

Office of the Secretary of the UNICEF Executive Board

Template for delegations commenting on the draft country programme documents

2022 annual session

Draft country programme document commenting period: 22 March to 11 April 2022

Delegations are kindly invited to use this template to share their comments on the draft country programme document being presented to the Executive Board during the forthcoming session.

Delegation name: European Union

Draft country programme document: Kenya

In accordance with Executive Board decision [2014/1](#), draft country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline stated above will be posted on the Executive Board website, and considered by the requesting country, in close consultation with UNICEF.

	Delegation's comments	Response(s)
General comments	<p>The document is well drafted and broadly addressing most of the areas of concern for the benefit of the children in Kenya, and is also aligned to a large extent to the EU priorities in Kenya as outlined in the MIP 2021-2027.</p> <p>While recognising the number of refugees living in the country, the programme does not fully take into account their current dependence in humanitarian assistance, the level of implementation of the roadmaps for durable solutions and integration into host communities, neither the specific needs of refugee children and women. Considering UNICEF's mandate and that over 48% of refugees in Kenya are women, almost half of all refugees are less than 18 years old and that in the past years the majority of new arrivals are women and children, many of whom unaccompanied minors, specific objectives and activities targeting these</p>	

	<p>populations should be included (as currently only mentioned under the education sector).</p> <p>In addition, humanitarian and development nexus approaches could be further explored, notably on the nutrition sector.</p> <p>Many thanks to UNICEF for inviting the EU Delegation to the 17 March briefing to donors, where we had already expressed support and shared comments orally.</p>	
<p>Comments on specific aspects of the draft country programme document</p>	<p>In general, we appreciate UNICEF’s focus on devolution and the work at county-level.</p> <p>On programme priorities and partnerships (paragraphs 24, 25 and 26) no mention is made to refugees, despite ongoing work of UNICEF (that is expected to be maintained) - these priorities/actions should be clearly reflected in the programme, and take into account the specific needs and vulnerabilities of refugee children, adolescents and women. In particular, UNICEF should continue to advocate close to national authorities for durable solutions to all refugees living in country, regardless of their nationality or country of origin, supporting national authorities in the development of the new legal framework for refugees in Kenya (following the approval of the new Refugee Act). As for support at subnational level, UNICEF should (continue to) work close with county authorities in the implementation of the KISED P and GISED P development plans. In this regard protection of refugee children, in particular those more vulnerable, like unaccompanied minors, child-led households, out of school children and children living with disabilities, should be prioritised, ensuring, among others, unhindered access to civil documentation, health, nutrition, child protection and education services.</p> <p>On “Survive and Thrive”, the issues of nutrition are addressed but the document needs to commit itself more clearly in addressing Nutrition-sensitive interventions. Since UNICEF is also implementing EU-funded NIPN phase II, it needs to point out issues of strengthening nutrition data collection, institutionalising</p>	

	<p>the system and nutrition governance, as these topics will be covered under the programme due to start imminently.</p> <p>Although there is a lot mentioned on social protection, it could be important to specifically mention cash transfers linked to nutrition counselling/education support, as piloted successfully under NICHE (EU-UNICEF) and upscaled through the WB-KSIEP programme.</p> <p>On “Education and Learning”, the issue of vocational training to develop skills for job creation is missing. It is important to amplify it in the CPD.</p> <p>Digitalisation and connectivity in education is an important area of UNICEF work which is consistent with EU’s efforts (cf. ongoing discussions on UNICEF Giga programme)</p> <p>Under social policy, we support the continued engagement of UNICEF in the area of PFM, which is complementary to the EU’s own engagement in that area.</p> <p>Child protection: notably on a “child-friendly justice system”, we encourage close coordination with UNODC, implementing the EU-funded PLEAD 2 programme, which has a strong focus on juvenile justice. Deinstitutionalisation not being a core priority of the EU’s Kenya MIP, but still a key EU policy at global level, we support fully UNICEF’s action in Kenya on institutional reforms and promotion of family-based and community-based care.</p> <p>188 million USD in “other resources” still to be mobilised, i.e. 80% of the country programme still to be funded. We invite UNICEF to pay particular attention to its resource mobilisation strategy.</p>	
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