

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>We note EU's observations with appreciation.</p> <p>Based on the UNSDCF principle of Leaving No One Behind (LNOB), UNICEF will respond to the needs of all children affected by emergency including refugee children. This will build on on-going work, for example at UNICEF field offices, of providing an integrated package of complementary child protection services which includes case management, social assistance, specifically tailored learning, and a structured referral mechanism including training for children and their caregivers. In addition, UNICEF will provide support to UNHCR and the</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>Government of Kenya efforts to find durable solutions to refugees including children.</p> <p>The new CPD will strengthening humanitarian - development nexus through UNICEF programming. For example, UNICEF will expand the coverage of integrated Management of Acute of Malnutrition (IMAM) which builds the capacity of the health care system to detect early surges in cases of malnutrition and consequently activate early emergency response.</p> <p>Noted with thanks.</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 and GISED 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</p>	<p>Noted with thanks.</p> <p>UNICEF acknowledges the importance of ensuring that the rights and needs of refugee children are addressed. It is expressed in the way the CPD vision was crafted to reflect refugee and asylum seeker children, without being explicit, by mentioning “all children in Kenya...”, rather than saying “all Kenyan children.” UNICEF will respond to the needs of refugee and internally displaced children affected by humanitarian situations to complement efforts by the Government of Kenya and other UN agencies supporting the roll out of the GoK roadmap for refugee, with particular attention to implementation of the Refugee Act. Paragraph 25 has been duly adjusted to specify the country programme’s priority attention to refugee children, among the most vulnerable.</p>

	<p>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 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>UNICEF continues to value the EU’s important funding and commitment to improving nutrition in Kenya. We fully concur on the importance of ‘nutrition-sensitive interventions’ and the CPD will programme these including through the integration of innovative, high-impact nutrition interventions within health, food, WASH, education and social protection systems. Paragraph 32 has been strengthened in respect of nutrition data collection and governance.</p> <p>Based on the successful pilot supported by EU, UNICEF has been supporting the scale up of integrated nutrition and cash transfer program through the Nutrition Improvements through Cash and Health Education (NICHE) program. UNICEF will continue to strengthen the social protection cash plus agenda during the next country programme. Such interventions are implicitly addressed as part of the integration of high-impact nutrition interventions within social protection systems.</p> <p>Building on UNICEF’ comparative advantage in the context of UNSDCF, UNICEF will continue to support efforts by national and county Governments on developing children’s foundational and transferrable skills, which also contribute to the Kenyan economy. However, technical and vocational skills are primarily supported in Kenya by other education stakeholders.</p> <p>This is noted and agreed.</p>
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	<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>	<p>This is noted and agreed.</p> <p>UNICEF confirms that under the UNSDCF it will coordinate with UNODC on child-friendly justice system programming. In addition, UNICEF Kenya welcomes comments and encouragement on deinstitutionalisation and family-based and community-based care.</p> <p>While fundraising is ongoing, UNICEF will be working closely with the Regional Office and partners to develop a robust resource mobilisation strategy.</p>
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