



Xavier Furtado
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Acting Country Manager, Somalia
The World Bank Group

4th September 2020

Dear Mr. Xavier,

Re: World Bank Group (WBG) Consultations on the Systematic Country Diagnostic (SCD) and Country Partnership Framework (CPF) for Kenya

About Okoa Uchumi Campaign

The Okoa Uchumi Campaign is a platform committed towards working with all stakeholders to redress Kenya's imminent public debt crisis by pushing for political accountability and bolster constitutional safeguards in public debt management.

Purpose of this Letter

We appreciate the WBG for consulting civil society organizations (CSOs) on the SCD for Kenya in April 2020. As a follow up to the CSO consultation, we kindly request an update on the SCD and CPF process in line with the WBG directives on **Access to Information, Citizen Engagement, and in Country Engagement** and international best practices.

To ensure meaningful stakeholder consultation in the CPF process moving forward, we wish to make recommendations as follows:

- **Systematized, timely, and accessible information and documentation for the CPF process**
 - All **dates and locations of consultations** should be publicly available on the World Bank website at least 30 days before any consultation begins, along with contact information for the organizers of these consultations so interested stakeholders can get in contact and or register to participate. The WB's Consultation Hub and Kenya Country Webpage are the logical central location for stakeholders to refer to for information on how to be involved, and for relevant documentation on the preparation and drafting of the CPF.
 - **All relevant documentation** for the drafting of the CPF should be publicly available including the final SCD, the Bank's lending portfolio in the country, and other relevant documentation. Any draft version of the CPF should be **published on the World Bank website at least 20 days prior to consultations** to ensure that all attendees

are fully prepared to comment on these documents during consultations. For those who are unable to participate in in-person consultations, there should be **an online portal** to submit comments on the draft of the CPF.

- **Timely translation** of all relevant documents into the relevant languages spoken in Kenya is also essential to ensure real and effective access to information necessary for meaningful participation of multiple stakeholders.
- **Open, inclusive, and accessible consultations for the CPF process**
 - Consultations should be **open to all those who would like to attend** and should occur in a **wide range of locations and regions across the country** to ensure that they are inclusive and accessible to a multitude of stakeholders. There should be at least **three rounds of consultations**.
 - **A first round** geared to seek stakeholders' inputs on what should be the priorities for the Group to negotiate with the Government of Kenya (GoK) based on the SCD, i.e., what sectors, types of investments, projects, programs, policy support, outcomes, and results indicators should be included in the future CPF. This discussion should also include what geographic regions in the country need to be prioritized, i.e., what cities, towns, communities, etc., and how CSOs and other local organizations can support and contribute during the implementation of the CPF.
 - **A second round** of consultation should seek stakeholders' feedback on a first draft CPF developed based on inputs from the first round. A draft CPF should be available at least 20 days prior to the second round of consultations on the World Bank consultations page and country page for stakeholders to read and submit details comments and recommendations in the upcoming consultations. The second round of consultation could be in-person meetings or online submissions of comments and recommendations. The decision on whether to have in-person consultation or online for the second round should be made in agreement with the GoK and all stakeholders involved during the first round of consultations.
 - **A third round** of consultations should seek to validate a second draft CPF based on inputs from the second round of consultations. After the second round, closing the feedback loop is a critical component of the consultation process, and participants should be informed as to how their feedback and inputs were or were not incorporated in the second draft CPF with clear explanations. Ideally, the second draft CPF will include **track changes** and comments explaining input and changes from the first round of consultations or a matrix detailing all comments received and explanations for those inputs which were not included. Attendees from the first and the second round of consultations should also be invited to the third round of consultations to ensure **continuity in the discussion**. Depending on the level of feedback during the third round based on a second draft CPF, during the consultation process and in agreement with all stakeholders and the GoK, the Group

should seek an agreement whether to have the second draft as final draft, or to develop a third draft based on new inputs.

- **Project Level Engagement**

- We are aware that the WB has been championing the establishment of project committees for WBG funded projects to provide citizen oversight. We propose the use of periodic citizen project committee reports and public reporting forums.
- We propose a review of the performance of project committees to consider ways in which to strengthen their oversight mandate.
- We propose an end of project CSO-led social audit and the development of a CSO shadow report on the CPF projects. We propose this be applicable to the just ended CPF.

In conclusion, it is our expectation that the proposed guidelines to be applicable to the new CPF, and hereby request a meeting on Monday the 14th at 1400 hours, or on a date soon after.

Best wishes,



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