



**REPUBLIC OF UGANDA**  
**MINISTRY OF EDUCATION AND SPORTS**  
**ENVIRONMENTAL AND SOCIAL AUDIT FOR THE 84 PUBLIC PRIMARY SCHOOLS IN**  
**27 DISTRICTS UNDER GPE-UTSEP**

**AUDITORS:-GREEN IMPACT AND DEVELOPMENT SERVICES (GIDS CONSULTS) LIMITED**

**1.0 INTRODUCTION & BACKGROUND**

- The Government of Uganda (GoU), through the Ministry of Education and Sports (MoES) using part of a grant of US \$ 100 Million from the Global Partnership for Education (GPE) under Uganda Teacher and School Effectiveness Project (UTSEP) constructed 84 schools in 27 districts under the decentralized modality.
- The projects were subjected to Environmental and Social Impact Assessments (ESIAs) and received EIA Certificates of Approval from the National Environment Management Authority (NEMA).
- Environmental and Social Audit – required under the National Environment Act (NEA) No. 5 of 2019 and attendant regulations and EIA Certificates of Approval.
- Following completion of construction, MoES contracted Green Impact and Development Services (GIDS) Consult Ltd to undertake an Environmental and Social Audit for all the project sites.

**1.1 Main objective**

- To evaluate the Environmental and Social performance of the project during the construction of schools' facilities.

**1.2 Specific objectives**

- To identify policies, laws, regulations, standards & guidelines pertinent to the operations and activities undertaken at the different school locations;
- To assess the compliance of the school construction and operation activities with relevant legal and policy requirements, Environmental and Social Management Plans (ESMPs), EIA approval conditions and any other relevant approvals;
- To identify non-conformances with the audit criteria, make observations & recommend appropriate corrective actions;

- To identify areas for improvement in the schools' practices and management activities; and;
- To prepare a practical implementation plan for the non-conformances identified specifying the corrective actions & time frame for implementation.

## **2.0 AUDIT SCOPE**

### **Covered Environmental and Social compliance of project activities with:-**

- National Policy & Legal framework, and relevant regulatory approvals;
- Project ESMPs & the World Bank (WB) safeguard requirements.
- Schools' infrastructural components construction in different districts that included:-
  - Classrooms i.e. (P1-P7 blocks);
  - 2 gender and disability responsive 5-stance sanitation facilities;
  - 1: 2-stance latrine for teachers;
  - Water harvesting facilities (the 5000 litres water tanks);
  - Administration block; and
  - Drainage systems and Greening of the environment (grass and tree planting).

### **2.1 Specific elements of the audit scope**

- Evaluation of compliance with National Environmental and Social Management (ESM) requirements;
- Evaluation of Occupational Health and Safety (OHS) practices;
- Identification of potential impacts (short, medium & long term);
- Feasible, cost-effective mitigation &/or corrective measures for non-conformances & adverse impacts identified;
- As well as opportunities for improved ESM practices; and
- Preparation of an Environmental and Social remedial Plan for the identified non-compliances.

## **3.0 ENVIRONMENTAL AND SOCIAL AUDIT METHODOLOGY**

- Pre-audit meeting with MoES;
- Preparation of ToRs & submitted to NEMA (approved by NEMA before start of Audit exercise);
- Document review (Project Briefs, ESMPs, Policies and Plans, Monthly monitoring reports, etc.);
- Preparation of a checklist;
- Site investigations; and
- Stakeholder investigation and consultation.

## **4.0 AUDIT CRITERIA**

Audit finding	Interpretation
Conforming	Compliance with requirements/audit criteria; no corrective action required.
Non-conforming	Non-compliance with specific requirement; corrective or remedial action is essential.
Observations	These are negative findings that do not represent any specific breach of legislation but have the potential to lead to adverse impacts in the absence of deliberate interventions/corrective actions by the Auditee (MoES).

## 5.0 **CONFORMANCES**

- EIA Certificates of Approval were issued for the 84 schools;
- No child labour, Gender based violence (GBV), conflicts & abuse issues were registered for all sites;
- Healthy and Safety Environment Officer on site for all the sites;
- Sensitisation & training conducted in all Districts;
- No serious records of accidents were registered;
- Valid IDs provided for all sites;
- Lightening conductors were installed at all schools;
- Emergency: contacts & assembly point in place for all sites;
- Chance Finds Procedure were in place for all sites;
- Monthly site supervision/monitoring reports records for all Districts;
- Staff recruitment forms in place; an Ethical Code of Conduct in place for all sites;
- Health and Safety plan & procedure for all sites;
- Incident registers for workers-all sites;
- Child Protection System Matrix with indicators was developed for all districts; and
- Provisions for physically hand capped learners like ramps, grab bars were implemented at all sites.

### 5.1 **Non-conformances**

***The project is still under Defects Liability Period (DLP) and most of the non compliances mentioned below can be closed out during this period.***

- Certificate of Registration from Ministry of Gender, Labour and Social Development (MoGLSD) was not obtained for all sites;
- Construction permit, Occupational permit & Work place registration permit were not obtained from MoGLSD for all sites;
- HIV/AIDS & HSE Policies were not in place for some contractors;
- Geotechnical survey was not conducted at all sites;
- No firefighting equipment at new school facilities at all sites;

- Latrines were constructed, however, they were not labelled to indicate gender differences for example at St. Lawrence P/S, Nyamabare P/S-Ntungamo district, Namutambi P/S-Mukono, among others;
- Noise measurements were not conducted for all sites;
- Consent for acquisition of raw materials were not obtained for all sites;
- Workers' Insurance Policy was not secured for all districts;
- The District Approval of Plans was not obtained from the Local Governments for all the sites;
- Although Waste Management Plans (WMP) were in place, the project did not have in place adequate solid Waste Management records like quantities generated and an authorised NEMA waste handler;
- No training records for drivers regarding safety concerns for all sites;
- No written evidence for disposing off the collected waste was provided-all sites;
- No school had a sickbay & a nurse for daily operations in all districts;
- Contractor left an uncovered pit at Byanamira Modern P/S-Kiruhura\_Mbarara District; and
- EIA Certificates not displayed at the notice boards.

## **5.2 Observations made**

- Tanks provided are too small to sustain the schools in periods of dry seasons for the whole academic term;
- Lightening arrestor component was damaged at -Kibenge P.S-Namutumba & Byanamira Modern P/S-Kiruhura District;
- Some drainage channels were not properly angled to drain the storm water i.e., Buwanga P.S-Namutumba; Rwobugoigo & Kashenyi P.Ss-Mbarara District;
- Most of planted trees had dried up during the prolonged drought;
- Blocked urinals at boys' section at.- Kashenyi P.S\_Kiruhura-Mbarara District; and
- Broken gutter at Kashenyi P/S-Mbarara District.

## **6.0 PREPARATION OF A PLAN TO ADDRESS THE IDENTIFIED GAPS**

### **Following the Audit findings:**

- A plan was prepared to address the non-conformances identified;
- The Plan provided for the following:
  - Specific requirements, Audit findings;
  - Corrective action;
  - Responsible party to implement the corrective action; and
  - Timeframe for implementing the corrective action.

## **7.0 GENERAL RECOMMENDATIONS**

**Arising out of the environmental and social Audit of the 84 schools, these are the recommendations:**

(1) There were some reported and documented cases of non-payment of workers by the contractors and these workers were forced to petition the Head teachers of those schools. It is therefore recommended that the Ministry follows up these cases with the Chief Administrative Officers (CAOs) of those districts to ensure that contractors address outstanding issues before final payment of the last amount under defects liability.

(2) Grievances like the one above were not adequately addressed because some of the Grievance Redress Committees (GRCs) were not properly constituted and therefore non-functional, which led to delayed/or not attention to grievance. It is recommended that the GRCs should be constituted in time, trained and assigned clearly outlined roles to facilitate handling of such grievances.

(3) In some schools provisions for Special Needs Education (SNE) were inadequate. In future the SNEs should be adequately provided for and this should be done for all schools across the board especially construction of uniform ramps to ease movement of pupils with special needs.

(4) During the audit exercise, it was found out that trees planted at a number of schools had died or dried up and the management of remaining or existing trees was not adequate. The project may in future consider using school management to plant and manage trees and if this approach is taken up, pupils should be involved in planting and managing the trees as a way of ensuring that pupils grow up in an environmentally responsive manner.

(5) Impacts of climate change disaster risks are becoming eminent in form of increased rainfall/floods among others, and hence this calls for future designs to address this. Therefore, future projects must plan for and consider climate change disaster risks through enhancement of solar energy, flood mitigation measures, soil tests, geotechnical and seismic studies among others. This will ensure that the structures constructed are climate proofed.

(6) All conditions of approval in the EIA certificates of approval from NEMA that are not part of the design or not implemented for various reasons should be reported to NEMA as part of overall reporting on compliance of the project and implementation of the mitigation measures.

(7) The Ministry should ensure for future projects that, certificate of registration and construction and work permit obtained from the Ministry of Gender, Labour and Social Development (MoGLSD) before the buildings/structures are cleared for usage.