



How is the AfDB addressing social risks in a high risk infrastructure project in Kenya?

Overview

The Coastline Transnational Highway project, also known as the [East African Coastal Corridor Development Project](#), is financed by the African Development Bank (AfDB), European Union, and the governments of Kenya and Tanzania. The project's development objective is to boost regional integration, cross-border trade, tourism, and socio-economic development, as well as to improve road transport infrastructure along the Kenya and Tanzania coastlines, particularly between Mombasa and Bagamoyo.

Findings

Alleged cases of child sexual exploitation, abuse and harassment (SEA/H), risks of child SEA/H exacerbated by the project, and lack of appropriate preventative measures. In line with risks identified in the [2021 USAID Field Review Report](#), field visit testimonies indicated that the project has directly led to cases of child SEA/H perpetrated by project workers. Additionally, project affected people (PAPs) in Kwale County, where construction has not yet begun, expressed their concerns about the road exacerbating risks of child SEA/H once the project commences. Situations such as some parents 'selling' their girls to laborers to pay off debts and children begging, hawking, or serving the laborers along the road, increase the risks of child SEA/H, school drop-outs, teenage

pregnancies, and child marriages, which are already common in project areas. Risks are exacerbated by the already existing culture of not reporting SEA/H. Community members further noted that there are no measures being taken to prevent and respond to child SEA/H cases.

Child labor in project areas. Project monitoring work revealed the existence of children working along the road hawking food items to the laborers and road users. Additionally, key actors interviewed during field visits indicated that they were aware of children being employed in project sites to carry water, stones, and sand.

Exclusion of children from stakeholder engagement and participation. Children were not engaged nor consulted in the design or implementation of the road project despite it negatively impacting them. Additionally, local community-based organizations and non-governmental organizations working on child rights were also not consulted.

Increased road accidents. Accidents were reported, especially in Mombasa county. A request for a bump or zebra crossing was sent to Kenya National Highway Authority (KeNHA). However, the response from KeNHA engineers was that the road is meant to serve passengers from different states, and if bumps are erected, it would slow down the speed of users.

Limited awareness around existing and functioning of the Grievance Redress Mechanism (GRM). When asked, the majority of the community members of Kilifi County affirmed they knew about the existence of a GRM but were uncertain of how it functions. Those unaware of the GRM did not know how and where to file a complaint. During the study findings validation workshop, the chiefs of Bombolulu and Mavueni in Mombasa and Kilifi County, respectively, mentioned that GRM members at the ward level had not been properly trained to handle cases, especially related to gender-based violence (GBV) and child SEA/H. PAPs and the community at large also revealed that they were not aware of the Independent Recourse Mechanism (IRM) of the AfDB.

Inadequate capacity to implement and comply with AfDB safeguards. AfDB operational safeguards were not well-known amongst the implementing agency staff and the project-affected people. Moreover, project level KeNHA staff revealed they needed more resources and capacity to properly monitor project implementation as well as implement the KeNHA child protection policy.

Recommendations

Develop an action plan to prevent and respond to child SEA/H and child labor.

This should be done in collaboration with other stakeholders, including child rights and gender civil society organizations (CSOs). It should look at tackling root causes of child SEA/H and child labor, and strengthening existing structures and community referral pathways in order to encourage reporting and allow for a better and more prompt response to these cases. Previous experience from a World Bank project in [Nepal](#) shows that when a Multilateral Development Bank works together with CSOs, child labor around a project can be tackled.

Include children as key stakeholders in the Stakeholder Engagement Plan (SEP)

In doing so, the AfDB should take a child rights approach and strengthen the design and implementation of projects by utilizing the UN Committee on the Rights of the Child standards, which state that children have a right to be heard and their opinions to be taken into consideration.

Strengthen the GRM to make it independent and accessible for children, and build awareness among project affected communities on how to use the GRM

In order to be effectively functioning, the GRM should be designed and set up in line with Principle 31 of the [UN Guiding Principles on Business and Human Rights](#). Additionally, the staff running the GRM should have the expertise to handle child SEA/H cases. It should also provide safe space for disclosure and confidentiality and be able to refer victims to service providers. It should also be set up in a child-friendly manner, and located in areas easily accessible by children. Throughout the project cycle, the GRM should conduct awareness-raising and outreach activities to inform the community about the GRM's existence, purpose, and procedures. Project-affected persons should also be informed about the existence and role of the IRM.

Meaningfully engage with child rights CSOs throughout the project life cycle

This will allow AfDB to learn about project concerns, facilitate knowledge sharing, and better design preventive and response measures to risks identified for children and the environment. AfDB should encourage and support other interested parties/individuals, such as CSOs, to monitor AfDB project implementation and progress.

Support KeNHA to implement road safety measures

These measures could include bumps, zebra crossings, signage, and accessibility paths to prevent accidents from speeding cars. A provision of accessibility will make it easier for children and other marginalized community members, such as persons with disabilities, to cross the road for access to schools and other amenities.

Closely monitor KeNHA's compliance with Integrated Safeguards System (ISS).

The AfDB should actively supervise the implementing agency's alignment and compliance with ISS throughout the project cycle, especially in high-risk projects. Additionally, it should deliver comprehensive and ongoing training on the AfDB ISS and provide relevant guidance materials to staff involved in the project to implement the aforementioned recommendations.