and vulnerable groups to report on the decisions made	Feedback sessions conducted with affected parties, other stakeholders, and vulnerable groups to report on the decisions made.	Bi-annually
10.	Level of satisfaction among APs, other stakeholders and vulnerable groups on the consultative process and its outcomes	Feedback surveys, focus group discussions and individual interviews with a cross-section	Annually
11.	No. grievances/complaints received and resolved	Review of progress reports and GRM database	Quarterly
12.	Level of efficiency and responsiveness of the GRM.	Review of the records of GRC meetings and decisions made	Bi-annually
13.	Level of satisfaction among affected parties, other stakeholders, and vulnerable groups on the overall performance of GRM	Focus group discussions, feedback surveys and individual interviews with a cross-section of parties who reported grievances	Annually

7.2. Reporting to stakeholder groups

57. The SEP will be periodically revised and updated as necessary in the course of project implementation. associated corrective/preventative actions, will be collated by the MoE. The monthly reports will provide a mechanism for assessing the number and nature of complaints, requests for information, and the Program's ability of addressing such in a timely and effective manner.
58. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project.
59. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways: including through website and/or formal communications and reports.

Annex 1: The IPF Component Key Activities

Description of Area	Activity	Key Activity Description	RA/PAP	US\$30 M	Comments
1. Program management, policy dialogue, communication, monitoring and evaluation, safeguards and fiduciary, and verification.	1.1	-Program operational costs, coordination of refugee interventions, and continued policy dialogue under the Shirika Plan. -Assessments for refugee intervention.	PAP	US\$7	Annual work plans are required of all implementing agencies (IAs) and will be consolidated by the Program Coordination Unit (PCU) and approved by the National Steering Committee (NSC) and the World Bank Procurement: Workshops and consultancy services. Procurement: International partner institutions, consultants/firms, trainings and workshops, and equipment (learning assistive devices for SNE for refugee learners, mobile science labs/ virtual science modules for target schools)
	1.2	Development of SIP/school grant SIP manual ¹⁰ for target camp-based JS schools. This activity includes capacity-building of target schools to develop the SIPs and monitoring on the SIPs 'implementation by MoE and DRS in collaboration with UNHCR.	RA 1		
	1.2	Procurement of an Independent Verifier Agency (IVA).			
	1.3	Beneficiary surveys			
	1.4	-Institutionalize climate action in Education. Development of an Education for Sustainable Development (ESD) framework and the associated costed operational plan to inform a structured approach to climate change and adaptation in the Education sector. -Conduct a study on the options and context specific models for CKA-SMP in ASAL regions considering the sparse populations, distances between schools, food prices, transport, and water challenges.			
	1.5	-Key Fiduciary, Environment and Social actions. -Strengthen Directorate of School Audit to comply with fiduciary actions in PAP.	PAP, RA 1, and 2		
	1.6	Three-year capacity-building plan (consolidated plan for MoE, TSC and all Implementing Entities).	PAP		
2. Support implementation readiness for a smooth transition from Junior School to Senior School.	2.1	-TA/Consulting services/workshops by KICD and KNEC on options for implementation of the Senior school pathways; establishment of a robust M&E mechanism for CBC and CBA implementation in Senior school; evaluation and adaption of textbooks; retooling in CBC and CBA of headteachers and teachers in senior school; and support Schools of Education to review relevant Degree-level teacher education programs to align with CBC and CBA reforms in Senior school. -Review of scholarship/bursary criteria, by JKF, for poor and vulnerable learners transitioning from Junior school to Senior school.	RA 1 and 2 PAP	US\$ 10	

¹⁰ The SIPs will include tree planting and rainwater harvesting.

Description of Area	Activity	Key Activity Description	RA/PAP	US\$30 M	Comments
		-Retooling of teachers and headteachers will include a module on climate change particularly the relevance of this change to local contexts or areas. Building on the PEELP, the evaluation and adaption of textbooks will also include further updates on climate change and adaptation.			
3. Key Technical Assistance /Consulting Services/Workshops	3.1	TA/Consultancy services/Workshops for: -Advocacy, mentorship, and social support. -In-service training of target teachers in SNE, including teachers in camp-based refugee schools, and officers at EARCs by KISE. -Development of a detailed implementation plan for the new Teacher's staffing norms ¹¹ by TSC. - Support for girls in STEM related subjects by CEMASTEIA. -Evaluation/review and monitoring for CBC/CBA for JS by KICD and KNEC. -Further develop the examination/assessment management system. - Support classroom observation and analysis of this data to inform teacher support. -Restructure School Equipment Production Unit (SEPU) to the proposed School Learning and Instructional Material Centre (SLIMC) to institutionalized reforms in provision of quality and affordable core instructional materials. - Support to facilitate establishment of Kenya School of Teacher Education and Management (a merger of relevant institutions/SAGA for efficiency).	RA 3 and PAP	US\$10	
	3.2	Procurement: -Procurement of virtual modules aligned to CBC and CBA to Pilot virtual science laboratories in target schools for live streaming, and to optimize use of the live streaming equipment. -Procurement of selected learning devices for learners with special needs and disability in camp base refugee schools. - Procurement of livestreaming sets for target schools by TSC			

¹¹ The new norms are a major shift and aim at rationalizing optimal utilization of existing teachers. For example, teacher sharing for schools within a specified physical distance, and where the concerned teachers do not have adequate lessons/workload per week as required. An action plan to implement the new reform is being discussed with the client. The specific target areas will be derived from this plan.