



**KENYA DIGITAL ECONOMY ACCELERATION PROJECT
P170941**

**VULNERABLE AND MARGINALIZED GROUP FRAMEWORK &
PLAN**

JUNE 2023

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ACRONYMS

ACA	Athi Catchment Area
AfDB	African Development Bank
AMRO	Avoid, Minimize, Restore & Offset
CA	Communications Authority
CAPEX	Capital Expenditure
CBC	Competency Based Curriculum
CERC	Contingent Emergency Response Component
C-ESMP	Contractor Environmental and Social Management Plan
CIH	Constituency Innovation Hubs
CO ₂	Carbon Dioxide
COVID-19	Coronavirus Disease-2019
CPS	Country Partnership Strategy
DE4A	Digital Economy for Africa Initiative
DLP	Digital Literacy Program
DOSHS	Directorate of Occupational Safety and Health Services
ECOP	Environmental Code of Practice
EHPMP	Environmental Health and Pollution Management Program
EHSg	Environment, Health and Safety Guidelines
ELC	Environment and Land Court
EMCA	Environment Management and Coordination Act
ENNCA	Ewaso Ng'iro North Catchment Area
EPRP	Emergency Preparedness and Response Plan
ERS	Economic Recovery Strategy
ESA	Environmental and Social Assessment
ESIA	Environmental and Social Impact Assessments
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plans
ESSs	Environmental and Social Standards
ESRS	Environment and Social Review
FTTH	Fiber to the Home
FY	Financial Year
GBV	Gender Based Violence
GCCN	Government Common Core Network
GCRF	Global Crisis Response Framework
GDP	Gross Domestic Product
GHG	Greenhouse Gases
GIIP	Good International Industry Practice
GoK	Government of Kenya
GRS	Grievance Redress Service
IBRD	International Bank for Reconstruction and Development
ICT	Information and Communication Technologies
ICTA	Information Communications Technology Authority
IDA	International Development Association
IDP	Internally Displaced Persons
IFMIS	Information Management Systems for Tax, Financial management

INDC	Intended Nationally Determined Contributions
IP	Internet Protocol
IPF	Investment Project Financing
ISP	Internet Service Provider
IP/SSAHUTLCs	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
ITES	Information Technology Enabled Services
ITU	International Telecommunication Union
IUCN	International Union for Conservation of Nature
KeBS	Kenya Bureau of Standards
KDEAP	Kenya Digital Economy Acceleration Program
KENET	Kenya Education Network
KEPSA	Kenya Private Sector Alliance
KFS	Kenya Forest Service
KODI	Kenya Open Data Initiative
KSH	Kenyan Shilling
KURA	Kenya Urban Roads Authority
LMP	Labor Management Procedures
LVNCA	Lake Victoria North Catchment Area
LVSCA	Lake Victoria South Catchment Area
M&E	Monitoring and Evaluation
MDA	Ministries, Departments and Agencies
MICDE	Ministry of Information, Communications and Digital Economy
MPA	Multiphase Programmatic Approach
MPLS	Multiprotocol Label Switching
NAP	National Adaptation Plan
NAS	National Addressing System
NCCRS	National Climate Change Response Strategy
NDC	Nationally Determined Contribution
NEC	National Environment Council
NECC	National Environment Complaints Committee
NEMA	National Environment Management Authority
NET	National Environment Tribunal
NGN	Next Generation Network
NGO	Non-Governmental Organization
NOC	Network Operations Center
NOFBI	National Fiber Optic Backbone Infrastructure
NRI	Network Readiness Ranking
NSDI	National Spatial Data Infrastructure
ODPC	Office of Data Protection Commissioner
OHS	Occupational Health and Safety
OPEX	Operational Expenditure
PAD	Project Appraisal Document
PBC	Performance Based Condition
PCM	Private Capital Mobilization
PDO	Project Development Objective
PEV	Post-election Violence
PIU	Project Implementation Unit

POM	Project Operation Manual
PPP	Public Private Partnerships
PrDO	Program Development Objective
PWD	Persons With Disabilities
RFP	Resettlement Policy Framework
RVCA	Rift Valley Catchment Area
SA	Social Assessment
SEA	Strategic Environmental Assessment
SCD	Strategic Country Diagnostic
SEP	Stakeholder Engagement Plan
SERC	Standards Enforcement Review Committee
SIEM	Security Information and Event Management
SMP	Security Management Plan
SOAR	Security Orchestration Automation and Response
SOC	Security Operations Centre
SPV	Special Purpose Vehicle
SSA	Shared Service Architecture
SSA	Sub-Saharan Africa
STEM	Science, Technology, Engineering and Mathematics
TA	Technical Assistance
TCA	Tana Catchment Area
TOR	Terms of reference
TTL	Task Team Leader
TVET	Technical and Vocational Education and Training
UCS	Unified Digital Communication System
UNICEF	United Nations Children's Fund
USD	United States Dollars
USF	Universal Service Fund
VMG	Vulnerable and Marginalized Groups
VMGF	Vulnerable and Marginalized Groups Framework
VMGF&P	Vulnerable and Marginalized Grou Framework and Plan
VMGP	Vulnerable and Marginalized Group Plan
VoIP	Voice Over Internet Protocol
WB	World Bank
WBG	World Bank Group
WIBA	Work Injury Compensation Benefit Act
WMC	Waste Management Council

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1.0 INTRODUCTION

1. Kenya Digital Economy Acceleration Program seeks to expand access to high-speed internet, improve the efficiency of education and government services and administration, and build digital skills for the economy.

2. The project seeks to harness opportunities to develop the Kenyan Digital Economy as a driver of growth and job creation and leverage digital technologies to improve service delivery and resilience. It also supports efforts to promote digital inclusion and mitigate growing digital-era risks of data protection and cybersecurity to ensure that every individual and business can engage in the digital economy confidently, safely, and securely. It is complemented by a range of parallel investment and technical assistance support programs that promote private sector innovation and entrepreneurship, education system strengthening and deeper integration of digital markets across the region.

1.1 Project Description

1.1.2 Project Development Objective (PDO)

3. The PDO of Phase 1 (KDEAP) is to enhance digital infrastructure, services and skills for inclusive participation in the digital economy.

PDO Level Indicators

4. The PDO level indicators are:
1. Estimated percentage of the population who are internet users (of which, % female);
 2. Institutions provided with new or enhanced access to the internet under the project;
 3. Number of government services that are available online; and
 4. Number of students provided with enhanced internet access and/or new digital skills under the project (of which, % female).

1.1.3 Project Components, Sub-components Budgets and Activities

Component 1: Broadband Infrastructure and Access (US\$170 million) – Estimated Private Capital Mobilization (PCM) – (US\$170m)

5. The aim of this component is to increase access to high-speed internet for individuals, industry and government – the “foundation of the foundations” of a digital economy – under a PCM approach. It leverages public infrastructure investments to connect critical public institutions and service locations such as universities, TVETs, schools and law courts while simultaneously helping to unlock private infrastructure investments in the last mile to better serve rural areas and rollout next generation connectivity services and technologies. This component will directly aid in increasing participation and inclusion in the digital economy - among the poor, rural communities, women, and persons with disabilities (PWD) – by enhancing accessibility to connectivity and thereby supporting productive participation in the digital economy.

Sub-component 1.1: Extending the Reach of Backbone Networks (middle mile) (US\$70 million). Estimated PCM (US\$100m).

6. This subcomponent aims to deepen the coverage of the national broadband backbone network by extending coverage to the ward level and by providing redundancy on key routes.

7. Key activities will include:

- a) Technical assistance to design an operational and commercial plan for building the digital superhighway, including exploring options for incentivizing private investments – as explored in Annex 2. The technical assistance will also provide cost-estimates (CAPEX + OPEX) and would inform on the use of best practice models.
- b) Conducting a feasibility study into the commercialization of NOFBI and funding a transaction advisor to assist with the agreed process;
- c) Financing of goods and works for rollout of fiber cable expansion, including backbone densification and last mile connectivity to key institutions (see below) to a part of the envisioned 90,000 additional kms of fiber, connecting up to 1,450 wards from the existing sub-county level points.
- d) Administering and awarding smart subsidies, alongside investment from the Universal Service Fund (USF) and the private sector, through a competitive tendering mechanism (sometimes called a reverse auction) and utilizing an interactive auction platform to achieve the most efficient results.¹

Sub-component 1.2: Last Mile Connectivity for Public Service Delivery (US\$100 million). Estimated PCM (US\$70m).

8. This subcomponent will support the expansion of last mile connectivity for priority public service delivery locations, particularly in underserved rural areas.

9. Key activities will include:

- a) Technical assistance on identification of current state and service level needs for each location for last mile connectivity (MDAs, universities, TVETs and schools, in phase 1; and healthcare facilities and law courts in phase 2) and development of an assessment methodology/typology to classify sites by least cost connection modality and potential spillover impact on market development and access rates in surrounding communities.
- b) Financing of contracts with private sector players, awarded through competitive tendering and use of smart subsidies, to enable last mile connectivity in key priority public service delivery locations, including establishing public internet access points (such as Wifi hotspots);
- c) Provision of pre-paid internet capacity, again through competitive tendering, to key public sector institutions, on longer-term supply agreement (through IRUs).

¹ See CEPA for World Bank. 2022. Price transparency in the allocation of smart subsidies.

Component 2: Digital Government Services and Platforms (US\$120 million) – Estimated PCM (US\$20m)

10. This component will invest in the foundational digital institutions, architectures and policies needed to transform the way the government communicates and conducts its internal operations. The component will support the government's manifesto target to ensure that at least 80 percent of public services are online within five years. In conducting paperless, cashless and presence-less transactions online that not only enhance convenience, reduce transaction costs, and risk of disease transmission, but also minimize the climate footprint that would normally be incurred by paper-based transactions and travel to seek in-person services. This will be facilitated by investments in connecting unconnected public offices, establishing a unified communication systems across government MDAs (email, videoconference, voice, remote working, document mgmt., etc.) and creating a shared service architecture to facilitate interoperable exchanges. These infrastructure investments in Phase 1 will underpin further investment in digitizing government services in Phase 2. The overall objective is for the government to better utilize digital technologies and enhanced connectivity to improve public service delivery and support public sector modernization, innovation and resilience. Improved resilience of digital infrastructure, ensuring continuity of critical communications networks, government operations and public services, and improved response capabilities in the event of climate-related or health emergencies such as COVID-19.

Sub-component 2.1: Digitization of Key Government Services and Platforms (US\$50 million).

11. This subcomponent aims to provide end-to-end digitization for a number of key government services and platforms.

12. Key activities include:

- a) Detailed feasibility studies of the end-to-end delivery of key government services, and their underlying platforms, to identify opportunities for digitization and business process re-engineering;
- b) Based on the feasibility studies, selection of up to five key Government Services and Platforms to be digitized during the lifetime of the project. This may also require selected digitization of archives;
- c) Enhancement of the eCitizen Portal to more user-friendly client interface and a more efficient back-end operation. This would be reinforced by a more systematic monitoring of user experiences to proposal enhancements; and
- d) Prepurchase of internet capacity for selected Ministries, Departments and Agencies (MDAs) hosting key services and platforms, using long-term IRU arrangements, to support service digitization (using same mechanisms as for sub-component 1.2).

Subcomponent 2.2: Creating a Unified Communications System for Government (US\$60 million).

13. This subcomponent will support rollout of a secure, digital UCS across government.

14. Key activities include:

- a) Technical assistance to identify the challenges faced and opportunities for upgrade and improvement in the existing communications systems; comparative analysis of software and systems needed and mechanisms for sourcing of hybrid, homegrown, licensed, open source, and others; methods of phasing out the old communications systems and establishing the new one, including considerations of e-waste management
- b) Financing of software (for example, licenses, subscriptions for online meetings) and hardware (IP based, others) associated with the UCS
- c) Capacity building for network administrators on regular operations on the network, including MPLS management, network management, and link provisioning
- d) Financing the enhancement of network security, that is, authentication, firewalls, security orchestration automation and response (SOAR) and security information and event management (SIEM) systems, and NOC and SOC systems
- e) Capacity-building support through training for key personnel in the government MDAs on change management and use of new communication systems
- f) Financing support for e-waste recycling or safe disposal as per recommendations of the EHPMP.

Subcomponent 2.3: Establishing a Shared Service Architecture (US\$10 million).

15. This subcomponent will also finance development and implementation of a shared services architecture. Key activities include:

- a) Financing of creation of a shared service architecture blueprint;
- b) Financing for hardware, software, IT equipment, and tools required to facilitate operationalizing the shared services architecture blueprint; and
- c) Capacity-building support through training for personnel in the government MDAs on change management and governance systems under the new shared services architecture design.

Component 3: Digital Skills in the Creative Economy (US\$50 million) – Estimated PCM (US\$10m)

16. This component aims to equip young Kenyans with digital skills and enhance their abilities to compete for job opportunities, enabling greater participation in the digital economy and creative industries. A two-pronged approach will be adopted, on the one hand supporting wider access to digital education, including advanced digital skills, throughout the education system and on the other hand, providing access to digital freelancing and other opportunities by making advanced digital devices more affordable and by strengthening the online trust environment. All activities supported will be geared towards increasing the supply of employment-ready technology talent in the local market and would include support targets for women and PWDs. By supporting digital adoption through investing in digital skills, the project will support the vulnerable who would have been excluded from accessing digital services and operations. It will also create a resilient and digitally skilled

citizenry that would be better prepared to handle any future public health emergencies. Related investments are expected to yield spillover benefits on private sector innovation.

Subcomponent 3.1: Supporting Digital Literacy and Skills for the Creative Economy (US\$25 million) - Estimated PCM (US\$5 million).

17. This subcomponent will strengthen digital literacy and digital skills programs through the rollout of Phase 32 of the national DLP to secondary schools, capacity building and content development for teachers in teacher training colleges to leverage digital technologies, and the provision of advanced digital skills in line with emerging opportunities in creative industry and the digital economy. Key activities include:

- a) Financing of scale-up of the DLP to secondary schools through provision of ICT equipment and tools in schools (for example, laptops, tablets, other digital devices);
- b) Capacity building for teachers on digital content and training methodologies;
- c) Financing of partnerships with private sector players to create digital content for online learning programs as part of the DLP;
- d) Technical assistance to develop a strategy for the creative sector in the digital environment; and
- e) Financing of demand-driven digital skills and linkage programs for creative industries through select intermediaries.

Subcomponent 3.2: Device Affordability Program (US\$15 million) - Estimated PCM (US\$5 million)

18. Activities to be financed include:

- a) An initial feasibility study to examine what device financing scheme currently exists in the market, better understand the financing models (such as pay-as-you-go), and assess the likely interest from private sector equipment vendors and financial sector intermediaries;
- b) Establishment of a fund to facilitate equipment purchase by targeted groups such as female students, young entrepreneurs, and PWDs. The fund would be created alongside interested private sector equipment vendors and financial sector intermediaries; and
- c) Seed money for the fund would be provided from the project to act as a guarantee against potential losses by other fund contributors. All financial instruments leveraged under the scheme will adhere to the World Bank's policies and guidelines for financial intermediaries, and a compliance review will be conducted.

Subcomponent 3.3: Strengthening the Trust Environment for the Digital Economy (US\$10 million) - Estimated PCM (US\$0).

² In 2015 the GoK launched the DLP. The first phase of this program equipped 22,000 primary schools with tablets, teacher laptops, and wireless access points to enable teachers and learners in the earliest years of primary school (grades 1 to 3) to integrate ICT into their teaching and learning activities. The slogan for DLP Phase 1 was 'Learn to Use' and the focus was on familiarizing young children with the device and its operation. In 2019, the program entered the second phase which addressed years 4 to 6 of primary school. The slogan for DLP Phase 2 was 'Use to Learn' and the focus was on using the devices to access content and enrich learning in all subjects. The third phase of the DLP program will address secondary schools (years 7 to 12 of learning). The slogan for Phase 3 is 'Use To Produce' and the emphasis is on equipping the children to use the devices to exploit their natural talents in line with the CBC.

19. This subcomponent will finance technical assistance and capacity building to enhance the policy and regulatory environment for the digital sector in line with the evolving needs of a thriving digital economy, including strengthening the ODPC and the CA. Key activities include:

- a) Providing technical assistance on (a) costing, budget, and finance requirements for strengthening the ODPC (including consultant salaries, IT equipment, and so on) and (b) creating drafts of legal and regulatory policies needed for data protection including developing a plan for regional coordination effort on data protection
- b) Supporting capacity building for preparing government datasets for usage, anonymizing as needed, and maintaining a data catalogue of existing datasets, conducting a data inventory, and identifying key data sources (for example, geospatial)
- c) Financing creation of the data institutional and governance framework, including creating data privacy compliance and audit frameworks for public sector institutions and private sector enterprises in line with international standards and regional frameworks
- d) Helping in development of a business model for the OPDC, for instance by developing training courses, to be delivered by OPDC, on awareness and compliance aimed at government and private clients
- e) Supporting international cooperation and partnerships with other data protection commissions through participating in exchange programs, study tours, and conferences on data governance
- f) Providing technical assistance to the CA on enhancing the regulatory framework to increase broadband access and usage across the country and adapt the regulatory framework to support regional digital integration and the needs of the burgeoning digital economy and fourth industrial revolution.

Component 4: Project Management (US\$10 million)

20. This component will support project implementation, coordination and capacity building for the PIU within ICTA. It will include support for dedicated project managers and technical specialists, procurement and financial management specialists, environmental and social safeguards and communications specialists. It will also provide support for office equipment, incremental operating costs, and audits. If necessary, this component will also fund TA to support M&E. Relevant MDAs will also receive training on measures to be taken during emergencies such as on emergency response procedures at times of health or climate emergencies, to ensure continuity of operations and minimize disruptions.

Component 5: Contingent Emergency Response Component (CERC) (US\$0)

21. A CERC is added to the project structure. This will have an initial zero value but may be financed during the course of the project to allow for an agile response to an eligible crisis or emergency. Adding the component from the beginning, albeit with zero funding, provides for flexibility to respond to crises as they arise, and the project implementation manual (PIM) will be adapted to guide the utilization of this

component including risk mitigation strategies. These could include, for instance, humanitarian crises which require the provision of emergency communications services to replace facilities that have been damaged, or to facilitate emergency humanitarian payments using mobile money. Annex 4 discusses ways in which the project design incorporates the World Bank's Global Crisis Response Framework (GCRF) and each of its four pillars.

1.2 Project Beneficiaries

22. The project will benefit a wide range of beneficiaries, including citizens, the private sector as well as public sector agencies and civil servants. Specifically:

- **Direct beneficiaries:** Public institutions; 1,450 national ward level public offices, 105 MDAs in Nairobi and several schools, health care centers and judicial bodies connected to the internet. Private sector players; several ISPs contracted for last mile delivery of connectivity, businesses supplying communication for the government, and digital devices/digital content for schools. Individuals; students trained in digital skills in secondary schools, and individuals trained in job placement and those securing jobs, civil servants trained in digital skills; and
- **Indirect beneficiaries:** Given the project's national coverage, citizens across the nation, central and local government institutions, public service delivery centers (schools, health centers, judicial bodies) and private sector businesses providing last mile connectivity and digital service offerings are likely to benefit.

1.3 Implementation Arrangements

23. A Project Implementation Unit (PIU) will be set up and operationalized within the Information and Communication Technologies Authority (ICTA) within the Ministry of ICT, Communication and Digital Economy (MICDE), which will serve as the main implementing agency of the project. A World Bank PIU has existed within ICTA for almost two decades, dating back to the Kenya Transparency and Communications Infrastructure Project (KTCIP; P094103). The current PIU serves a number of projects including the Horn of Africa Gateway Development Project (P161305). The PIU would be expanded through recruitment of specialists, with cost sharing for some positions. The PIU will be in charge of all project-related fiduciary functions, including managing financial management (FM) and procurement, as well as implementation of project-related environmental and social safeguard commitments. It will be responsible for orchestrating project planning, delivery and monitoring and evaluation (M&E), leveraging key project management tools such as annual work plans and budgets etc. The PIU will be staffed with a project coordinator, procurement, financial management (FM), environmental and social safeguards, M&E, communication specialists, as well as a number of technical experts in areas such as digital infrastructure, skills, etc.

24. Several other MDAs are expected to play a role in supporting the implementation of project activities and already work closely with MICDE. Examples include key line ministries such as the Ministry of Education (MINEDUC), and Ministry of Infrastructure in Phase 1 and the Ministry of Health and Department of Justice in Phase 2, well as key agencies and authorities such as the Communications

Authority (CA), the Office of the Data Protection Commissioner (OPDC), the Kenya Education and Research Network (KENET) and others.

25. A Project Steering Committee (PSC) will be set up to provide strategic oversight and governance for the project. The PSC will include 5-6 representatives of the main MDAs, detailed above, as well as representatives from the private sector (Kenya Private Sector Alliance -KEPSA) and civil society. The PIU will be headed by the Project Coordinator who will be supported by an M&E Specialist, technical experts, finance specialist, a procurement specialist, a social specialist and an environment specialist. The PIU will also work in collaboration with technical lead institutions.

2.0 CONTEXT OF VMGs

2.1 Overview of Nakuru County Demographic Characteristics

26. This section focuses on the socio-economic profile of Nakuru as a background to the VMGs that live in the county. According to the Nakuru CIDP (2018), the County is among the 14 Counties within the Rift Valley region. The major economic activities include; agriculture, tourism and financial services. Nakuru is an agricultural rich county whose background was shaped by the early white settlement schemes. The county human settlement has been shaped by major transport infrastructure i.e., early colonial rail network and road A104. The poverty level for the County is at 29.1 percent.

27. According to the CIDP (2018) the County covers an area of approximately 7,498.8 Square Kilometers and is located between Longitudes 35.41° East or 35° 24' 36" East and 36.6° East or 36°36' 0" East and Latitude 0.23° North or 0° 13' 48" North and 1.16° South or 1° 9' 36" South. The County headquarters is Nakuru City. Nakuru Municipality was awarded a City Charter on December 1, 2021.

28. The CIDP (2018) shows that the County has 11 sub-counties/constituencies namely; Naivasha, Nakuru Town West, Nakuru Town East, Kuresoi South, Kuresoi North, Molo, Rongai, Subukia, Njoro, Gilgil and Bahati. There are 55 wards in the County. Nakuru County is home to 2.1 Million people as per the Kenya National Bureau of Statistics (KNBS) projections for 2017. The County's two major urban areas are; Nakuru City which is the County's headquarters and Naivasha town which is popular for both local and international tourism because of its proximity Nairobi the capital city of Kenya. Nakuru and Naivasha towns are complemented by other urban centres spread across the County that include; Molo, Njoro, Gilgil, Mai Mahiu, Subukia, Salgaa and Rongai.

29. The CIDP (2018) points out that the dominant communities include; Kikuyu and Kalenjin. Other communities present in the County include; Abagusii, Luo, Luhya, Maasai, Kamba, Meru among others. Not all these non-dominant communities are VMGs. The main VMGs are Masai, Turkana, and Samburu, who are traditionally pastoralists, and Ogiek who are traditionally hunter-gatherers.

2.2 Land Ownership and Landlessness

30. Nakuru is historically a large-scale agricultural county having inherited the status from the colonial settlers who controlled most of the arable land. Nakuru County has few large-scale land owners holding approximately 263 Hectares (Ha) of land on average. On the other hand, the County is dotted with many small-scale land owners with mean landholding size of 0.77 Ha. The bulk of the land holdings in the county are small-scale and are found mainly in the high potential agricultural areas. The medium and large-scale farms account for a small per cent of the holdings but cover the largest area under farming. The mean holding size for land ownership in urban areas is 0.05 Ha.

31. Nonetheless the CIDP (2018) points out that slightly less than 20 per cent of the households are considered to be landless. Some of these landless persons are 2007-8 Post Election Violence (PEV) Victims settled in camps for Internally Displaced Persons (IDPs), while others are informal settlement dwellers and immigrants either in employment or engaged in business activities. There are also incidences of landlessness affecting those who were evicted from the Mau Forest.

2.3 Ogiek of Nassuit, Marioshoni

32. Marioshoni ward of Molo constituency is home to the largest proportion of Ogiek people in Kenya. The land they inhabit was forest land and has been cleared for settlement in the last twenty years. The Ogiek claim this land as their traditional territory as hunters and gatherers over several generations. However, this claim has been contested and a court case has progressed through Kenyan courts over the years and landed in the African Court on Human and People's Rights where it was decided in favor of the Ogiek on May 26th, 2017. The African Court ruled *inter alia* that the Mau forests are the ancestral home of the Ogiek peoples and stated that the most salient feature of indigenous societies is their unhindered access to and use of their traditional land. Even after the court ruling however, the Ogiek continue to live on the land without title deeds.

33. The Ogieks' livelihoods revolve around bee keeping and honey. According to Kang'ethe, Ontita and Mwangi (2000) honey is critical to their religion and belief systems and is a central item in their rituals and ceremonies. They have placed beehives in the forests around them and on their farms. They sell the surplus honey through cooperatives and self-help groups. They also grow maize, beans, vegetables, and potatoes for domestic consumption and for sale of surpluses to the rest of the country through middlemen who transport it. The Ogiek rear dairy cattle and sell most of the milk in Njoro and Nakuru towns. Some of them conduct business activities in the trading centres in their territory and beyond.

34. The Ogiek are a patriarchal society. They have a strong council of elders that holds sway in most community-wide decisions. All members of the council are men, but women participate in local community meetings and contribute to discussions without hindrance. Other representative organizations of the Ogiek include churches, self-help groups organized around honey production and sales, the NGO Ogiek Peoples Development Program (OPDP) and several Community-Based Organizations (CBOs).

2.4 The Maai-Mahiu Masai

35. The Maai-mahiu Area is in Naivasha Sub-county of Nakuru County. This sub-county borders Narok County to the south-east and east, and Narok County is predominantly occupied by the Masai People. Therefore, the Masai in Maai-mahiu are in a contiguous traditional Masai Territory that spreads from Kajiado through Narok into Nakuru County.

36. In Maai-mahiu the Masai people practice nomadic pastoralism as the main means of livelihood. They move their livestock seasonally into Narok and Kajiado counties in the east and into Nyandarua and Laikipia counties in the north in search of pasture and water. Nonetheless, in Maai-mahiu they own private land where they have built their permanent homes to which they return with their livestock when pasture and water is available.

37. The Masai supplement their livestock economy with sand and building stone harvesting and trade. They have local groups that supply sand and ballast to construction sites. In the Masai villages in the two areas herbalists practice traditional medicine. They fetch medicinal herbs from different forests and prepare them at home. In good seasons the Masai grow maize, beans, vegetables, and other horticultural crops such as bananas, onions, and tomatoes to supplement their income and improve food security.

38. There were a few people in the areas that were involved in livestock trade. They buy livestock in the villages and transport in lorries to Nairobi where they sell at a profit. Some bought livestock locally, slaughtered in Suswa or Maai-mahiu slaughterhouses and supply meat to hotels in Nakuru and Nairobi.

39. In the villages women were involved in caring for small stock such as calves, goats, and sheep. Besides, they made ornamental beads for the market. Buyers visited the villages to buy and sell in the highways in the rest of the country or export to the western world where Masai attires and souvenirs sell at good prices.

40. The Masai are a patriarchal society where property is inherited by male children from their fathers. Women and girls have few economic chances because they do not own land or cattle, which must belong to men. Their economic and political power are thus largely limited. Nonetheless, change is occurring in a few areas because of women succeeding formal education. So, there are Masai women teachers, nurses, lawyers, and politicians, although the numbers are low relative to their population size in the country.

41. Traditionally men wield a lot of political and economic power. They are organized in age-sets based on year of circumcision. Each age-set has a chief that is widely respected by his agemates across Masai-land beyond his village and county of residence. There are elders who traditionally control of events including migration, going to war and peace agreements with neighboring ethnic groups and enemy clans. The elder are the custodians of indigenous knowledge and its practice. Reference is made to them in planning rituals and ceremonies.

2.5 Masai, Samburu and Turkana of Kongasis, Ol Jorai

42. Ol Jorai is in Elmentaita Ward, Gilgil Constituency. The Masai of Ol Jorai have lived in the area from time immemorial. The name of the place is from the Maa language. The Samburu and Turkana on the other arrived in Ol Jorai around 1992. Previously they worked and lived in farms in Solai and the Agricultural Development Corporation (ADC) farms in Nakuru County. In 1992 some of them bought land in Ol Jorai Settlement Scheme and settled there. Some became squatters in the private farms in the area. Therefore, while most of these people have title to the land, others have been squatters for over twenty years and are marginalized.

43. In terms of livelihoods, the Masai, Samburu and Turkana follow their traditions of rearing livestock including sheep, goats, and cattle. Nonetheless, they also grow maize, beans, peas, potatoes, vegetables, and fruits. They sell surpluses in the market for an income. Their children attend local schools and a few travel to access education in Nakuru Town. The people also run businesses in local market centers such as Ol Jorai and Kongasis. These businesses include grocery shops, hardware shops and mobile cash transfer shops.

3.0 POSITIVE AND NEGATIVE IMPACTS OF KDEAP

Table 1: Positive Impacts of KDEAP Activities

Project Component	Project Benefits
Component 1: Broadband Infrastructure and Access	<ul style="list-style-type: none"> • Increased access to high-speed internet for individuals, industry and government. • Improved access to learning and teaching materials for VMG learners • Access to weather information for better farming • Increased online business leading better returns and value for money • Access to online jobs will reduce unemployment and poverty in the VMG territories.
Component 2: Digital Government Services and Platforms	<ul style="list-style-type: none"> • Digital services offerings include a number of revenue/fee-generating services, leading to higher government revenue. • Cashless transactions in accessing government services likely to reduce incidences of revenue leaks and corruption. • Transition towards a paperless government will reduce government's recurrent expenditure and contribute to shifting resources to development efforts.
Component 3: Digital Skills in the Creative Economy	<ul style="list-style-type: none"> • Better and widespread involvement of the youth in the digital economy. • Reduced youth unemployment may lead to reduced crime • Exposure of Kenya Culture online may lead to better appreciation of the country abroad.
Component 4: Project Management	<ul style="list-style-type: none"> • Use of institutionalized governance arrangements for continued implementation beyond the life of KDEAP. • The change management and on-the ground technical advisory and capacity building features built into KDEAP design are intended to generate widespread buy-in and capacity of the core IT staff at ICTA and MoICT&DE.
Component 5: Contingent Emergency Response Component	<ul style="list-style-type: none"> • Better coordinated emergence or crisis communications and response across government and partners. • Better understanding of emergence planning and response in the ICT ecosystem in the country.

Table 2: Potential Negative Impacts and Mitigation Measures

Exclusion of the VMGs from the project.	<ul style="list-style-type: none"> • Mentorship and training of VMG youth on computing, online jobs, and participation in the digital economy. • Provision of WIFI enabled community centers in VMG areas. • Provision of IT equipment to educational and health institutions in VMG areas.
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Labor, Worker Health and Safety	<ul style="list-style-type: none"> Workers and contractors will be engaged in accordance with the Kenyan labour laws of and gender considerations. Best management practices to ensure worker safety and acceptable working conditions. Labor Management Procedures (LMP) has been prepared and will be implemented by the PIU throughout project implementation. Contractors will sign codes of conduct (CoC) committing to the use of PPEs, and other health and safety measures in the respective sites
Waste Management	<ul style="list-style-type: none"> Promote proper waste management practices Implement Environmental and Social Management Plan (ESMP) and E-Waste Management Plan (EWMP) that has been prepared. Consult National Environment Management Authority (NEMA) for guidance on the disposal of e-waste and hazardous materials/substances.
Water Resource Management and Energy Efficiency	<ul style="list-style-type: none"> Equipment selected will promote energy efficiency. Negligible change in emissions from the project, GHG No impact on water conservation
Noise Emission	<ul style="list-style-type: none"> Standard measures will be employed to reduce impacts of noise (barriers or personal protection equipment).
Increased Traffic and Community Safety	<ul style="list-style-type: none"> Movement of equipment and transportation of materials will be managed to avoid traffic delays in the vicinity of the project sites. Proposed project activities at the designated sites will be restricted areas and fenced.
Land Acquisition and Resettlement	<ul style="list-style-type: none"> Project activities will not cause displacement or relocation of individuals or households as all works will be on government lands mainly road reserves. Where project activities will happen outside government land or where encroachers will be encountered RAPs will be prepared according to the RPF guidelines to manage any resettlement impact.
Loss of Natural Habitat and Biodiversity	<ul style="list-style-type: none"> No loss of natural habitat as deployment of fiber optics and existing training facilities are

	on lands without essential ecosystem value. In the unlikely event that sensitive ecosystems will be encountered ESIs will be developed in line with the ESMF to manage them.
Loss of or Damage to Archaeological and Cultural Resources	<ul style="list-style-type: none"> • The relevant authorities will be contacted for historical or cultural artefacts “chance find”.

4.0 VULNERABLE AND MARGINALIZED GROUP FRAMEWORK

44. The Vulnerable and Marginalized Groups Framework (VMGF) has been prepared during the KDEAP preparation phase, with the main goal of properly and effectively managing the possible social and economic impacts of the project activities on vulnerable and Marginalized Groups (VMGs) in the project footprint in Kenya. This is a live document and will be updated throughout project implementation and consultation with the VMGs in the project sites. Another goal of the VMGF is to outline a culturally appropriate strategy for collaboration and engagement with the VMGs in the project sites.

45. When revised during other phases of the project the VMGF will present details and updates on project activities to be implemented. Additionally, it will present the challenges likely to be experienced in implementation and suggest the way forward.

5.0 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

46. This section describes Kenya's legal and institutional framework with respect to IPs/VMGs to provide the context of the VMGF.

5.1 The Constitution of Kenya

47. The rights of the VMG are anchored in the Constitution of Kenya (CoK) and in several institutions; these include Commissions, Ministry of Labor and Social Protection; Ministry of Public Service, Youth and Gender Affairs. These Ministries, Departments and Agencies (MDAs) are responsible for promoting and coordinating efforts around empowerment for the youth, women and people living with disabilities (PLWDs) in the country, while also ensuring gender equity.

48. The National Gender and Equality Commission is responsible for mainstreaming issues related to minorities and marginalized groups while the National Cohesion and Integration Commission is responsible for preventing discrimination on the basis of race, ethnicity or other considerations and promoting cohesion among the many and diverse groups in the country.

49. The Constitution of Kenya (CoK) recognizes the socio-economic and cultural rights of all citizens as stipulated in Article 43. Article 21 requires State organs and public officers to address the needs of vulnerable groups within society including women, older members of society, persons with disabilities, members of minority or marginalized groups, and members of particular ethnic, religious or cultural communities that are deemed historically excluded. It identifies marginalized communities as:

- a community that because of their relatively small population or for any other reason, has been unable to fully participate and fully integrate into the larger social and economic life of Kenya.
- a traditional community that, out of a need or desire to preserve its unique culture and identity from assimilation, has remained outside of and thus failed to integrate into the larger social and economic life of Kenya.
- an indigenous community that has retained and maintained a traditional lifestyle and livelihood based on a hunter or gatherer economy; or
- pastoralist persons and communities, whether they are—(i) Nomadic; or (ii) A settled community that, because of its relative geographic isolation, has experienced only marginal participation in the integrated social and economic life of Kenya as a whole.

50. The aforementioned definition is in line with provisions of ESS 7 in the World Bank ESF. Like ESS 7 the definition covers historical disadvantage, protection of identity and culture, and unique livelihoods most dependent in large measure on natural resources. Based on this recognition of marginalization in Kenya, the country has developed a number of policies and created institutions to address the special need of VMGs in the country.

51. Article 69, 1(d) of the Constitution of Kenya provides that the state shall - encourage public participation in the management, protection, and conservation of the environment. This includes the environments of VMGs, hence the need for

meaningful consultation of the VMGs on how any environmental impacts arising from the proposed project shall be managed.

52. Article 63, 2(d)(i) *inter alia* recognizes VMG lands as community land consisting of - land that is lawfully held, managed, or used by specific communities as community forests, grazing areas or shrines; ancestral lands and lands traditionally occupied by hunter-gatherer communities. Such land is to be treated cautiously when it potentially falls in a project corridor. This is so because the land is usually collectively owned, often untitled and difficult to determine who to compensate in case of acquisition and what form such compensation should take to be acceptable and useful to VMGs.

5.2 The Policy Framework

53. In addition to the legal and institutional framework, there are some policy guidelines and documents, which are relevant to the development and welfare of the VMG:

- *Kenya Vision 2030*: has been designed to transform Kenya into a middle-income country by the year 2030. It has three pillars – economic, social, and political, of which the social and the economic pillars are the most relevant for the purpose of this report. The social pillar aims to “build a just and cohesive society with social equity in a clean and secure environment”. It, therefore, presents comprehensive social interventions aimed at improving the quality of life of all Kenyans and Kenyan residents. This strategy makes special provisions for Kenyans with various disabilities (PWDs) and previously marginalized communities. The economic pillar aims at improving the prosperity of all Kenyans through an economic development program, covering all the regions of Kenya. It aims to achieve an average Gross Domestic Product (GDP) growth rate of 10% per annum beginning in 2012.
- *National Social Protection Policy, 2011*: developed in 2011, this policy is aimed at reducing poverty and the vulnerability of the population to economic, social, and natural shocks and stresses. The main objectives of the policy include; (i) protecting individuals and households from the impact of adverse shocks to their consumption that is capable of pushing them into poverty or into deeper poverty; and (ii) cushioning workers and their dependents from the consequences of income-threatening risks such as sickness, poor health, and injuries at work as well as from the threat of poverty in their post-employment life.
- *National Land Policy, 2009*: though Kenya does not have a clearly defined or codified land policy, the 2009 version envisages the treatment of all people equitably, addressing itself to the various categories of VMGs including children, youth, pastoralists and minorities. In order to secure access to land and land-based resources for vulnerable groups generally, the policy proposes to a) develop mechanisms for identifying, monitoring and assessing the vulnerable groups; (b) establish mechanisms for redistribution of land and resettlement; (c) facilitate their participation in decision making over land and land-based resources; and (d) protect their land rights from unjust and illegal expropriation.
- *Gender Policy, 2011* – this policy guarantees equality of men and women before the law in accessing economic and employment opportunities. It facilitates the

review of laws that hinder women's access to and control over economic resources and improve vocational and technical skills of disadvantaged groups, notably unemployed youth, disabled women, poor urban and rural women, and street dwellers, for improved access to employment opportunities.

- *Kenya National Youth Policy, 2006* - this Policy aspires for a society in which the youth enjoy equal opportunity to usefully engage in social, economic, political, cultural, and religious life. The youth constitute a significant component of VMG populations in Kenya. Any initiatives that address their plight therefore necessarily speaks to the needs of VMGs and the general needs of the disadvantaged.
- *Forest Policy, 2007*: Read together with the Forest Act, 2005 they make some provisions for the customary rights of forest communities and community forestry: the Forest Act states that “nothing in this Act shall be deemed to prevent any member of a forest community from using, subject to such conditions as may be prescribed, such forest produce as it has been the custom of that community to take from such forest otherwise than for the purpose of sale” (Article 22), and “...may include activities such as ‘collection of forest produce for community based industries’ (Article 47.2.e) under a license or management agreement. The Act defines a “forest community” as “a group of persons who have a traditional association with a forest for purposes of livelihood, culture, or religion (Article 3). The Forest Policy recognizes the “traditional interests of local communities customarily resident within or around a forest” (paragraph 4.3).
- *The National Policy on Culture and Heritage, 2009*. The policy aims to promote and protect the cultures and cultural diversity among Kenya's ethnic communities. These include the protection of indigenous languages, the expression of cultural traditions, knowledge, and practices, traditional medicines, and community rights.
- *National Policy for the Sustainable Development of Northern Kenya and other Arid Lands, 2012* – the policy states that the Government will put in place an institutional and legal framework for the development of Northern Kenya and other arid lands. The policy thus calls on the government to establish a range of institutions that will provide long- term continuity in ASALs' development, including a National Drought Management Authority (NDMA) and National Drought and Disaster Contingency Fund to increase responsiveness to drought, National Council on Nomadic Education, a Northern Kenya Education Trust, a Livestock Marketing Board, and a Northern Kenya Investment Fund.

54. It should be noted that all the policies including the Kenya Vision 2030 speaks to both the financial protection and the value chain component since the focus is on building resilience of the vulnerable and marginalized groups in the drylands of Kenya.

5.3 International Instruments and Policy

The African Charter on Human and People's Rights

55. Article 22(1) All peoples shall have the right to their economic, social, and cultural development with due regard to their freedom and identity and in the equal enjoyment of the common heritage of mankind.

56. Article 5 Every individual shall have the right to the respect of the dignity inherent in a human being and to the recognition of his legal status. All forms of exploitation and degradation of man particularly slavery, slave trade, torture, cruel, inhuman, or degrading punishment and treatment shall be prohibited.

57. Article 13(2) Every citizen shall have the right of equal access to the public service of his country. (3) Every individual shall have the right of access to public property and services in strict equality of all persons before the law.

The ILO Convention No. 169 on Indigenous and Tribal Peoples

58. ILO Convention No. 169 is an international treaty adopted by the International Labor Conference of the ILO in 1989. It represents a consensus reached by ILO tripartite constituents on the rights of indigenous and tribal peoples within the nation-states where they live and the responsibilities of governments to protect these rights.

59. Article 6(1) stipulates that governments should: “Consult the peoples concerned, through appropriate procedures and in particular through their representative institutions, whenever consideration is being given to legislative or administrative measures which may affect them directly” . This calls for meaningful consultation of the VMGs regarding any developments that affect them or their ways of life and livelihoods.

60. Further, Article 6(2) of the Convention specifies that “consultations carried out in application of this Convention shall be undertaken, in good faith and in a form appropriate to the circumstances, with the objective of achieving agreement or consent to the proposed measures”. The Convention particularly emphasizes the need to consult in the following circumstances:

- Prior to exploration or exploitation of mineral and sub-surface resources (Article 15(2)).
- Prior to relocation, which should take place only with the free and informed consent (Article 16).
- When considering alienation or transmission of indigenous peoples’ lands outside their own communities (Article 17).
- On the organization and operation of special vocational training programs (Article 22).
- On literacy and educational programs and measures (Articles 27 and 28).

61. The foregoing provisions buttress the VMG natural resources including land and calls on their involvement in the design of social services for them. Development should therefore not be imposed on them, rather they must be afforded opportunities to negotiate and access that development at their terms.

5.4 Legislations

National Museums and Heritage Act Cap 216 Revised Edition 2012 (2006).

62. The issue of shrines mentioned in Article 63 of the Constitution of Kenya is picked up in the National Museums and Heritage Act Cap 216 Revised Edition 2012 (2006). At Section 46(1) the act provided that “all antiquities which are lying in or under the ground, or on the surface of any land already protected under any law as a monument or being objects of archaeological, paleontological or cultural interest are discovered in a part of Kenya after the commencement of this Act, shall be the property of the Government”. These are of great cultural value and are to be protected and preserved if found or expected to be found in the project footprint.

National Cohesion and Integration Act, 2008

63. The Act is meant to promote national cohesion and integration by protecting Kenyans from discrimination on the bases of ethnic or racial backgrounds. It is the basis of aspirations for equitable distribution of public resources in Kenya. It provides that the distribution of public resources should consider Kenya’s diverse population and poverty index. The latter points to affirmative actions in favor of VMGs and other peripheral populations to meet their expressed development needs and aspirations.

County Governments Act, 2012

64. The Act operationalizes the constitutional provisions on devolution of resources and power to the 47 counties in Kenya. It bestows the power of decision-making on people in the counties through their representatives in the county assemblies and enhancing their participation in local development. It attempts the protection of and promotion of the interests and rights of minorities and marginalized communities, through participatory budgeting and representation in the county legislatures deemed to be closer to the people at the grassroots.

The Community Land Act, 2016

65. The Act recognizes collective ownership of traditional commonly used land. Most VMG land is of the foregoing description and is therefore protected under the Act. The Act provides that community groups registered as owners of community land shall receive compensation in the event of compulsory acquisition. Where community land is not registered, the Act requires affected county governments to hold any such compensation in trust for the affected groups until registration of land titles in the community’s favor materializes. The Act recognizes customary occupancy as constituting VMGs’ land rights to community land and stipulates the said proprietary rights.

5.5 World Bank Environmental and Social Framework

66. The World bank Environmental and Social Framework (ESF) has 10 Environmental and Social Standards (ESS) that form a good basis for project sustainability. The most relevant standard to VMGs is ESS7 on Indigenous peoples/sub-Saharan Africa Historically Underserved Traditional Local Communities. ESS10 on Stakeholder Engagement and Information Disclosure is also applies to the issue of VMGs. These two standards are discussed below.

ESS7 Indigenous Peoples/Sub-Saharan Africa Historically Underserved Traditional Local Communities (IP/SSAHUTLC)

67. This ESS recognizes that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development. Therefore, the proposed

project should respect these identities and aspirations, and must strive to ameliorate rather than deepen their disadvantage.

68. This ESS applies regardless of whether Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are affected positively or negatively, and regardless of the significance of any such impacts. The ESS call for avoidance of adverse impacts on VMGs where possible and where not possible, minimization and/or compensation for these impacts in a culturally appropriate manner proportionate to the nature and scale of such impacts and the form and degree of vulnerability of the affected VMGs. Further, the ESS calls for mitigation measures as well as opportunities for culturally appropriate and sustainable development benefits. This process should adhere to stakeholder engagement as discussed in ESS10 on stakeholder engagement and information disclosure.

ESS10 Stakeholder Engagement and Information Disclosure

69. This ESS avers that to promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies, the Borrower will undertake an engagement process with affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, as required in ESS10. This engagement process will include stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation, in a culturally appropriate and gender and inter-generationally inclusive manner. Cultural appropriateness relates to the usual communication channels that VMGs use. For example, in the case of meetings, if men and women usually meet separately, that should be maintained during consultation. Additionally, any written material being shared during consultation should be in the language commonly understood locally by VMGs.

6.0 STAKEHOLDER IDENTIFICATION

6.1 Introduction

70. At this stage of preparing this VMGF&P, the identified stakeholders are preliminary and will be refined during project preparation and implementation. The project will adopt a multi-stakeholder engagement process which will be done through two approaches; information disclosure and public consultation throughout the project's life cycle (design, implementation and closure).

71. A detailed breakdown of the stakeholders (other interested parties, disadvantaged or vulnerable groups, or classification by type of leadership, youth, elders, women, organized youth and women, people living with disability, etc.) at the community level will be determined by the PIU during the development of specific the Vulnerable and Marginalized Group Plans (VMGPs) prior to the implementation of project activities.

72. The VMG stakeholders identified at this stage include farmers' groups, cooperative societies, pastoralist groups, county government, national government, indigenous leaderships, civil society organizations, people living with disabilities, and teachers' associations and unions.

6.2 Proposed Strategy for Information Disclosure

73. Information will be disclosed to stakeholder groups in various formats (e.g. posters, local vernacular FM Radio Stations, government office noticeboards, brochures, leaflets, nontechnical project summary documents and reports, community meetings, churches, mosques, project website, social media, etc.) to ensure maximum coverage and awareness of the project. The Grievance Redress Mechanism (GRM) will also be promoted and disseminated throughout the life of the project.

6.3 Proposed Strategy for Consultation

74. The project will consult the VMGs in KDEAP areas through the use of the following approaches:

- Interviews with stakeholders and relevant organization such as elders' councils
- Surveys, polls, and questionnaires
- Public meetings, workshops, and/or focus groups on specific topics
- Other traditional mechanisms for consultation and decision making.

75. Vulnerable or disadvantaged in KDEAP areas will be identified throughout the consultation process and where necessary measures will be used to remove obstacles to participation. This may include separate mechanisms for disseminating information, consultation and grievances to ensure participation and allow access to project benefits.

Table 3: Summary of Consultative Process: Stakeholder Engagement Plan

Project Stage	Area of Influence/Interest	Engagement Approach	Timetable: Locations/ Dates	Stakeholders	Stakeholder Manager
Design	Project Objective, activities, ESIA, ESMP, IPPF, RAF, LMP, SEP	Discussion with community leaders, Public	Prior to commencement of project activities at	General VMGs, pastoralist groups, farmers'	PIUs

Project Stage	Area of Influence/Interest	Engagement Approach	Timetable: Locations/ Dates	Stakeholders	Stakeholder Manager
		meeting, Brochure, Flyer	Community Centre	groups, respective county governments	
Civil works, Retrofitting and Rehabilitation	ESMP, LMP, VMGF, SEP	VMG community Meeting(s), Focus Group Discussions, Vernacular FM Radio Broadcasts	Prior to commencement of project civil works, retrofitting and rehabilitation activities	VMG Communities, Civil Society, Teachers' Unions and Associations, Health Institutions, cooperatives, farmers' groups, pastoralist groups, and religious groups.	PIU
Commissioning	Project activities completed and benefits	VMG community Meeting(s), Focus Group Discussions, Vernacular FM Radio Broadcasts	On completion of project activities	VMG Communities, Civil Society, Teachers' Unions and Associations, Health Institutions, cooperatives, farmers' groups, pastoralist groups, and religious groups.	PIU

6.4 Budget for Consultation

Table 4: Budget for VMG Consultations and Engagement

#	Item	Cost (USD)
1	PIU Trips (12 trips @USD 2000)	24,000
2	Consultation processes (25 activities @USD 700)	17,500
3	Information Production and Dissemination (25 Presentation materials (flyer, brochures, maps, etc.) @USD 500)	12,500
4	FM Radio Costs (30 shows at USD 300)	9,000
	Total	63,000

76. Following the public consultations, budgets will be reviewed throughout the project implementation period to ensure that costs are more realistic in terms of meeting the socioeconomic goals of the project.

7.0 INSTITUTIONAL ARRANGEMENT FOR SCREENING PROJECT SUPPORTED ACTIVITIES

77. As appropriate, sub-project specific Vulnerable and Marginalized Group Plans (VMGPs) setting out the measures or actions proposed to minimize, avoid or manage risks (or enhance benefits) – will be developed as needed. In such case, the VMGP may include the following elements, as needed.

- A summary of the Targeted Social Assessment, including the applicable legal and institutional framework and baseline data. The Targeted Social Assessment Summary will be conducted by the KDEAP PIU Social Safeguards Specialist or consultant.
- A summary of the results of the meaningful consultation tailored to VMGP, and if the project involves the three circumstances specified in paragraph 24 of ESS7, then the outcome of the process of FPIC carried out with the affected VMG during project preparation.
- A framework for meaningful consultation tailored to VMG during project implementation.
- Measures for ensuring the VMG receives social and economic benefits that are culturally appropriate and gender sensitive and steps for implementing them. If necessary, this may call for measures to enhance the capacity of the project implementing agencies.
- Measures to avoid, minimize, mitigate, or compensate the VMG for any potential adverse impacts that were identified in the social assessment, and steps for implementing them.
- The cost estimates, financing plan, schedule, and roles and responsibilities for implementing the VMG Plan.
- Accessible procedures appropriate to the project to address grievances by the affected VMG arising from project implementation, as described in paragraph 35 of ESS7 and in ESS10.
- Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the VMG Plan, including ways to consider input from project- affected VMG in such mechanisms.

8.0 GRIEVANCE REDRESS MECHANISM

78. Grievances can arise right at any time and at any level in the project. A grievance is a concern or complaint raised by an individual or group affected by the project. The concerns and complaints can result from either real or imagined impacts of the project. This GRM therefore, provides guidance, guidelines and modalities for managing grievances that may emerge from KDEAP implementation process. It also provides modalities for raising awareness, visibility, and understanding on KDEAP and providing feedback on its implementation.

79. The KDEAP GRM offers project stakeholders and VMGs an opportunity to seek and receive grievance/ complaints and strengthen the project team to identify, track, resolve and refer eligible grievances thereby enhancing KDEAP efficiency and development of outcomes.

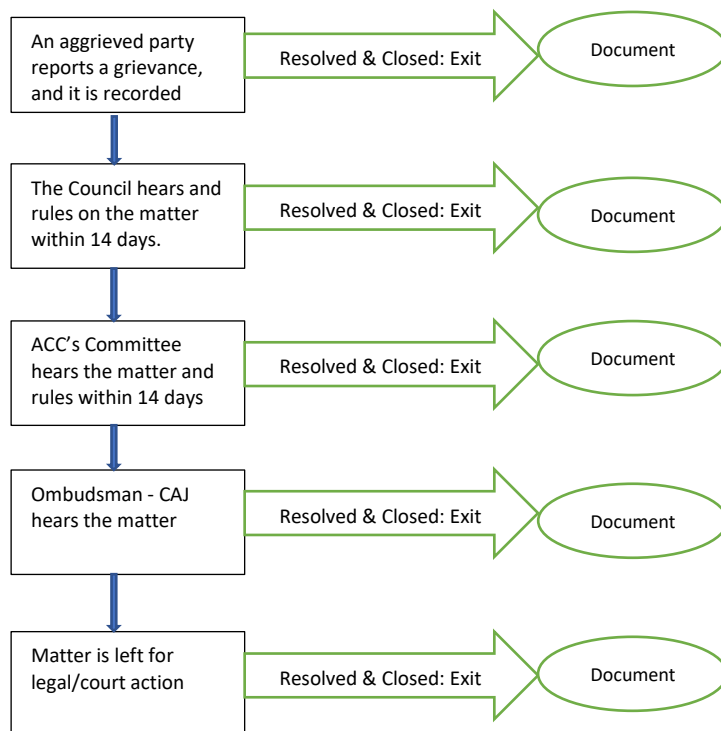
80. This KDEAP GRM is being anchored in the existing local conflict/grievance resolution structures in the GRM territories. Among all the VMGs FGD participants said that whenever they had grievances about government projects, they approached the chief and if not satisfied report to the County Commissioner or their deputy. The Masai and Samburu FGD participants said that when they had disputes among themselves, they used their age-set chiefs and if not satisfied went to the councils of elders that were settlement based comprising of the Village Chairman and village elders. The Turkana FGD participants reported that they have a council of elders that handles their disputes.

81. The KDEAP GRM will be guided by the following principles.

- Promptness - grievances usually relate to the welfare of complainants and should be resolved as quickly and completely as possible. Time is of essence in this GRM process.
- Transparency - the GRM system and process will be as open as possible. No deals should be struck under the table. GRM process outcomes should as much as possible be disclosed to VMGs to build confidence in the system.
- Fair and Effective - the system should be fair, treating the same issues in the same manner regardless of who the complainant is. Committees involved should aim to deal with matters comprehensively and to the satisfaction of parties.
- Non-retributive to complainant - the system should ensure that complainants are protected throughout the process and project. They should not suffer any loss or injury from the contractor or VMG community merely for raising their complaint with the GRM system. This assurance should be the preamble of any grievance process.
- Appropriateness to Custom - this GRM strives to conclude the resolution of grievances at the lowest level of the mechanism namely, the council. This relates to the kind of dispute resolution process that VMG members are familiar with, and which they consider simple and fair. The process up the ladder is complex and alien and may not be considered fair.

- Documentation - the grievances or feedback will be recorded as received and the resolution process and outcomes will be documented judiciously. The aim is to keep record just in case the same grievances are mischievously raised up the GRM ladder and for learning purposes.

82. Each VMG preferred to have grievance mechanisms organized around their territories. In this line of thought there will be grievance committees at Maaimahiu, Nassuit, and Ol Jorai. These committees will handle issues in conjunction with the project and if not resolved escalate them to the sub-county level where the Assistant County Commissioner's (ACC) committee will take over. The ACC's Committee brings together the ACC, Contractor, and proponent's grievance experts. From the ACC's committee the grievance would be escalated to the National Ombudsman. At every point the complainant will be free to exit the mechanism and seek judicial intervention. The schematic version of the GRM is presented below.



83. The VMG's Council that will hear a grievance in the first instance will be composed of the following.

- Chair of Council of Elders (Chair)
- Two (2) women
- Two male members
- One youth
- Local Chief/Assistant Chief
- Contractor's Social Safeguards Person (Secretary)

84. The ACC's committee will include the following.

- The ACC (Chair)
- Local Chief
- Chair of the Council of Elders / Representative

- (iv) A Woman representative of the VMG concerned
- (v) Contractor's Social Safeguards Person
- (vi) Proponent's Social Safeguards Person (Secretary)

85. The ombudsman (Commission for Administration of Justice) has her own procedures for receiving and processing grievances. The same applies to the judicial system. The contractor will be obligated to continually disclose this GRM to the VMGs and to sensitize them to its principles and how the process works.

86. The Complainant has also the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. World Bank Procedures requires the complainant to express their grievances by writing to World Bank office in Washington DC.

87. This [GRS complaint form](http://pubdocs.worldbank.org/pubdocs/publicdoc/2015/3/743201426857500569/GRScomplaint-formMarch2015.docx) which can be found at the following URL link: <http://pubdocs.worldbank.org/pubdocs/publicdoc/2015/3/743201426857500569/GRScomplaint-formMarch2015.docx> may be used. Complaints will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices. Email: grievances@worldbank.org Fax: +1-202-614-7313.

By letter:

The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018 NW,
Washington, DC 20433, USA

9.0 VULNERABLE AND MARGINALIZED GROUP FRAMEWORK MONITORING AND REPORTING

88. The overall monitoring of the Vulnerable and Marginalized Group Framework (VMGF) shall be the responsibility of the Project Implementation Unit (PIU). Within the proposed organizational structure, the Environmental/Social Safeguards Specialist shall be specifically responsible to monitor implementation of the VMGF. The Environmental/Social Safeguards Specialist will include at every stage in the project implementation, the VMG stakeholder groups and leaderships. Reports on the implementation of the VMGF will be submitted to the KDEAP PIU and when necessary, consultations will be held with the VMG communities and stakeholder groups.

9.1 Community Consultations and Monitoring Visits

89. Regular scheduled and unscheduled monitoring visits will form part of the PIU's efforts to ensure compliance with national law and policy, and World Bank Safeguard policies. The PIU will work closely with the VMG communities and stakeholder groups to ensure that all project related activities do not negatively impact the immediate environment within the respective VMG Territory and affect the livelihoods or health and safety of the VMGs.

90. Where applicable, the PIU will consult the VMG communities, stakeholder groups and leaderships to obtain the relevant consent and license to operate for project activities within the respective VMG Territory.

91. The monitoring exercise will consider input from project affected VMGs into the monitoring system, and will serve the purpose of enhancing project development deliverables.

10. 0 ANNEXES

Annex 1: Vulnerable and Marginalized Group Plan

1 Summary of the Approach to VMG Consultations

92. The detailed approach to consultations with the VMGs has been discussed in Section 2.0 above. Suffice it to say that all meetings with VMGs were preceded with sufficient notice of not less than fourteen days. This notice enabled VMG leaders to mobilize participants and discuss their views on the project upfront. In the meetings VMG leaders facilitated the consultant's presentations and discussions that followed. Men, women, youth and at least one teacher participated in the meetings and had time to express their fears, opinions, aspirations, and expectations. A free and fair environment was maintained in the meetings and all members spoke to their satisfaction before meetings were closed by the leadership after closing prayers.

2 Project Impacts on VMGs

93. The VMGs identified the following positive impacts of the project.

- Cheaper and faster internet connections. The VMG participants in meetings said that this was going to benefit their businesses including meat and livestock, honey, and agricultural produce, as this will open online market opportunities.
- Online education and training. The VMG participants in the meetings said that the project will benefit their teachers to deliver better online and college students to access education and training.
- Jobs for the youth. The VMG participants said that once internet access becomes cheaper, and speeds improve youth will access online job opportunities and support their families and communities.
- Online Business opportunities. The VMG participants in the meetings averred that cheaper and easier internet access is likely to spur online business opportunities including meat, livestock, and honey sales as well as imports of goods and services required locally.
- Online meetings for local groups including church and community groups. The VMG participants in the meetings said that they conducted some of their group activities such collecting funds from group members on WhatsApp. However, they reckoned this was expensive and inaccessible to some members. They averred that when the KDEAP is implemented, and internet access becomes cheaper they will intensify group activities online and save time for other productive activities.
- Entertainment and news. The VMG participants in the meetings said that they were aware that internet platforms had a lot of news and entertainment programs that they will enjoy when internet becomes cheaper and more accessible.
- Reduced carbon emissions because with stable and affordable internet connections fewer people will travel for meetings or classes away from home or even to visit cyber cafes in towns.

94. The potential adverse/negative impacts of the project on VMGs include.

- Livelihood disruptions. The VMG participants in the meetings indicated that their fences, kiosks, and other temporary business structures along the roads where fiber optic cables will be laid are likely to be affected.

- Exclusion of the VMGs from the project. This is likely to result from the VMGs' current limited access to ICT equipment and internet services, inadequate awareness on computing and the digital economy.
- Increased crime. In the event that internet connections improve through the KDEAP there is a likelihood that small businesses such as cyber cafes and online jobs will flourish in those isolated VMG areas and crime may set in due emerging inequality.
- Health and safety during construction. Trenches for laying the fiber optic cables unless managed properly will pose safety challenges for humans and livestock.
- Labor influx during construction. Although the numbers of workers may not be large, there will be workers from outside the VMG territories who may a threat to the safety of children, girls, and women. Gender-based Violence will likely increase in the VMG territories as transactional sex set in. This will lead to the spread of diseases such as COVID-19, HIV/AIDS, and other Sexually Transmitted Diseases (STDs) in VMG territories.
- The labor influx during construction may also disrupt the social lives of the VMGs especially their languages, taboos, and norms. Workers from outside may bring in new ways of life including diets and relationships with people of the opposite or same sex that may be offensive to VMG social organization.

3 Measures for Impact Mitigation and Benefit Enhancement

Table 2: Measures to Mitigate Adverse Impacts on VMGs

#	Adverse Impact	Proposed Mitigation Measure
1	Livelihood disruptions. The VMG participants in the meetings indicated that their fences, kiosks, and other temporary business structures along the roads where fiber optic cables will be laid are likely to be affected.	The ICTA will compensate the VMG members whose structures, trees, crops, and fences will be affected during trenching to lay the fiber optic cable.
2	Exclusion of the VMGs from the project. This is likely to result from the VMGs' current limited access to ICT equipment and internet services, inadequate awareness on computing and the digital economy.	The KDEAP will make specific effort to enhance awareness of and training in computing for VMG members especially the youth, provision of IT equipment and gadgets to them, and set up community ICT labs for VMGs at appropriate places.
3	During construction the labor influx will lead to the spread of diseases such as COVID-19, HIV/AIDS, and other Sexually Transmitted Diseases (STDs) in VMG territories.	<ul style="list-style-type: none"> • Adoption of COVID-19 Ministry of Health Protocols during design and construction phases

#	Adverse Impact	Proposed Mitigation Measure
		<ul style="list-style-type: none"> • HIV/AIDS and STD education and awareness campaigns in VMG areas • Specific partnership with schools in VMG areas to create project and labor influx awareness and sensitization to attendant social and health risk management
4	The labor influx during construction may also disrupt the social lives of the VMGs especially their languages, taboos, and norms. Workers from outside may bring in new ways of life including diets and relationships with people of the opposite or same sex that may be offensive to VMG social organization.	<ul style="list-style-type: none"> • Induction of workers from outside VMG areas and sensitization to the culture of various VMGs. • Preparation of Codes of Conduct to protect VMG interests and culture to be signed and adhered to by contractor's workers.
5	Labor influx will also be a threat to the safety of children, girls, and women. Gender-based Violence will likely increase in the VMG territories as transactional sex set in.	<ul style="list-style-type: none"> • Preparation of GBV Prevention Plans and their judicious implementation. • Child Protection through labor practices compliant to the Children's Act Laws of Kenya.
6	Increased crime. In the event that internet connections improve through the KDEAP there is a likelihood that small businesses such as cyber cafes and online jobs will flourish in those isolated VMG areas and crime may set in due emerging inequality.	<ul style="list-style-type: none"> • ICTA will inform the security sector in VMG areas to anticipate and link crime increases to ICT development trends and grow security installations accordingly.

4 Measures to Enhance Opportunities or VMGs in KDEAP



95. The VMG participants in the study proposed several measures to support members of VMGs better utilize the KDEAP. These measures are meant to make it possible for VMG members to better become aware and appreciative of the KDEAP and to be predisposed to use the project in ways and to the extent otherwise not possible without the measures. The measures suggested are as follows:

- Creation of awareness of and training in computing for VMG members especially the youth to sensitize them to the digital economy and skill them to be active participants and beneficiaries of the economy. This should focus on youth business groups, youth entrepreneurs, and youth who study business, Information Technology, Agribusiness and related course

in colleges in VMG areas. Creation of awareness and training in computing for VMG members shall be done by the PIU in collaboration with the Training Department of ICTA and the Ministry of ICT and the Digital Economy. A target of 500 VMG members especially youth per VMG per year is attainable.

- Provision of IT equipment and gadgets. These will be targeted at community ICT centres, youth groups, and educational institutions such as primary schools, secondary schools, and vocational training centers in VMG territories to equip VMG members for participation in the digital economy. Provision of IT equipment to schools will give VMG children a head-start in gaining computing skills, accessing learning and teaching materials online and ultimately getting ready for the digital economy. The target of the PIU in this intervention shall be a fully function ICT centre and a pilot ICT equipped primary and secondary school per VMG area.
- Set up community ICT labs/centres for VMGs at appropriate places. The community centres with WIFI connection to be provided by KDEAP will help the youth gain better access and participation in the Digital Economy. Free WIFI in these centres will be necessary for the youth to try out business ideas on their own and access online mentorship and training from sites such as UNIDEM that offer short, targeted course on “how to do or do it yourself” modes. The PIU working with other partners should target a community ICT lab per VMG area.
- Mentorship programs for VMG youth, businesspersons, and teachers presently involved in aspects of the digital economy. This will help the mentees function better as digital economy champions and spur wider and deeper participation of VMG community members in the digital economy in the future. The PIU will target mentorship for 500 youth per year.
- Set up Digital Economy Based business incubation hubs in VMG areas and work with respective county governments to mobilize youth with ideas to incubate those ideas in the hubs. Partnership with the respective country governments will provide the necessary sustainability mechanisms for the hubs. The PIU will target to provide on Digital Economy Business Incubation Hub per country with VMGs during the life of the project.

Annex 2: Attendance Sheet for the Nassuit FGD for Ogiek People

MINISTRY OF ICT, COMMUNICATION AND DIGITAL ECONOMY (MICDE)

KENYA DIGITAL ECONOMY ACCELERATION PROJECT
PREPARATION OF SAFEGUARDS FRAMEWORK INSTRUMENTS
CONSULTATIONS

ATTENDANCE SHEET - LIST OF PARTICIPANTS

PROJECT	Kenya Digital Economy Acceleration Project		
SUBJECT	VME Consultation	DATE	19/12/2022
COUNTY	Nakuru	SUB-COUNTY	Njoro
VENUE	NASSUIT RAG Church		
STAKEHOLDERS	Members of OGIEK Community		



#	NAME	ORGANIZATION & POSITION	TELEPHONE NUMBER	SIGNATURE
1	Edward Ontia	Consultant - ICTA	0715 766 266	
2	SILVIA KANAKA KANINI	C.E.O	0715 270 302	
3	HASSAN SANGARE	C.E.O	0704 050 439	
4	JENNIFER CHELANGAT	Farmer	0794 254 551	
5	DANIEL KIPKORIR	Farmer	0745 972 666	
6	LUCY SOPHIA KASO	STUDENT	0724 616 437	
7	EMILY CHEBET KAPUNA	Teacher	0741 408 029	
8	James Brian Lelesha	Chairman Tabor Nasayara	0722 675 552	
9	JUSTUS G. PANYATI	FARMER	0714 428 848	

Ogiek - 1

#	NAME	ORGANIZATION & POSITION	TELEPHONE NUMBER	SIGNATURE
10	DAVID F. RANA	PASTOR	0726 324 703	
11	JOH K. KISIAMBEI	YOUTH	075 680 5321	
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ogieki - 2

Annex 3: Attendance Sheet for the Maimahiu Masai FGD

MINISTRY OF ICT, COMMUNICATION AND DIGITAL ECONOMY (MICDE)

KENYA DIGITAL ECONOMY ACCELERATION PROJECT
PREPARATION OF SAFEGUARDS FRAMEWORK INSTRUMENTS
CONSULTATIONS

ATTENDANCE SHEET - LIST OF PARTICIPANTS

PROJECT	Kenya Digital Economy Acceleration Project		
SUBJECT	VMG/JP Consultation	DATE	21/12/2022
COUNTY	Nakuru	SUB-COUNTY	Naivasha
VENUE	Windy Ridge	TIME	11:45-
STAKEHOLDERS	Maimahiu Masai VMG members		



#	NAME	ORGANIZATION & POSITION	TELEPHONE NUMBER	SIGNATURE
1	Edmund Rntita	Consultant ICTA	0715466266	
2	Joyce Kishorin	Business Lady	0705620251	
3	Nemolai Kudale	Business Lady	012886224	
4	Emma weinmy SINTET	Business Lady	0727368613	
5	Jackline Naishorua	Masai youth-student	0705068904	
6	Peter Turpesio Lerru	Masai youth-student	0793611066	
7	Peter Kishau	Masai elder	0706561890	
8	Moses Sopia	Teacher	0714744302	
9	Alex Siara	Masai elder	0748631383	

Maimahiu masai - 1

#	NAME	ORGANIZATION & POSITION	TELEPHONE NUMBER	SIGNATURE
10	Julian Ole Lerru	Masai elder	0722501189	
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Maimahiu Masai - 2

Annex 4: Attendance Sheet for the FGD of Ol Jorai VMGs

MINISTRY OF ICT, COMMUNICATION AND DIGITAL ECONOMY (MICDE)

KENYA DIGITAL ECONOMY ACCELERATION PROJECT
PREPARATION OF SAFEGUARDS FRAMEWORK INSTRUMENTS
CONSULTATIONS

ATTENDANCE SHEET - LIST OF PARTICIPANTS

PROJECT	Kenya Digital Economy Acceleration Project		
SUBJECT	VMG FGD - Masai, Samburu	DATE	20/12/2022
COUNTY	Turkana	SUB-COUNTY	Gilgil
VENUE	Kengasis Area	TIME	11:15 -
STAKEHOLDERS	Masai, Samburu and Turkana of OL Jorai.		

#	NAME	ORGANIZATION & POSITION	TELEPHONE NUMBER	SIGNATURE
1	Edward Omba	ICTA - Consultant	0715766266	
2	Charles Siroka Kosi	Refined @ web	0722902210	
3	Jamini A. K.	Business	0728923557	
4	Lucia Sapien	Business	0793728957	
5	Kizabeta Lemaunda	Business	0712058404	
6	Nkari Olo Kateri	Business	0759176717	
7	Teoike S. GARA	Business	0724035279	
8	FRANK ROBIN	Business	0728102393	
9	EMILIA HIRIYA	Business	0720341906	

OL Jorai - 1

#	NAME	ORGANIZATION & POSITION	TELEPHONE NUMBER	SIGNATURE
10	Alvina Naathu	Business Lady	0707915521	
11	DAVID NUYA LOPAKIKO	TEACHER	0720968464	
12	PETER MANAI	Madabada Rider	0745593005	
13	SIDA PARKITEL	TOUR GUIDE	0721479213	
14	Mistun pashali Lesango	Business / Goat & Sheep	0724497863	
15	Honey Abiba	Business Lady	0711935222	
16	SIMON ILOM	PARAGRAPH	079876062	
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OL Jorai - 2

Annex 5: Sample Grievance Record Form

Grievance Record	
Name of complainant:	Telephone:
Date complaint filed:	Nature of grievance:
Name of person taking complaint: Position: _____ Signature: _____	
Review/Resolutions	
Date of conciliation session:	Was complainant present?
Nature of complaint:	
Was field verification of complaint conducted:	Finding of field investigations:
Was agreement on the issue reached? If agreement not reached provide points of disagreement:	If agreement reached provide details;
Mediator Name:	Signature: Date:
Complainant Name:	Signature: Date:
Sub-project team member name:	Signature: Date:

Annex 6: Sample Grievance Log Form

No.	Name of Complainant	Gender	Brief Description of Grievance	Date of Receipt	Grievance Status and Brief Description of Response	Date of Response	Remarks

ANNEX 7- GM MEETING RECORD FORM

Date of the Meeting: Grievance No:

Venue of meeting:

Details of Participants:

#	Name	Affiliation
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Summary of Grievance

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Meeting Notes:

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Decisions taken in the meeting / Recommendations of GRC

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Issue Resolved / Unresolved:

Signature of Chairperson of the meeting:

Name of Chairperson: Date (DD/MM/YYYY):

Annex 8: LIST OF PEOPLE LIVING WITH DISABILITIES CONSULTED

#	Name	Gender	VMG
1.	Justus Punyati	Male	Ogiek
2.	Jennifer Chelangat	Female	Ogiek

Annex 9: List of Key Informants Interviewed

#	Name	Occupation/Community Role	VMG Area
1	John Kiplangat	Teacher	Ogiek Area
2	Sapit ole Molo	Businessman	Mai-Mahiu Masai
3	Lokiru Moru	Elder	Kongais Turkana

Annex 10: FGD Guide



Ministry of ICT, Communication and Digital Economy (MICDE)

KENYA DIGITAL ECONOMY ACCELERATION PROJECT (KDEAP) **FOCUS GROUP DISCUSSION GUIDE**

Preliminaries

- Prayer by a volunteer
- Introductions
- Brief on the KDEAP

Focus Group Discussion Themes

1. What are the main sources of livelihood in this area? Probe for sources of income, food, social support and protection.
2. What are the main socio-economic and cultural characteristics of the (specific VMGs) in this area? Probe for specific IP characteristics.
3. What is your current digital connectivity? Do you have access to the internet? How do you as (specific VMG) people access internet in this area? How do women, men, youth respectively use internet services? Would you welcome improved digital connectivity?
4. What are the challenges that you face in accessing and using internet in this area?
5. Do your children in primary, secondary, and tertiary institutions have access to internet services? If yes, where do they access those services? What challenges do they face and how do they overcome them?
6. The KDEAP will require the construction of digital infrastructure to increase digital connectivity. Would you have any concerns that natural habitats could be affected by construction? Or that the environment could be impacted? Or that any of your livelihoods could be impacted?
7. What will be the benefits of the KDEAP to the (specific VMG) people? How can these benefits be enhanced for the (specific VMG) people?
8. Which adverse impacts do you foresee from the KDEAP? How can those be mitigated? By whom?
9. How best can the fiber optic cables be laid to schools and health facilities without causing any harm to the (specific VMG) people?
10. Have you ever bought or sold anything online? What challenges did you face and how did you overcome them? Probe the youth for online jobs.
11. Who are the main stakeholders in the KDEAP in this area? Probe for role of County Governments, Telecoms, Financial Institutions, National Governments, Farmers /Pastoralists /beekeepers.
12. If you have a general grievance about a government project, where do you turn for redress?

13. The project will implement a grievance redress mechanism, what in your opinion, are the best ways to allow stakeholders to file a grievance?
14. We would like to keep you informed about the project, what is the best way to disseminate information to you?
15. Any further comments?

Thanks for your participation in this discussion

Annex 11: Key Informant Interview Guide



Ministry of ICT, Communication and Digital Economy (MICDE)

KENYA DIGITAL ECONOMY ACCELERATION PROJECT (KDEAP) KEY INFORMANT INTERVIEW GUIDE

Introduction and brief on the KDEAP

1. What are the main sources of livelihood in this area?
2. What are the main socio-economic and cultural characteristics of the (specific VMGs) in this area? Probe for specific IP characteristics.
3. What is your current digital connectivity? Do you have access to the internet? How do you as (specific VMG) people access internet in this area? How do women, men, youth respectively use internet services? Would you welcome improved digital connectivity?
4. What are the challenges that you face in accessing and using internet in this area?
5. Do (VMG) learners in primary, secondary, and tertiary institutions have access to internet services? Where do they access those services? What challenges do they face and how do they overcome them?
6. The KDEAP will require the construction of digital infrastructure to increase digital connectivity. Would you have any concerns that natural habitats could be affected by construction? Or that the environment could be impacted? Or that any of your livelihoods could be impacted?
7. What will be the benefits of the KDEAP to the (specific VMG) people? How can these benefits be enhanced for the (specific VMG) people?
8. Which adverse impacts do you foresee from the KDEAP? How can those be mitigated? By whom?
9. How best can the fibre optic cables be laid to schools and health facilities without causing any harm to the (specific VMG) people?
11. Who are the main stakeholders in the KDEAP in this area? Probe for role of County Governments, Telecoms, Financial Institutions, National Governments, Farmers /Pastoralists /beekeepers.

12. If you have a general grievance about a government project, where do you turn for redress?

13. The KDEAP Project will implement a grievance redress mechanism, what in your opinion, are the best ways to allow stakeholders to file a grievance?

14. What are the best ways to disseminate information to members of this VMG community?

15. Any further comments on the KDEAP?

Thanks for your participation in this interview