



Republic of Uganda

Ministry of Education and Sports

Department for Secondary Education

Uganda Secondary Education Expansion Project

Environmental and Social Management Framework

Updated 23th April 2020

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ACRONYMS

ARAP	Abbreviated Resettlement Action Plan
ANPPCAN	African Network for the Prevention and Protection against Child Abuse and Neglect
APL	Accelerated Programme Learning
ASC	Annual Schools Census
IDA	International Development Association
BoG	Board of Governors
BTVET	Business, Technical, Vocational Education and Training
CDO	Community Development Officer
CGV	Chief Government Valuer
CMU	Construction Management Unit
CWD	Children with Disabilities
DES	Directorate of Education Standards
DEO	District Environment Officers
DEOs	District Education Officers
DoR	Department for Refugees
DRC	Democratic Republic of Congo
ECD	Early Childhood Development
EMIS	Education Management Information System
ESIA	Environmental and Social Impact Assessment
ESSF	Environmental and Social Screening Form
ESMF	Environmental and Social Management Framework
ETS	Environmental Tobacco Smoke
GER	Gross Enrolment Rate
GPE	Global Partnership for Education
GoU	Government of Uganda
GPI	Gender Parity Index
ICR	Implementation Completion Reports
ICT	Information Communication Technology
ISR	Implementation Supervision Reports
LGRC	Local Grievance Redress Committees
m.a.s.l	Meters above sea level
MoES	Ministry of Education and Sports
MoGLSD	Ministry of Gender, Labor and Social Development
MoLHUD	Ministry of Lands, Housing and Urban Development
MoWT	Ministry of Works and Transport
NHPC	National Housing and Population Census
NGOs	Non-Government Organization
NRM	National Resistance Movement
NSGE	Ministry of Education and Sports National Strategy for Girls' Education
OHS	Occupational Health and Safety
OPM	Office of the Prime Minister
PPP	Public Private Partnership
PCU	Project Coordination Unit
PDU	Procurement and Disposal Unit
PTA	Parents Teachers Association
RDC	Resident District Commissioner
RPF	Resettlement Policy Framework

RWC	Refugee Welfare Committee
SCMC	School Construction Management Committee
SDA	Seventh Day Adventist
SHS	Second Hand Smoke
SMC	School Management Committee
UBOS	Uganda Bureau of Standards
UCE	Uganda Certificate Education
UNEB	Uganda National Examinations Board
UNHCR	United Nations High Commissioner for Refugees
UNHS	Uganda National Household Survey
UPE	Universal Primary Education
UPPET	Uganda Post Primary Education & Training Program
UPOLET	Uganda Post Level Education Training
ESSS	Environmental and Social Safeguards Specialist
USDP	Uganda Skills Development Project
USE	Universal Secondary Education
UTSEP	Uganda Teachers and School Effectiveness Project
VCT	Voluntary Counselling and Testing
VIP	Ventilated Improved Pit latrine
WASH	Water Sanitation and Hygiene
WHO	World Health Organization

INTRODUCTION

The focus of the proposed Secondary Education Expansion Project complements the Global Partnership for Education intervention and is to provide a gateway to the millions of young people from poor families and underserved areas that have hitherto been excluded from lower secondary education which requires increasing both access and improving quality. The Project will focus primarily on improving equitable access to lower secondary education in underserved areas and populations including refugee hosting communities and girls. It will also support the preparation for a comprehensive sector reform and improve the Ministry's management and monitoring capacity. There will be a strong focus on ensuring that girl's access, stay and complete lower secondary education based on well-documented evidence by various recent studies and projects¹ that girls' education brings a wide range of benefits not only for the girls themselves but also for their children and communities, as well as society in terms of economic growth. Women that are more educated tend to be healthier, participate more in the formal labour market, earn more income, have fewer children, and provide better health care and education to their children, all of which eventually improve the well-being of all individuals and can lift households out of poverty. These benefits also transmit across generations, as well as to communities at large.

Uganda is now home to 1,411,794 refugees as of 31/01/2018, with South Sudan contributing 1,045,236 of which 61% of the population are under 18 years (UNHCR 16 February 2018). This unprecedented mass influx of refugees into Uganda in 2016 and 2017 has put enormous pressure on the country's basic service provision capacity, particularly in health and education sectors. Refugees share social services with the host communities. The refugee hosting districts are also among the least developed districts in the country. Therefore, the project will also focus on support to refugees and their host communities.

PROJECT DESCRIPTION:

PDO Statement

The project development objective is to enhance access to lower secondary education by focusing on underserved populations in targeted areas. Underserved populations include communities hosting refugees, refugees, girls and people in the targeted areas with limited access to public lower secondary schools.

PROJECT COMPONENTS

¹ UNICEF, World Bank.

Component 1: Expansion of Lower Secondary Education

This component will focus on building more schools and expanding existing schools, and by providing learning environments that are safe, non-violent, and supportive of girls' education. Lower secondary school construction financed under this component is complemented with a support package to ensure that each new school is fully ready to offer quality education to students. All new schools will include new cost efficient and quality infrastructure design, learning materials on a 1:1 ratio for students, school management and multi-pronged teacher training (curriculum, girls' education, special needs, violence awareness, ICT assisted teaching) and communities of practice for further professional development.

Existing overcrowded public schools in the Refugee Hosting Areas (RHAs) will receive a standard package of additional infrastructure. Financial support provided to such schools through the scholarships program (sub-component 2.2.) shall be used to procure required learning materials and other resources as required by each benefiting school. In cases, where additional teachers will be required for such schools, the GoU will be responsible for recruiting, training, and paying salaries. Demand for additional teachers will be established during detailed sites appraisal as part of the ESMPs preparation.

Subcomponent 1.1: Construction of New Lower Secondary Schools and Facilities

This subcomponent will finance the construction of about 116 new lower secondary schools across the country and improving infrastructure in about 61 existing schools in the RHAs. In total, over 70,300 new spaces will be established. Out of 116 schools, approximately 32 new schools will be located in refugee and hosting communities and 84 will be in other targeted sub-counties of districts meeting the selection criteria. The new schools will be built as large (double stream, eight classrooms) schools creating a total of 55,680 additional spaces for enrolment. The component will also finance school furniture, science laboratory kits, ICT laboratory computers, student textbooks and teacher guides for all new schools. Overcrowded public schools in the RHAs will receive a standard package of additional infrastructure: four classrooms, science lab and latrines. The component will also finance school furniture and science laboratory kits for new classrooms and labs. Thus, 14,640 additional space.

Subcomponent 1.2: Ensuring Safe and Protected Children

This subcomponent will complement the construction of new school facilities by ensuring safe and protected children with a particular emphasis on girls, based on the policy and legal framework of Uganda. The subcomponent will support a multi-pronged approach through: (i) training of the new schools' headteachers, and their deputies and teams of teachers in establishing and maintaining safe school environments; (ii) implementation of social and emotional learning modules; (iii) implementation of violence against children codes of conduct for communities' leaders, school-founding bodies and Boards of Governors, teachers, and works contractors; (iv) sensitization of the local communities (violence reduction, back to school and importance of girls' education); and (v) equipping students with important life skills, including independent and proactive participation in income generating activities. All existing schools in the RHAs (about 210) and all new schools constructed under the project inside and outside RHA (116) will benefit from the sub-component.

A set of targeted community and school level activities will comprise the “Safe School Program” and promote school, community, and parental awareness to prevent cases of violence in schools, encourage parents to educate their girls, prevent early pregnancies, provide support to at-risk children, mobilise child mothers to complete their education, and help girls and boys to develop crucial life skills.

Within the target districts special attention will be provided to the areas where the pregnancy and dropout rates for girls is high. Social and emotional learning (SEL) modules under the program will help students, especially in the RHA to cope with psycho-social challenges related to violence in schools and local communities by fostering their resilience, empathy, and engagement.

Much of this component’s activities are modelled after and will build on ongoing and past efforts made by the Uganda-based Non-Governmental Organizations (NGOs). To ensure sustainability, staff from the MoES’s Secondary Education Department and the Local Government will go through capacity building so that they will be better equipped to support schools in implementing and sustaining the component activities.

Component 2: Hosting Community and Refugee Education Support

Component 2 will focus on both new and existing lower secondary schools in refugee hosting sub counties within the 12 targeted districts. All activities under this component are financed through grants received through the IDA 18 sub-window for refugees and host communities. The target population is refugee and host community school-aged children eligible for lower secondary education (ages 13-18) who have already completed primary schools. The component will support the development and execution of the following programs: (i) Accelerated Education Program (AEP) and (ii) School scholarships. Note that social and emotional learning programs (SEL) which are crucial for addressing specific challenges faced by refugees will be funded in subcomponent 1.2 together with Safe schools packages. The component will also provide support in obtaining equivalent certifications in Uganda that allows children who have finished primary school abroad to attend secondary school in Uganda.

Subcomponent 2.1: The Accelerated Education Program

The Accelerated Education Program (AEP) will provide students who have missed the opportunity to enrol in lower secondary school at the appropriate age or who dropped out of school for various reasons (displacement, pregnancy, etc.) with a fast track learning opportunity. Given the paucity of experience and track records of administering AEP at the secondary school level, this program will start with small scale pilots in five existing schools building on some of the most promising early AEP initiatives by leading NGOs. This will be followed by additional AEPs in seven new schools, resulting in 12 pilot AEP across the whole refugee hosting regions.

Subcomponent 2.2: The Scholarship Program

The school scholarship program transfers funds to Local Governments (LGs) as Accounting Offices for further administration to the lower secondary schools in refugee and hosting communities as a means to offset the economic shock refugee families are experiencing. The school scholarships will assist in reducing school charges that are passed on to parents, especially to refugee families. School charges in Uganda represent a considerable share of the average household income. The proportion of school charges of household income is likely to be higher for refugee and host community. This program is designed to increase the likelihood of households (both hosts and refugees) with eligible

secondary school aged children to enrol and retain their children in school. The amount generated by scholarships at each school (both new and existing) will depend on the number of refugee students enrolled each year. The scholarships will be managed on the school level in the same way and under the same guidelines as the capitation grants for Ugandan students.

The school scholarship program relies on Project grant funds to provide support for refugees that are equivalent to the capitation grants that the MoES already provides for Ugandan students. Given the Government, as part of the Refugee Response Plans, has pledged extending capitation grants to refugees during the next few years, this project considered that it would be the MoES's responsibility to finance capitation grants as part of their regular budget by the end on the project life.

Subcomponent 2.3: Certification of Prior Education

The sub-component will provide funding to (a) mainstream support for refugees in obtaining papers required to start / continue secondary education (e.g. translation, validation and equating of relevant certificates) through MoES/Uganda National Examinations Board (UNEB), and (b) identify those who need support for certification and cover the costs for obtaining relevant certifications for refugees.

Component 3: Improving Teachers Support and Policy Development Nationally

This component will scale up existing elements of the teacher support system and build capacity of the school principals as primary pedagogical supporters for teachers. The component will also aim to prepare for future development of quality lower secondary education through analytical and capacity building work.

Subcomponent 3.1: Support to Teachers

The sub-component will support establishing a **Continuous Professional Development (CPD) system** nationwide. The system will be based on about 100 lower secondary school clusters that will help organize and support teacher training country wide. Each cluster will be built around a cluster center – existing well performing schools with capable teachers. The cluster centers will deliver in person and distance-based teacher coaching. The centers will facilitate Communities of Practice (CoPs) for subject teacher. The CoPs will serve as peer-to-peer teacher support mechanism. Digital platforms will be utilized to operate CoPs and deliver teacher support by distance.

The CPD support will focus on providing ongoing support to teachers implementing the new curriculum. The GoU will cover the basic costs of introducing the new curriculum: initial and follow up teacher training, printing and delivering textbooks and teacher guides with scripted lessons, learning materials, and ongoing training /support costs, etc.

The subcomponent will finance the establishment of the cluster centers in existing schools (using existing facilities, no construction is expected) that are geographically accessible by their network of schools and have a track record of good performance delivering learning outcomes at an appropriate level (e.g. above national average). A selected teacher will be the coordinator at the cluster center and will be responsible for coordinating the trainings for their respective network of about 40 schools. Coaching will be led by the head teacher at each school and by visiting coaches

(inspectors, regional trainers). The subcomponent will train center leaders. Digital platforms and resources will be utilized to allow teachers to grow CoPs, to receive remote support and feedback from regional and national trainers and coaching on how to improve teaching and learning. They will also be able to share their own experiences directly with each other.

Head teachers and deputy head teachers from all public schools as well as head teachers from poorly performing private schools (the worse performing half of the private schools) will be trained in (i) school management and (ii) pedagogical leadership. School performance will be measured by the tool which is currently under preparation with support from UglIFT project. The tool will be applied to select beneficiary private schools. The training provided under the project will improve school management practices, results orientation, service delivery and raise quality of teaching though providing teachers with ongoing pedagogical support from the principals.

The project will implement a special program for training science teachers as ICT Champions to promote technology assisted teaching of science subjects and develop modern digital skills (as required by the new curriculum) among lower secondary school students. One teacher from each public school and teacher from poorly performing private schools (bottom half of worse performing schools) will be trained. The ICT assisted teaching starts with identifying an ICT champion (supporter and early adopter) in a school. The champion will promote the use of ICT for better teaching and learning in the whole school starting with his/her subject. After training in ICT enhanced pedagogy, the champion will receive a laptop and projector (to be owned by the school). It will be preloaded with ICT resources for all the subjects. The program will be available to all public schools in the country (more than 1,200 schools), and new schools to be built under subcomponent 1.1, some with ICT capacity and some without any previous exposure to ICT assisted teaching in order to avoid widening the technology gap. This will enhance professional sharing and learning across teachers in all lower secondary schools in their respective clusters. In total, about 6,600 teachers and administrators will benefit from the training / capacity development program.

Subcomponent 3.2: Support for Development of Key Secondary Education Improvement Policies

This sub-component will prepare for the key measures/reforms required to further improve the quality of teaching and learning in lower secondary schools in accordance with the new education sector strategy (forthcoming around June 2020). It will include technical assistance to support policy research, preparation of policy papers and implementation plans, and capacity building for policy-makers. The sub-component will, inter alia, focus on the following areas: (i) assessing existing experience and adopting a sustainable school construction strategy; (ii) teacher recruitment, deployment, retention, reward and motivation to address the teacher gap, teacher attrition, and the increase in enrolment due to demographic stress; (iii) improvement of provision of teaching and learning materials; (iv) quality assurance and assessment; and (v) enhanced private sector service delivery. In addition to developing new strategies/policies, the component will help to introduce measures required to operationalize existing policies, for instance VAC and GBV related.

Component 4: Project Management, Monitoring and Evaluation

This component will provide support to the project implementation, supervision, monitoring and evaluation, and verification costs. It will finance project staff (including staff needed to supervise school construction, including clerks of works), office rent, furniture, equipment, transportation, data collection and analysis, including gender specific aspects of the project, and capacity building.

Third party assessments will be done to verify the achievement of the DLIs, other project results and satisfactory completion of large procurements.

THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Principally, the objectives of the ESMF are to:

- a. establish clear procedures and methodologies for the environmental and social screening, detailed assessment and implementation of subprojects to be financed under the project;
- b. specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to project investments;
- c. determine the training and capacity building needs; and
- d. establish the budget required to implement the ESMF.

Since the exact locations for the sub-projects are not yet known with certainty at this time, this Environmental and Social Management Framework (ESMF) provides guidance on how environmental and social aspects shall be identified, assessed and managed. The purpose of the ESMF is to ensure that environmental and social management is integrated into the development cycle of individual subprojects. The ESMF identifies the policy triggers for the project, the screening criteria of sub-projects, the environmental and social impacts for the likely subprojects and the mitigation measures to mitigate the identified risks, assessment of the institutional capacity of the implementing agencies and measures for capacity-filling gaps, and an estimate of the budget needed for the implementation of the ESMF.

Therefore, the detailed guidelines and procedures in this ESMF will be important for assessing potential environmental and social impacts of subprojects, help the implementing agencies in screening subprojects' eligibility; determining their environmental and social impacts; identifying appropriate mitigation measures to be incorporated into the sub-project; and specifying institutional responsibilities for implementing preventive, mitigation and compensation measures, and monitoring and evaluation.

Methodology for ESMF Preparation

The ESMF has been prepared in accordance with applicable World Bank safeguard policies and Uganda environmental and social impact assessment guidelines, and involved data literature reviews; field reconnaissance studies, public consultations and discussions with relevant education sector agencies, as well as presenting the draft ESMF to the Education Sector Working Group Meeting in MoES.

PROJECT IMPACTS

Positive Impacts

The potential positive impacts of the proposed construction of classrooms facilities include:

- a. ***Provide additional facilities for education needs:*** This project is geared towards addressing one of the major constraints facing the delivery of Universal Secondary Education i.e. large and congested classes. It is sighted that, in most such schools (especially in some rural areas), students' performance has worsened and is attributed to the high numbers/population in classes which makes it difficult for teachers to capture the attention of more than 80 students per class. For instance, in rural areas of Yumbe and specifically, Bidibidi Refugee Settlement and its environs, classrooms are over-crowded with pupil teacher ratio being up to 162:1. Therefore, the planned construction of new schools/classrooms under USEEP, will go towards reducing pressure in existing schools in terms of population of students and improved teacher: pupil ratio hence, good learning outcomes;
- b. ***Uplift girl child secondary education:*** The project strong focus on ensuring that girl's access, stay and complete lower secondary education based on well-documented evidence brings in

a strong bearing on affirmative action on steps government is taking to actualize MoES National Strategy for Girls' Education (NSGE) in Uganda. It has been established, that girls' education brings a wide range of benefits not only for the girls themselves but also for their children and communities, as well as society at large in terms of economic growth. More educated women tend to be healthier, participate more in the formal labour market, earn more income, have fewer children, and provide better health care and education to their children, all of which eventually improve the well-being of all individuals and can lift households out of poverty. These benefits also transmit across generations, as well as to communities at large hence, translating to one of the main benefits of USEEP from a strategic perspective;

- c. **Address need for education facilities for increasing numbers of students;** UBOS 2017 in its ASC established that, a total of 1,448,527 secondary school going students were reported to be Ugandans and 8,750 non-Ugandans with percentage composition of 52.5% and 55.76% of males respectively, the rest being females. It is evident, the number of non-Ugandans is observed to increase in Ugandan secondary schools due to refugees and non-Ugandan population as such, a need for increase in facilities to absorb the rapidly growing numbers of secondary school going students in the country;
- d. **Construction of teachers' houses:** The 2016 ASC findings reveal that there are 94,636 permanent structures translating into 91.2% of the total structures. A total of 10,796 teacher houses were recorded and 20,173 were recorded as needed. This almost doubles the number of the available houses for teachers and thus, there is a huge gap that USEEP is making a contribution towards its filling by constructing, amongst others, teachers houses' as part of its interventions. It is important to note that, teaching staff are mostly not from within the vicinity of the schools and therefore, they travel distances and sometimes on foot to the schools. Others live in sub-standard accommodation with some living tents which is not conducive for the delivery of teacher services leading to frustration, lowered motivation with attendant high levels of absenteeism, and poor-quality engagement. This situation is dire and appalling in refugee areas;
- e. **The water harvesting** which is to come along with the classrooms and teachers' construction will provide additional water sources for schools WASH needs as well as domestic usage at households in their teachers' homes;
- f. **Reduced distance to schools:** From the findings of UBOS 2016 during ASC, about 78.6% of all secondary schools were below the radius of 1km, while only 0.8% were in the radius of distance above 5kms. This indicates that, majority of secondary schools are accessible to students and surrounding communities hence, this situation would be improved through USEEP planned interventions;
- g. **The WASH facilities:** Findings from ASC 2016 by UBOS in 2017 indicate that about 7,180 sanitation structures are set aside for teachers, 12,202 exclusively for girls while 11,631 for boys. In all, USEEP interventions will put in place, gender sensitive facilities which will also give confidence to the girl child with respect to management of their menstrual life thereby allow them to attend classes even while menstruating;
- h. **Put in place, equal opportunities facilities:** under the project, all buildings (both classroom blocks and WASH facilities) will be designed to provide suitable access for children with disabilities (CWD) by having in place, ramps, handrails, and adequate space to accommodate their mobility support facilities;
- i. **Improved schools play environment:** a number of schools do not have standard play fields. Some of the play fields have not been levelled and landscaped, children use any available spaces for their games as such, USEEP will go a long way to having in place, standard play fields for all round education of the children;

- j. Provision of short-term employment opportunities** through engagement of locals and refugees as casual workers during classrooms construction. This will be a source of additional incomes for both refugees and host communities;
- k. A source of income to local food suppliers and contractor's personnel:** construction of school facilities will entail civil works requiring materials such as bricks, sand, timber and cement. This is a positive but short-term and reversible impact;
- l. Enhancing facilities for better girls' education:** in terms of changing rooms in toilets for girls which, creates a safer and more secure environment guaranteeing and improving school infrastructure for learning and retention at school for girl child;
- m. Improved teaching of science subjects:** Uganda's socio-economic transformation will be led by scientific innovations as envisaged under Vision 2040 as such, government is taking deliberate steps to improve the teaching of science by constructing laboratories in secondary schools which is one of the large positive impacts of USEEP; and
- n. Improving the environmental health** of the schools by addressing problems of poor sanitation, poor waste disposal and storm water/runoff.

Negative impacts and their mitigation measures

These focuses on works covering classrooms, teachers' houses (including head teachers) and their associated support infrastructures and their negative impacts will include:

- a. Land take concerns:** during the construction of USEEP facilities there will be need to ensure issues of land take are adequately taken care of and at this planning stage, an RPF has been prepared alongside this ESMF to address all aspects of land acquisition and compensations that shall arise;
- b. Vegetation loss implications,** through site clearance and preparation works where class rooms and WASH facilities will be constructed, though the impact will be small-scale in nature, delineating areas for such infrastructure prior to clearing sites, define routes for delivery trucks to minimize unwanted trampling on vegetation and full restoration and re-grassing the sites at the end of the project coupled with plating some ornamental trees to enhance greenery in the compounds will reduce the impact;
- c. Risks of polluting underground waters from pit latrines:** construction and usage of pit-latrines could cause seepage of contaminated water into aquifers. It is therefore important that, pit latrines should be excavated avoiding high water table areas or with appropriate technologies such as lining. Construction and usage should be monitored by District public Health officials notably in the siting of such infrastructure. Environmental Guidelines for Rural Water Supply and Sanitation sub-programs should be applied as appropriate;
- d. Management of cut to spoil material** which is likely to arise through excavation works and general works to with foundations. Such material can cause erosion, siltation of water ways, be dust nuisance and is sometimes unscrupulously dumped in wetlands;
- e. Erosion control concerns,** likely to arise through site clearances and excavations, run-offs from roofs of constructed classrooms, and transport routes for construction traffic. This can be mitigated through site restoration, re-grassing, planting ornamentals and rain-water harvesting. In addition, the project could put in place storm water discharge channels based on the designs of the project;
- f. Noise nuisance** which can arise through transportation of construction materials, construction equipment and from the workers which, noise can be a nuisance to the schools' operations and is to be mitigated through briefing the workers and drivers on the need to control noise while in the schools' settings and restricting construction activities to daytime (8:30 am-5:00 pm);
- g. Potential resistance of the community to the contractors,** sections of the communities feel, they normally get a good share of employment opportunities from the projects that are implemented

in their areas and sometimes, contractors have had resistance in trying to access construction materials. This is to be mitigated through providing information to the public on the availability of the contract opportunities, eligibility criteria and other relevant procurement information. Such information should be pinned up in all public notice boards in the districts, sub-counties and supported by radio announcements on local radios in local languages;

- h. **Setting and operations of temporary workers camp site** can raise public health issues which the contractor will address through routine cleaning of the toilets and later, demolition and fully landscaping such sites;
- i. **Impacts relating to sourcing of construction materials** like stones, sand, timber, etc. will have impact on the environment at their points of extraction which emphasizes the need for the contractors to fully restore such site to the satisfaction of DEO and the Project Engineer;
- j. **Occupational health safety (OHS) risks** on both the construction workers and the public is to be mitigated by providing PPEs to the workers, having modestly stocked First Aid kits on the site and observing speed limits while transporting construction materials into the sites and even while on the school compounds. In addition, the contractors should have contacts of nearby ambulance and police fire and rescue services for any emergencies; Occupational health safety (OHS) Risks for the project workers. In all, the workers will be provided with PPEs, work areas be clear of obstacles and proper lighting of the rehabilitation sites. Furthermore, all construction sites/work areas should be hoarded to deter unauthorised persons accessing the constructions sites;
- k. **Risks of HIV/AIDS, STIs/STDs** or other contagious diseases among local community and pupils alongside child abuse (child labour, child pregnancy, sex work involving children). This is a serious concern to be addressed by Client representatives briefing contractors on the code of conduct while implementing the project especially not engaging in sexual relations with girls below 18 years of age. Schools Management Committees, parents, the church/mosques, local area councils to sensitize the communities and pupils on the risks of sexual relations with project workers. The contractor to liaise with HIV/AIDS Service providers in the localities who should be co-opted to conduct awareness sensitization, distribute condoms for the workers and conduct Voluntary Counselling and Testing (VCTs) for the workers and those willing within the project settings.
- l. **Management of construction waste**, construction waste such as cement bags, brick debris, off-cuts from roofing and timber works, waste paper, plastic bags and heaps of excavated soils will likely be generated. All these have to be transported outside the sites by the contractor to agreed disposal sites in consultation with both the DEOs and project engineers;
- m. **Rampant vandalism of schools' properties**: schools in the rural areas are facing increasing vandalism of school property in terms of malicious damage to plastic rainwater harvesting tanks through removal of taps or deliberately cutting the tanks. In some cases, livestock roam schools' premises destroying trees and even enter classrooms if they are left not locked. There are many cases of delinquent youth who reportedly enter and defecate inside the classrooms plus a host of abuses on school infrastructures. Stakeholders suggest that, possibly underground water tanks could be the options for rainwater harvesting and classrooms be lockable pending future drives of enclosure fencing for whole school compounds. Hoarding and employment of security personnel at construction sites/areas can also reduce this vice;
- n. **Fears of collapse of infrastructure**, cases of collapsing buildings in the country are common and arise through; poor workmanship, substandard construction materials, inappropriate engineering designs amongst others. In the project, employing a Project Engineer to oversee the construction processes as well as, certify works on behalf of the Client and securing relevant approvals for the designs from approving entities especially the District Engineers will mitigate this risk;

- o. **Fire risks:** could potentially arise through delinquent pupils who can lead school strikes thereby torching school infrastructures. This is to be addressed through schools' regulations restricting possession of match boxes while in schools; and
- p. **Risks of lightning strikes** of recent there are increasing risks of lightning striking school facilities with attendant fatalities on children and teachers. This is to be mitigated by putting in place, lightning conductors/arrestors on buildings and such arresters should be aluminium types which are not so much sought out by thugs compared to copper rods.

IMPLEMENTATION ARRANGEMENTS AND SAFEGUARDS MANAGEMENT

USEEP implementation will be mainstreamed in the Ministry of Education and Sports (MoES) using existing institutional establishments with the overall responsibility for project implementation vested with the Permanent Secretary, with day to day implementation under the aegis of the Department of Secondary Education in which, a Project Implementation Unit (PIU) will be established and staffed with the Project Coordinator, Project Accountant, Procurement Specialist, and Monitoring and Evaluation Specialist. MoES Gender Unit, Construction Management Unit alongside the Environmental and Social Specialist for IDA financed UTSEP/GPE and other staff as may be required.

Other agencies such as MoGLSD will be key on their areas of HIV/AIDS, gender, labor and occupational health and safety in the project while MoLUHD will take interest on aspects of valuation and compensation (resettlement). The Office of the Prime Minister and its Department for Refugees will take lead on education expansion in the refugee hosting areas. NEMA will take charge of review and approval of Environmental Assessment reports for project components before and during implementation. At districts levels, line technical and relevant Departments such as labour, gender, environment and public health as well as Community Development officers will all take lead in ensuring compliance of USEEP interventions with applicable environmental and social safeguards.

Monitoring and evaluation

The overall objective of environmental and social monitoring is to ensure that mitigation measures are implemented and are effective. Environmental and social monitoring will also enable response to new and developing issues of concern during project implementation and therefore, it will ensure that, project activities comply and adhere to environmental provisions and standard specifications of both the Bank and the environment requirements governing projects typical of USEEP as shall be detailed in the Environmental Assessments (Project Briefs, ESIAs, ESMPs, Grievance Redress Mechanism etc.) for the project. In addition, a Safeguards supervision and monitoring plan, forming part of the project supervision plan, should be put in place to address environmental and social issues.

Reporting

Reporting on environmental and social issues will be through the use of a range of tools including- environmental and social screening forms, stakeholder engagement plans, Grievance Redress Mechanism (GRM)-included in the ESMF, checklists, monthly and quarterly reports, Completion Certificates etc.

Environmental and Social Audit

All projects that are listed in Schedule 5 and 10 of the National Environment Act, No 5, of 2019, and other projects not included in these schedules, as the Authority may require, shall require an environmental audit.² to be undertaken. Such an audit must be undertaken within a period of not less than twelve months and not more than thirty-six months after the completion of the project or the commencement of its operations, whichever is earlier, provided that an audit may be required sooner if

² Cf. Section 126 of the National Environment Act, No. 5 of 2019

the life of the project is shorter than this period.³ It will be responsibility of MoES to procure a consultant/firm to execute the required environmental and social audit. The consultants to undertake the Audit shall be those who are certified and registered in line with the National Environment (Conduct and Certification of Environmental Practitioners) Regulations, 2003 and such Audit report will be submitted to the NEMA for review and approval.

THE GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism (GRM) will provide a way to an effective avenue for expressing concerns and achieving remedies for communities that will be impacted by project activities. The goal is to promote a mutually constructive relationship and enhance the achievement of project development objectives. The GRM is to ensure that complaints are directed and expeditiously addressed by the stakeholder agencies involved in the implementation of USEEP. While a project-specific feedback and complaints mechanism is to be set up, the USEEP will incorporate the existing grievance mechanism that uses the settlements and host communities' administrative structure.

In all, the GRM should follow the principles i.e. it should be scaled to address the risks and impacts on affected communities, be culturally appropriate, be clear and accessible for any individual or group at no cost (vulnerable groups), be transparent and including regular reporting, and preventive of retribution and to not impede access to other remedies. Furthermore, the grievance mechanism should be designed to provide access to specific target groups, e.g. girls and women who, might be subject to sexual harassment during construction, and would need avenues to submit grievances that protect their privacy.

Anticipated grievances under USEEP

In all, some of the anticipated grievances under USEEP will include:

- a. Land uptake issues where there could be issues of encroachment on neighboring lands and loss of livelihoods;
- b. Access to water for construction works;
- c. Access and payments for project construction materials;
- d. Grazing of livestock in the school compounds;
- e. Employment opportunities offered by the projects with reference to availing jobs to refugees as well;
- f. Abuse or improper use of sanitation facilities;
- g. Sexual abuse of the girl child by the project workers;
- h. Sexual harassment and gender-based violence by the workers;
- i. Fights amongst school going children which can trigger fights amongst the parents;
- j. Complaints by parents over punishments by the teachers;
- k. Theft of construction equipment, materials and school property; and
- l. Abuse of school infrastructures by the communities' especially malicious damage to rainwater harvesting tanks.

The grievance mechanism for the implementation process is as follows:

- a. The LGRC will reach out to the Project affected people (PAP) in the local language and complete a Grievance Form which will be signed by the leader of the LGRC and the PAP/complainant. This will then be lodged in the Grievance Log/Register provided by the Grievance Officer;
- b. The PAP should expect a response from the LGRC within seven days of filing the complaint. If the issue is not resolved, the LGRC will forward the complaint to the GRC at the Sub County;

³ Cf. paragraph 31 of the Environmental Impact Assessment Regulations, 1998

- c. The GRC at the Sub County will be given a fourteen-day notice to hold a meeting. Two days after the meeting, the Sub County GRC will call the PAP and LGRC for discussions and resolution. The resolution will be presented to the PAP in written form within the same day of the meeting. If there is no resolution to the grievance, the GRC at the Sub County and the PAP shall then refer the matter to the GRC at the District;
- d. The GRC at the District will be given a fourteen-day notice to hold a meeting. Two days after the meeting, the GRC will call the PAP and LGRC for discussions and resolution. The resolution will be presented to the PAP in written form within the same day of the meeting; and
- e. If there is no resolution to the grievance, the GRC at the district and the PAP shall then refer the matter to the District Land Tribunal for land-related issues and to USEEP head office for all other grievances.

It is important to note that, even contractors sometimes have issues with the workers, suppliers of construction materials or payments for their works. For instance, some workers deliberately refuse to use PPEs despite their availability. Under such cases, it is proposed that, the contractor will proceed as follows:

- a. for uncooperative workers, such will be reported to supervisors for warning and if they continue they will be treated in accordance to the Occupational Health and Safety Act 2006 as well as Employment Act;
- b. On issues where workers are not paid their wages, they can report the issue to the District Labour Officer and if issues fail to be resolved before the District Labour Officer, then the matter can be reported to Industrial courts for mediation;
- c. There can also be instances where suppliers of construction materials and not paid by the contractors. It is suggested that, under such circumstances, the supplier will report such issues to the area Local Council leaders and if the contractor fails to comply, the LC1 council will write a letter to area District Police Commander through which, a file is opened, and the prosecution process is started;
- d. On issues of non-payments for the works done by the contractors, they have a window under FIDIC Contract Agreement where it is provided that..... *Any dispute arising out of this Contract, which cannot be amicably settled between the parties, shall be referred to adjudication/arbitration in accordance with the laws of the Clients country.*

However, on all aspects, more serious grievances must immediately be referred to the police. It is important to note that, not all conflicts and grievances will be addressed by the Project GRM. Cases that involve assault, gender-based violence, rape and “serious” theft are not resolved under this framework but are instead referred to the police for appropriate prosecution process. Appeal to Court - The Ugandan laws allow any aggrieved person the right to access to Court of law. If the complainant remains dissatisfied with the outcome of GRM has the option to pursue appropriate recourse via judicial process in Uganda. Courts of law will be a last resort option, in view of the above mechanism.

CAPACITY BUILDING AND ENHANCEMENT MEASURES

The implementation of the environmental and social safeguards in USEEP will require its stakeholder institutions to have some levels of competence in environmental management as well as understand the provisions in the ESMF alongside resultant ESIA or Project Briefs that will be prepared. In line with this, the ESMF herewith has identified some training that is to be provided to PCU and other stakeholders. It is proposed that, the Environmental and Social Specialist under UTSEP/GPE as well as the proposed Social Safeguards Specialist for USEEP will take a lead in the capacity building trainings. In addition, the head of the Gender Unit in the Ministry will equally be instrumental in the process of capacity development under USEEP.

ESMF Disclosure

This ESMF will be disclosed in compliance with relevant Ugandan regulations and the World Bank Operational Policies. At the national level, once the ESMF is finalized, MoES will submit it to the World Bank for their review, clearance and disclosure in their website and Government's disclosure in the print media. MoES will upload the ESMF and other safeguards for the project onto its website <https://www.moes.go.ug/> and invite the public to access and review the documents. The Ministry will also provide copies of the ESMF and RPF safeguards documents in the project to the public in its public libraries in its research institutes who will be participating in the project. The ESMF and the RPF alongside other safeguards documents will be disclosed at the World Bank's website and made available to any interested persons for public access and for public information and comments/feedback as will be necessary.

ESMF IMPLEMENTATION BUDGET

The budget for implementing the ESMF is summarised below though these figures will be reviewed and revised during subsequent stages of project preparation.

Summary of Budget Estimate for implementing the ESMF is herein presented as follows:

Nº.	Item	Cost Estimate (US \$)
01.	Conducting subsequent Environmental Assessments (ESMPs, Project Briefs)	80,000
02.	Implementation of ESMPs	385,000
03.	Environmental and social monitoring	150,000 ⁴
04.	Capacity building and institutional strengthening.	155,000
05.	Environmental Audits	95,000
06.	Stakeholder consultations	50,000
	TOTAL (US\$)	915,000

USEEP ENVIRONMENTAL AND SOCIAL ISSUES FOR FURTHER DISCUSSIONS

Based on the consultations, the following deserve further consideration as the project preparation process continues to unfold.

These include:

- Design of Ventilated Improved Pit(VIP) latrines:** Stakeholders feel that the VIP latrines should be designed and constructed as drainable ones this is because land is increasingly getting scarce hence, the tendency of sinking new VIP latrines once those in use get full is getting increasingly a challenge. Because some areas such as Arua and Kapchorwa have weak soil profiles and latrines do not last longer as compared to other areas. In addition, alongside the drainable pit latrines, the project could plan and integrate some sludge treatment plants especially in refugee hosting areas and Kapchorwa region;
- Provision of menstrual rooms:** The designs for VIP toilets should include provisions for menstrual rooms for safe and private usage by girls when under their menstrual periods;
- Use wood preservatives:** There is concern regarding the problem of termites destroying buildings especially roofs where the timber is not protected with wood preservatives which triggers Operational Policy on Pesticides (OP 4.09);

⁴This figure envisages involvement of DEOs, CDOs and likely to be 4-5-year period.

- d. **Management of bat invasions:** Bats reportedly invade classrooms and teachers houses by nesting in the roofs through eaves of houses. It is suggested that, the designs for the roofs should ensure entry for bats to the roofs are totally sealed;
- e. **Rainwater harvesting tanks:** In many cases schools are in fairly isolated locations far from settlements and with skeleton staff staying within. Under such circumstances, it has been found that, ill-motive persons maliciously damage rainwater harvesting plastic tanks by removing taps or, deliberate cutting the tanks at their bases rendering them useless. Communities feel that, possibilities be explored to have in place, concrete water harvesting tanks as opposed to plastic tanks; and
- f. **Erecting perimeter fences:** The open nature of the schools (no fences/enclosures) makes them vulnerable to all kinds of abuse by the public including grazing livestock on the school compounds which destroys ornamental and lawn vegetation as well as theft of school properties. Stakeholders are of the opinion that, schools should have perimeter fencing as part of the project and should be reinforced with Kei Apple live fence. MoES should provide in the management structures for the schools, employment of security personnel. In addition, the perimeter fence be reinforced by planting live fence such as Kei Apple (*Caffradovyalis*).
- g. **Consideration for roofing materials:** Due to the size of the project and the number of school facilities to be constructed, it is proposed that, if resources could allow, some of the structures especially classrooms could be roofed with steel materials rather than timber to cut down on the forest degradation for timber;
- h. **Design of roofs/roofing materials:** The design should take into consideration the risks of wind speed/load that may vary for some areas and hence affecting the cost of roofs. A standard design taking into consideration wind loads should be adopted;
- i. **Topographical and cadastral surveys** should be undertaken for proper planning and design of structures as well as needs for drainage and landscaping needs;
- j. **Thorough land ownership verification** should be undertaken before zeroing in on the areas/sites for the facilities to avoid wrangles and prosecution in the long -run; and Schools (including the teachers) have a number of fuel wood needs, which are largely met through supplies from the wild thereby leading to continued environmental degradation. It is proposed that, the beneficiary schools should set-up demonstration woodlots, which in the end, can be, and sources wood for the schools needs such as fuel wood and construction. Thorough land ownership verification should be undertaken through development of an adequate criteria for land assessment and acquisition.

1 INTRODUCTION

BACKGROUND

The Government of Uganda is focused on improving learning levels and completion rate at the primary education level, through a variety of measures. This includes a US\$100 million grant from the Global Partnership for Education to strengthen the effectiveness of teachers and schools in the delivery of primary education in Uganda. This will potentially increase the number of children who will try to access lower secondary education, while also reduce the outflow of students into the labour market with minimum skills. The education system will therefore, have to double its current intake capacity to achieve Universal access to primary, secondary and Post Primary Education.

Therefore, the proposed Secondary Education Expansion Project complements the Global Partnership for Education intervention by focusing on lower secondary education, which will provide the gateway for most young people to acquire the skills that are required for a more productive life. The focus of the proposed Project is to provide this gateway to the young people from poor families and underserved areas that have hitherto been excluded from lower secondary education. This requires increasing both access and improving quality. The IDA financed UPPEP project, which closed in July 2014, laid the foundation for expanding lower secondary education by increasing access to schooling through classroom construction, procuring textbooks, preparing a new and relevant curriculum for lower secondary education, developing a framework for teacher preparation, support and management.

The proposed Project will focus primarily on improving equitable access to lower secondary education in underserved areas and populations including refugee hosting communities and girls. It will also support the preparation for a comprehensive sector reform and improve the Ministry's capacity. There will be a focus on ensuring that girl's access, stay and complete lower secondary education based on well-documented evidence by various recent studies and projects⁵ that girls' education brings a wide range of benefits not only for the girls themselves but also for their children and communities, as well as society at large in terms of economic growth. Women that are more educated tend to be healthier, participate more in the formal labour market, earn more income, have fewer children, and provide better health care and education to their children, all of which eventually improve the well-being of all individuals and can lift households out of poverty. These benefits also transmit across generations, as well as to communities at large.

Uganda is now home to 1,411,794 refugees as of 31/01/2018, with South Sudan contributing 1,045,236 of which 61% of the population are under 18 years (UNHCR 16 February 2018). The asylum seekers from South Sudan are concentrated mainly in the West Nile districts, while those from the DRC and Burundi are being hosted in the western region districts such as Isingiro, Kamwenge and Kyegegwa. In the Districts of Adjumani and Moyo refugees now make up well over half of the total population. This unprecedented mass influx of refugees into Uganda in 2016 and 2017 has put enormous pressure on the country's basic service provision capacity, particularly in health and education sectors. Refugees share social services with the host communities. The refugee hosting districts are also among the least developed districts in the country. Therefore, the project will also focus on support to refugees and their host communities. The design of the proposed project will, to the extent possible, build on the lessons learned from other IDA funded

⁵ UNICEF, World Bank.

projects such as; the UPPET/ALP project that closed in 2014, USDP, UTSEP and the recently approved Intergovernmental Fiscal Transfer Project.

DESCRIPTION OF THE PROPOSED PROJECT

1.2.1 PROPOSED DEVELOPMENT OBJECTIVE

The project development objective is to enhance access to lower secondary education by focusing on underserved populations in targeted areas. Underserved populations include communities hosting refugees, refugees, girls and people in the targeted areas with limited access to public lower secondary schools.

KEY RESULTS

Over five years the project is expected to contribute to achieving long term outcomes and results that include:

- Improved equitable access to the lower secondary education.
- Better foundation for ensuring quality and relevance of lower secondary education.
- Improved access to lower secondary education for refugees and refugee host communities.

1.2.2 PROPOSED PROJECT COMPONENTS:

Component 1: Expansion of lower Secondary Education

This component will focus on building more schools and expanding existing schools, and by providing learning environments that are safe, non-violent, and supportive of girls' education. Lower secondary school construction financed under this component is complemented with a support package to ensure that each new school is fully ready to offer quality education to students. All new schools will include new cost efficient and quality infrastructure design, learning materials on a 1:1 ratio for students, school management and multi-pronged teacher training (curriculum, girls' education, special needs, violence awareness, ICT assisted teaching) and communities of practice for further professional development.

Existing overcrowded public schools in the refugee hosting areas (RHAs) will receive a standard package of additional infrastructure. Financial support provided to such schools through the scholarships program (sub-component 2.2.) shall be used to procure required learning materials and other resources as required by each benefiting school. In cases, where additional teachers will be required for such schools, the GoU will be responsible for recruiting, training, and paying salaries. Demand for additional teachers will be established during detailed sites appraisal as part of the ESMPs preparation.

Subcomponent 1.1: Construction of new lower secondary schools and facilities

This subcomponent will finance the construction of about 116 new lower secondary schools across the country and improving infrastructure in about 61 existing schools in the RHAs. In total, over 70,300 new spaces will be established. Out of 116 schools, approximately 32 new schools will be located in refugee and hosting communities and 84 will be in other targeted sub-counties of districts meeting the selection criteria. The new schools will be built as large (double stream, eight classrooms) schools creating a total of 55,680 additional spaces for enrolment. The component will also finance school furniture, science laboratory kits, ICT laboratory computers, student textbooks and teacher guides for all new schools. Overcrowded public schools in the RHAs will receive a standard package of additional infrastructure: four classrooms, science lab and latrines. The component will also finance school furniture and science laboratory kits for new classrooms and labs. Thus, 14,640 additional space.

Subcomponent 1.2: Ensuring safe and protected children

This subcomponent will complement the construction of new school facilities by ensuring safe and protected children with a particular emphasis on girls, based on the policy and legal framework of Uganda. the subcomponent will support a multi-pronged approach through: (i) training of the new schools' headteachers, and their deputies and teams of teachers in establishing and maintaining safe school environments; (ii) implementation of social and emotional learning modules; (iii) implementation of violence against children codes of conduct for communities' leaders, school-founding bodies and boards of governors, teachers, and works contractors; (iv) sensitization of the local communities (violence reduction, back to school and importance of girls' education); and (v) equipping students with important life skills, including independent and proactive participation in income generating activities. All existing schools in the RHAs (about 210) and all new schools constructed under the project inside and outside RHA (116) will benefit from the sub-component.

A set of targeted community and school level activities will comprise the "safe school program" and promote school, community, and parental awareness to prevent cases of violence in schools, encourage parents to educate their girls, prevent early pregnancies, provide support to at-risk children, mobilise child mothers to complete their education, and help girls and boys to develop crucial life skills.

Within the target districts, special attention will be provided to the areas where the pregnancy and dropout rates for girls is high. Social and Emotional Learning (SEL) modules under the program will help students, especially in the RHA to cope with psycho-social challenges related to violence in schools and local communities by fostering their resilience, empathy, and engagement.

Much of this component's activities are modelled after and will build on ongoing and past efforts made by the Uganda-based non-governmental organizations (NGOs). To ensure sustainability, staff from the MoES's Secondary Education Department and the Local Government will go through capacity building so that they will be better equipped to support schools in implementing and sustaining the component activities.

Component 2: Hosting Community and Refugee Education Support

Component 2 will focus on both new and existing lower secondary schools in refugee hosting sub counties within the 12 targeted districts. All activities under this component are financed through grants received through the IDA 18 sub-window for refugees and host communities. The target population is refugee and host community school-aged children eligible for lower secondary education (ages 13-18) who have already completed primary schools. The component will support the development and execution of the following programs: (i) accelerated education program (AEP) and (ii) school scholarships. Note that social and emotional learning programs (SEL) which are crucial for addressing specific challenges faced by refugees will be funded in subcomponent 1.2 together with safe schools packages. The component will also provide support in obtaining equivalent certifications in Uganda that allows children who have finished primary school abroad to attend secondary school in Uganda.

Subcomponent 2.1: The Accelerated Education Program

The accelerated education program (AEP) will provide students who have missed the opportunity to enrol in lower secondary school at the appropriate age or who dropped out of school for various reasons (displacement, pregnancy, etc.) with a fast track learning opportunity. Given the paucity of experience and track records of administering AEP at the secondary school level, this program will start with small scale pilots in five existing schools building on some of the most promising early AEP initiatives by leading NGO. This will be followed by additional AEPs in seven new schools, resulting in 12 pilot AEP across the whole refugee hosting regions.

Subcomponent 2.2: The Scholarship Program

The school scholarship program transfers funds to Local Governments (LGs) as accounting offices for further administration to the lower secondary schools in refugee and hosting communities as a means to offset the economic shock refugee families are experiencing. The school scholarships will assist in reducing school charges that are passed on to parents, especially to refugee families. School charges in Uganda represent a considerable share of the average household income. The proportion of school charges of household income is likely to be higher for refugee and host community. This program is designed to increase the likelihood of households (both hosts and refugees) with eligible secondary school aged children to enrol and retain their children in school. The amount generated by scholarships at each school (both new and existing) will depend on the number of refugee students enrolled each year. The scholarships will be managed on the school level in the same way and under the same guidelines as the capitation grants for Ugandan students.

The school scholarship program relies on project grant funds to provide support for refugees that are equivalent to the capitation grants that the MoES already provides for Ugandan students. Given the government, as part of the refugee response plans, has pledged extending capitation grants to refugees during the next few years, this project considered that it would be the MoES's responsibility to finance capitation grants as part of their regular budget by the end of the project life.

Subcomponent 2.3: Certification of prior education

The sub-component will provide funding to (a) mainstream support for refugees in obtaining papers required to start / continue secondary education (e.g. translation, validation and equating of relevant certificates) through MoES/Uganda national examinations board (UNEb), and (b) identify those who need support for certification and cover the costs for obtaining relevant certifications for refugees.

Component 3: Improving Teachers Support and Policy Development Nationally

This component will scale up existing elements of the teacher support system and build capacity of the school principals as primary pedagogical supporters for teachers. The component will also aim to prepare for future development of quality lower secondary education through analytical and capacity building work.

Subcomponent 3.1: Support to teachers

The sub-component will support establishing a continuous professional development (CPD) system nationwide. The system will be based on about 100 lower secondary school clusters that will help organize and support teacher training country wide. Each cluster will be built around a cluster centre – existing well performing schools with capable teachers. The cluster centres will deliver in person and distance-based teacher coaching. The centres will facilitate communities of practice (cops) for subject teacher. The cops will serve as peer-to-peer teacher support mechanism. Digital platforms will be utilized to operate cops and deliver teacher support by distance.

The CPD support will focus on providing ongoing support to teachers implementing the new curriculum. the GoU will cover the basic costs of introducing the new curriculum: initial and follow up teacher training, printing and delivering textbooks and teacher guides with scripted lessons, learning materials, and ongoing training /support costs, etc.

The subcomponent will finance the establishment of the cluster centres in existing schools (using existing facilities, no construction is expected) that are geographically accessible by their network of schools and have a track record of good performance delivering learning outcomes at an appropriate level (e.g. above national average). A selected teacher will be the coordinator at the cluster centre and will be responsible for coordinating the trainings for their respective network of about 40 schools. Coaching will be led by the head teacher at each school and by visiting coaches (inspectors, regional trainers). The subcomponent will train centre leaders. Digital platforms and resources will be utilized to allow teachers to grow cops, to receive remote support and feedback from regional and national trainers and coaching on how to improve teaching and learning. They will also be able to share their own experiences directly with each other.

Head teachers and deputy head teachers from all public schools as well as head teachers from poorly performing private schools (the worse performing half of the private schools) will be trained in (i) school management and (ii) pedagogical leadership. School performance will be measured by the tool which is currently under preparation with support from UGiFT project. The tool will be

applied to select beneficiary private schools. The training provided under the project will improve school management practices, results orientation, service delivery and raise quality of teaching through providing teachers with ongoing pedagogical support from the principals.

The project will implement a special program for training science teachers as ICT champions to promote technology assisted teaching of science subjects and develop modern digital skills (as required by the new curriculum) among lower secondary school students. One teacher from each public school and teacher from poorly performing private schools (bottom half of worse performing schools) will be trained. The ICT assisted teaching starts with identifying an ICT champion (supporter and early adopter) in a school. The champion will promote the use of ICT for better teaching and learning in the whole school starting with his/her subject. After training in ICT enhanced pedagogy, the champion will receive a laptop and projector (to be owned by the school). It will be preloaded with ICT resources for all the subjects. The program will be available to all public schools in the country (more than 1,200 schools), and new schools to be built under subcomponent 1.1, some with ICT capacity and some without any previous exposure to ICT assisted teaching in order to avoid widening the technology gap. This will enhance professional sharing and learning across teachers in all lower secondary schools in their respective clusters. In total, about 6,600 teachers and administrators will benefit from the training / capacity development program.

Subcomponent 3.2: Support for development of key secondary education improvement policies

This sub-component will prepare for the key measures/reforms required to further improve the quality of teaching and learning in lower secondary schools in accordance with the new education sector strategy (forthcoming around June 2020). It will include technical assistance to support policy research, preparation of policy papers and implementation plans, and capacity building for policy-makers. the sub-component will, inter alia, focus on the following areas: (i) assessing existing experience and adopting a sustainable school construction strategy; (ii) teacher recruitment, deployment, retention, reward and motivation to address the teacher gap, teacher attrition, and the increase in enrolment due to demographic stress; (iii) improvement of provision of teaching and learning materials; (iv) quality assurance and assessment; and (v) enhanced private sector service delivery. In addition to developing new strategies/policies, the component will help to introduce measures required to operationalize existing policies, for instance vac and GBV related.

Component 4: Project Management, Monitoring and Evaluation

This component will provide support to the project implementation, supervision, monitoring and evaluation, and verification costs. It will finance project staff (including staff needed to supervise school construction, including clerks of works), office rent, furniture, equipment, transportation, data collection and analysis, including gender specific aspects of the project, and capacity building. Third party assessments will be done to verify the achievement of the DLIs, other project results and satisfactory completion of large procurements.

1.3.1 SCOPE OF WORK

The Environmental and Social Management Framework (ESMF) provides a process and guidance to assess the potential environmental and social impacts of USEEP. This process will address generic potential impacts of proposed project activities and propose relevant costed mitigation measures and strategies. The Framework is therefore, intended to help ensure that the MoES implements the proposed project in an environmentally and socially sustainable manner. The ESMF provides step by step environmental and social screening process for sub projects that will enable national and local governments, as well as communities to simultaneously identify potential environmental and social impacts.

In addition, the ESMF provides an analysis of relevant national policies, laws and guidelines on social risk management. The ESMF is to guide on the assessment and mitigation of social risks including those arising out of labour mobility and influx resulting from construction of schools across the country. Specifically, the ESMF focuses on processes for identification of risks related to gender-based violence, child labour and other forms of violence against children and propose potential measures for prevention and response. The ESMF suggests processes for stakeholder analysis and engagement throughout the life of the project, including citizen engagement and how an effective and efficient grievance redress mechanisms for the project has been proposed herein. The social assessment component identifies potential entry points for inclusion of disadvantaged and marginalized groups in project activities including strategies for targeting women for employment in construction work under the project.

1.3.2 ESMF PREPARATION METHODOLOGY

The ESMF was prepared through a combination of the following methodologies:

1.3.2.1 KICK-OFF MEETING WITH THE CLIENT

A kick off meeting was held on 19th September 2018 at Legacy Towers MoES with the Client and chaired by the Assistant Commissioner, Secondary Education (Project Coordinator designate), Senior Education Officer, Private Education; Environmental and Social Safeguards Specialist-UTSEP/GEP IDA Projects and two Environmental and Social Safeguards Consultants. The meeting was to draw the study strategy and agree on the districts to be visited during the field consultations. This meeting served to clarify the scope and delivery milestones for the task in keeping with the project processing milestones set out by the Bank.

1.3.2.2 FIELD CONSULTATION PLANS

The details of the field consultations were worked out based on the need to capture on ground information on refugees' aspects in secondary education as follows:

- a. Yumbe with a target to visit Bidibidi Refugee Settlement in West Nile Region;
- b. Kyegegwa so as to capture issues in Kyaka II Refugee settlement for the western region,
- c. Isingiro to capture refugee issues in Nyakivale Refugee Settlement for the southwest and Kiryandongo refugee resettlements for mid-central.

For none refugee hosting districts that were visited included; Namayingo (eastern region), Sembabule for the central, Nwoya for the northern region while districts of and Bukwo or Manafwa were sampled due to their uniqueness in terms of difficult access. To visit those areas, teams were accordingly drawn, and all the consultative processes were led by Ministry Teams supported by the consultants.

1.3.2.3 PRESENTATION OF THE ESMF TO MOES MONITORING WORKING GROUP

On 5th February 2018, the consultant made a presentation of the Draft ESMF to the MoES, which comprised of members of Monitoring and Evaluation Committees from a cross-sections of public and private universities in Uganda. The key issues that were raised included the need to put in place, measures to ensure easy access and mobility of PWDs children into and out of such facilities, ensuring compliance of works with applicable safeguards requirements and involvement of the local communities in terms of employment in the project.

1.3.2.4 ENVIRONMENTAL AND SOCIAL SCREENING

Social and environmental sustainability are fundamental to the achievement of development outcomes and are enshrined into Uganda environmental and development commitments as in Vision 2010 and related strategic national development policy documentations. It underpins and demonstrates government commitment to its National Environment Policy goals⁶. The EIA Guidelines for Uganda of 1997⁷ require that, development projects be subjected to Environmental and Social Screening (ESS) for early screening of environmental and social risks in the project, which helps their early management and integration into the project design. During the preparation of this ESMF, an Environmental and Social Screening was undertaken which helped in identification and subsequent preliminary placement of the project in Category B (Annex 2).

1.3.2.5 STAKEHOLDERCONSULTATIONS

Stakeholder engagement and public consultations was undertaken to help the Ministry Team collect environmental and social information, and for them to inform the sample districts, refugee host community and other beneficiary communities and get responses/comments about the school proposed projects. The engagement was undertaken in the districts of Namayingo, Sembabule, Nwoya, Isingiro, Bukwo, Manafa, Yumbe, Kyegegwa and Kiryandongo, and their concerns, responses, issues raised by the stakeholders are detailed in Annex 1. In addition to the information collected using various tool in Annex 1, using key Informants and Focus Group Discussion, the field team also solicited information/concerns/issues from persons/officials that might be affected directly or indirectly by the proposed construction of school facilities. This was done through using a stakeholder consultations tools (Annex 1) for environmental aspects in the project during the study.

The process involved meetings with Chief Administrative Officers (CAOs), District Education Officers, District Environment Officers, District Planners, Community Development Officers, District Inspectors of Health, some of the head teachers of existing secondary schools and Refugees Settlement Commandants amongst others. Some of the key issues that emerged out of the consultations were mainly on secondary education in the districts District Inspectors of Health, Sub-County Chiefs, and some parents and pupils. The possible impacts (social and environmental) both beneficial and negative were explained to them to clarify technical issues.

⁶ National Environment Policy 1994, Uganda-Kampala

⁷ The Environmental Impact Assessment Guidelines 1997 for Uganda, Kampala



Figure 1: Meeting leadership of Yumbe District



Figure 2: Community meeting in Kapchorwa



Figure 3: Meetings in rural areas of Hoima



Figure 4: Consultations in Sembabule areas



Figure 5: A section of the community in Moyo areas during ESMF preparation



Figure 6: Discussions with a cross-section of community members in Bukwo areas

1.3.3 SOME OF THE KEY ISSUES/CONCERNS AND SUGGESTIONS

The following were some of the key issues raised by the stakeholders during the consultative process, details are given in Annex 1.

- a. Fears over rampant shoddy work which has of recent been characterised by collapsing buildings with many lives lost. This, the meetings attribute to poor supervision and inadequate quantities of construction materials used in the construction of such structures. In this case, they ask for strict supervision of the sites to stamp out theft of materials;
- b. **Erecting perimeter fences:** The open nature of the schools (no fences/enclosures) makes them vulnerable to all kinds of abuse by trespassers and theft of school property including grazing livestock on the school compounds which destroys ornamental and lawn vegetation. This, according to stakeholders needs to be discussed exhaustively so that, in case fencing is to be adopted modalities of guaranteeing safety of fencing materials be worked out with all stakeholders' and roles and responsibilities agreed which is key considering wide spread lucrative trade in scrap metal materials. MoES should provide in the management structures for the schools, employment of security personnel. In addition, the perimeter fence is reinforced by planting live fences such as Kei Apple (*Caffradovyalis*).
- c. It also emerged that, in some areas, there is a problem of termites. As such, there could be a need to use pesticides such as wood preservatives on roofing timbers for the buildings, as well as application of anti-termites in the construction of foundations for structures;
- d. Much as the project has provided for rainwater harvesting, it is imperative that, the rainwater harvesting tanks should be of concrete nature than plastic types to check against vandalism where thugs remove water taps and, in some cases, deliberately cutting the tanks as was seen in some schools. In addition, the project should construct drainable latrines instead of ordinary pit Latrines which can be drained and can serve for a longer period. In addition, when well-constructed, drainable latrines take longer time in usage;
- e. Alongside constructing drainable pit latrines, it would be better for the project to include a component of sludge treatment in some urban areas especially in areas with such limited facilities;
- f. The pit latrines should have provisions for girls to manage their menstrual processes i.e. cleaning up and changing pads with ease and in privacy implying there should be room for such purposes;

- g. During advent of education alongside spread of Christianity, communities gave land for schools, hospitals and churches. However, of late, the new generations look to be waking up to demand schools and churches should pay/acquire any such lands to avoid complications after. In all, the lands should be properly acquired and documented;
- h. Where communities agree to give their land for the schools it should be well documented and signed by the clan i.e. accompanied with a clan resolution to that effect;
- i. The locals should be targeted with respect to gaining employment in the project than giving priority to those outside the project. Implying information on available job opportunities be well publicized in the communities through available media;
- j. The project should have strong HIV/AIDS awareness and sensitization program targeting both the workers and the communities. This should be done to address risks of HIV/AIDS spread in the community;
- k. Lightning is a common risk in schools and the project should put in place appropriate protection measures on the buildings and such equipment should be protected from vandalism;
- l. Institute in the projects good waste management measures to avoid littering construction waste all over the compound;
- m. There should be measures for wind break in the schools and for such trees, the project should plant multi-purpose trees which can serve a host of functions include source of fruits for the children and serve as food security, provide shade and protect classroom facilities; and
- n. On many sites, once works are concluded, the contractors simply walk away without doing any landscaping, clearing of debris and removing old tyres such that, the site remains landscaping to give aesthetics to the school compounds is key.

PROJECT LOCATION AND SALIENT PHYSICAL CHARACTERISTICS RELEVANT TO THE SAFEGUARD ANALYSIS

Of specific relevance to safeguards analysis are project components 1 and 2 which involve construction/civil works. For component one, the project supports interventions aimed at increasing access to quality lower secondary education in underserved areas and refugee host communities. Specifically, the project will support the construction of new secondary schools. The specific sites for project implementation will be determined during preparation. Component two will support refugees and their host communities.

The infrastructure works under component 1 will pose civil works/construction related impacts including health and safety considerations. While component 2 focusing on refugees and host communities will have social impacts. Therefore, by their nature, project components 1, and 2 may have limited and localized negative environmental and social impacts. These projects may involve land acquisition and displacement of land-uses and/or livelihoods, which involves establishment of new facilities at grant aided community schools. The project will finance construction of hundreds of new schools across the country. Land will therefore, be required for school construction. An RPF has been prepared to avoid or mitigate any potential land acquisition, resettlement and loss of livelihood impacts. Based on the RPF, site-specific RAPs will be developed once the actual construction sites are known. The potential environmental and social impacts can be adequately managed by integrating environmental and social due diligence into the sub-project cycle. Since the exact locations are not yet known at this time for Component 1 and Component 2 engineering designs will be subject to review.

IMPLEMENTING AGENCY

The overall oversight of the project is the responsibility of the MOES under the leadership of the Permanent Secretary. The Project will have a Steering Committee with relevant representation and TORs detailing their responsibilities including the frequency of their meetings. The Project will also have a Technical Committee with key project staff. A Project Coordination Unit will be established to support the day to day implementation of the project. The PCU will be led by a Project Coordinator and a Deputy Coordinator assisted by component technical leads for each of the key project activities, recruited specialists and fiduciary staff (procurement, financial management and M&E). The Project will be under the Secondary Education Department.

The PCU will work in close coordination with the user departments of the Ministry that will provide technical guidance, coordinate the delivery of the project, and work in collaboration with other Ministries, and agencies specifically NCDC, UNEB, Office of the Prime Minister, Ministry of ICT on connectivity, Ministry of Energy and Power Supply, and Ministry of Local Government (MoLG). The MoLG will verify the allocation of new schools and conduct procurement for decentralized schools if deemed to have capacity. MoLG will also supervise construction works, monitor safeguards, and operationalize the Grievance Redress Mechanism (GRM).

Component 1 covers construction of new schools and support to girls' education. The PCU will have a dedicated team of engineers supervising the project implementation with support from the LG. The Construction Management Unit (CMU) will be responsible for coordination with different projects. The standardized drawings and bill of quantities for the various lower secondary school structures have been developed with support from the CMU. The Gender Unit within the MoES will be responsible for the delivery of the gender activities in the targeted regions as well as the awareness training programs for new lower secondary schools to be built under the project.

Component 2 focuses on refugee hosting districts, the refugee focal point within the MoES (e.g. Policy and Planning Department) will assign a dedicated officer to be responsible for supporting the refugees and host communities' education activities of the project. The MoES will ensure coordination of the various stakeholders under this component including the selected NGOs, Office of the Prime Minister, and UNHCR to deliver the project activities. The Strategy and Policy department of the MoES will host the focal point for refugee agenda. The project will support capacity building and knowledge exchange in this area for the MoES staff.

Component 3 will be led by a component coordinator within the PCU, and s/he will be responsible for coordinating/facilitating the technical specialists working together from the NCDC, TIET, UNEB and DES to deliver the teaching and learning activities.

ENVIRONMENTAL CATEGORY ACCORDING TO WORLD BANK CLASSIFICATION

1.6.1 THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK AND PROJECT CATEGORIZATION

The potential environmental and social impacts can be adequately managed by integrating environmental and social due diligence into the sub-project cycle. Because of the overall limited likely environmental and social impacts, the project is rated as EA Category B.

1.6.2 PURPOSE OF ESMF

Overall, the purpose of the ESMF is to ensure that interventions under the Uganda Secondary Education Expansion Project (USEEP) will be undertaken in a manner that avoids and minimizes environmental and social impacts as much as possible. Specific project locations have not been clearly identified at this stage, hence it provides a general impact identification framework to assist project implementers to screen the projects and institute measures to address adverse environmental and social impacts. For future projects within the Ministry of Education and Sports (MoES), the ESMF describes the procedures to assess environmental and social risks. This ESMF also provides guidance on how environmental and social aspects shall be identified, assessed and managed.

1.6.3 PREPARATION OF ESMF

The ESMF has been prepared in accordance with applicable World Bank safeguard policies and Uganda environmental impact assessment guidelines, and involved data literature reviews; field reconnaissance studies, public consultations and discussions with relevant sector institutions, including districts, private sector, statutory agencies and local communities.

1.6.4 CATEGORIZATION OF USEEP

1.6.4.1 TYPICAL WORKS TO BE UNDERTAKEN

Based on the position of the Ministry, it is said that, the project should focus on construction of full school facilities, not partial facilities and should be on a single contract basis. Therefore, the following facilities should constitute a full school:

- a. 6 N^o. new classrooms including furniture (furniture will be a separate contract from construction one);
- b. 2N^o. Unit science laboratory equipped with furniture;
- c. an administration block - furnished and 2 stance latrines;
- d. 2N^o. unit teachers' house (for hard to reach and hard to stay schools), with kitchen, 2 stance latrine and wash rooms;
- e. water harvesting system for teachers and classrooms;
- f. semi-detached house for head teacher and deputy with wash rooms, kitchen and 2 stance latrines;
- g. library/ICT Laboratory- furnished;
- h. play ground;
- i. installation of power-solar; where there is no main grid; first fix where there is grid; and
- j. 2 N^o. 5 stance VIP latrines.

1.6.4.2 CATEGORY OF THE PROJECT

The proposed USEEP has been screened against both World Bank and Government of Uganda environmental and social considerations taking into account the following:

- a. The schools' infrastructures to be constructed will be basic classrooms facilities (not storied infrastructure);
- b. The infrastructure will be largely constructed on land acquired by the Ministry for the project, which may belong to the existing schools and likely acquisition of more or new land that may belong to communities who will be compensated in line with requirements under the RPF.

- c. The project has by and large positive impacts in terms of providing dire needed infrastructure for delivery of education services (classrooms, teachers' accommodation, better management of public health in the schools in terms of putting in place, standard pit latrines and water harvesting facilities).

In view of the above, the proposed USEEP project is placed as a category B type, a position that will be confirmed during detailed and subsequent project preparation.

1.6.4.3 LESSONS LEARNT

Lessons learned from the implementation of safeguard requirements under similar WB funded projects in the education sector such as GPE-UTSEP, USDP and ARSPD, which lessons can be carried over to strengthen/enhance safeguards management under USEEP include:

- a. **Recruitment of the Environmental and Social Safeguard Team:** The environmental and social safeguard team were recruited and brought on board one year after the project/UTSEP became effective. In future, the environmental and social safeguards Specialist needs to be brought on board early to minimize delays, which characterized UTSEP implementation;
- b. **Role of Project Environmental and Social Safeguards Specialist:** The Ministry under Uganda Teacher and School Effectiveness Project (UTSEP) of the Global Partnership for Education (GPE) has hired an Environmental and Social Safeguards Specialist who has provided oversight role on the on-going schools facilities construction. The involvement of the officer has given direction to current observed levels of environmental and social compliance in the implementation of works, a lesson that should be applicable to the planned USEEP project;
- c. **Low interest in safeguard issues:** Low appreciation of environmental and social safeguards issues by relevant stakeholders including the contractors was clearly noted, which calls for capacity building and sensitization early before project implementation i.e. during the project mobilization phases;
- d. **Contractual obligation of social and environmental risk:** Majority of contractors did not sign contracts with their workers and suppliers. In future all contractors workers, including suppliers of materials should sign formal contracts to avoid construction and post-construction issues which may negatively impact on the project (s);
- e. **Mainstreaming gender issues:** Many sites employed a very big number of males as compared to females. It was noted that employment of women should be given priority in terms of gender balance vis-a-vis their responsibilities; as a few sites which had women as supervisors had better overall compliance with safeguards than sites which had men as supervisors;
- f. **Site hoarding and protection of children:** Proper site hoarding greatly limits access to the sites by children hence facilitating the prevention of different forms of child abuse and accidents.
- g. **Supervision and monitoring:** Regular monitoring of the sites improves compliance with environmental and social safeguards especially if their relationship with civil works is well explained.
- h. **Involvement of the District Environment Officers:** These officials by mandate under the National Environment Act, No. 5 of 2019, have the responsibility to report to NEMA on environmental compliance of on-going developments in the districts in which case, they are well placed to inspect and monitor USEEP schools construction works. However, their effective involvement is hampered by lack of direct access to facilitation. For instance, they are to operate under the engineering department, which has its own challenges in cases where timely monitoring is deemed necessary. In this project, provide a deliberate budget line to support effective involvement of the DEOs in monitoring and inspections of works;
- i. **Capacity of the contractors:** There is a fundamental need for the Ministry to improve the quality and performance of contractors undertaking construction projects especially in the observance of environmental and social safeguards during the construction of schools. There is a glaring

difference across contractors on the levels of compliance with the environmental and safeguards requirements. From the discussions with stakeholders on this, it emerged that; the contractors need to have their capacity built through tailor-made trainings under Uganda National Association of Building and Civil Engineering Contractors (UNABCEC). Strengthening the social safeguard obligations of contractors will ensure that, they are able to identify and take measures to manage the negative impacts arising from their works and according have such reported in their schedule of project reporting;

- j. **Integration of environmental and social safeguards into the bid documents:** to date, there is improvement regarding mainstreaming of cross-cutting issues into MoES construction projects largely due to integration of such cost items into the Bills of Quantities for works making payable items;
- k. **Mainstreaming HIV/AIDS interventions into construction works projects:** The contractors endeavour to address HIV/AIDS in their activities by distributing condoms and creation of general awareness on the scourge. However, this could be fairly easier for them if they adopted an approach of engaging HIV/AIDS service providers such as TASO amongst others;
- l. **Stakeholder consultation and grievance redress mechanisms:** Public consultations during the preparation of safeguard instruments were carried out in almost all cases, but could be improved in quality and comprehensiveness, and need to be continued throughout project implementation, including addressing construction and post construction issues through application of grievance redress mechanism. Opportunities to engage beneficiary communities/schools/colleges in sub-project design, implementation and monitoring needs to be more actively explored and;
- m. **Tree planting:** Tree planting has a number of benefits to the schools like provision of shade, windbreak and fruits, and wider environmental conservation when integrated into the projects infrastructure. However, there is a challenge of vandalism and loitering livestock, which destroys the trees, and in many cases, the investment is lost. It is suggested that, trees planted by the contractor should be taken care of by the contractors throughout the Defects Liability Period and eventually, the school should then take over after the contractors have brought them up to reasonable levels.

1.6.5 ACQUISITION OF PERMITS/APPROVALS

Prior to the commencement of the project activities, a number of permits and approvals will have to be secured to ensure legal compliance and, foster cooperation and harmony among the different stakeholders. Key permits and approvals that are likely to be applicable to the project include:

Some of the Permits for the Project

Nº.	Permit/Approvals	Responsible /Issuing Agency
01.	Construction Permit	Directorate of Water Resources Management (DWRM) in Ministry of Water and Environment
02.	Surface Water Abstraction (Legal basis: <i>Uganda water act (Cap. 152), The Water Resources Regulations, 1998</i> . Application Fees: UGX 450,000 while license fee: UGX 450,000 for a New permit. Likely to be applicable where water is to be abstracted for project works.	Directorate of Water Resources Management (DWRM).
03.	Wastewater discharge permit. Its legal basis: <i>The Water Act Cap 152, The Water Resources Regulations, 1998</i> . License Fee: UGX 650,000	Directorate of Water Resources Management (DWRM).
04.	EIA Approvals	National Environment Management Authority (NEMA)

05.	Registration of Construction Site/Workplace. Its Legal Basis are provision in Occupational Safety and Health Act 2006.	Occupational Health & Safety Department of Ministry of Gender, Labour and Social Development-MoGLSD
06.	Request and obtain hoarding permit	District Local Government (Engineering Department)

2 BASELINE ENVIRONMENTAL AND SOCIAL SETTING

The proposed Uganda Secondary Education Expansion Project (USEEP) is a national project hence, the baseline description herein, is based on a national outlook of the country under each of the thematic areas as provided below:

PHYSICAL ENVIRONMENT

2.1.1.1 SIZE AND LOCATION

Uganda is a land locked country, located in East Africa, lying between latitude 40 12' N and 10 29' S and longitude 290 34' E and 350 E astride the equator. It is bordered by South Sudan to the North, the Democratic Republic of the Congo (DRC) to the west, Tanzania and Rwanda to the South and Kenya to the East (Figure 7). Its total land area is 236,000km² of which, 33,926km² is permanent water and 7,674km² is permanent swamp, its dry land accounts for 194,000km². Administratively, Uganda is divided into 112 districts and the capital city Kampala.

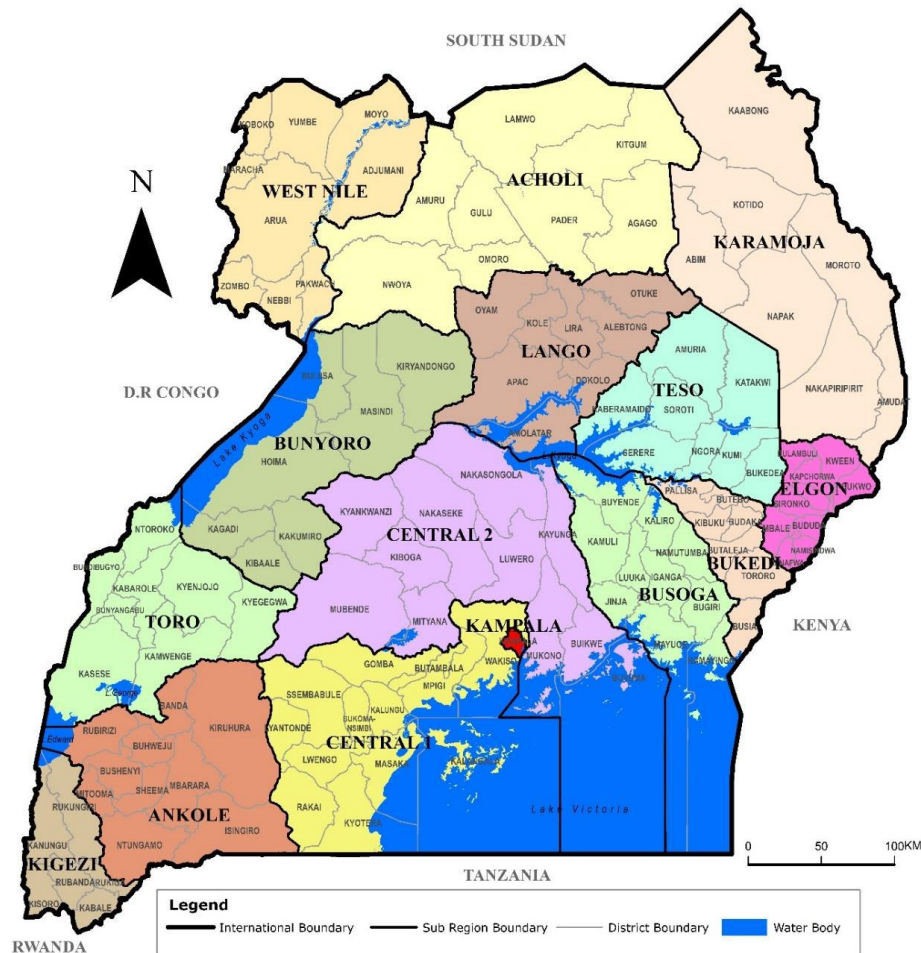


Figure 7: The 15 Sub-Regions of Uganda⁸

⁸Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the Thematic Report Series*, Kampala, Uganda.

2.1.2 TOPOGRAPHY

Towards the South, the characteristic scenery consists of flat-topped masa-like hills and broad valleys frequently containing swamps. Towards the North, the landscape consists of gently rolling open plains interrupted by occasional hills, mountains and inselbergs. Most of the country lies within altitude 900–1,500m above sea level. The lowest point in Uganda is at Nimule on the Sudan border in North Western part of the country, where the altitude is 600 m.a.s.l and the highest point is Mt.Rwenzori whose highest pick is 5 100 m.a.s.l.

2.1.3 GEOLOGY AND SOILS

Geological formations of Uganda reveal very old rocks formed in the pre-Cambrian era around 300 or 600 million years ago. The younger rocks are either sediments or of volcanic origin, formed from about 135 million years ago (cretaceous period) to the present. A number of parameters define the soils of Uganda and these include parent rock, and the age of soil and climate. The most dominant soil type in ferralitic soil, which accounts for about two-thirds of the soils found in the country.

2.1.4 LAND USE

Uganda has a total area of 241,550,000 ha of which, agricultural land occupies of 14,415,000 ha (72%) in 2013. Notably in the last decade, agricultural land has steadily increased at a rate of 1% per annum, and if this rate continues agricultural land will account for 90% of Uganda's land by 2040. Natural forest cover has declined drastically from 54% in the 1950s to 20% of the total area, while grassland has increased by 28.18% during 1996–2013. About 41% of the country's total area is experiencing degradation, of which 12% is in a severe state of degradation.

2.1.5 LAND TENURE SYSTEMS IN UGANDA

The Land Act of Uganda 1998 recognizes four major systems of land tenure:

2.1.5.1 CUSTOMARY TENURE

Customary tenure is the most common tenure system in Uganda whereby access to land is “governed by the customs, rules, and regulations of the community.” Holders of land under the customary system do not have a formal title to the land they use, but generally have secure tenure.

2.1.5.2 MAILO TENURE

Mailo tenure is a quasi-freehold tenure system established in 1900 by the British colonial government to reward colonial agents who advanced British interests in many regions of Uganda and remains a relatively secure and well-defined system of tenure, particularly in the Central region. An important feature of *mailo* Systems is that much of the land is used by tenants who are restricted in their security of tenure on the land they farm.

2.1.5.3 FREEHOLD TENURE

Freehold tenure is a system whereby owners of the land have a title to their land, which allows them to hold the registered land indefinitely. The landowner is given complete rights to use, sell, lease, transfer, subdivide, mortgage and bequeath the land as they see fit, so long as it is done in a manner consistent with the laws of Uganda.

2.1.5.4 LEASEHOLD TENURE

Leasehold tenure is a system where the owner of the land grants the tenant exclusive use of the land, usually for a specific period. Land may also be leased from the state to individuals for typical lease

periods of five, 45, or 99 years. In return, the tenant usually pays an annual rental service under specified terms and conditions. Leaseholders may or may not hold formal contracts with the owner.

2.1.6 AGRICULTURE

Agriculture continues to be the main economic activity in the Eastern African sub-region employing more than 75% of the population, majority of whom are smallholder farmers. In Uganda, agriculture has for a long time been a very dominant sector that exerts considerable influence on overall GDP growth of Uganda. Thus, the sector remains the backbone of the country's economy with a sector contribution to GDP of about 25.8% in 2015. It contributes over 40% of the country's exports. Agriculture also employs about 72% of the total labour force (including disguised labour), 77% of whom are women, and 63% are youth and most of whom reside in the rural areas. Indeed, in the recent past, the smallholder agriculture sector has been crucial for poverty reduction in Uganda as agricultural households accounted for 79% of poverty reduction between 2006 and 2013.

2.1.7 VEGETATION RESOURCES

The vegetation in Uganda is extremely diverse a result of the different microclimates of the country. Vegetation zones can be roughly classified according to the rainfall zones and are generally: Lake Victoria region, northern region, and the highlands of the southeast. These are defined according to the climate of the areas. The biogeography, climate and topography have contributed to the biological richness of the ecosystems of the country. The greater proportion of the original forest cover has been reduced and is degraded and therefore, no significant areas of the forest are completely original and natural.

2.1.8 CLIMATE

Uganda's climate is characterized by temperatures ranging from 16-31⁰C. Most of the country has high moisture levels except the Karamoja region in the north-eastern part of the country which experiences a semi-arid condition especially during the dry season. The average annual rainfall ranges from 600–2,500mm received in two seasons of March–June and October–December. Although there has been no discernible change in total annual rainfall beyond natural variability, there is a likely decrease during the long rains of March–May. These conditions make climate one of Uganda's most valuable natural resources that support the agrarian economy and farming households (MoLGSD, 2016)⁹. Climate determines the state of other natural resources such as water, forests, wildlife and biodiversity that form the basis for socio-economic development in other sectors such as agriculture, fisheries, tourism, transport and health. This dependency inherently makes Uganda highly vulnerable to the impacts of climate change.

The climatic conditions in the project areas are discussed under broad climate of Uganda (Figure 8). The country is characterized by equatorial climate with plenty of rain and sunshine moderated by the relatively high altitude. In most parts of the country, the mean annual temperature ranges from 16⁰-30⁰C. The Northern region receives one rainy season from April to October, and the period from

November to March has minimal rain. Most of the country receives between 750-2100 mm of rain annually.

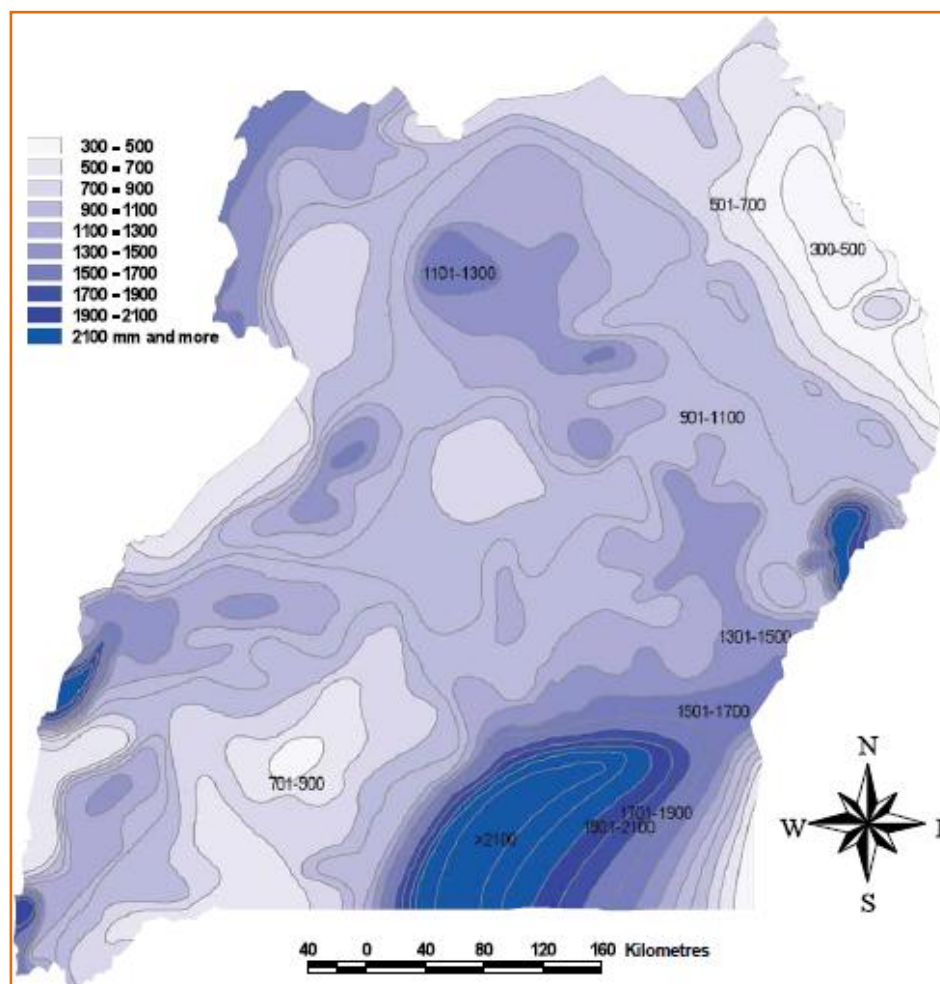


Figure 8: Uganda Rainfall Map¹⁰

Uganda's climate is significantly affected by the La Nina and El Nino phenomena. Climate change impacts on these phenomena are not clearly understood to make any climate change predictions with confidence. However, there is evidence that warming will increase the intensity or frequency of these phenomena. Temperature, on the other hand, varies mainly with altitude and changes very little from year to year, in the order of 0.5°C. However, it is observed that temperatures have been increasing by approximately 0.2°C per decade over the last 30 years.

SOCIO-ECONOMIC ENVIRONMENT

2.2.1 POPULATION

Uganda has one of the youngest and most rapidly growing populations in the world. About half (48.7%) of Uganda's population is younger than 15, well above Sub-Saharan Africa's average of 43.2% and world average of 26.8%. The country's population growth rate, currently at 3.3%, is also above Africa's average.

¹⁰ ESMF for Uganda Secondary Education Improvement Project, MoES 2016

Uganda's population has increased from 9.5 million in 1969 to 24.2 million in 2002 and between 1991 and 2002 the population increased at an average annual growth rate of 3.2%. Results from the 2014 National Housing and Population Census (NHPC) put Uganda's population at 34.9 million people and is one the fastest growing in the world. Overall, between 2002 and 2014, the population increased from 24 million to about 35 million representing an average annual growth rate of 3.0%. The population was projected to be 37.7 million by Mid-year 2017 (Figure 9).

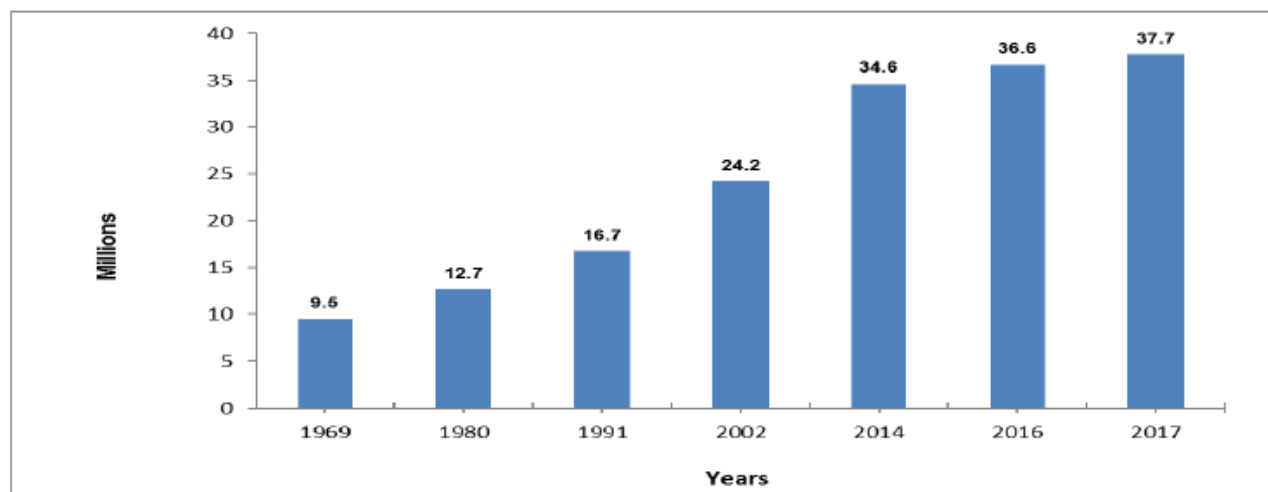


Figure 9: Uganda Population Census for the period 1969 to 2017¹¹

2.2.2 POPULATION DISTRIBUTION

UBOS 2017¹² indicates that, children aged below 13 years constitute 46% of Uganda's population while the age-group 14–64 years account for 51% of the population. The highest percentage of the population in both and urban areas was in the age-group 14–64 years (49% and 58% each respectively). Compared to other sub-regions, Kampala has the highest percentage of the population in the age-group 14–64 years (64%) while Karamoja has the lowest (42%). There has been a slight increase in the percentage of household population aged 14–64 years from 48% in 2012/13 to 51% in 2016/17.

2.2.3 FERTILITY

The Total Fertility Rate (TFR) which refers to the average number of children that would be born alive to a woman during her lifetime if she were to pass through her childbearing years conforming to the age-specific fertility rates of a given period. The TFR declined from 7 children per woman to 5 children per woman between 1995 and 2016 as per UBOS 2017 findings.

2.2.4 MORTALITY

Infant and under Five Mortality rates between 2000 and 2016, declined by 16 more than half, dropping from 88 to 43 deaths per 1000 live births and from 152 to 64 deaths per 1,000 live births respectively. A higher proportion of those over 5 years died due to injuries from road traffic accidents (2.9%) and cardiovascular diseases (2.9%) compared to the under 5. The proportion of death due to Tuberculosis among persons aged 5 years and above has more than doubled in the last one year, from 6.4% to 15.8%. On the other hand, the leading cause of death among persons aged below 5 years is malaria (19.9%) followed by pneumonia (12.4%) and anaemia (12.2%)¹³.

¹¹UBOS 2017: Statistical Abstract

¹² Uganda National Household Survey 2016/2017

¹³ Uganda National Household Survey 2016/2017

2.2.5 LIFE EXPECTANCY AT BIRTH

Life expectancy at Birth is an estimate of the average number of years a person is expected to live if a particular pattern of mortality is maintained with the overall life expectancy at birth from 2002 Census then being 50 years. Males registered a lower life expectancy of 49 years compared to their female counterparts at 52 years. Overall, there was a gain of 2.3 years in life expectancy between 1991 and 2002.

2.2.6 LITERATE POPULATION

Figure 10 shows that the literate population has been increasing steadily over the last 24 years from 5.9 million in 1991 to 10.8 million in 2002 and to 16.3 million in 2014 (Figure 4). There are no major gender differentials observed among the literate population, 8.2 million were males and 8 million were females. Despite the increase in number of literate persons, the illiterate population increased from 4.7 million in 2002 to 6.3 million in 2014.

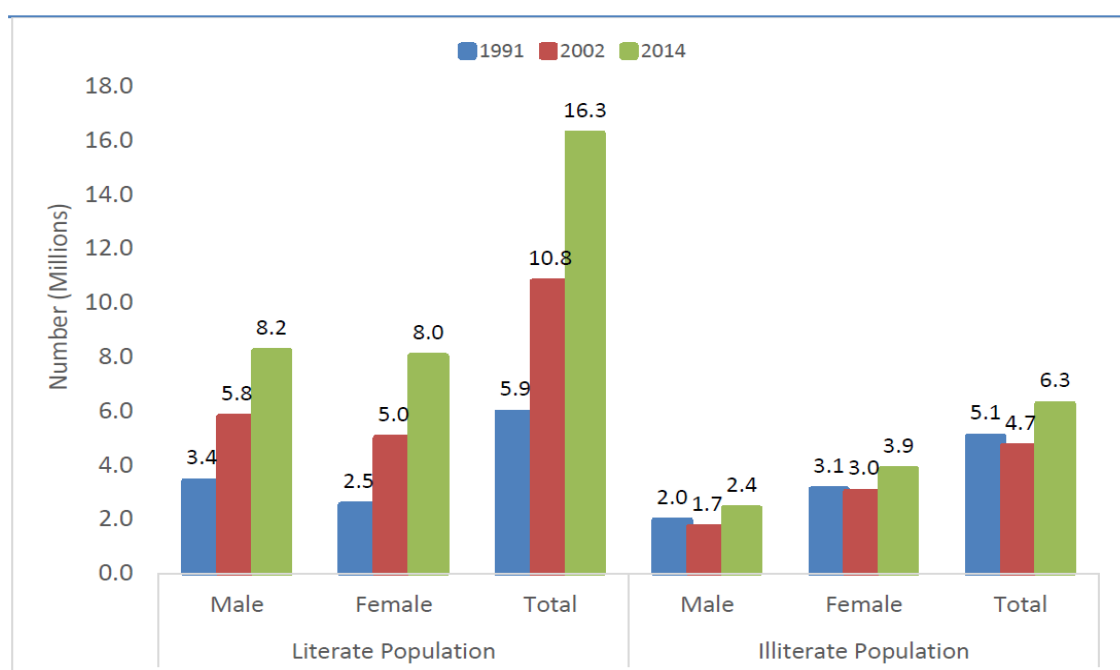


Figure 10: Uganda literate and illiterate population age 10 years and above for the period 1994-2014¹⁴

2.2.7 EDUCATION

2.2.7.1 FOCUS ON NON-REFUGEE HOSTING AREAS

The quality education is key in acceleration of the country's socio-economic development through making the populace functionally literate and productive. Of late, the Ministry of Education and Sports has focused on closing the gap between the girl and boy child with less attention to retention and achievement; and quality of education. Primary school enrolment increased from about 8.3 million in 2012 to about 8.7 million pupils in 2016. However, 2014 registered the highest enrolment of 8.8 million in the five-year period under review. As a result, Gross Enrolment Ratio (GER) was 117 in 2014 but fell to 109 in 2015. National Enrolment Ratio (NER) stood at 91% in 2015 compared to 97% in 2014.

¹⁴Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the Thematic Report Series*, Kampala, Uganda.

Table 1: Primary School Enrolment by Class for the period 2012-2016¹⁵

Class	2012	2013	2014	2015	2016
P1	1,877,801	1,883,803	1,932,489	1,842,006	1,888,847
P2	1,284,122	1,307,745	1,349,233	1,277,974	1,352,893
P3	1,291,268	1,312,592	1,362,786	1,283,194	1,349,293
P4	1,299,994	1,317,315	1,359,448	1,272,522	1,328,035
P5	1,118,900	1,138,789	1,178,273	1,101,698	1,156,465
P6	892,338	920,045	963,083	901,939	958,298
P7	564,217	579,431	627,343	584,984	622,093
Total	8,328,640	8,459,720	8,772,655	8,264,317	8,655,924

(Source: UBOS, 2017)

2.2.7.1.1 SECONDARY EDUCATION

According to UBOS 2017 it is reported that, Uganda has 3,070 secondary schools, of which 1,058 are government schools. It further noted that, 2,012 schools receive aid from government in form of grants. This includes all government schools (i.e. 902) and the 690 Public Private Partnership schools. Furthermore, about 78.6 % of the secondary schools are located within a distance of <1km from the nearest Primary schools out of which 57.6% are in rural areas. This presupposes that the Sector is on the right track of achieving its set target of having at least a secondary school in each sub-county to ensure the sustainability/continuity of UPE.

Of the total number of schools in the country, 324 are not yet registered. Only 72% of the schools that responded were registered. This brings into caution the type and quality of education that is offered to students in these schools. The total enrolment of students stands at 1,457,277 of which female students constitute 47.5%, an indication that the sector is in line with the achievement of gender parity (Annex 6). There are about 157,312 students are over age (i.e. they are above 18 years). On the other hand, there is a total of 11,349 under age (i.e. students below the recommended entry age (13 years) into secondary education). The presence of overage students is partly attributed to high repetition rate, which stands at 4.9%. The two scenarios have far reaching consequences to the Sector: for instance, they lead to congestion and competition of the already meagre school infrastructure, and wastage of government resources in terms capitation grants.

Out of 58,100 total secondary teachers reported, there are 25,578 (i.e. 18,817 male and 6,761 female) teachers in government schools. Based on the minimum standard qualifications (i.e. which is Grade V for a secondary teacher). A total of 28,629 classrooms were recorded out of which 26,169 classrooms were permanent. A total of 42,672 39,832 latrine stances were established with 39,832 stances being permanent. HIV/AIDS is still prevalent in the sector; for instance, 3,893 cases of students were registered with 48.4 % being females.

In 2007 therefore, Uganda became the first country in sub-Saharan Africa to introduce universal secondary education. Under the secondary scheme, students who get specific grades in each of the four-primary school-leaving exams study free in public schools and participating private schools. Secondary school is divided into: - lower/ordinary level (O' level) and the advanced level (A' level). At the end of the 4 years of Level, students take the Uganda Certificate of Education (UCE) national examination.

¹⁵Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the Thematic Report Series*, Kampala, Uganda.

2.2.7.1.2 SCHOOLS BY OWNERSHIP AND USE STATUS

From the findings a total of 3,070 schools responded to ASC 2016, out of these 1,058 were government and 2,012 were private schools. A total of 1592 (51.9%) USE schools responded out of which 690 schools were private USE schools. It is reported that private schools are high than the government schools and this is attributed to the government intervention of public private partnerships which has been key in the implementation of USE. In terms of regional analysis, Buganda region registered the highest number of schools (708; 23.1%) of the total schools in Uganda while Karamoja region registered the least number of secondary schools with only 0.2% share.

Table 2: Number of secondary schools by ownership and USE status¹⁶

Region	Government		Total	Private		Total
	Non use	Use		Non use	Use	
ACHOLI	5	47	52	51	18	69
ANKOLE	20	91	111	159	54	213
BUGANDA	50	200	250	499	209	708
BUKEDI	10	59	69	48	49	97
BUNYORO	10	40	50	83	35	118
BUSOGA	19	67	86	99	106	205
ELGON	6	68	74	58	45	103
KARAMOJA	4	13	17	3	4	7
KIGEZI	10	77	87	72	33	105
LANGO	5	52	57	34	18	52
TESO	3	53	56	49	30	79
TORO	7	71	78	104	49	153
WEST_NILE	7	64	71	63	40	103
Grand Total	156	902	1,058	1,322	690	2,012

2.2.7.1.3 SCHOOLS BY FOUNDING BODIES

According to the ASC 2016, entrepreneurial secondary schools were reported with the highest percentage (29.7%) followed by Catholics and church of Uganda schools with the nearly the same percentage (17.3% & 17.6% respectively). On the other hand, SDA registered the least number of schools with percentage composition of only 1.5%.

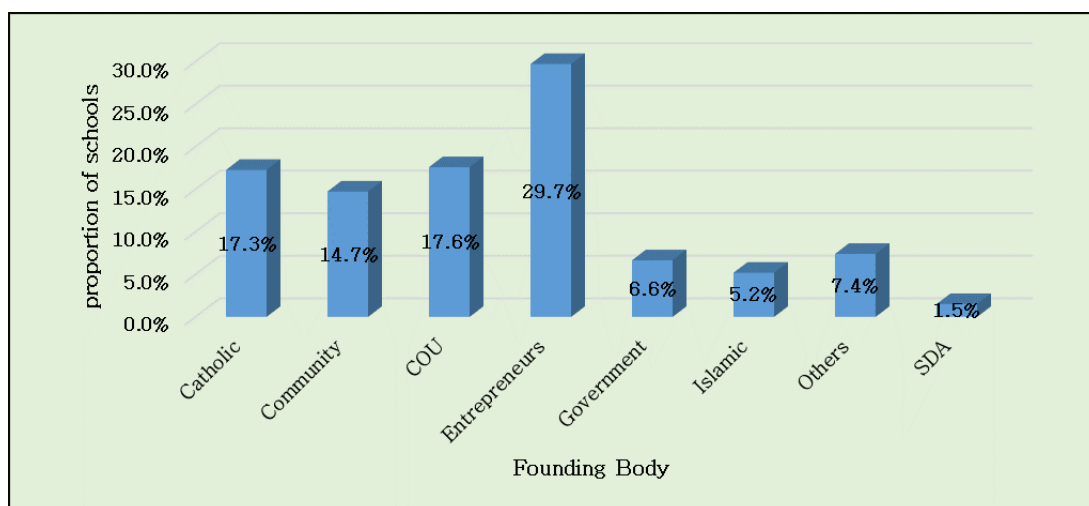


Figure 11: Schools by Founding Bodies

¹⁶UBOS 2016, Education Abstract

2.2.7.1.4 SECONDARY SCHOOL INFRASTRUCTURE

The 2016 Annual Schools Census (ASC) findings reveal that there are 94,636 permanent structures translating into 91.2% of the total structures. A total of 10,796 teacher houses were recorded and 20,173 were recorded as needed. This almost doubles the number of the available houses for teachers and thus there is gap. A total of 51,236 structures were reported as needed including 7,709 classrooms. Further analysis shows that 9,896 structures regardless of them being complete are not being used and only 1,491 (1.44%) were incomplete but in use.

Table 3: Infrastructure by building type and completion status¹⁷

Infrastructure type	Complete in use		Incomplete in -use		Complete not in use		Permanent	Total	
	P	T	P	T	P	T	structures	structures	Needed
Classrooms	22,128	1,925	3,267	406	774	129	26,169	28,629	7,709
Computer Lab	1,286	249	111	11	20	9	1,417	1,686	2,182
Latrine Stances	35,757	2,611	3,888	183	187	46	39,832	42,672	8,975
Libraries	1,531	333	139	34	21	9	1,691	2,067	1,844
Office	6,805	603	425	64	52	8	7,282	7,957	3,835
Staff Rooms	2,138	373	167	32	19	9	2,324	2,738	1,561
Store Rooms	3,239	608	223	96	30	14	3,492	4,210	2,554
Teachers Houses	8,996	1005	552	108	105	30	9,653	10,796	20,173
Science Labs	2,579	191	172	18	25	4	2,776	2,989	2,403
Grand Total	84,459	7,898	8,944	952	1,233	258	94,636	103,744	51,236

2.2.7.1.5 SECONDARY SCHOOL ENROLMENT

Secondary school attendance has increased from about 1.1 million students in 2002 to about 2.1 Million students in 2014, a 47% increase as shown in Table 4.

Table 4: Secondary school status for pupils in secondary schools¹⁸

Year/Class	2002			2014		
	Male	Female	Total	Male	Female	Total
S1	207,644	163,389	371,033	279,931	264,309	544,240
S2	124,652	104,038	228,690	240,522	218,592	459,114
S3	100,116	83,991	184,107	212,591	194,009	406,600
S4	82,399	66,936	149,335	186,503	166,275	352,778
S5	72,313	54,935	127,248	136,245	127,678	263,923
S6	33,690	21,838	55,528	56,431	43,126	99,557
Total	620,814	495,127	1,115,941	1,112,223	1,013,989	2,126,212

2.2.7.1.6 SECONDARY GROSS ENROLMENT RATE

GER at secondary is defined as the total enrolment in secondary school regardless of age and grade expressed as a percentage of the official secondary school going population (13-18years). Table4 shows that the national secondary school Gross Enrolment Rate (GER) was 41%. It also reveals that the GER for male (43%) was higher than for females (38%). At sub regional level, Kampala (67%) had the highest GER

¹⁷UBOS 2016, Education Abstract

¹⁸Uganda Bureau of Statistics 2017, The National Population and Housing Census 2014 –Education in the Thematic Report Series, Kampala, Uganda.

and Karamoja (17%) had the lowest GER among all the sub regions. Generally, GER for 2014 census (43%) is higher than the GER for 2002 census (34%).

2.2.7.1.7 SECONDARY SCHOOL GENDER PARITY INDEX

The Gender Parity Index (GPI) is the ratio of the GER for girls to the GER for boys (Table 5). It is used to assess gender differences in secondary school enrolment. A value of less than one indicates that boys more than girls attend school. The GPI at national level was 0.89 indicating the existence of Gender disparity in secondary school enrolment. Gender disparity was also observed in all the regions. More males than females enrolled in secondary school in all the regions except for Central 1, Central 2 and Ankole regions where more females than males enrolled in secondary education.

Table 5: Distribution of secondary school gross enrolment rate by region and residence¹⁹

Characteristic	Male	Female	Total	GPI
Residence				
Urban	58.11	52.6	55.09	0.91
Rural	38.8	33.13	35.99	0.85
Sub-Region				
Kampala	73.06	62.93	67.16	0.86
Central1	45.39	47.77	46.64	1.05
Central2	40.16	41.53	40.83	1.03
Busoga	45.86	39.79	42.82	0.87
Bukedi	50.26	36.8	43.49	0.73
Elgon	53.13	46.99	50.01	0.88
Teso	44.97	35.14	40.08	0.78
West Nile	36.1	25.67	30.85	0.71
Acholi	46.22	31.76	39.07	0.69
Lango	38.13	26.72	32.4	0.7
Karamoja	20.09	14.28	17.15	0.71
Toro	37.67	32.02	34.84	0.85
Ankole	42.16	42.48	42.32	1.01
Bunyoro	33.62	28.04	30.85	0.83
Kigezi	43.98	43.42	43.69	0.99
Total	42.99	38.09	40.51	0.89

2.2.7.1.8 SECONDARY SCHOOL ATTENDANCE BY AGE

The official school age for joining secondary school in Uganda is 13 years. This implies that children are expected to be in senior four at the age of 16 years and to be in senior six at the age of 18. Table 6 indicates a declining trend in the proportion of children who enrolled in both lower and upper secondary school within the target age. Whereas approximately 67% of children aged 13 enrolled in senior one, only 13% of the children aged 16 years were enrolled in senior four. A paltry six percent of children aged 18 were enrolled in senior six.

¹⁹ Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the Thematic Report Series*, Kampala, Uganda.

These results could imply two things:

- one, the levels of dropping out of school as students advance in secondary education.
- two, it could also show that students chose other options to secondary education especially the vocational education.

Table 6: Proportion of Secondary School Enrolment by Class and Age²⁰

Age	S1	S2	S3	S4	S5	S6	Total
12	100	0	0	0	0	0	100
13	66.6	33.4	0	0	0	0	100
14	51.6	32.0	16.3	0	0	0	100
15	39.8	30.4	19.8	10.1	0	0	100
16	31.2	27.1	21.9	13.3	6.5	0	100
17	24.7	23.3	21.7	16.7	9.6	3.9	100
18	19.0	19.2	20.5	19.7	15.3	6.3	100
19	1.2	18.5	22.1	25.0	23.1	10.1	100
20	1.9	0.7	22.5	29.5	32.5	12.9	100
21	2.5	0.9	1.2	34.7	44.4	16.4	100
Total	25.8	21.4	19.1	16.4	12.5	4.7	100

2.2.7.1.9 SECONDARY SCHOOL NET ENROLMENT RATE AND GENDER PARITY INDEX

Table 7 and Figure 6 both reveal that, the national secondary school Net Enrolment Rate in 2017 was 44%, which implies that, only 44% of students who were expected to be in secondary school (13-18 years) were enrolled in secondary school. The Table also shows that, there was a slight difference between the male (43%) and female (39%) NER. Compared to 2002 census, the NER for 2014 census (44%) is higher than for 2002 Population Census (23%). At sub-regional level, the NER was highest in Kampala (67%) and lowest in Karamoja (19%) among all the sub regions. The secondary school NER for the urban areas (57%) was higher than for rural areas (40%).

²⁰Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the Thematic Report Series, Kampala, Uganda.*

Table 7: Secondary School Net Enrolment Rate by Region and Sex

	Male	Female	Total	GPI
Residence				
Urban	30.46	25.19	27.57	0.83
Rural	46.20	43.34	44.79	0.94
Sub- Region				
Kampala	18.79	13.94	15.97	0.74
Central1	32.74	26.20	29.31	0.80
Central2	40.01	35.43	37.75	0.89
Busoga	47.19	43.50	45.35	0.92
Bukedi	52.26	49.22	50.73	0.94
Elgon	48.59	43.98	46.25	0.91
Teso	51.03	50.40	50.72	0.99
West Nile	47.57	43.85	45.70	0.92
Acholi	49.36	49.03	49.20	0.99
Lango	51.01	47.93	49.46	0.94
Karamoja	18.53	14.73	16.61	0.80
Toro	43.44	40.49	41.97	0.93
Ankole	40.91	38.98	39.94	0.95
Bunyoro	43.36	38.31	40.85	0.88
Kigezi	42.12	39.79	40.92	0.94
Total	42.78	38.71	40.72	0.90

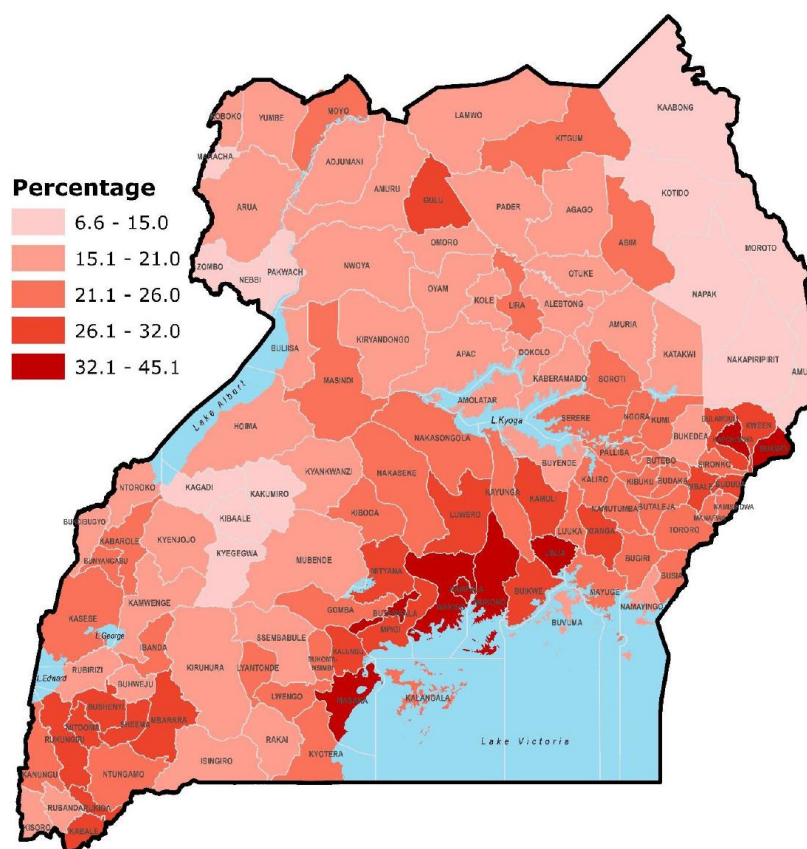


Figure 12: Secondary Net Enrolment²¹

²¹Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the*

2.2.7.1.10 SENIOR 1 GROSS INTAKE RATE (GIR)

The Senior 1 Gross Intake Rate (GIR) refers to the total enrolment in senior one regardless of age expressed as a percentage of the population aged 13 years (the official secondary school starting age). Overall, the national senior one GIR was 61% higher than that of 2002 census (59%). The males had a relatively higher GIR (63) compared to the females 59 (Table 8).

At sub-regional level, Kampala (95%) had the highest GIR, while Karamoja sub-region (40%) had the lowest GIR, among all the regions. Senior one GIR for urban areas (78%) was higher than for rural areas (56%). Analysis by sex at sub-regional level shows that the GIR for males was higher than for females in most of the regions with the exception of central 1, Central2, Ankole and Kigezi. The GIR shows that the inequality between males and females in enrolment in secondary education is still wide and should be targeted if the SDG four is to be achieved by 2030.

Table 8: Senior 1 Gross Intake Rate by sex and region²²

	Male	Female	Total	GPI
Residence				
Urban	78.30	77.68	77.97	0.99
Rural	59.62	53.60	56.63	0.90
Total	63.27	58.90	61.07	0.93
Sub-Region				
Kampala	94.70	94.95	94.84	1.00
Central1	62.83	69.66	66.30	1.11
Central2	58.16	62.37	60.25	1.07
Busoga	68.91	62.85	65.84	0.91
Bukedi	68.24	55.29	61.70	0.81
Elgon(Bugishu)	80.42	79.01	79.71	0.98
Teso	62.92	54.66	58.83	0.87
West Nile	57.26	42.49	49.81	0.74
Acholi	77.51	56.98	67.29	0.74
Lango	67.82	50.18	58.96	0.74
Karamoja	48.47	32.26	40.16	0.67
Toro	53.32	48.34	50.83	0.91
Ankole	60.02	62.48	61.25	1.04
Bunyoro	47.81	41.95	44.91	0.88
Kigezi	59.84	64.52	62.20	1.08
Total	63.27	58.90	61.07	0.93

2.2.7.1.11 POPULATION THAT HAS NEVER BEEN TO SCHOOL

Table 9 shows that, overall, about 13% of the population aged 10 years and above had never been to school in Uganda. The result also shows that more females (17%) than males (9%) among the same population had never been to school. disaggregation by place of residence reveals that the proportion of the population aged 10 years and above who had never been to school in the rural areas (20%) was more than those in urban areas (10%) as seen on Table 9. The regional analysis indicates that Karamoja (71%) had the highest proportion of the population who had never attended school among all the regions. Still in Karamoja, more females (77%) than males (64%) had never been to school.

Thematic Report Series, Kampala, Uganda.

²²Uganda Bureau of Statistics 2017, *The National Population and Housing Census 2014 – Education in the Thematic Report Series, Kampala, Uganda.*

Table 9: Proportion of the Population aged 10+ that has never been to school by Place of Residence and Sub-Region

Category	Male	Female	Total
Residence			
Urban	4.7	8.8	6.9
Rural	9.8	19.6	14.9
Sub-region			
Kampala	2.4	4.1	3.3
Central1	5.6	8.4	7.1
Central2	7.8	12.7	10.3
Busoga	7.9	15.9	12.1
Bukedi	6.6	15.3	11.2
Elgon	5.0	10.0	7.6
Teso	4.9	14.3	9.8
WestNile	8.4	23.1	16.3
Acholi	6.1	21.8	14.4
Lango	5.0	16.9	11.3
Karamoja	64.0	76.5	70.8
Toro	10.0	19.4	14.9
Ankole	9.7	17.4	13.8
Bunyoro	9.0	18.3	13.7
Kigezi	8.6	19.3	14.5
Total	8.6	16.7	12.9

2.2.7.1.12 SANITATION FACILITIES AND HYGIENE FACILITIES

In terms of latrines stances, the findings reveal that 35,045 stances have doors and 6,253 stances have shutters. Considering the users, the stances are disaggregated for teachers and student and furthermore for females and males. The finding from ASC 2016 indicate that 7,180 sanitation structures are set aside for teachers, 12,202 exclusively for girls and 11,631 exclusively for boys. Only 1,141 are used only for used collectively at a national level. The results also indicate a total of 11,327 hand washing facilities which portrays that the secondary schools appreciate the issues of hygiene and sanitation.

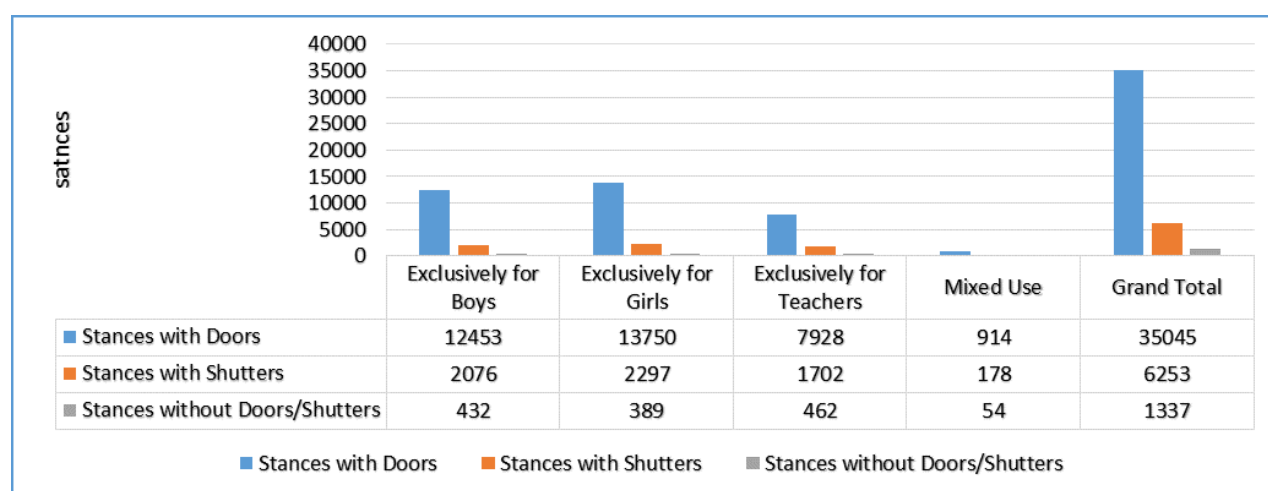


Figure 13: Stances by type and users

2.2.7.2 SECONDARY SCHOOL EDUCATION IN REFUGEE HOSTING AREAS

2.2.7.2.1 OVERVIEW

In Uganda, there are 34 refugee-hosting sub-counties in 12 districts, namely, Yumbe, Moyo, Arua, Adjumani, Koboko, Lamwo, Kiryandongo, Kyangwali, Kamwenge, Kyegegwa, Isingiro and Kampala. The table below shows all refugee children and youth within the specified age range according to Refugee Information Management System (RIMS), including refugees from South Sudan, DRC, Burundi and other countries. The population data for host communities covering 3-24-year olds in the 34-refugee hosting sub-counties is from the UBOS 2014 Census.

Table 10: School Aged Population²³ in the target areas (as of November 2017)²⁴

No.	Education Level	Refugee	Host Community	Total
01.	Pre-primary level (3-5 years)	164,795	119,572	284,367
02.	Primary level (6-12 years)	370,303	245,766	616,069
03.	Secondary level (13-17 years)	147,020	163,192	310,212
04.	Post-Secondary level (18-24 years)	116,079	105,376	221,455
TOTAL		78,197	633,906	1,432,103

2.2.7.2.2 LIMITATIONS IN THE DELIVER OF SECONDARY SCHOOL EDUCATION IN REFUGEE HOSTING AREAS

2.2.7.2.2.1 ISSUES OF ACCESS TO SECONDARY SCHOOL EDUCATION

The unprecedented mass influx of refugees into Uganda in 2016 and 2017 has put enormous pressure on the country's basic service provision, health and education services. Refugees share all social services with the local host communities. The refugee hosting districts are among the least developed districts in the country, and thus the additional refugee population is putting a high strain on already limited resources.

There are currently more than 616,000 school age children among the refugee population in the 12 refugee hosting districts in the country. Of these children, only 43% (around 267,000) enrol in any kind of education services (Table 11). Gross enrolment rate (GER) stands at 39% for ECD, 58% for primary, and 11% for secondary respectively. Among these, females represent approximately half of all the children enrolled in ECD programmes and primary schools though only a third of the children are enrolled in secondary schools are female. In the host community in the 34-refugee hosting sub-counties in the 12 districts, there are more than 520,000 school age children, among which 66% (around 349,000) are enrolled in school (EMIS, 2016). Although the GER in primary school is relatively high, the access to ECD is particularly showing a challenging situation, together with access to secondary schools.

²³The age bracket presented in the chart is based on the UNHCR data on school-aged population for the refugees. The school going age bracket for the Host Community is 3-5 years for pre-primary, 6-13 years for primary level, 14-18 years for secondary level and 18-24 for post-secondary level based on the Uganda National Household Survey 2016-17 p.33.

²⁴Education Response Plan for Refugees and Host Communities in Uganda. Ministry of Education and Sports May 2018

Table 11: Overall Population Projection in the 34 Refugee hosting counties²⁵

R/ HC	Education level	Current As of Nov 2017	2018	2019	2020	2021
Refugee (3-17 y/o)	ECD (3-5 y/o)	164,795	199,402	223,330	223,330	223,330
	Primary School (6-13 y/o)	370,303	448,067	501,835	501,835	501,835
	Secondary School (14-17 y/o)	147,020	176,684	197,886	197,886	197,886
	Post Secondary (18-24 y/o)	116,079	138,541	155,166	155,166	155,166
	SUBTOTAL	798,197	962,694	1,078,217	1,078,217	1,078,217
Host Community (3-18 y/o)	ECD (3-5 y/o)	119,572	124,050	128,659	133,458	138,437
	Primary School (6-12 y/o)	245,766	254,948	264,436	274,315	284,574
	Secondary School (13-18 y/o)	163,192	169,202	175,365	181,779	188,432
	Post Secondary (19-24 y/o)	105,376	109,234	113,226	117,374	121,671
	SUBTOTAL	633,906	657,434	681,686	706,926	733,114
GRAND TOTAL		1,432,103	1,620,128	1,759,903	1,785,143	1,811,331

The increasing numbers of refugees have put pressure on ECD centres, primary and secondary schools, many of which already faced challenges of poor infrastructure and insufficient teachers. For example, in Yumbe district, the school- aged population has more than doubled since early 2016. In the four government primary schools neighbouring refugee settlements, refugee children now out number children from host communities, yet the districts education departments do not have sufficient capacity to provide additional facilities and resources for such numbers of learners (Figure 14).



Figure 14: Temporary tented classroom structures at Ayivu Secondary School in Yumbe District

2.2.7.2.2.2 OTHER CONSTRAINTS TO DELIVERY OF SECONDARY EDUCATION IN REFUGEE HOSTING AREAS

One of the bottlenecks for refugees to access secondary schools is the lack of documentation to prove completion of primary education in their home countries. Even when certificates are available, the equivalency of the certificates can be unclear, and some secondary schools require refugees to complete

²⁵ Education Response Plan for Refugees and Host Communities in Uganda. Ministry of Education and Sports May 2018

the Ugandan primary leavers' exam to qualify for enrolment. In some areas (but not all) refugees are treated like other foreign learners and charged fees to take the primary leavers' exam.

Other constraints include, long distances between home and existing secondary schools, poor facilities including a lack of science laboratories and equipment, lack of libraries with relevant books, lack of up to date technology and power, and a lack of teachers' accommodation. For the current secondary school enrolment in the settlements and host community, an estimated 244 additional classrooms are required to meet the government standards of one classroom for every 53 learners. Whilst this analysis shows the number of teachers is enough to meet the number of children who are currently enrolled in secondary schools, this does not take into account the specialist subject teachers often required, and so there is a need for a full analysis of workforce capacity needs. If all secondary aged children in the area were to attend, the classroom gap and teacher gap grow to 2,342 and 2,071 respectively, to meet the government standards (53:1).

2.2.8 HEALTH

Malaria/Fever (26%) and respiratory infections (18%) were the major symptoms of illness/injury among the population. Malaria/fever symptoms were more common in Teso sub-region (49%) and Kigezi (38%) and least common in Bukedi sub-region (7%). The use of tobacco and related products reduced from 11 percent in 2012/13 to 5% in 2016/17. Also 1% of the population were using drugs such as *opium*, *marijuana* and *mairungi*. A higher percentage of the population (48%) visited private hospital/clinic when ill than government health facilities (34%). In addition, 86% of the population accessed healthcare within a 5km radius. Health insurance coverage is still low with only 5% of the population having health insurance. Average household expenditure on healthcare in real terms reduced from shs.27,600 in 2012/13 to shs.22,800 in 2016/17.

2.2.9 VULNERABLE GROUPS AND SOCIAL PROTECTION

Orphan hood in Uganda have been on a slight decrease across the three survey periods from 15% in 2005/06 to 11 percent in 2016/17. Orphan hood in female headed households was at 25% compared to male headed households at only 6 percent. The death of a father has been a major explanatory factor for orphan hood for the different background characteristics compared to death of mother or both parents. Overall, 14% of the children aged 5-17 years were engaged in child labour. Close to half of the older persons (42%) had never been to school and these were predominantly females (57%). The majority of the widows (86%) were household heads implying they were major decision makers in their households.

2.2.9.1 ORPHANS AND POOR CHILDREN

Orphans and poor children are the single largest group of Ugandans living in absolute poverty, constituting 59% of the absolutely poor. Often, orphans and poor children lack recognition, and are neglected and mistreated. There are a large number of AIDS orphans in Uganda who are likely to be poor because they have limited opportunities to attend school or to access health care. On the other hand, orphaned children also tend to be marginalized by their guardians and may end up as street children or child prostitutes. UBOS 2014 indicates that in 2013, about 1.2 million primary school pupils were orphaned though this number reduced by 1.5% between 2012 and 2013. Similarly, the proportion of orphaned pupils to the total primary school enrolment declined to 14.6 in 2013.

2.2.10 WOMEN/WIDOWS

In most Ugandan societies widows tend to be poor because of asymmetries in intra-household power, resulting in unequal access to and control over productive assets (Figure 6). They have little influence over household income, lack education and skills, are often exploited by "middlemen", are marginalized

by the labor market, have low participation in decision-making processes, and are adversely affected by the patriarchal system of inheritance. Widows with a large number of children to care for are most vulnerable.

2.2.10.1 THE ELDERLY

Studies that link old age to poverty in Uganda are very scarce though anecdotal information however suggests that, older people in both rural and urban areas fall steadily into poverty as old age sets in. Many in the rural areas depend on remittances from their children, relatives and neighbours, and exchanging what little they own for food. However, there are also other categories of elderly poor, particularly those who may not have accumulated property during their early life, those who have been low-paid wage earners, the uneducated and those impoverished by the burden of looking after orphans.

2.2.11 INTERNALLY DISPLACED PEOPLE (IDPS) AND REFUGEES

Uganda is party to key refugee conventions and international human rights treaties, and currently hosts over 1.35 million refugees, the majority from South Sudan (75%), the Democratic Republic of Congo (17%), Burundi (3%) and Somalia (3%). When renewed conflict broke out in South Sudan in July 2016, an unprecedented number of refugees came to Uganda, doubling the refugee population in less than seven months. Uganda has since become the largest refugee-hosting country in Africa, with refugees making up 3.5% of the country's total population of 39 million. The economy faces challenges, compounded by adverse weather and spill-over from the civil unrest in South Sudan.

2.2.11.1 UGANDA REFUGEE STATUS

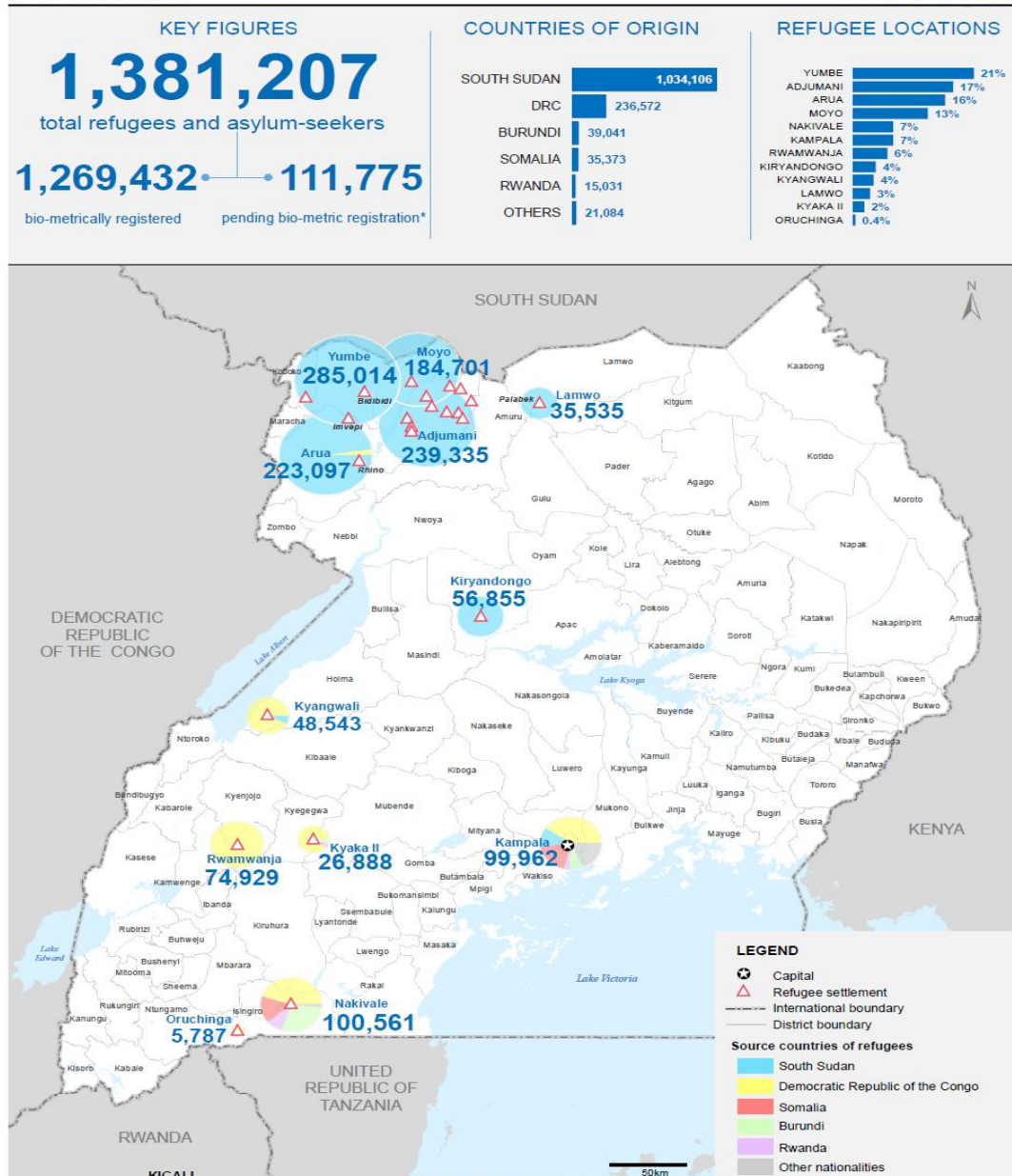
Uganda has a long history of welcoming refugees and asylum seekers. Currently, Uganda hosts approximately 1.4 million refugees making it Africa's largest refugee hosting country and one of the five largest refugee hosting countries in the world. Most recently, throughout 2016 and 2017, Uganda was impacted by three parallel emergencies from South Sudan, the Democratic Republic of the Congo (DRC), and Burundi. As of December 2017, there are 1,395,146 refugee and asylum seekers in Uganda, which translates to 36 refugees per 1,000 inhabitants. Among the total refugees, 1,037,898 are from South Sudan.

More than 50% of the refugee population in Uganda is located in refugee settlements in the West Nile region. In the 5 districts in the West Nile there are almost a million refugees making up 32% of the population, while in the Districts of Adjumani and Moyo refugees now make up well over half of the total population. More than 400,000 refugees live in the central and southern districts of Hoima, Kyegegwa, Kamwenge, Isingiro, and in Kampala (Figure 9).

UGANDA

Refugees and asylum-seekers

as of 01 October 2017



The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
 * Koboko refugee population is considered under Arua district.
 Creation date: 01 October 2017 Geodata Sources: UNHCR, UNCS, UBOS Statistics: Provided by Government (OPM), Refugee Department, Registered in (RIMS)
Figure 15: Uganda Refugee and Host Community Composition as of October 2017²⁶

2.2.12 HIV/AIDS PREVALENCE IN UGANDA

According to Uganda Population Based HIV Based Impact Assessment -UPHIA 2016/2017 report, HIV prevalence among adults aged 15-64 years in Uganda is 6.2% i.e. 7.6% among females and 4.7% among males, which corresponds to approximately 1.2 million people aged 15-64 years living with HIV in the country. The prevalence based on regional dimension shows that, West Nile Region with 3.1% while the broader Central with the highest with 8.0% (Figure 16).

²⁶ ESMF for Development Response to Displacement in the Horn of Africa(P152822), Office of the Prime Minister, GoU 2017

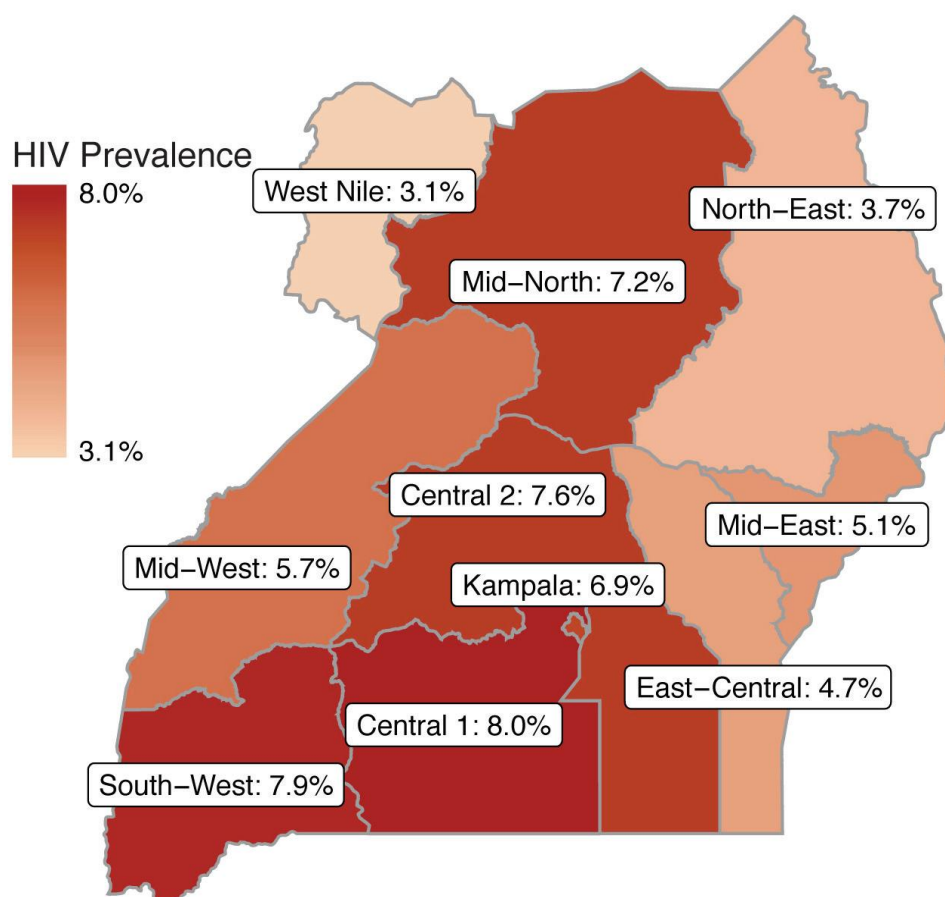


Figure 16: Regional Prevalence of HIV in Uganda²⁷

2.2.13 PREVALENCE OF GENDER BASED VIOLENCE IN UGANDA

According to Lyndsay McLean et al., 2016²⁸ the prevalence of Gender Based Violence (GBV) in Uganda is relatively high. The latest Demographic Health Survey (2011) shows that 62.2 % of all women and 58.8% of all men aged 15-49 in Uganda reported experience of physical or sexual violence (by any perpetrator) at least once since the age of 15.²⁹ By comparison, the global average prevalence rates for violence against women (physical or sexual) aged 15-49 is estimated by the WHO at 35.6% and the regional (Africa) average is 37.7%³⁰.

2.2.14 CHILD LABOUR: NATIONAL CONTEXT

In Uganda, a child is legally defined as a person below the age of 18 years. The total number of children aged 5-17 years is estimated to 7.9 million. According to the Child Labour Report, it is estimated that there are about 2.7 million working children in Uganda, giving an overall participation rate of 34.2%. More than half of the working children (54%) are aged 10-14 years, with about one third of them being less than 10 years. The number of working children aged 5-17 years who were currently attending primary school was estimated to be about 1.9 million, with more than 300,000 in the same age bracket

²⁷ UPHIA 2016-2017 report

²⁸ Dr Lyndsay McLean and Dr Paul Bukuluki with Louise Jenkins and Ismael Ddumba-Nyanzi Uganda Gender Based Violence 2016.

²⁹ Figures are for men and women aged 15-49 whether never married, married /living together or divorced /separated /widowed.

³⁰ World Health Organization (2013), *Global and regional estimates of violence against women: prevalence and health effects of intimate partner violence and non-partner sexual violence*. Geneva, World Health Organization.

having no formal education. According to the African Network for the Prevention and Protection against Child Abuse and Neglect (ANPPCAN) Uganda Chapter Report of 2013, there are two types of child labourers identified in Uganda. The first category comprises of boys and girls who are exploited by adults, to provide cheap labour, whereas the second categories are those who are forced into child labour due to harsh conditions and desperation. The regional distribution of child labour in Uganda indicates that eastern region has a relatively higher proportion of working children aged 5-9 years and reveals the highest number of working children compared to other regions.

2.2.15 WATER AND SANITATION

2.2.15.1 SAFE WATER COVERAGE

Overall, 78% of households in Uganda had access to improved sources of drinking water while 22% did not have. The results also show variations in access to drinking water sources by residence and by sub-region. Eighty percent of households in urban areas had access to improved water sources compared to 77 percent in rural areas. Among the sub-regions, as expected, Kampala had the highest percentage of households that used improved drinking water sources (96%), followed by Busoga (93%) while Ankole had the lowest (57%).

There was an increase in the percentage of households using improved sources from 68% in 2012/13 to 78% in 2016/17. The percentage of households accessing improved water sources in urban areas reduced from 87% to 80% while the percentage in rural areas increased from 68-77%. This reduction in the urban percentage may be attributed to the creation of new districts and town councils that have added to the percentage of population categorised as dwelling in urban areas without necessarily getting enough time to improve their water sources to the level generally expected in urban areas. A household is considered to have safe drinking water coverage if there is a safe water source within 1.5km from the household. The main technology options used for water supply improvements in rural areas include protected springs (18%), shallow wells (23%), deep boreholes (44%), piped water schemes (gravity-fed) and piped water schemes (pumped) (11%), valley tanks and rainwater tanks. As of June 2016, the national safe water coverage in rural areas was estimated at 67% and in urban areas, it stands at 71% (Annual Sector Performance Review Report, 2016).

2.2.15.2 SANITATION

It is estimated that, almost 75% of Uganda's disease burden is preventable and linked to poor hygiene and inadequate sanitation facilities and practices. Access to proper sanitation ensures dignity and helps prevent the spread of diseases such as cholera that are associated with faecal contamination. UBOS 2016 reports that, overall, in Uganda, 83% of households used pit latrines while seven percent used bushes/did not use any toilet facilities. Only three percent of households used flush toilets. In both rural and urban areas, the percentage of households that used pit latrines was high (86% for rural and 74% for urban respectively). A higher proportion of households in urban areas (17%) than rural areas (3%) used VIP latrines. Conversely, a higher proportion of households in rural areas did not use any toilet facilities at all (9%) compared to households in urban areas (2%). The proportion of households that used pit latrines remained the same between 2012/13 and 2016/17 (83%). There was a slight increase in the percentage of households that used VIP latrines from six percent in 2012/13 to eight percent in 2016/17.

2.2.16 POVERTY

2.2.16.1 OVERVIEW

According to Uganda Economic Outlook for 2018, it is noted that, the national economy has constrained growth on a *per capita* basis, resulting in a deterioration of the poverty levels in the country. Ten years ago, when the economy was growing at an average of 7.0% per year, the proportion of Ugandans living below the national poverty line declined from 31.1% in 2006 to 19.7% in 2013. However, the recent slowdown in growth of the economy has resulted in an increase in the proportion of people living in poverty. According to the revised National Household Survey Report published by UBOS in February 2018, the proportion of people living in poverty now stands at 8 million. In percentage a term that means that, 21.4% of Ugandans are living in poverty. The key reason for the increase in poverty is that growth has slowed down, while at the same time the population is increasing. Looking ahead, real GDP is expected to grow by 5.5% in 2018 and then accelerate between 5% to 7% per year, during the period 2018 to 2022³¹.

2.2.16.2 NATIONAL INCIDENCE OF POVERTY

Based on UBOS 2017, it was estimated that 19.7% of Ugandans are poor, corresponding to nearly 6.7 million persons with the incidence of poverty remaining higher in rural areas than in urban areas. The poor in the rural areas represent 22.8% of the population compared to only 9.3% in the urban areas. The rural areas with about 77.4% of the population constitute 89.3% of the national poverty. On the other hand, the urban areas represent 22.6% of the population and constitute 10.7% of national poverty.

The proportion of the Ugandan population living below the national poverty line declined from 31.1% in 2006 to 19.7% in 2013. Similarly, the country was one of the fastest in Sub-Saharan Africa to reduce the share of its population living on \$1.90 PPP per day or less, from 53.2% in 2006 to 34.6% in 2013. Nonetheless, the country is lagging behind in several important non-monetary areas, notably improved sanitation, access to electricity, education (completion and progression), and child malnutrition.

2.2.16.3 REGIONAL INCIDENCE OF POVERTY

In 2006, approximately 68% of the poor lived in the Northern and Eastern regions of the country though seven years later, this proportion increased to 84%. About 47% of the poor live in the Northern region and another 37% live in the Eastern region. In particular, sub regions in the north, the North East and West Nile sub regions, have a very high poverty headcount. Almost three in four residents (74%) in North East sub region live below the national poverty line. The Northeast sub region is also the least populous. Largely has become increasingly concentrated in the Northern and Eastern regions of Uganda as the Central and Western regions have experienced more rapid poverty reduction.

2.2.16.4 OWNERSHIP OF ASSETS

Households in Uganda's northern, eastern, and western regions have much lower levels of human capital, fewer assets, and more limited access to infrastructure than those in the Central region. The Northern region is least in terms of assets ownership, largely because the conflict took lives, destroyed assets, and had lasting effects on the aspirations of many individuals. Households in the north are larger and more likely to be headed by a woman and are more likely to have a household head with no education. Most households own land but they are less likely to own other assets and have lower access to infrastructure services. The Eastern region also lags behind the Central and Western region in nearly all of these measures.

2.2.16.5 ACCESS TO SOCIAL SERVICES

³¹Uganda Economic Outlook 2018 published PwC.

Households in the northern region have limited access to markets and services. For households in these regions, distances to schools and health services are much longer as distances to the markets. The provision of agricultural extension and veterinary services is much lower, and this is of concern given the reliance of these households on agriculture and livestock income. Rural financial institutions are scarce in the north. These constraints have limited the accumulation of human capital and the extent to which households can use their assets to earn a return in these regions. Household income among the bottom 40% is low in the Eastern and Northern regions and heavily reliant on food crops and livestock farming. Livestock income comprises 39% of the agricultural income of the bottom 40% who live in the north. In addition, rainfall is lower and more volatile in the north increasing the vulnerability of households in this region, while households in the east are particularly vulnerable to the collapse of maize prices³².

Table 12: Human capital, asset ownership, and access to infrastructure across regions³³

Characteristics	Regions			
	Central	Eastern	Northern	Western
a. Household size	4.2	5.4	5.0	4.8
b. Dependency ratio	101	130	134	116
c. A female (%) heads household	30	30	35	31
d. Head has no education (%)	14	19	27	25
e. Head has some primary education (%)	43	50	41	41
f. Head has completed primary education (%)	9	7	8	11
g. Head has some secondary education (%)	19	15	12	11
h. Head has completed secondary education (%)	7	5	3	5
i. Head has tertiary education (%)	6	3	5	5
j. Literacy rate among 18+ years old (% literate)	79	60	56	72
k. Owns a mobile phone (%)	82	52	35	63
l. Has electricity (%)	40	6	3	8
m. Has piped water (%)	20	5	1	6
n. Availability of tarmac roads (%)	53	21	19	27
o. No toilet (%)	5	8	29	2
p. Owns land (%)	59	78	80	86

³²(Source: World Bank, 2016)

³³Source: UBOS Statistical Abstract, 2017

POLICY FRAMEWORK

3.1.1 UGANDA VISION 2040

Uganda Vision 2040 provides development paths and strategies to operationalize Uganda's Vision statement which is "A Transformed Ugandan Society from a Peasant to a Modern and Prosperous Country within 30 years" as approved by Cabinet in 2007. It aims at transforming Uganda from a predominantly peasant and low-income country to a competitive upper middle-income country. Over the Vision period, the provision of universal primary and secondary education will be considered as a human right and consolidated as basic education.

3.1.2 THE GOVERNMENT WHITE PAPER ON EDUCATION

The 1992 Government White Paper on Education is the basis of official policy on the purposes and programs of education. Its aims are to promote citizenship; moral, ethical, and spiritual values; scientific, technical and cultural knowledge, skills, and attitudes; literacy and equip individuals with basic skills and knowledge - in short, "to contribute to the building of modern, integrated, self-sustaining and independent national economy."

3.1.3 EDUCATION AND SPORTS SECTOR STRATEGIC PLAN 2017/18-2019/20

The Ministry of Education and Sports have developed a new strategic plan which includes the provision of education to children in refugee and host communities. Under objective one, the education and sports sector strategic plan 2017-2020 clearly states "the need to develop and implement response programs for the provision of quality education to refugees and the host communities". This plan is designed to provide an implementable plan to deliver this strategic intention.

The three objectives of the strategy overall are to:

- a. Achieve equitable access to relevant and quality education and training
- b. Ensure delivery of relevant and quality education and training; and
- c. Enhance efficiency and effectiveness of education and sports service delivery at all levels.

3.1.4 EDUCATION RESPONSE PLAN FOR REFUGEES AND HOST COMMUNITIES IN UGANDA 2018-2021

The purpose of the Education Response Plan for Refugees and Host Communities is to set out a realistic and implementable plan to ensure improved learning outcomes for increasing numbers of refugee and host-community children and adolescents across Uganda. The timeframe for this plan starts in January 2018 and runs to June 2021. The plan is designed to be a three-year rolling plan; with each year that passes, the achievements, lessons learned, and challenges are reviewed, and an additional year added to the planning cycle. This Plan is designed within the context of the Education Sector Strategic Plan (2017-2020). Under Objective One of the Education Sector Strategic Plan (ESSP), the sector sets out the need to develop and implement response programs for the provision of quality education to refugees and the host communities. This creates a clear entry point for all refugee interventions in the education sector in Uganda. At a cost of USD 395 million and in line with potential levels of funding over 3.5 years, the Education Response Plan will reach just over 675,000 refugee and host community learners per year.

3.1.5 THE COMPREHENSIVE REFUGEE RESPONSE FRAMEWORK FOR UGANDA 2017

The Comprehensive Refugee Response Framework (CRRF) for Uganda was launched at a high-level meeting in Kampala in March 2017. The purpose of the CRRF is to harness a whole-of-society approach

in responding and finding solutions to refugee crises in Uganda, building on existing initiatives and policies. The CRRF is part of an enabling policy environment including the Refugee Act 2006 and the Refugee Regulations 2010, which state that refugees have access to the same public services as nationals, including education services.

3.1.6 MINISTRY OF EDUCATION AND SPORTS NATIONAL STRATEGY FOR GIRLS' EDUCATION (NSGE) IN UGANDA (2014–2019)

The design of that strategy was premised on the national desire to provide an implementation framework, laying out strategies to achieve the goal of narrowing the gender gap in education particularly through promoting girls' education, as a form of affirmative action. The Strategy is pegged to addressing the most pressing barriers to girls' full and equal participation in education in Uganda, clustered as social cultural factors, school related factors, political, economic as well as administrative factors.

3.1.7 THE NATIONAL ENVIRONMENT MANAGEMENT POLICY, 1994

The overall goal of the policy is the promotion of sustainable economic and social development that enhances environmental quality without compromising the ability of future generations to meet their needs. The policy states that an Environmental Impact Assessment should be conducted for a policy or project that is likely to have impacts on the environment. This ESMF has been prepared to address environmental and social issues in the project in line with its policy aspirations.

3.1.8 UNIVERSAL SECONDARY EDUCATION POLICY, 2007

In 2007, Uganda became the first country in sub-Saharan Africa to introduce universal secondary education (USE). Coming 10 years after it introduced universal primary education (UPE). Under the secondary scheme, students who get specific grades in each of the four-primary school-leaving exams study free in public schools and participating private schools. Before the USE scheme, less than 50% of primary school-leavers joined secondary education each year. Within a year of the scheme being introduced, that figure rose to 69%. Similarly, the number of O-Level (Senior Four) candidates in the country rose from 172,000 in 2006 to almost 265,000 last year, an increase of 54%.

3.1.9 THE UGANDA GENDER POLICY 2007

The Uganda Gender Policy makes the case for gender mainstreaming at the sectoral level, including education. The salient objectives of the policy that emphasize environmental protection are to promote equal access to and control over economically significant resources and benefits and to promote recognition and value of women's roles and contributions as agents and beneficiaries of the development process.

3.1.10 THE EDUCATION SECTOR WORK PLACE POLICY ON HIV/AIDS 2013

This focuses on reducing the spread and mitigating the impact of HIV/AIDS among teachers, non-teaching staff and other employees in addition to pupils/students. It emphasizes the provision of education services as a means to combat the spread and weaken the HIV/AIDS epidemic.

3.1.11 THE BUSINESS, TECHNICAL, VOCATIONAL EDUCATION AND TRAINING (BT/VET) STRATEGIC PLAN (2012/3-2021/2)

The Business, Technical, Vocational Education and Training (BTJET) Strategic Plan (2012/3-2021/2) focuses on increasing equitable access to skills development and addressing barriers that keep girls and women from pursuing training in key service and productivity areas.

3.1.12 THE NATIONAL RESISTANCE MOVEMENT (NRM) MANIFESTO 2016-2021

The National Resistance Movement (NRM) Manifesto 2016-2021 commits to remove barriers to girls' education and promote equitable and quality education.

3.1.13 MOES GENDER IN EDUCATION SECTOR POLICY 2016

The vision of this policy is an inclusive and equitable quality education and sports and lifelong learning opportunities for all girls and boys, women and men in Uganda. Its main purpose is to guide effective mainstreaming of gender throughout the Education and Sports Sector. Specifically, the objectives of the Gender in Education Policy are to enhance equal access and participation for girls and women, boys and men in the education and sports sector.

LEGAL FRAMEWORK

3.2.1 THE CONSTITUTION OF THE REPUBLIC OF UGANDA, 1995

Under the Constitution of the Republic of Uganda 1995, Article 39 provides that everyone has a duty to maintain and enjoy a sound environment. In addition, Article 30 guarantees a right to education for all. This provision underlines the principle of eliminating all forms of discrimination in education.

3.2.2 THE EDUCATION (PRE-PRIMARY, PRIMARY AND POST-PRIMARY) ACT, 2008

An Act amongst others, to amend, consolidate and stream line the existing law relating to the development and regulation of education and training and to give full effect to the Universal Post Primary Education and Training Policy of Government. The Act stipulates that "the provision of education and training for a child shall be the joint responsibility of the state, parent or guardian and other stakeholders, the basic education shall be provided and enjoyed as a right by all persons."

3.2.3 THE CHILDREN ACT, CAP. 59

This Act defines the rights of children and requires all duty bearers, parents, community members and teachers to ensure that children under care are safe and protected. In a school setting, teachers therefore, have the responsibility to prevent any form of violence against children.

3.2.4 THE NATIONAL ENVIRONMENT ACT, NO. 5 OF 2019

Where a project/an activity may have, is likely to have or will have significant impact on the environment, an environmental impact study (or Project Brief) shall be conducted. The developer has undertaken environmental and social screening to assess the impacts of the proposed infrastructure; and from the results obtained it was concluded that these are likely to be low impacts projects whose mitigation measures can easily be formulated.

3.2.5 THE LAND ACT, CAP 227

According to the Act, land in Uganda is owned by the people and where land take is anticipated, the affected persons shall be compensated in a timely manner, adequately and fairly. In addition, Section 43 provides that whoever owns land or occupies land shall manage and utilize it in accordance with the existing and applicable laws such as the National Environmental Act, No. 5 of 2019, which has provisions obliging land restoration especially where construction materials are extracted from.

3.2.6 THE WATER ACT, CAP. 152

Section 31, Subsection (1) provides for any person who intends to abstract water from a water source to obtain an Abstraction Permit from the regulator. The contractor will be required to obtain all the necessary approvals in case there is abstraction of both surface and underground water for use during construction of classroom blocks.

3.2.7 THE PUBLIC HEALTH ACT, CAP. 281

The Act details the location of waste disposal facilities such as solid waste skips and septic tanks in relation to settlements and food points. The management of the school shall ensure that the local authorities are allowed to inspect the infrastructure at any time during construction and usage of infrastructure. In addition, the contractor and management of the school will ensure that all waste is disposed of as required under the law.

3.2.8 THE OCCUPATIONAL SAFETY AND HEALTH ACT, 2006

The Act provides amongst others, for safe access to the workplaces and safe work practices which applies to the construction and operation of the factory. The contractor will be required to have an environmental management policy and to train workers/employees on issues related to occupational safety and health such as wearing protective gear and operating fire-fighting equipment, among others.

3.2.9 THE EMPLOYMENT ACT, 2006

The Act mandates Labour officers to regularly inspect the working conditions of workers to ascertain that the rights of workers and basic provisions are provided, and workers' welfare is attended to. The Act also provides for the freedom of association of workers permitting workers to join labour organizations. The contractor will ensure that workers are employed in accordance with the act and the requirement of the labour laws as guided by the District Labour Officer.

3.2.10 THE LOCAL GOVERNMENTS ACT, CAP 243

The Local Governments Act, CAP. 243 provides for decentralization and devolution of Government functions, powers and services from the central to local governments and sets up the political and administrative functions of local governments. The District Local Government Authorities will be key in guiding the project on aspects of land acquisition and if any compensation, the applicable rates will be those used in the districts.

3.2.11 THE NATIONAL ENVIRONMENT (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS

These Regulations are primary tools that operationalize Part X and Section 179 of the National Environment Act No 5 of 2019, on matters of Environmental Impact Assessment. They provide amongst provisions for conducting given levels of environmental assessment required in given projects as well as fees payable for such projects when NEMA approval is to be secured.

3.2.12 THE NATIONAL ENVIRONMENT (NOISE STANDARDS AND CONTROL) REGULATIONS N^o. 30/2003

The regulation requires that the owner of the machinery or occupier of a facility or premises, to use the best practicable means to ensure that the emission of noise does not exceed the permissible noise levels. The regulations require that persons to be exposed to occupational noise exceeding 85 dBA for 8 hours should be provided with requisite ear protection. In the execution of construction of classroom blocks, teacher's houses, and latrines, the above provision will be put under consideration and observed for the smooth implementation of the school infrastructure.

3.2.13 THE NATIONAL ENVIRONMENT (WASTE MANAGEMENT) REGULATIONS 153-2

This Regulation applies to all categories of hazardous waste and non-hazardous waste and to the storage and disposal of hazardous waste and its movement into and out of Uganda. The contractor and the school management will ensure that waste generated during construction and usage of the classroom block is disposed of in gazetted waste dumpsites.

3.2.14 THE NATIONAL ENVIRONMENT (WETLANDS, RIVER BANKS AND LAKESHORES MANAGEMENT) REGULATIONS, 2000.

This law, consisting of four Parts, describes management policy and directions for important wetlands, riverbank and lakeshore areas that exist in Uganda. Any development projects, within those registered areas need ESIA studies and permission to be granted by NEMA in accordance with Regulation 34 of this law.

3.2.15 NATIONAL ENVIRONMENT (HILLY AND MOUNTAINOUS AREAS MANAGEMENT) REGULATIONS, 2000.

Section 16(5) requires protection of soil against erosion during development or implementation of the project. This Act is relevant in so far as the proposed project may have some of its activities undertaken in mountainous and hilly areas being a nationwide project.

3.2.16 THE NATIONAL ENVIRONMENT (STANDARDS FOR DISCHARGE OF EFFLUENT INTO WATER OR ON LAND) REGULATIONS 1999.

The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations 1999, together with National Environment (Waste Management) Regulations of 1999 were put in place to ensure sustainable use of environment and natural resources across the country. Amongst others, under these Regulations, the standards for effluent or waste before it is discharged into water or on land shall be as prescribed in the Schedule of the Regulations.

3.2.17 NATIONAL ENVIRONMENT (CONTROL OF SMOKING IN PUBLIC PLACES) REGULATIONS, 2004

Second hand smoke (SHS) also known as environmental tobacco smoke, is a complex mixture of more than 4,800 chemical compounds, including 69 known carcinogens. The World Health Organization (WHO) indicates "scientific evidence has unequivocally established that exposure to tobacco smoke causes death, disease and disability". According WHO, SHS is a human carcinogen for which there is no "safe" level of exposure³⁴ To avoid public health risk from SHS, Uganda enacted a law: National Environment (Control of Smoking in Public Places) Regulations 2004 to avoid smoking in public places.

Under this law, a public place is defined as, "any place to which members of the general public or segments of the general public ordinarily have access by express or implied invitation and includes any indoor part of a place specified in this schedule" and these places include, office buildings, work places, eating areas, toilets and public service vehicles. The regulations task owners of such places to designate **"NO SMOKING"** and **"SMOKING AREAS"** in premises. Specifically, in regard to proposed constructions in the project, these regulations will apply to areas communally used by construction workers such as site offices, eating areas in camps/shades and workers transport vehicles. Requirements of these regulations should be fulfilled to avoid exposure of workers to tobacco SHS and attendant health risks.

INSTITUTIONAL FRAMEWORK

³⁴World Health Organization. *International Consultation on Environmental Tobacco Smoke (ETS) and Child Health*. January 11–14, 1999 (WHO/NCD/TFI/99.10).

3.3.1 PROJECT PROPONENT/MINISTRY OF EDUCATION

As the developer, the Ministry will assume overall responsibility for implementing conditions of this Project Brief. During construction, contractors to be employed on the project as such, the Ministry will assume overall responsibility over the contractor's compliance standards and obligations in the implementation of the ESMF environmental and social safeguards (as well as wider contractual obligations).

3.3.1.1 THE PROJECT COORDINATION UNIT-PCU

The PCU especially the Environmental Safeguards Specialist shall assume responsibility for ensuring works on the project as well as reporting are compliant with environmental obligations in the project as enshrined in the contract. The PCU will be responsible for supervising construction activities at beneficiary primary schools. The Engineering Assistants will be in charge of supervising school construction in the project areas and their capacity will be enhanced in monitoring socio-environmental impacts of building projects using checklists.

3.3.2 MINISTRY OF GENDER, LABOR AND SOCIAL DEVELOPMENT

Has the mandate on related to work safety and health during works. Working together with the Gender Unit of the MoES, this Ministry will also provide support on gender issues, and be involved in training and conducting baseline studies related to children vulnerabilities. In addition, the Gender Unit of the MoES will be involved in preparation and implementation of a Child Protection and HIV/AIDS prevention plan to be distributed to all schools and contractors where activities to be undertaken under the project. A Code of Conduct will be developed for the Contractors workers.

3.3.3 MINISTRY OF WORKS AND TRANSPORT-MOWT

Through its Department of Construction Management, will ensure construction standards for public buildings will be followed during construction of the project facilities.

3.3.4 MINISTRY OF LANDS, HOUSING AND URBAN DEVELOPMENT-MOLHUD

Will ensure that land issues and land acquisition involving resettlement if it does occur, will be done in accordance with applicable land acquisition laws of Uganda and in consultation with the respective District Local Governments.

3.3.5 THE NATIONAL ENVIRONMENT MANAGEMENT AUTHORITY-NEMA

The National Environment Act, No. 5 of 2019, gives a mandate to NEMA to supervise and monitor environmental compliance in all development interventions in the country. It also empowers the Authority to determine what degree of environmental Assessment is suitable for given projects and such reports will be submitted for its review and approval.

3.3.6 DISTRICTS BASED STAKEHOLDERS

The key institutions at the Districts that have a role to play in the planned project can be summarized as follows:

Overview of the District line Department in the management and operation of the project

District Department	Its mandate	Its role in monitoring project environmental and social compliance
The Resident District	Political head in the district	❖ Available to offer political support necessary for

Commissioner (RDC)	and chairman of the District Committee	the implementation of the project; and ❖ Report to the Office of the President on the performance of the Project in line with the Government Manifesto commitments and strategic education objectives of Government.
District Local Council V Chairman	Representation of the people and custodian policies for district development	❖ Mobilize the communities through established local government channels for their participation in the project in a number of available aspects and opportunities; ❖ To see that, the project agenda benefits people in matters of employment ensuring the facilities are put in place on schedule for teaching purposes.
Chief Administrative Officer (CAO)	Accounting officer for resources at district levels	❖ CAO to verify and endorsement of consent letters on land availability for the project.
District Education Officer	Responsible for education sector in the district including education inspection and operations.	❖ Oversee and routinely report to MoES on aspects of project implementation by the contractors. ❖ Conduct scheduled and unscheduled checks on the project to ensure compliance.
District Engineer	Responsible infrastructure compliance and approvals of plans in the district	❖ Ensure classrooms facilities comply with approval standards as provided by MoES and MoWT; ❖ Materials for construction are of approved quality.
District Environment Officer	Supervision, monitoring and coordination of environmental issues in the district; Advice Council on matters of environment in the district.	❖ Ensure environmental and social conditions and requirements in the project are implemented; ❖ Report to Council and NEMA on environmental compliance of the project
District Labor Officer	Responsible for labor issues in the district i.e. plight of workers etc.	❖ Will ensure, labour law requirements are observed in terms of employment, recruitment; ❖ Monitor and report to MoES on any misdemeanours in the project such as sexual harassment and employment of children.
Community Development Officer	Is responsible for community aspects such as gender dimension in the district.	❖ Issues of Gender and HIV/AIDS mainstreaming in the project are implemented.
Public Health Officer	Oversees aspects of public health in the district	❖ Will ensure, public health dimensions in the project are observed.

Others include:

- School Management Committees (SMCs):** to monitor project implementation mostly from economic and logistical angle of project progress, material consumption and financial expenditure. They will also be imparted with basic skills to monitor socio-environmental impacts during and after project implementation.
- School Construction Management Committee (SCMC):** will assist in the implementation of the environmental and social safeguards requirements, and they will include a woman representative,

person with disability, a science teacher (who understands basic building measurements, materials, and structures), and a community representative (e.g. a member of the schools Board of Governors).

- c. **Church/Faith Based Foundation Bodies:** will be involved on matters confirming lands for the schools and confirming land availability commitment/acceptance to allow the land be used to construct the classrooms.

THE WORLD BANK SAFEGUARDS POLICIES

Based on the Environmental and Screening results, the operational policies that will be triggered under USEEP project (Table 13):

Table 13: Summary of World Bank Safeguards in relation to the Project

OP N°.	Summary of Safeguard Policy	Safeguard Triggered/Not Triggered	Policy Remarks
OP 4.01	Environmental Assessment: The Bank requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. Projects are screened to determine the appropriate extent and type of EA. The Bank classifies the proposed project into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts.	√	The construction works will involve excavation and materials extractions which will trigger need for Environmental Assessment hence, triggering this safeguards policy. The project is under Environmental Assessment Category B because the likely impacts are anticipated to be of small-scale, localized, of short-term in nature and can easily be mitigated and managed.
	Natural Habitat: The Bank supports the protection, maintenance, and rehabilitation of natural habitats and their functions. The conservation of natural habitats is essential for long term sustainable development.	X	The project works shall not support any activities that affect natural habitats.
OP 4.09	Pest Management: In Bank-financed agricultural operations, pest populations are normally controlled through Integrated Pest Management (IPM) approaches. In Bank-financed public health projects, the Bank supports controlling pests primarily through environmental methods.	X	Not triggered as per the Aide Memoir and draft PCN ³⁵
OP 4.10	Indigenous peoples: These are defined to be a distinct, vulnerable, social and cultural group possessing a number of characteristics including collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories.	√	OP/BP 4.10 is triggered because this is a national project and some facilities may be constructed in areas inhabited by IPs and as such, an IPPF has been prepared alongside this ESMF.
OP 4.11	OP 4.11 Physical Cultural Properties: This policy addresses physical cultural resources, which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. The Bank supports the preservation of cultural properties which	√	Though there may be no histo-cultural resources in the project sites, a Chance Finds Procedure (Annex 4) has been outlined in the Annex of this ESMF for the management of accidental encounters with PCRs.

³⁵During consultations, it was strongly recommended that, modest levels of termiticides (anti-termites) be applied on the foundations of classrooms and teachers' houses as well as contractors should apply minimum levels of wood preservatives to preserve timbers from destruction .

OP N°.	Summary of Safeguard Policy	Safeguard Policy Triggered/Not Triggered	Remarks
	includes sites with archaeological, paleontological, historical, religious or unique natural values. It seeks to avoid impacts on such sites.		
OP 4.12	Involuntary Resettlement: This policy includes safeguards to address and mitigate these risks and recommends involuntary resettlement instruments which include a resettlement plan, a resettlement policy framework and a resettlement process framework.	√	The schools set ups will take land areas and an RPF has been prepared for mitigating such impacts.
OP 4.36	Forests: The objective of this policy is to assist borrowers to harness the potential of forests to reduce poverty in a sustainable manner, integrate forests effectively into sustainable economic development, and protect the vital local and global environmental services and values of forests.	X	The policy is not triggered because project supported activities will not have any direct impacts on the forests.
OP 4.37	Safety of Dams: The Bank distinguishes between small and large dams where large dams are 15 m or more in height. Dams that are between 10 and 15 m in height are treated as large dams if they present special design complexities. Dams less than 10 m in height are treated as large dams if they are expected to become large dams during the operation of the facility. Such large dams require amongst others, that preparation and implementation of detailed plans ensure safety aspects.	X	The Safety of Dams (OP 4.37) policy is not triggered. The project does not include construction of dams.
OP 7.50	Projects on International Waterways: This policy applies to the following types of international waterways: (a) any river, canal, lake, or similar body of water that forms a boundary between, or any river or body of surface water that flows through, two or more states, whether Bank members or not; and (b) Any tributary or other body of surface water that is a component of any waterway described in (a) above.	X	The Projects on International Waters (OP 7.50) policy is not triggered. The project will not be implemented on international waters.
OP 7.60	Projects in Disputed Areas: Projects in disputed areas may raise a number of delicate problems affecting relations not only between the Bank and its member countries.	X	The projects are not to be undertaken in disputed areas.

GAP ANALYSIS

This gap analysis specifies aspects where there are gaps between national and international standards, analyses the gap and states actions to be undertaken by the USEEP regarding these aspects.

Table 14: Gap Analysis

Aspect/Issue	Ugandan policies/laws	Development Partners Environmental and social safeguards	Gap Analysis	Action in the USEEP
Comprehensive and inclusive coverage of environmental and social aspects in the development process.	National Environment Management Policy 1994: The policy emphasizes the need to pursue sustainable development which ensures resource sustainability to meet the needs of both the current and future generations.	The 11 key Safeguard Operational Policies and associated Bank Procedures which are embracing and critical to ensuring that potentially adverse environmental and social consequences are identified, minimized, and mitigated during project preparation and approval process. The safeguards policies are a cornerstone and guide to the Bank investment projects as they ensure strong protection for people and for the environment.	a. The National Environment Management policy does not address climate change impacts, mitigation and adaptation as well as some of emerging fields such as oil and gas matters amongst others; b. The Environmental policy does not cover aspects of Resettlement Action Plans (RAP) yet the World Bank safeguards have OP 4.12 dedicated to Involuntary Resettlements.	USEEP has prepared along this ESMF an RPF which has measures for addressing resettlement issues which could arise during its implementation. During implementation of USEEP, if any issues of land take occur, appropriate RAP/ARAP will be prepared. The ESMF proposes measures for addressing climate change mitigation in terms of tree planting, waste management process during operations of schools.
ESMF preparation and project screening and categorization	The National Environment Act, No. 5 of 2019 a. In its Schedule 5 & 10, lists projects that require mandatory EIAs to be conducted. b. Though this law recognizes the need to screen projects, it does not provide for project categorization. c. Has no provision for preparation and approval mechanism for ESMFs. d. EIA study is taken to include social issues in	World Bank Safeguards Policies Place projects into three clear categories based on their anticipated levels of impacts and EIAs to be conducted. It also provides that an ESMF be prepared for projects whose details are not fully known during their preparation. The safeguards policies provide for a comprehensive consultative process that covers project cycle i.e. pre-preparation, preparation, implementation and post implementation phases.	a. The National Environment Act, No. 5 of 2019, does not place projects in categories i.e. category A, B and C; b. It is silent on the ESMF preparation process, review and in its approval; c. Follow up of pertinent issues in post EIA approval is inadequate.	a. This ESMF has placed USEEP as a Category B type and an ESMF has been prepared since at this stage, other details on the project are not clearly known which all in line with World Bank safeguards policies is; b. Though the environment law is silent on RAP, NEMA for now reviews and discloses ESMFs. In addition, the Environment law is being reviewed and the revised law has a framework for addressing ESMFs processes and procedures; c. The ESMF has modalities for post ESIA follow ups; and d. The ESMF mitigation measures will be integrated into BoQs for USEEP.

Aspect/Issue	Ugandan policies/laws	Development Partners Environmental and social safeguards	Gap Analysis	Action in the USEEP
	their coverage.			
The EIA Process	<i>The National Environment Act, No. 5 of 2019 and EIA Regulations of 1998</i> provide for an EIA to be conducted for projects listed in Schedule 5 and 10.	<i>The World Bank Safeguards Policy OP 4.01 on Environment Assessment</i> provides for screening and categorisation of projects. The Bank is critical of public consultations in all phases of the project i.e. before, during and after EIA process. OP 4.01 views EIA as a tool to guide decision making on the suitability of the project for implementation.	a. Environmental Screening is provided in the EIA Guidelines 1997 but does not explicitly categorise its projects into Category A, B and C as does World Bank; b. Public consultations are key during an EIA but not so much after the EIA process; c. EIA is apparently done as conditionality for a project to be implemented rather than as a mechanism through which, environmental sustainability can be mainstreamed into the development project for sustainability purposes.	a. The ESMF for RRF has undertaken screening and categorization of the RRF as a category B type; and b. It is proposed that, consultations should be on-going process which should continue even after the project implantation
Physical Cultural Resources (PCRs)	<i>National Environment law as well as the EIA Regulations</i> are all not very clear its coverage of PCRs aspects in the EIA process.	The World Bank Operational Safeguards policy (OP 4.11 Physical Cultural Resources-PCRs)	Issues of valuation and compensation regarding PCRs are not covered in the national laws.	In the ESMF, a Chance Finds Procedure has been prepared to guide management of any accidental discoveries of histo-cultural resources in the process of implementation.
Focus of compensation for involuntary resettlement	<i>The National Environment Act, No. 5 of 2019</i> law seem to focus on entitlement with respect to compensation. The Land Act Cap, 227 ,also provides that, the following shall be taken into account (a) in the case of a customary	World Bank safeguards policies (OP 4.12) focus is on the rights of the legitimate landowner as well the non-entitled with the objective of ensuring that, the project should not leave PAPs vulnerable at the end of the project.	The concept of compensation and its rules should take into account, all matters and resources of value to the community including PCRs based resources.	The RPF includes full replacement costs which take into account PCRs, amongst other aspects. The practise is that if some PCR is to be relocated, the project is to meet such relocation costs as well. This is a practise with respect to all World Bank financed projects in Uganda's sectors of economy. In addition, the provision in the Land

Aspect/Issue	Ugandan policies/laws	Development Partners Environmental and social safeguards	Gap Analysis	Action in the USEEP
	<p>owner, the value of land shall be the open market value of the unimproved land;</p> <p>(b) the value of the buildings on the land, which shall be taken at open market value for urban areas and depreciated replacement cost for the rural areas;</p> <p>(c) the value of standing crops on the land, excluding annual crops which could be harvested during the period of notice given to the tenant.</p> <p>In the Land Acquisition Act, 1965 , Section 10 : 2 requires that: (a) give notice in writing to any persons having an interest in the land of the purpose and term for which the land is required and of the date on which the term is to commence; and</p> <p>(b) pay to those persons for the occupation and use of that land for that term, for the materials, if any, to be taken from the land andfor the standing crops on the land, if any, such compensation, either in a gross sum of money or by monthly or other periodical payments, as may be agreed in writing between</p>			<p>Act 227, the Land Acquisition Act, and GCALA compensation guidelines relate well to OP 4.12.</p>

Aspect/Issue	Ugandan policies/laws	Development Partners Environmental and social safeguards	Gap Analysis	Action in the USEEP
	<p>him or her and them.</p> <p>The provisions in the Guidelines for compensation-Assessment under Land Acquisition, are backed by the Land Act, 227, the Land Acquisition Act , and other legislation and they provide that fair and adequate compensation is done in line with the Constitution of the Republic of Uganda. The guidelines deal with the issue of compensation solely to the owners and occupiers of landed property and the multiple interest thereon in cases of involuntary resettlement or acquisition.</p>			
RAP process	<p><i>The National Environment Act , No. 5 of 2019</i> has no clear provisions for RAP preparation, review and approval. There is even no list of approved practitioners to prepare RAP.</p>	OP 4.12 provides for Involuntary Resettlement and measures of undertaking RAP.	<p>a. National Environment law has no provisions for approvals of RAPs much as RAP is prepared alongside EIA in projects;</p> <p>b. There is no register of RAP specialists as opposed to EIA Specialists who are certified by law.</p>	a. USEEP has prepared a comprehensive RPF based on World Bank as well as GoU Guidelines which addresses aspects of land acquisition and compensation in the project.
Labour and working conditions for the employees.	Employment Act 2006 and Occupational Act 2006 all provide for the welfare of the workers in terms of; settlement of grievances, wages of workers, issuance	World Bank safeguards policies not explicitly addressing aspects of labour and working conditions for the employees.	The World Bank safeguards policies in their current versions do not cover labour and working conditions for the workers.	Aspects of Labour and Working Conditions for the employees under USEEP are to be based on IFC PS 2 which clearly seeks to ensure that, the minimum working conditions for the employee are compliant

Aspect/Issue	Ugandan policies/laws	Development Partners Environmental and social safeguards	Gap Analysis	Action in the USEEP
	of contracts for employees, safe and secure working conditions, rights to collective bargaining, safety of workers, compensation of workers . In addition, Employment (Sexual Harassment) Regulations 2012 requires that an employer with more than 25 employees should have a written sexual harassment policy		However, the Bank has reviewed and will shortly launch its updated version of safeguards policies which cover a range of safeguards aspects.	with internationally acceptable standards and practices. In addition, compliance with the Employment (Sexual Harassment) Regulations, 2012, will have to be emphasised through development of a written sexual harassment policy for contractors with more than 25 employees.

4 ENVIRONMENTAL SCREENING AND ENVIRONMENTAL ASSESSMENT

Principally, Environmental Screening is intended to ensure that, proposed projects are subjected to appropriate extent and type of environmental assessment (EA). The classification of each subproject under the appropriate environmental category will be based on the provisions of the World Bank Operational Policy on Environmental Assessment (OP 4.01). The environmental and social screening of each proposed sub-project will result in its classification in one of the three Environmental Assessment Categories - A, B or C, depending on the **type, location, sensitivity, scale of the subproject, the nature** and the **magnitude** of its potential environmental and social impacts.

CRITERIA FOR CLASSIFYING PROJECT

As per the Banks safeguards policies³⁶, projects are placed under categories based on the following considerations:

4.1.1 PROJECT TYPE AND SCALE

The Bank lists and places projects into categories based upon prior Bank and international experience and such lists provide a good starting point and framework usually for the screening decision. The project type involves understanding the type of the project, nature of project activities and extent of impacts from such project/s.

4.1.2 PROJECT LOCATION

The significance of potential impacts is partly a function of the natural and socio-cultural settings for the project. The location considerations for instance for placing the project in either of the categories include being:

- a. in or near sensitive and valuable ecosystems such as wetlands or in habitats for endangered species;
- b. in or near areas with archaeological and/or historical significance;
- c. in densely populated areas, where resettlement may be required, or potential pollution impacts and other disturbances are likely to significantly affect communities;
- d. in regions subject to heavy development activities or where there are conflicts in natural resource allocation;
- e. along watercourses or in reservoir catchments which are sources of water for the communities; and
- f. on lands or waters containing valuable resources (such as fisheries, medicinal plants, prime agricultural soils).

4.1.3 SENSITIVITY OF ISSUES

The project may involve activities or environmental features that are of concern to the Bank and such issues may include and may not be limited to disturbance of tropical forests, conversion of wetlands, impacts on protected areas or sites, lands on which are indigenous peoples or other minority groups, involuntary resettlement or impacts of trans boundary nature amongst others or toxic waste disposal. Therefore, under such circumstances, such projects are placed under Category A type and the level of effort needed to assess their anticipated impacts will be of higher order adequate in terms of analytical, decision-making, coordination, and public involvement.

4.1.4 NATURE OF IMPACTS

³⁶World Bank Environmental Assessment UPDATE of April 1993 N°.3

Naturally, it is difficult to consider nature of impacts without having some overlap with the concepts of sensitivity and project type. The nature of impacts assessment should take into consideration the aspects below under which, projects in Category A are typified:

- a. Irreversible destruction or degradation of natural habitat and/or loss of biodiversity or environmental services provided by a natural system;
- b. risk to human health or safety (from generation, storage or disposal of hazardous wastes); and
- c. Absence of effective mitigation or compensatory measures.

4.1.5 MAGNITUDE OF IMPACTS

Magnitude of impacts can be gauged as absolute taking into account, the amount of a resource affected relative to the existing stock of such a resource or ecosystem as well as the intensity of the impact and its timing and duration. In addition, the probability of occurrence for a specific impact and the cumulative impact of the proposed action and other planned or ongoing actions may equally be considered. For example, the resettlement of 5,000 families is a large impact, in absolute terms.

PROJECT CATEGORIZATION BASED WORLD BANK SAFEGUARDS

The World Bank places projects into categories **A, B and C** and each of these project categories will require a specific level of Environment Assessment taking into account considerations outlined under section 7.1 above as follows:

4.2.1 CATEGORY A PROJECTS

Category A projects are those which are likely to have adverse impacts with one or more of the attributes that make their potential impacts *significant* such as direct pollutant discharges that are large enough to cause degradation of air, water or soil; large-scale physical disturbance of the site and/or surroundings; extraction, consumption, or conversion of substantial portions of forest and other natural resources; measurable modification of hydrologic cycle; hazardous materials in more than incidental quantities; and involuntary displacement of people and other significant social disturbances.

4.2.2 CATEGORY B PROJECTS

Any project which is likely to have potential environmental and social impacts, which are less adverse than those of EA Category A projects, on human populations or environmentally important areas including wetlands, forests, grasslands and any other natural habitat. The impacts are usually site specific, few or none of them are irreversible, and most of them are mitigated more readily than impacts from EA Category-A sub projects. ***Although an ESIA is not always required, some environmental analysis is necessary. Such subprojects would require an ESMP.***

4.2.3 CATEGORY C PROJECTS

Any project which is likely to have minimal or no adverse environmental and social impacts. Beyond screening no further ESIA action is required. No assessment would be required under World Bank requirements.

CATEGORIZATION OF USEEP PROJECT

The proposed USEEP has been screened against above provisions taking into account the following set of core facilities to be constructed in ensuring, the facilities make a full and functional school:

- a. 6 new classrooms including furniture (though furniture will be a separate contract after);
- b. 2-unit science laboratory with furniture;
- c. An administration block - furnished and 2 stance latrines;

- d. 2-unit teachers' house (for hard to reach and hard to stay schools), with kitchen, 2 stance latrine and wash rooms;
- e. Water harvesting system for teachers and classrooms;
- f. Semi-detached house for head teacher and deputy with wash rooms, kitchen and 2 stance latrines;
- g. Library/ ICT Laboratory- furnished;
- h. Play ground;
- i. Installation of power-solar; where there is no main grid; first fix where there is grid; and
- j. 2 no 5 stance VIP latrines.

It is noted that, principally, the works under this project as named herein, do not fall under those projects under Schedule 5 and 10 of the National Environment Act, No. 5 of 2019, that require mandatory EIAs before their implementation hence, USEEP falls under Category B type of projects whose impacts are largely localized, small-scale and of short-term in nature.

In addition, the named infrastructures to be constructed, will be of basic nature, their inputs will be readily available and that, their construction works will not involve use of heavy equipment. Above all, their anticipated operations will not generate substantial and any hazardous waste. Based on these, preliminarily, USEEP has been placed as a category B type of project, and under this ESMF a position will be confirmed in subsequent project processing programs.

ENVIRONMENTAL AND SOCIAL ASSESSMENT IN UGANDA

The key laws/regulations for environmental and social assessment in Uganda include The National Environment Act, No. 5 of 2019, the EIA Regulations, 1998, the EIA Guidelines of 1997 and the National Environment (Audit) regulations, 2006. The National Environment (Environmental Impact Assessment) Regulations, 1998 define the role of ESIA as a key tool in environmental management, especially in addressing potential environmental impacts at the pre-project stage. The regulations define the ESIA preparation process, required contents of an ESIA, and the review and approval process including provisions for public review and comment. The regulations are interpreted for developers and practitioners through the Guidelines for Environmental Impact Assessment in Uganda (1997). Although assessments nowadays conducted and submitted to NEMA are now termed "Environmental and Social Impact Assessment", in common with best international practice, this term is not used in the environmental Regulations or Guidelines. The acronyms EIS and EIA are used about environmental impact statement and environmental impact assessment respectively. However, the acronyms ESIS and ESIA are used herein to refer to environmental and social impact statement and environmental impact and social assessment respectively to include the social component in line with best international practice.

The section below illustrates the steps involved during environmental and social assessment and management process as per Ugandan regulations that will lead to the review and approval of subprojects under the USEEP.

KEY STEPS IN ENVIRONMENTAL AND SOCIAL ASSESSMENT UNDER OP 4.01

The section below illustrates the steps involved during environmental and social assessment and management process as per Ugandan regulations and to a larger extent World Bank safeguard policy that will lead to the review and approval of subprojects under the USEEP as summarized on Figure 12.

4.5.1 STEP 1: SCREENING OF ACTIVITIES AND SITES

MoES through its Secondary Education Department as the implementing entity will carry out scoping and screening of the sub-projects using the Environmental and Social Screening Form (ESSF) in Annex 2. The ESSF requires information that determines the characteristics of the prevailing local bio-physical and social environment with the aim of assessing the potential project impacts on it. The ESSF should also identify the potential socio-economic impacts that will require mitigation measures and or resettlement and compensation if any during the time of project implementation

4.5.2 STEP 2: ASSIGNING THE APPROPRIATE ENVIRONMENTAL CATEGORIES

In summary these will entail:

- a. MoES will assign the appropriate environmental category to the subprojects based on the information contained in the ESSF and the national criteria for categorization. The potential categories have been described under Section 4.1 above and are in principle in line with the National Environment Act, No.5 of 2019, and EIA Guidelines of Government of Uganda;
- b. Activities that will require a full Environmental and Social Impact Study (ESIS), either because (i) they meet the general criteria in Schedule 4 of the National Environment Act, No. 5 of 2019, are out of character with their surroundings, are of a scale not in keeping with surroundings, or involve major changes in land use; (ii) are types of projects listed in Schedule 5 & 10; (iii) are located in a nature conservation area; or (iv) are identified in other laws or regulations as requiring EIA because of their location. Under the World Bank categorization, these are likely to fall under Category A. However, there are not expecting investments that will require full scale ESIs because the planned investments are likely to be of small-scale in nature and their impacts being localized as such, most of the interventions will necessitate either ESMPs/Project Briefs (Category B) or may be exempt (Category C);
- c. Activities for which additional information is needed to determine what level of environmental analysis and/or management is appropriate and for which mitigation is easily identifiable. These will likely be Category B under the World Bank categorization. Under GoU requirements, a Project Brief suffices and under the World Bank requirements, an ESMP suffices; and
- d. Activities that are determined by the ESIA Consultant and in the opinion of the Executive Director NEMA, that, such activities will not have any significant or adverse potential impact on the environment, (4th Schedule in the National Environment Act, No. 5 of 2019) will require a Project Brief to be prepared based on a review of the Scoping Report for the proposed project. Such projects are most likely to be Category B or C types as per the World Bank categorization.

4.5.3 STEP 3: CARRYING OUT ENVIRONMENTAL ASSESSMENT

The ESIA will be conducted by the consultancy firms registered by NEMA. However, Project Briefs (equivalent of an ESMP as per OP 4.01) may be prepared by non-NEMA registered persons. A Project Brief doesn't require preparation of ToRs but their approval is done by NEMA. However, in case an ESIA needs to be undertaken, the ToRs for the study will be prepared by the Secondary School Education Department in MoES and such ToRs have to be reviewed and approved by NEMA. The ESIA report will identify and assess the potential environmental and social impacts for the planned activities, assess the alternative solutions, and will design the mitigation, management and monitoring measures to be implemented.

According to the National Environment Act, No. 5 Of 2019, "Project Brief" means a summary statement of the likely environmental effects of a proposed development referred to in Section 19. Unlike the ESIA, a Project Brief does not require a scoping report and neither submission of terms of reference for approval by NEMA. The ESMP or Project Brief will for each potential impact include: mitigation measures, monitoring indicators, implementing and monitoring agencies, frequency of

monitoring, cost of implementation, and necessary capacity-building. It is possible that after completing the Checklist, the Environmental Specialist may recommend that the subproject concerned should be subjected to a full ESIA and submitted to NEMA for review and their decision concerning approval.

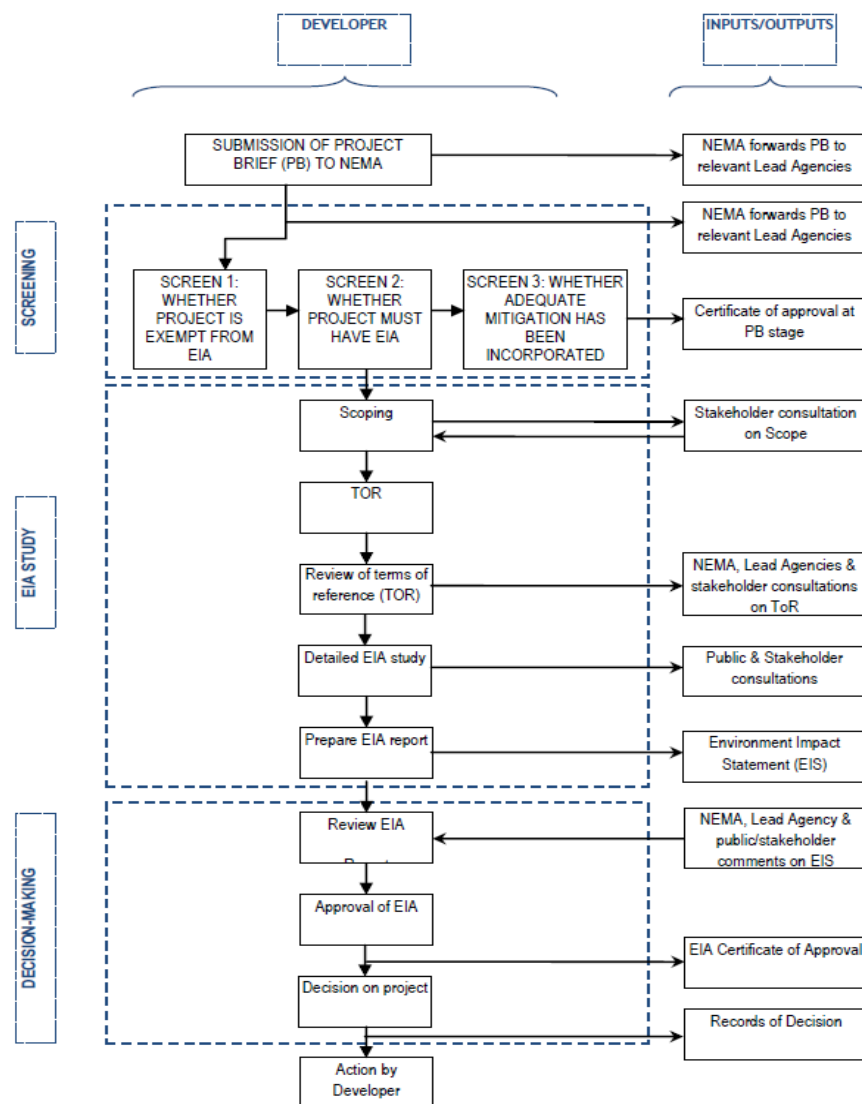


Figure 17: Schematic flow of EIA process in Uganda.

4.5.3.1 PREPARATION OF A PROJECT BRIEF

According to Regulation 5 of the EIA Regulations, 1998, a Project Brief is to contain amongst others, the following:

- the nature of the project in accordance with the categories identified in the Third Schedule of the Act;
- the project area of land, air and water that may be affected;
- the activities that shall be undertaken during and after the development of the project;
- the design of the project;
- materials that the project shall use (including both construction materials and inputs);
- possible products and by-products, including waste generation of the project;

- g. the number of people that the project will employ and the economic and social benefits to the local community and the nation in general;
- h. the environmental effects of the materials, methods, products and by-products of the project, and how they will be eliminated or mitigated; and
- i. Any other matter which may be required by the Authority.

In addition to the above, it is currently a practice and requirement by NEMA to include details of stakeholder consultations in Project Briefs.

4.5.4 STEP 4: PUBLIC CONSULTATIONS AND DISCLOSURE

Public consultation will be initiated during the scoping and ESIA preparation stages and views of stakeholders (public and lead agencies) have to be included in a Project Brief as well. Public consultation will also be an integral part of the process throughout the planning and execution of the project. The Project Safeguards staff will interact closely with management of beneficiary schools, local government administrations, NGOs right from the early stages of the project preparation on a regular basis for developing and implementing the respective project ESIAs/ESMPs and RAP where applicable.

For this purpose, public consultations drives shall be organized by MoES and public awareness shall also be created with NGO's and other social organizations active in the affected areas. During the public awareness drives, it will be ensured that only accurate information is given about the project and its possible environmental and social impacts. The opinion/suggestions made by the community/affected groups shall be incorporated in the respective ESIA/ESMP and Resettlement Action Plans. After clearance, the assessment reports (ESIA/ESMP, RAPs, and PBs etc.) shall be disclosed both in Uganda through the daily print media by Implementing Agency and at WB's *Infoshop* by IDA.

4.5.5 STEP 5: REVIEW AND APPROVAL

Following internal review of the ESIA/ESMP/PB by MoES (Secondary School Education Department) and the Bank, the ESIA report will be forwarded to NEMA for their review and decision i.e. approval. If the Executive Director is satisfied that the subproject will have no significant impact on the environment, or that the assessment done discloses adequate mitigation measures to manage anticipated impacts, s/he may approve the project. The Executive Director shall then issue an EIA Certificate of Approval for the project. Similarly, when submitted to the World Bank, the Bank will review, provide guidance on content and compliance with safeguard policies, and either clear or decline to clear with justified technical reasons.

It is important to note that this review and approval process is to be carried out in parallel with the review and approval of the technical, economic, financial and other aspects of the subprojects. Implementation of subprojects cannot commence until the environmental and social aspects have been reviewed and appropriate mitigation measures have been adopted. As possibilities of social impacts regarding land acquisition, the implementation of subprojects cannot proceed until the resettlement and/or compensation plans have been prepared and implemented after clearance by the Chief Government Valuer (CGV) in the Ministry of Lands, Housing and Urban Development (MoLHUD).

4.5.6 STEP 6: ENVIRONMENTAL MONITORING

Environmental and social monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures. On a day to day basis, the District

Environment Officers (DEOs) and the Community Development Officers (CDOs) alongside the Environmental and Social Safeguard Specialist under UTSEP of the Global Partnership for Education (GPE) in MoES, and other staff/consultants as may be recruited will be compiling the reports (after verification on ground) and submit to the PCU/Ministry and NEMA.

The monitoring indicators will be developed based on the mitigation measures in the ESMPs. In case of any civil works, at the end of subproject construction phase, a Certification for Compliance integrating Environmental and social issues for the completion of works is issued by MoES under its CMU or PCU. It is also worth noting that World Bank will also from time to time, as part of its Project Support Supervision, be involved in monitoring and providing technical guidance throughout project implementation.

4.5.7 DISCLOSURE OF SUBPROJECT INFORMATION

In compliance with World Bank Policy on Information and Uganda EIA Regulations, before a subproject is approved, the applicable documents (ESIA, ESMP and/or RAP and associated management plans) must be made available for public review at a place accessible to local people (e.g. at a local government office/project location/site), and in a form, manner, and language they can understand. It is recommended that the ESMPs and RAPs be disclosed in the same location that the community development plans are made public to ensure that there is wide access to the documents. In addition, copies of the ESIs/ESMPs shall be made available to the public through the public libraries and websites of participating District Local Governments, MoES and NEMA. Any arising comments from the public shall be taken into consideration by the project depending on the stage of the project.

5 ANTICIPATED ENVIRONMENTAL AND SOCIAL IMPACTS OF THE PROJECT

Overall, the project is likely to have a positive impact on the social issues in community development in Uganda in the short, medium and long term. The project benefits will be based on the infrastructure interventions as follows:

- a. 6 new classrooms including furniture (though furniture will be a separate contract after);
- b. 2-unit science laboratory with furniture;
- c. An administration block - furnished and 2 stance latrines;
- d. 2-unit teachers' house (for hard to reach and hard to stay schools), with kitchen, 2 stance latrine and wash rooms;
- e. Water harvesting system for teachers and classrooms;
- f. Semi-detached house for head teacher and deputy with wash rooms, kitchen and 2 stance latrines;
- g. Library/ ICT Laboratory- furnished;
- h. Play ground;
- i. Installation of power-solar; where there is no main grid; first fix where there is grid; and
- j. 2 no 5 stance VIP latrines.

ANTICIPATED POSITIVE SOCIAL IMPACTS

The potential positive impacts of the proposed construction of classrooms facilities include:

- a. **Provide additional facilities for education needs:** This project is geared towards provision of one of the major problems facing delivery of Universal Secondary Education, which is the question of large and congested classes³⁷. It is sighted that, in most such schools, performance has worsened, and this is attributed to the numbers/population in classes which make it difficult for teachers to capture the attention of more than 80 students per class. It is common in USE schools to conduct lessons in open space, but it is a challenge to keep the attention of the students and this undermines their performance. For instance, in rural areas of Yumbe and specifically, Bidibidi Refugee Settlement and its environs, classrooms are over-crowding with pupil teacher ratio being up to 162:1. Therefore, the planned construction of new schools/classrooms, there will be reduced pressure in existing schools in terms of population of students and improved teacher: pupil ratio hence, good learning outcomes;
- b. **Uplift girl child secondary education:** The project strong focus on ensuring that girl's access, stay and complete lower secondary education based on well-documented evidence brings in a strong bearing on affirmative action on steps government is taking to actualize MoES National Strategy for Girls' Education (NSGE) in Uganda. It has been established, that girls' education brings a wide range of benefits not only for the girls themselves but also for their children and communities, as well as society at large in terms of economic growth. More educated women tend to be healthier, participate more in the formal labour market, earn more income, have fewer children, and provide better health care and education to their children, all of which eventually improve the well-being of all individuals and can lift households out of poverty. These benefits also

³⁷ Huylebroeck, Lisa and Kristof Titeca 'Universal Secondary Education (USE) in Uganda: blessing or curse? The impact of USE on educational attainment and performance'. In: Reyntjens, F., Vandeginste, S. and M. Verpoorten (eds.) *L'Afrique des Grands Lacs: Annuaire 2014-2015*. Antwerp: University Press Antwerp, pp.349-372.

transmit across generations, as well as to communities at large hence, translating to one of the main benefits of USEEP from a strategic perspective;

- c. **Address need for education facilities for increasing numbers of students;** UBOS 2017 in its ASC established that, a total of 1,448,527 students were reported to be Ugandans and 8,750 non-Ugandans with percentage composition of 52.5% and 55.76% of males respectively, the rest being females. It is evident, the number of non-Ugandans is observed to increase in Ugandan secondary schools due to refugees and non-Ugandan population as such, a need for increase in facilities to absorb the rapidly growing numbers of secondary school going students in the country;
- d. **Construction of teachers' houses:** The 2016 ASC findings reveal that there are 94,636 permanent structures translating into 91.2% of the total structures. A total of 10,796 teacher houses were recorded and 20,173 were recorded as needed. This almost doubles the number of the available houses for teachers and thus, there is a huge gap that USEEP is contributing towards its filling by constructing, amongst other teachers houses as part of its interventions. It is important to note that, teaching staff are mostly not from within the vicinity of the schools and therefore, they travel distances and sometimes on foot to the schools. Others live in sub-standard accommodation with some living in tents which is not conducive for the delivery of teacher services leading to frustration, lowered motivation with attendant high levels of absenteeism, and poor-quality engagement. This situation is dire and appalling in refugee areas;
- e. **The water harvesting** which is to come along with the classrooms and teachers' house construction will provide additional water sources for schools WASH needs as well as domestic usage at households in their teachers' homes;
- f. **Reduced distance to schools:** From the findings of UBOS 2016 during ASC, about 78.6% of all secondary schools were below the radius of 1km, while only 0.8% were in the radius of distance above 5kms. This indicates that, majority of secondary schools are accessible to students and surrounding communities hence, this situation would be improved through USEEP planned interventions;
- g. **The WASH facilities:** Findings from ASC 2016 by UBOS in 2017 indicate that about 7,180 sanitation structures are set aside for teachers, 12,202 exclusively for girls and 11,631 exclusively for boys. Only 1,141 are used only for used collectively at a national level. The results also indicate a total of 11,327 hand-washing facilities which portrays that the secondary schools appreciate the issues of hygiene and sanitation. In all, USEEP interventions will put in place, gender sensitive facilities which will also give confidence to the girl child with respect to management of their menstrual life thereby allow them to attend classes even while menstruating;
- h. **Put in place, equal opportunities facilities:** under the project, all buildings (both classroom blocks and WASH facilities) will be designed to provide suitable access for children with disabilities (CWD) by having in place, ramps, handrails, and adequate space to accommodate their mobility support facilities;
- i. **Improved schools play environment:** several schools do not have standard play fields. Some of the play fields have not been levelled and landscaped like others, children use any available spaces for their games as such, USEEP will go a long way to having in place standard play fields for all round education of the children;
- j. **Provision of short-term employment opportunities** through engagement as casual workers during classrooms construction be source of additional incomes for both refugees and host communities;

- k. A source of income to local food suppliers and contractor's personnel:** construction of school facilities will entail civil works requiring materials such as bricks, timber and cement. This is a positive but short-term and reversible impact;
- l. Enhancing facilities for better girls' education:** in terms of changing rooms in toilets for girls creates a safer and more secure environment guaranteeing and improving school infrastructure for learning and retention at school for girl child;
- m. Improved teaching of science subjects:** Uganda's socio-economic transformation will be led by scientific innovations as envisaged under Vision 2040 as such, government is taking deliberate steps to improve the teaching of science by constructing laboratories in secondary schools which is one of the large positive impacts of USEEP; and
- n. Improving the environmental health** of the schools by addressing problems of poor sanitation, poor waste disposal and storm water/runoff.

ANTICIPATED NEGATIVE IMPACTS AND THEIR MITIGATION MEASURES

These focuses on works covering classrooms, teachers' houses (including head teachers) and their associated support infrastructures and their negative impacts will include:

- a. Land take concerns:** during the construction of USEEP facilities there will need to ensure issues of land take are adequately well taken care of and at this planning stage, an RPF has been prepared alongside this ESMF to address all aspects of land acquisition and compensation shall arise;
- b. Vegetation loss implications,** through site clearance and preparation works where class rooms and WASH though the impact will be small-scale in nature, delineating areas for such infrastructure prior to clearing sites, Define routes for delivery trucks to minimize unwanted trampling on vegetation and full restoration and re-grassing the sites at the end of the project coupled with planting some ornamental trees to enhance greenery in the compounds will reduce the impact;
- c. Risks of polluting underground waters from pit latrines:** construction and usage of pit-latrines could cause seepage of contaminated water into aquifers. It is therefore important that, pit latrines should be excavated avoiding high water table areas or with appropriate technologies such as lining. Construction and usage should be monitored by District Public Health officials notably in the siting of such infrastructure. Environmental Guidelines for Rural Water Supply and Sanitation sub-programs should be applied as appropriate;
- d. Management of cut to spoil material** which is likely to arise through excavation works and general works to with foundations. Such material can cause erosion, siltation of waterways, be dust nuisance and is sometimes unscrupulously dumped in wetlands;
- e. Erosion control concerns,** likely to arise through site clearances and excavations, run-offs from roofs of constructed classrooms, and transport routes for construction traffic. This can be mitigated through site restoration, re-grassing, planting ornamentals and rainwater harvesting. In addition, the project should put in place storm water discharge channels based on the designs of the project;
- f. Noise nuisance** which can arise through transportation of construction materials/construction activities and from the workers, which noise can be a nuisance to the schools' operations and is to be mitigated through briefing the workers and drivers on the need to control noise while in the schools' settings and restricting construction activities to daytime (8:30 am-5:00 pm);
- g. Risk of GBV especially against the girls:** Making sure that the physical infrastructure constructed provides safe access for girls. There should be separate latrines for girls and boys and such facilities be built in physically different locations in the school, and that, the latrines

should be fitted with locks on the doors, and also the places around the toilets/pit latrines should well lit. Make sure that school staff, parents and teachers have access to, know of, and report any abuse using the national child abuse reporting hotline 611. The existence of the hotline can be displayed throughout the school, community and construction site. It is also important that, the contractors be zero tolerant on workers conduct related to violence against women and girls (VAWG). Other measures to address GBV against girls include:

- ❖ All employees must be made aware of the zero tolerance policy and codes of conduct for employees.
- ❖ In addition, display signs throughout the site making it clear that the work site is a violence free zone and VAWG will not be tolerated.
- ❖ All workers should receive briefing on the laws against defilement and other sexual offences. In the regulatory framework, the client should cite/include the policies on ending violence against children policy and the GBV, how they could be upheld and potentially implemented by this project.

h. Potential resistance of the community to the contractors, sections of the communities feel, they normally get a good share of employment opportunities from the projects that are implemented in their areas and sometimes, contractors have had resistance in trying to access construction materials. This is to be mitigated through providing information to the public on the availability of the contract opportunities, eligibility criteria and other relevant procurement information. Such information should be pinned up in all public notice boards in the districts, sub-counties and supported by radio announcements on local radios in local languages;

i. Setting and operations of temporary workers campsite can raise public health issues, which the contractor will address through routine cleaning of the toilets and later, demolition and fully landscaping such sites;

j. Impacts relating to sourcing of construction materials given that, most of the schools will new constructions, as such, there will be need for supply of substantial quantities of construction materials such as; stones, bricks, sand amongst others which will have impacts on the environment especially their processes of extraction which will bring about environmental degradation. It is important, that, contractors obtain lease agreements with the landowners for them to access such materials at agreed terms and that, at the end of the project works such sits fully restored to the satisfaction of NEMA and the District Environment Officers in the respective districts. For sources that are already operational, there will requirement for environmental due diligence on the part of the contractor to ensure such sources of materials have NEMA approvals and their operations are compliant.

k. Occupational health safety (OHS) risks on both the construction workers and the public is to be mitigated by providing PPEs to the workers, having modestly stocked First Aid kits on the site and observing speed limits while transporting construction materials into the sites and even while on the school compounds. In addition, the contractors should have contacts of nearby ambulance and police fire and rescue services for any emergencies; Occupational health safety (OHS) Risks for the project workers. In all, the workers will be provided with PPEs, work areas be clear of obstacles and proper lighting of the rehabilitation sites.;

l. Risks of HIV/AIDS, STIs/STDs or other contagious diseases among local community and pupils alongside child abuse (child labour, child pregnancy, sex work involving children). This is a serious concern to be addressed by Client representatives briefing contractors on the code of conduct while implementing the project especially not engaging in sexual relations with girls below 18 years of age. Schools Management Committees, parents, the church/mosques, local area councils to sensitize the communities and pupils on the risks of sexual relations with project workers. The contractor to liaise with HIV/AIDS Service providers in the localities who should be co-opted to conduct awareness sensitization, distribute condoms for the workers and conduct

Voluntary Counselling and Testing (VCTs) for the workers and those willing within the project settings.

m. Management of construction waste, construction waste such as cement bags, brick debris, off-cuts from roofing and timber works, waste paper, plastic bags and heaps of excavated soils will likely be generated. All these must be transported and disposed outside the sites by the contractor to agreed disposal sites in consultation with both the DEOs and project engineers;

n. Rampant vandalism of schools' properties: schools in the rural areas are facing increasing vandalism of school property in terms of malicious damage to plastic rainwater harvesting tanks through removal of taps or deliberately cutting the tanks. In some cases, livestock roam schools' premises destroying trees and even enter classrooms if they are left not locked. There are many cases of delinquent youth who reportedly enter and defecate inside the classrooms plus a host of abuses on school infrastructures.

o. Stakeholders suggest that, possibly underground water tanks could be the options for rainwater harvesting and classrooms be lockable pending future drives of enclosure fencing for entire school compounds;

p. Fears of collapse of infrastructure, cases of collapsing buildings in the country are common and arise through; poor workmanship, substandard construction materials, inappropriate engineering designs amongst others. In the project, employing Project Engineers to oversee the construction processes as well as, certify works on behalf of the Client and securing relevant approvals for the designs from approving entities especially the District Engineers will mitigate this risk;

q. Fire risks: could potentially arise through delinquent pupils who can lead school strikes thereby torching school infrastructure. This is to be addressed through having/installing fire extinguishers and/or schools' regulations restricting possession of match boxes while in schools; and

r. Risks of lightning strikes of recent there are increasing risks of lightning striking school facilities with attendant fatalities on children and teachers. This is to be mitigated by putting in place, lightning conductors/arrestors on buildings and such arresters should be aluminium types which are not so much sought out by thugs compared to copper rods.

5.2.1 RISKS DURING LABORATORIES AND WORKSHOPS OPERATIONS

Solid waste from laboratories will be disposed based on its nature and hence, in a manner as follows:

5.2.1.1 MANAGEMENT OF SCIENCE LABORATORY WASTE

It is the responsibility of all laboratory staff to properly segregate laboratory waste because different types of wastes have different treatment standards. All waste in the laboratory will hence be laid in the waste bins as per bin labels. Improper and irresponsible disposal of chemical wastes down drains, to the Local Authority refuse collection, or into the atmosphere is forbidden by law. The laboratories are to have separate bins for separate types of waste.

Incineration: All other items that are deemed unsuitable to be put in the normal waste bins in the laboratories, will be placed in a special waste-bin supplied in each of the laboratories and such items include: broken laboratory glassware, sharp objects of metal or glass, dirty sample tubes or other items lightly contaminated with chemicals and such will all be incinerated;

Misuse and inability to operate installed equipment: There could also be risks of laboratory staff abusing the equipment and reagents which has some economic implications on the cost operations.

This is already addressed through having in place, Standard Operational Procedures for any investigations, training and re-training and ensuring staff operate under hierarchy of supervision and accountability;

Risks of fires: Risks of fires in laboratories can be occasioned through spillages, irresponsible storage, handling and application of inflammable reagents, irresponsibly carrying around naked flames, smoking cigarettes and faulty electricity connections. All these will be addressed through SOP, having appropriate and functional fire extinguishers and skills in fire fighting. Laboratory staff be regularly subjected to fire/rescue drills amongst others;

Management of reagents spills: Of late scientific laboratories have adopted strategies of managing accidental spillages as part of their Standard Operating Procedures (SOPs). When a spill occurs, the area is cleared of any users, and the spill cleaned up immediately. Waste from spill clean-up is then disposed of appropriately depending on the kind of chemical. After floor spill has been thoroughly cleaned up appropriately, the area is mopped dry to minimize the risk of slipping and falling. Other details are summarized in Annex 05;

Management of obsolete and expired reagents: MoES ought to put in place, guidelines for the management and disposal of expired and obsolete reagents, which are applicable to all its school science laboratories operations and can be summarized as follows:

- a. At the end of every quarter (3 months), laboratory technicians do prepare a list of reagents which have/are about to expire;
- b. A chemical Disposal Form is filled with all key information, which includes name of the chemical(s), its/their percentage purities, date at which the chemical expired. The same information is filled on a label and attached to the chemical intended for disposal;
- c. Such chemicals/reagents are to be placed in designated sections inside the storage rooms with the label facing outwards and clearly visible;
- d. Laboratory technicians will be informed of such chemicals intended for disposal; and
- e. The Chief Laboratory Technician then informs the contracted licensed waste disposal agent who arranges for safe transportation and disposal of such wastes within a month of notifying him/her of such development.

The Table below sets out a generic ESMP for USEEP impacts and their mitigation framework. Once fully finalized and based on acceptable levels of Environmental Assessments (Project Briefs or ESMPs), such outcomes will be integrated into the Bills of Quantities (BoQs) for works contracts.

Table 15: Generic ESMP for USEEP

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
Pre-construction phase						
Anxiety amongst communities	Anxiety over surveying and marking of areas for construction of project.	Sensitization of the communities about the project.	MoES, District Education Officers. District Environment Officers.	a. Reports of the sensitization meetings held; b. Records of attendance of meetings in place.	Records	15,0000
Land acquisition	Areas where classrooms, teachers' houses are to be established.	Schools will be on secured land acquired for the project and/or land from the Community, so land-take up envisaged. Restrict construction to areas for infrastructure development to minimize disruption of any other activities within the vicinity. For construction materials extractions, contractor to enter separate access agreement with landlords.	SMC/OPM/District/MoES	c. Copies of MoUs in place d. Consent letters from landowners in place. e. Lease agreements between the contractors and property owners in place.	Records	RAP will cover the costs.
Construction Phase						
Loss of vegetation	Site clearance works	Restricting works to areas for classrooms	Contractor	a. Plans for infrastructures in place and approved;	Records and site inspections	15,000

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
		and teachers houses; Where feasible, avoid clearing mature trees; Proper and full site restoration after works; and Re-grassing bare or exposed surfaces and plating of ornamental trees.		<ul style="list-style-type: none"> b. Plans for restoration of site in place and sites restored and re-grassed; c. Where tree loss is inevitable, conduct compensatory tree planting; and d. Routes for trucks in place. 		
Conflict in water use	Construction works (motor works etc.).	Contractor to have arrangements for his own water supply for his works and staff. Obtain written consent where they use school water sources/facilities	Contractor	<ul style="list-style-type: none"> a. Plan for water supply in place i.e. water supply sources and transportation arrangements. b. Authority letter/agreements 	Records and site inspections	15,000
Management of cut to spoil materials from foundation excavations.	During excavations for foundations for classrooms and teachers houses.	The excess and usable cut to spoil materials can be used as back fill material on foundation works of facilities being constructed; Sites be fully restored and re-grassed after works; and To control dust from	Contractor	<ul style="list-style-type: none"> a. Approvals for re-use of excess cut to spoil in place from the works engineer; b. Plans to restore opened surfaces in place. c. Stone pitch high excavated slopes at risk of collapse 	Records and site inspections	

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
		loose soils, water be sprinkled on such surfaces.				
Noise nuisance	Construction trucks and workers.	Keep the timing of the project works to day hours 8:30 am-5:00 pm not into night hours; Noise impacts should not exceed the levels i.e. in residential, institutional and educational settings between 07:00-22:00 hrs allowable limits are 55dBA while at night should be 45dBA between 22:00-07:00 hrs; Briefing the workers and drivers on the need to control noise on the site; Siting permanent facilities away from community areas if possible; and Provide ear muffs to her workers and have a few extra ones for visitors visiting the site. Use	Contractor	a. Work schedule in place; b. Minutes/record of briefing of workers in place.	Records	covered under OHS below

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
		well maintained and serviced machinery to minimize noise generation.				
Waste and operational concerns for temporary campsite.	The contractor could likely set out a temporary campsite whose operations could trigger public health concerns.	Operations of the temporary camp site be in line with the provisions of the Public Health Act 1964; and The campsite areas be demolished and fully restored at the end of the project to the satisfaction of the Project Engineers and DEOs.	Contractor	a. Restoration/Decommissioning plan in place; b. Site restored fully.	Records and site inspections.	
Creation of borrow pits	Extraction of construction materials such as soils/ for back-fill of foundations. Borrow pits fill up with water and become breeding grounds for malaria vectors.	Sites are to be restored fully after extraction of such materials.	Contractor	a. Borrow pits restoration plans in place; and b. Site restored fully to the satisfaction of the DEO and Project Engineer.	Site inspection and records.	45,000
Occupational Health and Safety	This can be triggered by a number of activities and operations on the site: a. Equipment; b. Accidents from falls/falling; c. Conduct/behaviour	Provide H&S Training to the construction workforce including drivers; Sites be fenced off; Posting speed limit signs in strategic routes in the	Contractor	Training schedule and training materials in place; Plan for fencing in place; PPEs secured and used by the workers; Policy on workers conduct on site in place; First Aid kit in place and modestly	Records and site inspections.	50,000

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
	of the workers.	schools; Provide PPEs to the workforce; No consumption of alcohol or drugs on the site; Provide First Aid kits on the site; Provide workers with basic First Aid and safety trainings; Provide adequate and well-maintained public facilities, which are routinely cleaned.		stocked with essential medicines; House-keeping guidelines in place i.e. when to do what and where to keep what; Speed control signs in place; and Site hoarding		
Soil erosion and surface water pollution.	Run-off from roof tops of classrooms	Implement rainwater harvesting to trap and store water for subsequent use in dry season; Proper restoration of the site; and Re-grassing exposed surfaces.	Contractor	Rainwater harvesting measures instituted; and Areas on the site re-grassed.	Site inspections and records.	25,000
Transmission of HIV/AIDS and COVID-19 ³⁸	Workers mix with some coming from outside the project area and staying away from their spouses.	Sensitization on HIV/AIDS transmission risks; Distribution of condoms;	Implementing Partner	HIV/AIDS sensitization schedule in place; Condoms secured and distribution schedule in place alongside records of distribution done; and	Workers Code of Conduct Grievance Mechanism records	85,000

³⁸ Detailed evaluation and assessment of the Novel corona virus will be provided in the specific ESMPs that will be developed later. It will also be a standalone impact.

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
		Sensitization on the need to undertake VCT to establish ones zero status; and Give preference to employment of locals in the project areas to reduce separating families.		Locals from the project vicinity employed.		
Operational Phase Impacts						
Management of sanitary waste from menstrual cycle.	Girls of adolescence age.	Within the menstrual room in the wash rooms, there should be a lined pit where used sanitary pads be dropped	Implementing Partner	Menstrual room in place within the constructed drainable pit latrines.	Site inspections	120,000
Conflicts between the host community and the refugees in the school	a. Tribalism b. Cultural norms c. Distribution of scholastic materials.	One uniting and workable solution is to enforce use of English as official language. Sensitization of the community on peaceful coexistence.	Schools Administration and School Management Committee	Understandings in place inform of agreements etc	School Management Committees	
Disease vector nuisance	Improper management of pit latrines	The project to support set of WASH and Environment Committees in the schools to champion hygiene campaigns;	Implementing Partner/ School Management Committees	a. WASH and Environment Committees in place; b. Modalities for their operations in place.	Site inspections	15,000

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
		Schools to have clear cleanings rosters for the pit latrines.				
Risks of collapse of pit latrines.	a. Poor workmanship, b. Poor construction materials. c. Natural disasters	The pit-latrine be constructed based on engineering designs which should be approved by CMU and District Engineer; and Strict supervision of works to ensure they are done according to standards.	Contractor	Construction designs in place and approved by CMU, and the District Engineer.	Records and site inspections.	
Risks of ground water contamination	Digging pit latrines to excess depths.	The pit latrines depths should be based on known water tables in the areas; and The pit latrines should be located 30-50m from the nearest water sources.	Contractor	Information on water tables in the area in place; and Water sources locations established.	Records and inspections.	
Risks of child abuse	Employing children to work on the project	Liaising local leader to ensure recruitment process does not bring on board, children to work on the project.	Contractor			
Social impacts of construction labour(Harassment	Use of bad language on the workers. Non-payment, sexual	-Train workers on the labour Act -Follow workers	-MoES -Contractor -Local government	-Presence of register -Availability of ethical code of conduct -Availability of contracts	- Records and inspections.	Cost will be embedded in contract

Potential Impact	Impact trigger through	Mitigation Management and Enhancement Measures	Responsibility for implementation	Monitoring indicators to track implementation of mitigations	Means of Verifying implementation of mitigation measures	Cost USD.
and abuse of and by workers)	abuse and harassment, and violence against women and children	ethical code of conduct -Ensuring contracts are signed for each employee. -Collaboration with labour officer to guide/monitor contract -Engagement of contractors on the laws against defilement and other sexual offences.	-School Management committees	-Register of reported abuse cases against women and girls -Reports of engagement meetings		documents/ BOQs
TOTAL						385,000

6 IMPLEMENTATION ARRANGEMENTS AND SAFEGUARDS MANAGEMENT ROLES

IMPLEMENTATION ARRANGEMENTS AT NATIONAL LEVEL

6.1.1 MOES ROLE IN IMPLEMENTATION

Project implementation will be mainstreamed in the Ministry of Education and Sports (MoES) using existing institutional establishments. The overall responsibility for project implementation lies with the Permanent Secretary, with day to day implementation under the aegis of the Department of Secondary Education in which, a Project Coordination Unit (PCU) will be established. The operations of the PCU will be under oversight role of the Commissioner Secondary Education. The MoES shall maintain a fully operational implementation team, with functions and responsibilities agreed with the World Bank, including, *inter alia*, the responsibility to coordinate and monitor project implementation processes.

The PIU will be staffed with principally with:

- a. Project Coordinator
- b. Project Accountant
- c. Procurement Specialist
- d. Monitoring and Evaluation Specialist
- e. Safeguard Specialist (s)

During the preparation of this ESMF, it was learnt that, Assistant Commissioner Private Secondary Education was playing the role of Project Coordinator. Overall accountability to the project will rest with the Permanent Secretary, MoES.

According to available lessons from some of the World Bank Supported projects, it is noted that, MoES strategic use of its technical expertise significantly enhances its capacity³⁹. However, any capacity gaps will be mapped during the design phase of the project and efforts to fill them undertaken prior to its effectiveness. It is also envisaged that, the project will build on the existing capacity under the current IDA portfolio in MoES though on a need basis, additional man-power can be recruited as shall be agreed in between missions and discussions with the Bank.

6.1.1.1 THE ROLE OF PERMANENT SECRETARY OF THE MOES

The Permanent Secretary (PS) as the Accounting Officer of the Project will be responsible for overseeing overall project implementation. The PS will delegate the day-to-day management of the Project to the Project Coordinator (PC) supported by a team of officers specifically hired to provide technical support for project implementation. The senior officers in MoES especially Directorate of Basic and Secondary Education and the Commissioner for Secondary Education will coordinate closely with the Project Implementation Team in the PIU to ensure smooth implementation of the project. The Permanent Secretary will chair any inter-ministerial meetings/committees that will be formed during project implementation.

6.1.1.2 ROLE OF GENDER UNIT IN MOES

³⁹ ESMF for Uganda Secondary Education Improvement Project Environmental and Social Management Framework April 2016

The Unit is mandated to coordinate with all other sub-sectors and other actors in education to mainstream gender initiatives into their plan, activities and program. Under USEEP, the Unit will be responsible for gender mainstreaming during works and while the constructed schools are operational.

6.1.1.3 CONSTRUCTION MANAGEMENT UNIT (CMU) UNDER THE MINISTRY

Will be responsible for supervising construction activities at the beneficiary project schools. Its Engineering Assistants will oversee supervising school construction and their capacity will be enhanced in monitoring socio-environmental impacts of building projects using checklists and working with the PCU, DEOs and CDOs/Labor Officers.

6.1.2 MINISTRY OF GENDER, LABOR AND SOCIAL DEVELOPMENT

The Ministry has the mandate related to work safety and health during works in this project. Working together with the Gender Unit and the OHS Departments of the MoLGSD, this Ministry will also provide support mainstreaming of gender, HIV/AIDS and OSH issues into the project during its implementation. In addition, the Gender Unit of the MoES will be involved in preparation and implementation of a Child Protection and HIV/AIDS prevention plan to be distributed to all schools and contractors where works will be undertaken under the project.

6.1.3 MINISTRY OF WORKS AND TRANSPORT

The Ministry of Works and Transport (MoWT) through its Department of Construction Management will ensure project construction standards for public buildings will be applied in the project. In addition, MoWT through its Materials Laboratory will be instrumental in certification of construction materials as a Government entity mandated by law to do so.

6.1.4 MINISTRY OF LANDS, HOUSING AND URBAN DEVELOPMENT-MOLHUD

MoLHUD will ensure that land issues and land acquisition involving resettlement if it does occur, is done in accordance with relevant laws and in consultation with the Districts Local Governments. Its Chief Government Valuer will be instrumental on matters of valuation and compensation.

6.1.5 THE OFFICE OF THE PRIME MINISTER

The Ugandan Office of the Prime Minister (OPM) will be key in the implementation of USEEP interventions in refugee hosting areas. The OPM is a national and government entity with the mandate to respond to the refugee situations in the country. The mandate includes settling refugees, registration, and initiating projects for refugees. Within OPM, the Department of Refugees (DoR) is mandated to take charge of all administrative matters concerning refugees including the coordination and implementation of refugee programmes in Uganda. Therefore, USEEP interventions in refugee hosting communities will require closer collaboration with OPM and its established frameworks such as its Department of Refugees (Department for Refugees (DoR)).

6.1.6 NATIONAL ENVIRONMENT MANAGEMENT AUTHORITY-NEMA

The National Environment Act. No. 5 of 2019, alongside related legal instruments gives mandate to NEMA to supervise and monitor environmental compliance on development interventions in the country. It also empowers the Authority to determine the level of Environmental Assessment required in the proposed project alongside its sub-projects. For this case, will the

project during its implementation require a Project Brief or detailed ESIA and will review and approve the project as well in line with its mandate.

DISTRICT LEVEL

6.2.1 DISTRICT EDUCATION OFFICERS-DEOS

Under the decentralized governance system, the district local governments (District Education Departments) are responsible for monitoring and inspection of schools under their jurisdiction to ensure compliance with policy guidelines, provide supportive supervision and coordinate activities of partners. They have a role to coordinate and provide technical and professional guidance in the management of education and sports policies, plans and programmes in the districts. In addition, they also implement approved education and sports development plans, strategies and council decisions. In the project they will have oversight roles of ensuring the works are adequately supervised by the District Engineers and in keeping with the education infrastructure standards and specifications.

6.2.1.1 SCHOOL MANAGEMENT COMMITTEES (SMCS)

At the school level, the School Management Committee (SMC) is composed of representatives from the founding body of the school, teachers, parents, local authorities of the area, and the DED. It is the statutory organ that governs the school on behalf of the government. Principally, they are to monitor project implementation mostly from economic and logistical angle of project progress, material consumption and financial expenditure. They will also be imparted with basic skills to monitor socio-environmental impacts during and after project implementation.

6.2.1.2 SCHOOL CONSTRUCTION MANAGEMENT COMMITTEE (SCMC)

Will assist in the implementation of the environmental and social safeguards requirements, and they will include a woman representative, person with disability, a science teacher (who understands basic building measurements, materials, and structures), and a community representative (e.g. a member of the schools Board of Governors).

6.2.2 OTHER DISTRICT DEPARTMENTS

A number of line district technical departments such as; District Environment Officers/Municipal Environment Officers, District Planners, District Engineers, Community Development Officers and District Labour Officers, and alongside political arm will have a role in the implementation of the project in keeping with their decentralized roles as enshrined in the Local Governments Act and other applicable legal and policy instruments. However, it is reported that, based on the experience under the on-going UTSEP/GPE-other than stakeholders directly under the supervision of the ESSS, district reporting on safeguards is still not adequate.

ENVIRONMENTAL AND SOCIAL SAFEGUARDS MANAGEMENT IN USEEP

6.3.1 ENVIRONMENTAL AND SOCIAL SAFEGUARD MANAGEMENT IN THE PROJECT

6.3.1.1 ROLE OF ENVIRONMENTAL AND SOCIAL SAFEGUARDS SPECIALIST UTSEP/GPE

For now, and during the preparation as well initial start of USEEP implementation, the Environmental and Social Safeguards Specialist (ESSS) for UTSEP-GPE, an IDA supported project in the Ministry is/will continue to support the safeguards aspects under USEEP. From discussions with MoES officials, the ESSS is giving support across the sector on all safeguards. It is suggested

that, the Ministry has a long-term strategy of fully mainstreaming environmental and social safeguards into its macro-structure and for now, USEEP should recruit a Social Safeguards Specialist to complementarily support the ESSS in the management of safeguards issues across the two projects. The two Specialists should be able to play oversight right on the compliance of the project with both NEMA and World Bank environmental and social safeguards requirements during its implementation.

Because the project will be spread in areas of the country, it is proposed that, services of a Third-Party Service provider be retained or short-term consultants recruited to support effective safeguards management, given the scope of work and coverage of the project.

6.3.1.2 ROLES OF THE CONTRACTORS DURING PROJECT IMPLEMENTATION

All contractors hired to undertake project civil works shall be required to develop a Contractor's ESMP which will include among others, the following aspects: the initial sub-project ESIA approved by both NEMA and World Bank, Health and Safety Management Plan, Traffic Management Plan, Waste Management Plan, Construction Camp and Equipment Yard Management Plan, Labour Force Management Plan (which will also include code of conduct for workers), construction materials acquisition due diligence procedure amongst others. The contractors shall be required to comply with Environmental, Social, Health and Safety (ESHS) requirements and most important too, the project bidding documents will integrate safeguards aspects too and contractors will be required to sign the code of conduct with the workers .

6.3.1.3 ROLE OF SUPERVISING ENGINEER

The Supervising Engineering Firm will be hired by the client (MoES) to supervise civil works and general construction of the facilities and such a Firm will be required to have in its staffing, and full-time Environmental and Social Management Specialist to oversee the contractors' compliance with safeguards requirements and reporting. The Environment Management Specialist will be responsible for ensuring compliance of the project activities with both contract and environmental conditions of the Bank.

6.3.2 MITIGATION ENHANCEMENT MEASURES

These include:

- a. Once the Environmental Assessments for the sub-projects are conducted, approved and disclosed, NEMA will issue the letters of approvals with conditions for such sub-projects. The approval conditions from NEMA alongside ESMPs in such ESIAs will be integrated into the BoQs for works for contracts and through this arrangement, the environmental mitigations will be operationalized.
- b. The Environmental and Social Safeguards Specialist in MoES alongside the Environment Management Specialists from both the contractors and the supervising consultants will be responsible for overseeing integration of environmental and social issues into the project works, supervision and reporting.
- c. Having in place, a Grievance Redress Mechanism for addressing grievances that can arise in the project; and The designs for the schools infrastructures such as classrooms take into account, the need to maximize natural ventilation and lighting, cater for required capacity of spacing per child per classroom, provision for appropriate drainage systems, hand washing facilities close to the toilets/latrines.

- d. Conducting an Environmental Audit: One of the measures to verify compliance of works will be to conduct an Environmental Audit of the Project and this should be in accordance to environmental audit requirements of NEMA environmental and social safeguards as well as for the Bank. The Audit will be able to bring to light some of the emerging environmental issues during its implementation and proposed compliance interventions for such concerns.
- e. Bank support supervision: In addition, there will be scheduled Bank Supervision missions, which among others, will be checking compliance of the project works with the Loan Agreement environmental commitments and the Bank's safeguards Systems. Environmental and social issues raised by the Bank Missions will be taken up by MoES Environmental Unit in their routine follow supervision of the project.
- f. Participation in monthly site meetings: Furthermore, there will be monthly site progress meetings to discuss matters and progress of the project. In those meetings, environmental and social compliance of the project will be reported by the staff of MoES/PCU Environmental Unit. Salient aspects of compliance will be reported and corrective actions will be discussed and agreed upon.

6.3.3 MONITORING EVALUATION AND REPORTING

6.3.3.1 MONITORING AND EVALUATION

The overall objective of environmental and social monitoring is to ensure that mitigation measures are implemented and are effective. Environmental and social monitoring will also enable response to new and developing issues of concern during project implementation and therefore, it will ensure that, project activities comply and adhere to environmental provisions and standard specifications of both the Bank and the environment requirements governing projects typical of USEEP as shall be detailed in the Environmental Assessments (Project Briefs, ESIA's, ESMPs, Grievance Redress Mechanism etc.) for the project.

The project envisages having in place a Monitoring and Evaluation Specialist whose role is to track the implementation of the project in line with its approved milestones. The M&E Specialist will be expected to integrate in his/her schedule and reporting, project compliance with environmental and social safeguards which should be prominently captured in the overall project reporting. The M&E Specialist will work closely with the M&E Division under the Department of Education Planning and Policy Analysis to ensure the outcomes of USEEP fit into the overall sector strategy and objectives.

Monitoring of environmental and social safeguards in the project will be undertaken through use of an "Environmental and Social Management Supervision and Monitoring Plans" which will be developed for the project, but under the overall M&E framework of the project structure as above. In addition, Monthly and Quarterly Monitoring should be undertaken by all the stakeholders as will be defined. Other core staff expected to be part of the PCU will include an Architect and Civil Engineers.

6.3.3.2 REPORTING

Reporting on environmental and social will be using a range of tools including-environmental and social screening forms, stakeholder engagement plans, Grievance Redress Mechanism (GRM)-included in the ESMF, checklists, monthly and quarterly reports, works completion certificates etc.

The Reporting will include amongst others:

- a. ESMF management actions undertaken during the reporting period;
- b. Progress to-date in implementing the ESMF challenges encountered;
- c. Lessons learnt;
- d. Emerging issues in the project especially; and
- e. Recommendations for improvement to enhance compliance of the project.

6.3.4 ENVIRONMENTAL AUDIT

All projects that are listed in Schedule 5 & 10 of the National Environment Act, No. 5 of 2019, and others as NEMA may determine, and that are likely to have significant impact on the environment require an environmental audit.⁴⁰ Such an audit must be undertaken within a period of not less than twelve months and not more than thirty-six months after the completion of the project or the commencement of its operations, whichever is earlier, provided that an audit may be required sooner if the life of the project is shorter than this period.⁴¹ It will be responsibility of MoES to procure a consultant to execute a required environmental and social audit. The consultants to undertake the Audit shall be those who are certified and registered in line with the National Environment (Conduct and Certification of Environmental Practitioners) Regulations 2003 and such Audit report will be submitted to the Executive Director for review and approval. The Environmental and Social Audit will bring to light, those areas of non-compliance with respect to environmental, social, health and safety in the project, which require corrective actions to be undertaken by MoES.

THE GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism (GRM) will provide a way to an effective avenue for expressing concerns and achieving remedies for communities. The goal is to promote a mutually constructive relationship and enhance the achievement of project development objectives. The GRM is to ensure that complaints are directed and expeditiously addressed by the stakeholder agencies involved in the implementation of USEEP. While a project-specific feedback and complaints mechanism is to be set up, the USEEP will incorporate the existing grievance mechanism that uses the settlements and host communities' administrative structure.

In all, the GRM should follow the principles i.e. it should be scaled to address the risks and impacts on affected communities, be culturally appropriate, be clear and accessible for any individual or group at no cost (vulnerable groups), be transparent and including regular reporting, and preventive of retribution and to not impede access to other remedies. Furthermore, the grievance mechanism should be designed to provide access to specific target groups, e.g. girls and women who, might be subject to sexual harassment during construction, would need avenues to submit grievances that protect their privacy.

6.4.1 STEPS OF GRIEVANCE REDRESS

A verbal or a written complaint from aggrieved person will be received by the Project Manager or a person assigned in the project as the Grievance Officer (GO) and recorded in a grievance log (electronically if possible). Grievances can be lodged at any time, either directly to the contractor, Sub-county/District Office or via the grievance committee member.

⁴⁰ Cf. Section 126 of the National Environment Act, No. 5 of 2019

⁴¹ Cf. paragraph 31 of the Environmental Impact Assessment Regulations, 1998

The process for lodging a complaint is outlined below:

- a. The GO will receive a complaint from the complainant;
- b. The GO will ask the claimant questions in their local language write the answers in English and enter them in English onto the Grievance Form;
- c. A representative of the community and LC-1 Chairman shall witness translation of the grievance into English;
- d. The GO reads the complaint in English and translates it into the complainant's local language on the Grievance Form;
- e. The local leader and the complainant both sign the Grievance Form after they both confirm the accuracy of the grievance; and
- f. The GO lodges the complaint in the Grievance Log.

6.4.2 WHY GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism (GRM) is to provide a way for an effective avenue for expressing concerns and achieving remedies for communities. The goal is to promote a mutually constructive relationship and enhance the achievement of project development objectives. The GRM is to ensure that complaints are directed and expeditiously addressed by the relevant agencies which are to enhance responsiveness and accountability. While a project-specific feedback and complaints mechanism is to be set up, USEEP will incorporate the existing grievance mechanisms that operate in the areas of the project based on established administrative structures including in the refugee hosting areas.

6.4.3 SOME OF THE ANTICIPATED GRIEVANCES UNDER USEEP

Some of the anticipated grievances likely to arise during USEEP implementation will, to a large extent, take the shape of the existing circumstances in the project areas. For instance, while implementing the project in refugee hosting areas, the grievances could a different dimension from those in non-refugee hosting areas.

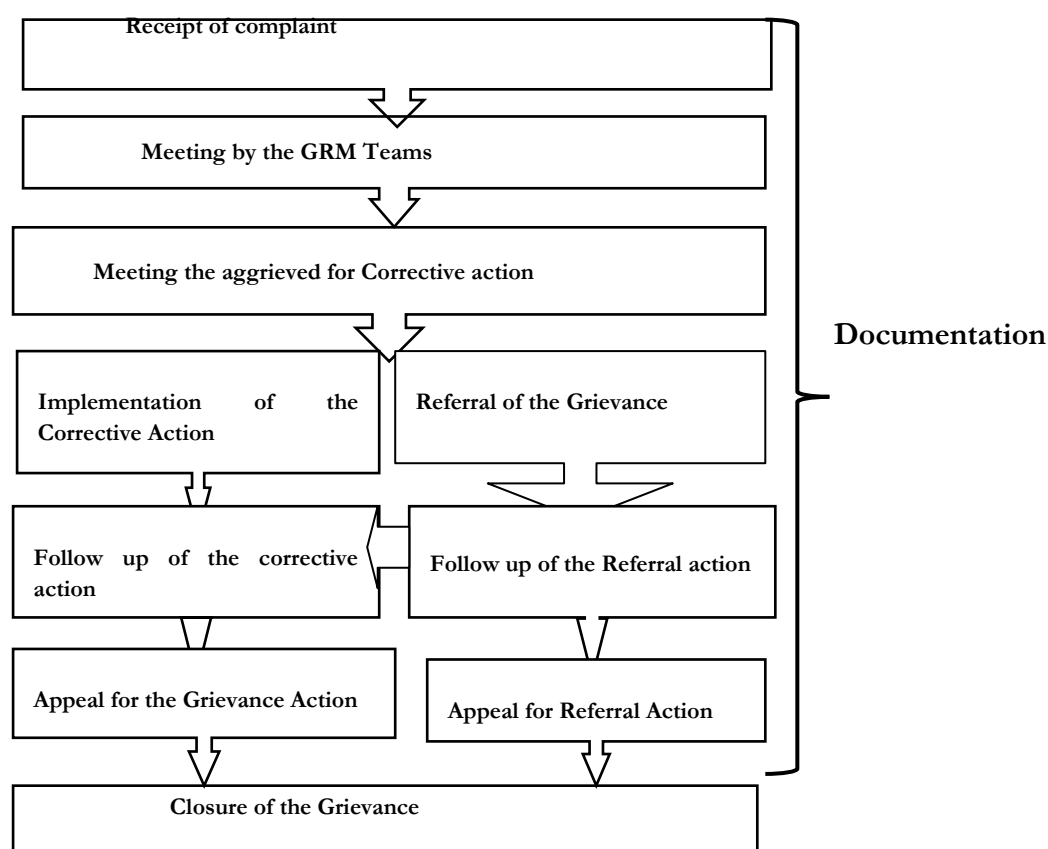
In all, some of the anticipated grievances under USEEP will include:

- a. Land uptake issues where there could be issues of encroachment on neighboring lands;
- b. Access to water for construction works;
- c. Access and payments for project construction materials;
- d. Grazing of livestock in the school compounds;
- e. Employment opportunities offered by the projects with reference to availing jobs to refugees as well;
- f. Abuse or improper use of sanitation facilities;
- g. Sexual abuse of the girl child by the project workers; other social ills related to labor influx like alcoholism and drug abuse;
- h. Sexual harassment and gender-based violence by the workers;
- i. Fights amongst school going children which can trigger fights amongst the parents;
- j. Complaints by parents over punishments by the teachers; and
- k. Abuse of school infrastructures by the communities' especially malicious damage to rainwater harvesting tanks.

6.4.4 GRM SCENARIOS AVAILABLE UNDER USEEP

6.4.4.1 GRM UNDER NORMAL PROJECT AREAS SET UPS

Local grievance redress committees (LGRC) will be initiated at the school/village level to record grievances and also help in mediation. This Committee will comprise the LC I Chairperson, a trusted village elder, a religious representative, and specific vulnerable group representatives of relevance to the village i.e. women and the disabled. Disputes will be resolved at the village level as far as possible. The GRC at the Sub County level will comprise the LC III Chairperson, Sub County Chief, a representative of vulnerable groups (women etc.) and the Councillor of the Parish. At the District Level, the Grievance Redress Committee will be established to deal with any grievances unsettled at the village level. The Grievance Redress Committee at the district will at a minimum comprise the LC3 representative, representatives of vulnerable groups, District Land Officer/Surveyor, District Environment Officer, District Community Development Officer and a Grievance Officer from the implementing agency who will oversee and coordinate grievance issues at the village level including setting up of LGRCs, provision of Grievance Logbooks and related logistics, training and orientation of LGRCs, and providing advice on grievance resolution as well as compiling records of all grievances raised and their mediation for the whole district. The generic grievance handling would be summarised as follows:



The grievance mechanism for the implementation process is as follows:

- The LGRC will interrogate the PAP in the local language and complete a Grievance Form which will be signed by the leader of the LGRC and the PAP/complainant. This will then be lodged in the Grievance Log/Register provided by the Grievance Officer;
- The PAP should expect a response from the LGRC within seven days of filing the complaint. If the issue is not resolved, the LGRC will forward the complaint to the GRC at the Sub County;
- The GRC at the Sub County will be given a fourteen-day notice to hold a meeting. Two days after the meeting, the Sub County GRC will call the PAP and LGRC for discussions and

resolution. The resolution will be presented to the PAP in written form within the same day of the meeting. If there is no resolution to the grievance, the GRC at the Sub County and the PAP shall then refer the matter to the GRC at the District;

- d. The GRC at the District will be given a fourteen-day notice to hold a meeting. Two days after the meeting, the GRC will call the PAP and LGRC for discussions and resolution. The resolution will be presented to the PAP in written form within the same day of the meeting; and
- e. If there is no resolution to the grievance, the GRC at the district and the PAP shall then refer the matter to the District Land Tribunal for land-related issues and to USEEP head office for all other grievances.

It is important to note that, even contractors sometimes have issues with the workers, suppliers of construction materials or payments for their works. For instance, some workers deliberately refuse to use PPEs despite their availability. Under such cases, it is proposed that, the contractor will proceed as follows:

- a. for uncooperative workers, such will be reported to supervisors for warning and if they continue they will be treated in accordance to the Occupational Health and Safety Act 2006 as well as Employment Act;
- b. On issues where workers are not paid their wages, they can report the issue to the District Labour Officer and if issues fail to be resolved before the District Labour Officer, then the matter can be reported to Industrial courts for mediation;
- c. There can also be instances where suppliers of construction materials and not paid by the contractors. It is suggested that, under such circumstances, the supplier will report such issues to the area Local Council leaders and if the contractor fails to comply, the LC1 council will write a letter to area District Police Commander through which, a file is opened, and the prosecution process is started;

On issues of non-payments for the works done by the contractors, they have a window under FIDIC Contract Agreement where it is provided that *"Any dispute arising out of this Contract, which cannot be amicably settled between the parties, shall be referred to adjudication/arbitration in accordance with the laws of the Clients country"*.

More serious grievances must immediately be referred to the police. It is important to note that, not all conflicts and grievances will be addressed by the Project GRM. Cases that involve assault, gender-based violence, rape and "serious" theft are not resolved under this framework but are instead referred to the police for appropriate prosecution process. However, during handling of these cases, the aggrieved parties can also consult others institutions to provide counselling sessions, testing for infections/HIV/AIDs, medical treatment (i.e. health Centres) before cases are appealed.

Appeal to Court -The Ugandan laws allow any aggrieved person the right to access to Court of law. If the complainant remains dissatisfied with the outcome of GRM has the option to pursue appropriate recourse via judicial process in Uganda. Courts of law will be a last resort option, in view of the above mechanism.

6.4.4.2 CASES OF ISSUES IN REFUGEE SET UPS

In the complaint resolution, effort be made to the extent feasible, to use existing complaints and resolution mechanisms operating in the refugee set ups which involve informing the Settlement Commandants and possibly the OPM Regional Desk Officer about serious

concern/complaints and involve them in the resolution. All grievances should be logged in a complaint register to assess whether the grievance is closed or whether further action is needed.

The project-specific grievance mechanism will be complemented by the existing refugee response GRM that utilizes existing local administrative and community structures both inside and outside the settlements. Settlements are divided into smaller units for ease of administration. Each unit has its own administration office so that its inhabitants have easier access to administration services. The constituent units in refugees' camp are headed by village chairpersons referred to as Refugee Welfare Committees (RWC I). One of the tasks of the RWC I is to mediate in the conflicts and solve problems within the villages in his/her constituency. However, in case of grievances that the RWC I cannot resolve, such issues will be referred to the RWC II. If RWC II fails to resolve a conflict, they in turn refer to RWC III and if the problem fails to be solved at this level, the matter will be referred to the Settlement Commandant who will also try to resolve it. The governments' courts of law constitute the final instances.

More serious grievances must immediately be referred to the police. It is important to note that, not all conflicts and grievances in the settlements are addressed under RWC arrangements. Cases that involve assault, gender-based violence; rape and "serious" theft are not resolved under this framework but are instead referred to the police for appropriate prosecution process.

CAPACITY BUILDING AND ENHANCEMENT MEASURES

The implementation of the environmental and social safeguards in USEEP will require its stakeholder institutions to have some levels of competence in environmental management as well as understand the provisions in the ESMF alongside resultant ESIA or Project Briefs/ESMPs that will be prepared. In line with this, the ESMF herewith has identified some training that is to be provided to PCU and other stakeholders. Details of capacity building framework are summarized in the Table 16. It is proposed that, the Environmental and Social Safeguard Specialist under UTSEP/GPE as well as the proposed Social Safeguards Specialist for USEEP will take a lead in the capacity building trainings. In addition, the head of the Gender Unit in the Ministry will equally be instrumental in the process of capacity development under USEEP.

Table 16: A summary of Training and Capacity Building programme

No.	Institutions/Groups	Safeguards weakness	Cost Estimates
01.	PCU/Gender Unit under MoES	a. Additional training needed in disciplines such as: <ul style="list-style-type: none"> i. Climate change mainstreaming into development interventions, ii. Environmental and Social Safeguard Management under GoU, iii. Awareness of the Contract, Contractor Environmental and Social Management Plan (CSMP) and sub-plans, ESMP, IPPF, RAP etc; iii. Occupational hygienic training; iv. Environmental Auditing; v. World Bank Safeguards monitoring and reporting, 	55,000

		b. Limited facilitation in terms of transport for effective monitoring of safeguards in MoES projects; c. Limited work equipment such as computers for setting up occupational hygienic database. d. Lack of basic equipment for <i>in situ</i> monitoring: <ul style="list-style-type: none"> i. Noise ii. Air quality iii. Waste water monitoring iv. Temperature v. Water quality monitoring. 	
02.	District technical staff (Labour, education, gender, Environment, CDOs)	Staff need training in disciplines such as: <ul style="list-style-type: none"> i. General understanding of environmental and social safeguards; ii. Monitoring of E&S iii. Reporting on E&S e. Facilitation in terms of transport for effective monitoring E&S in projects; f. Limited work equipment such as computers for setting up occupational hygienic database.	65,000
03.	SMC/BoGs/HMs	Training in disciplines such as: <ul style="list-style-type: none"> a. Basic understanding of environmental and social safeguards; b. Monitoring of E&S c. Reporting on E&S 	35,000
Total Budget			155,000

6.5.1 COST OF ESMF IMPLEMENTATION BUDGET

The table below shows a budget breakdown of the cost for implementing the ESMF under USEEP over the project lifetime of 5 years. These figures will be reviewed and revised during subsequent stages of project preparation.

Table 17: Summary of Budget Estimate for implementing the ESMF

N°.	Item	Cost Estimate (US \$)
01.	Conducting subsequent Environmental Assessments (ESMPs, Project Briefs)	80,000
02.	Implementation of ESMPs	385,000
03.	Environmental and social monitoring	150,000 ⁴²
04.	Capacity building and institutional strengthening.	155,000
05.	Environmental Audits	95,000
TOTAL (US\$)		865,000

⁴²This figure envisages involvement of DEOs, CDOs and likely to be 4-5-year period.

6.5.2 USEEP ENVIRONMENTAL AND SOCIAL ISSUES FOR FURTHER DISCUSSIONS

Based on the consultations, the following deserve further consideration as the project preparation process continues to unfold:

1. **Design of VIP latrines:** Stakeholders feel that the VIP latrines should be designed and constructed as drainable ones this is because land is increasing getting scarce hence, the tendency of sinking new VIP latrines once those in use get full is getting increasingly a challenge. Because some areas such as Arua and Kapchorwa have weak soil profiles and latrines do not last longer as compared to other areas. In addition, alongside the drainable pit latrines the project could plan and integrate some sludge treatment plants especially in refugee hosting areas and Kapchorwa region;
2. **Provision of menstrual rooms:** the designs for VIP toilets should include provisions for menstrual rooms for safe and private usage of girls when under their menstrual periods;
3. **Use wood preservatives:** There is concern regarding the problem of termites destroying buildings especially roofs where the timber is not protected with wood preservatives which triggers Operational Policy on Pesticides (OP 4.09);
4. **Management of bat invasions:** Bats reportedly invade classrooms and teachers houses by nesting in the roofs through eaves of houses. It is suggested that, the designs for the roofs should ensure entry for bats to the roofs are totally sealed;
5. **Rain water harvesting tanks:** in many cases schools are fairly in isolated locations far from settlements and with skeleton staff staying within. Under such circumstances, it has been found that, ill-motive persons malicious damage rain water harvesting plastic tanks by removing taps or, deliberate cutting the tanks at their bases rendering them useless. Communities feel that, possibilities be explored to have in place, concrete water harvesting tanks as opposed to plastic tanks; and
6. **Erecting perimeter fences:** The open nature of the schools (no fences/enclosures) makes them vulnerable to all kinds of abuse by trespassers and theft of school property including grazing livestock on the school compounds which destroys ornamental and lawn vegetation. This, according to stakeholders needs to be discussed exhaustively so that, in case fencing is to be adopted modalities of guaranteeing safety of fencing materials be worked out with all stakeholders' and roles and responsibilities agreed which is key considering wide spread lucrative trade in scrap metal materials. MoES should provide in the management structures for the schools, employment of security personnel. In addition, the perimeter fence is reinforced by planting live fence such as Kei Apple (*Caffradovyalis*).
7. **Consideration for roofing materials:** Due to the size of the project and the number of school facilities to be constructed, a decision must be made to use steel for some buildings other than timber alone to address quality issues of timber for such a big project and discourage forest cutting/degradation for timber, although steel alone would be expensive.
8. **Design of roofs/roofing materials:** The design should take into consideration the issue of wind speed/load that may vary for some areas and hence affecting the cost of roofs. A standard design taking into consideration wind loads should be adopted.
9. Topographical and cadastral surveys should be undertaken to avoid issues of difficult terrain/slopes and other land issues that may cause variation of contracts during project implementation.

Schools (including the teachers) have a number of fuelwood needs which have largely met through supplies from the wild thereby leading to continued environmental degradation. It is proposed that, the beneficiary schools should set-up demonstration woodlots which in the end, can be sources wood for the schools needs such as fuelwood

and construction. Thorough land ownership verification should be undertaken through development of an adequate criteria for land assessment and acquisition.

ANNEX 1: STAKEHOLDERS CONCERNS, VIEWS AND RESPONSES

Some the key issues raised during different stakeholder consultations can be summarized as below:

Date and Stakeholders Met	Issues discussed/Raised	Responses and Comments
<u>Date; 04th October 2018</u> District; Kyegegwa Mr. Eric Ahimbisibwe Ms. Carol Atwoki Mr. John Tumwine	<ul style="list-style-type: none"> a. School facilities are still few in the district and not to that of standard, we need to have them upgraded and improved; b. There are rampant cases and instances of collapsed building including in schools; c. The contractors especially of Chinese origin are arrogant and mistreat workers; d. High enrolment followed by poor retention and completion especially for girls; e. Schools are High dropout especially in Government schools; f. High teacher turn-over and absenteeism of both teachers and students; g. Long distances travelling to neighbouring schools; h. Land issues are key because the schools are being taken to courts of law for lands they are built on; i. Impact of refugees on education; j. Refugee children are a problem in many aspects in the schools... they are disobedient and don't listen to teachers; and k. Poor community effort on respect and management of children with disability. 	<ul style="list-style-type: none"> a. It is important to also include District Engineers to oversee the construction works; b. Supervision be strict to avoid collapsing buildings problems; c. The dropout rate is being addressed through project like this one; Schools' need to be built on land with clear. d. Increasing Provide and cater for refugees who are victims of not of their choice; e. Visit refugee camps and interact with them and their leaders on issues of discipline; f. Expanding schools in host communities to help accommodate refugees; and g. Liaise with the NGO's already working in refugee camps to expand on social services like counselling of refugee children.

<p><u>Date: 05 and 6th October 2018</u> District; Kiryandongo</p>	<ul style="list-style-type: none"> a. Vulnerable/ marginalized communities, the Maragori refugees from Kenya are more vulnerable in the district. b. Current Secondary education situation. c. Impact of refugees on education. Resolving refugee issues through the project implementation stages. d. Other issues for education improvement in the district. <ul style="list-style-type: none"> i. High teacher absenteeism. ii. Poor attendance of girl child. iii. Increasing refugee population in schools. iv. Performance and work load of teachers affected. v. Refugees are taking the lions share than the locals in schools. vi. Refugees have more support from NGO's than the locals; vii. High drop out of girls because of cultural interests, and viii. Need a standard way of sharing resources between the refugees and the local people. 	<ul style="list-style-type: none"> a. Poor secondary education completion rates; b. Inadequate infrastructure and facilities; c. Land tenure system is freehold and customary which is fluid for school establishment as such, the need for proper land ownerships in the project; d. Religious establishments such as catholic churches have firm land ownership documents and their land are intact; e. Most land belongs to religious institutions; f. Multi-lingual issues. Each tribe has its own culture. g. Political leaders not assertive to play their roles. h. Conflict drivers are mainly cultural interests and political influence. i. Liaise with the NGO's already working in refugee camps to discuss on the gaps and challenges. This will give a way forward for the project. j. Improvement and expansion of school structures and facilities. k. Recruitment of teachers and their accommodation provided. l. Monitoring teachers and student absenteeism. m. Need for the project to partner with NGO's working in the refugee settlements.
<p>Date :4/10/2018 District: Yumbe Date :4/10/2018, District: Yumbe Date :4/10/2018 District: Yumbe Date :4/10/2018 District: Yumbe Date :4/10/2018 District: Yumbe Name of stakeholders: Yasin Tabu, DEO</p>	<p>Issues of lightning risks on school buildings and children. Of late, a number of children have been killed by lightning.</p> <ul style="list-style-type: none"> a. No teacher accommodation at school, therefore, rampant and excusable absenteeism of teachers; b. Lack of science teachers in the District. c. Under stocked libraries and laboratories. d. Low enrolment in secondary schools (6111 students in 12 schools) 1823 Girls, 3288 Boys 	

Yumbe. Date :4/10/2018 District: Yumbe	e. Lack of Special need facilities and their teaching aids such as Braille materials and buildings purposely constructed or special needs users	
	a. High dropout rates for girls attributed to the following; b. Rampant teenage pregnancies and marriage. c. Teacher violence(punishment) by use of corporal punishment on children. d. Early responsibility –taking care of home at juvenile age; e. Walking long distance to school as such, early drop-outs from schools; f. Low dropout rates for boys include; i. Peer influence ii. Drugs-Marijuana, opium iii. Early fathers. iv. Desire to get free food from camps v. Enrolling into private schools. vi. Desire to make money by riding <i>bodaboda</i> .	School regulations prohibit consumption of any liquors in the schools; No selling of Bi-laws in place to stop these selling the sachets, enforcement by Police and LC's; and Need to sensitize communities on risks and legal implications of the law on defilement.
	a. Poor community attitude towards education. b. High immorality amongst the school going age. c. Lack of teacher accommodation at school. d. Over aged children in schools. e. Drunkard and immoral teachers.	-Where Local people have the required skills. Secondary schools are not decentralized so Local Government cannot do the supervision
	a. Issues of conflict, drivers of conflict and implication of this to project design and implementation. b. Foundation body should be Government because its neutral. c. Politicians may scramble for location of the project to have it in their home area. d. Monitoring the success of the project especially	

	construction, funds be availed for this activity.	
	<ul style="list-style-type: none"> a. Procurement of contractors be done at local Government level. b. Empowerment of poor families by the project through employment. 	
	<ul style="list-style-type: none"> a. Secondary School inspections by Local Government is still a challenge. b. Land in Yumbe is available for construction and even expansion as the focus group members welcomes the project with open hands. 	
Date: 26/09/2018 District: Moroto Name of stakeholders: Mr. Paul Oputa (District Education Officer)	<ul style="list-style-type: none"> 1. The major problem is girls commuting from home to school and they get destructed on the way. 2. Most schools do not perform well especially in science subjects due to inadequacy of science teachers both in Ordinary and Advanced levels. 3. Challenge of fees especially the indigenous people for example Moroto High School charges Ushs. 345,000 per term which is not affordable to the Karamojongs but by people from other districts. 4. Teachers are recruited through PTA funds which are not enough. 5. The remoteness of Tapac makes it difficult to retain qualified teachers who are often assigned to teach in particular communities from other regions of the country. For example, Moroto High school has a ceiling of 45 teachers but has only 29, Nadunget S.S ceiling is 25 but has only 12 teachers and Moroto Parents has only 13 teachers. 6. High labour demand from parents who are pastoralists in general, who prefer their children to stay home and look after their herds 	<ul style="list-style-type: none"> 1. Affirmative action is needed here to improve on the enrolment of girls and enforce stringent laws against men and boys who spoil school going girls. 2. Government should recruit more teachers and especially for science subjects to improve the education standards in the district. 3. Government should consider offering bursaries to students who excel in their exams which will motivate the others also to work harder to benefit from the bursaries. Also encourage parents to work hard and pay fees. 4. Increase on the PTA funds given to districts which education levels are very low and more teachers should be recruited in Moroto. 5. Pay teachers in this district a hard to reach allowance to lure more qualified teachers to come to Moroto and also increase teachers' salaries. 6. Sensitize parents the benefits of educating their children like other districts in Uganda instead of keeping the children at home to look after their cows. 7. Let there be a rule in the district stopping school going children to provide casual labour at any cost. Any school going child got doing the same should be punished. 8. Government should improve on teaching materials like textbooks and novels for literature. 9. Parents should not use security as one of the reasons for keeping girls' home because there is security in Moroto now.

	<p>of cows and sheep.</p> <ol style="list-style-type: none"> 7. Mining of Tororo cement at Kosiroy has attracted students to provide casual labour instead of going to school hence high school dropouts in Karamoja. 8. Lack of adequate teaching and learning materials to remote locations of Karamoja. 9. Apart from labour requirements, parents are particularly reluctant to send girls away from homes where they are protected and controlled. 10. Early marriages, where a girl is seen as a source of wealth in terms of cows. Girls get married off at an early stage because they walk daily to school which makes them vulnerable to rape and being deceived by business men who have money to give them, sometimes parents arrange with marriage partners and the girls are just whisked away to marriages. 11. Lack of boarding schools; like in Moroto Parents and Nadunget S.S where some classrooms have been converted to dormitories. Day schools cannot manage because the girls are always involved in house chores at home before going to school. 12. Accommodation for teachers and support staff for example Moroto Parents completely has no accommodation and also Nadunget S.S. Irish Aid managed to construct accommodation for Moroto High school adding to the old IDA buildings which are also dilapidated. 13. The laboratories are there but lack equipment. The schools like Nadunget and Mopasa lack libraries too. 	<ol style="list-style-type: none"> 10. Land to construct new schools can be donated by the community in the area and we want a boarding school with all the facilities like staff quarters as teachers cannot rent elsewhere. 11. Land encroachment especially Moroto Parents is not fenced. Nadunget has enough land which needs to be fenced. All school land should be fenced and titled. 12. Children joining primary one is overwhelming due to food ratios provided by World Food Program where school going children go with young ones to have a meal. The same program should be provided for secondary schools. 13. The district needs to do a lot of mobilization to ensure that the Tepeth attend school. 14. The Tepeth have enough boarding facilities that keep the children at school until they complete. More dormitories should be built in the school. 15. Conflict drivers: Poverty is regarded as the largest cause of low education in Karamoja region. Government should forge ways of elevating poverty levels in Karamoja. Currently the political climate is good, and the use of land is not a big problem too as a matter of sensitizing communities and land will be available.
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<p>Date: 26/09/2018 District: Moroto (Tapac Sub-County) Name of stakeholders: Mr. Daniel Longole (Chairperson L/C III)</p>	<ul style="list-style-type: none"> • The Tapac sub-county lack secondary schools • We don't have enough teachers for sciences. • We don't have enough teachers and science teachers are not there • It is our humble request that government considers constructing a secondary school which will provide education from S.1 – S.6 so that the students can go straight to university and tertiary after that. 	<ul style="list-style-type: none"> • A school in the sub-county will further lower the cost of parents going outside the sub-county looking for admissions for their children in schools far away from Tapac. • When government constructed a secondary school at Katikele, the community was very happy which means with another secondary school at Lonyilik this will make us extremely happy because this will be the first secondary school in the whole of Tapac sub-county.
<p>Date: 26/09/2018 District: Moroto Name of stakeholders: Agnes AsiriAlice (community member)</p>	<ul style="list-style-type: none"> • I stand here to give my personal experience where I failed to study beyond primary seven. I always felt unsafe because men were always around me from all sides. These men could come to me with gifts to confuse and that is why conceived in Primary 7. • Another big issue why we girls are stopped from studies when we get pregnant and the boys are allowed to continue with their education. 	<ul style="list-style-type: none"> • Government should have means of following up the girl child especially after PLE through the leaders like L/Cs and give help to those who still want to continue with the education. Government should look at this problem too and get a solution to early girl children becoming young mothers.
<p>Date: 26/09/2018 District: Moroto Name of stakeholders: Rosemary Akol (community member)</p>	<ul style="list-style-type: none"> • I am Councillor for people with disability, with all the above hardships, the sub-county leaders do not look for those who are very needy, instead opportunities are given to those one who already have. This has made the community to have negative opinion to education, making children lose interest in studying and this has led to students repeating P.7. • Another issue is about the boys who mislead the girls who are bright and still want to study. 	<ul style="list-style-type: none"> • There should be parameters to be followed with the help of local council leaders to vet students that they are really need and deserve these bursaries. The constitution is very clear on the punishment but the leaders at the sub-county level agree with the parents and cows are paid as dowry for a young girl. The law should take its course and the boys should be punished by imprisonment for several years so that they learn a hard lesson.
<p>Date: 26/09/2018 District: Moroto (Tapac)</p>	<ul style="list-style-type: none"> • Parents were very concerned about the education of their children and the major challenge is when a child reaches P.7 we cannot 	<ul style="list-style-type: none"> • Improve on agriculture in the region so that parents can earn more from their income to be able to send their children to school • Parents should control and guide their children and educate them

<p>Name of stakeholders: Talepi Apalonraka (community member)</p>	<p>afford to take them to secondary school due to high levels of poverty.</p> <ul style="list-style-type: none"> • Early sex engagements of girls resulting in children becoming child mothers in the community. Many girls get pregnant during holiday periods and some boys drop out of school too. • Issue of lack of land for the project will not arise in Tapac 	<p>the dangers of early child birth.</p> <ul style="list-style-type: none"> • On the issue of land, it was noted that the community was willing to give land for secondary school project, but they will want some compensation for this land.
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<p>Date: 27/09/2018 District: Kween Name of stakeholders: Mr.Cherwotich Kapterin (District Education Officer)</p>	<ul style="list-style-type: none"> • Lack of many secondary schools in the sub-county, and the few secondary schools which there are also very far, for example there only 4 secondary schools of which 2 are government aided secondary schools in the whole county, most sub-counties do not have any secondary school at all. As such there are high school dropout rates. • School dropout phenomenon is more prevalent among the Benet because the parents' priority is not the education of their children. • Child labour is a major factor influencing school dropout in the district. Some students, especially those at the secondary level leave school to engage in farming activities to get quick money. • Since parents are poor, they regard girls as a source of income in form of dowry, so they prefer to marry the girls off at an early age. • Teenage pregnancy and early marriages whereas one of the major factors influencing basic school dropouts in Benet sub-county. You will find girls as young as 14 years pregnant. • Girls also hesitate to go to school during menstruation days due to stigma by the boys. • Lack of infrastructure, some of the schools under AfD Bare incomplete and sub-standard, because of centralized procurement and monitoring and evaluation. 	<ul style="list-style-type: none"> • Construct more schools in the district to match the high population growth to fight high school drop-outs. • Sensitive parents on the advantages of taking their children to school. • Parents should know that their children are not a source of labour and this will help the students to go to school instead of being used as labourers in farmlands. • It is recommended that the government should treat the school dropout issue seriously and make national education plans to assist the poor continue with their studies. Interventions by educational policy makers, the Government, NGOs, etc. to reduce dropout rate should not be focused on only female pupils but also on male pupils as well. • A lot of sensitization is required for parents not to treat their girls as a source of income in terms of dowry. • Government should consider providing girls with sanitary wear during their menstruation periods so that they can continue to go to school without missing a single lesson. • The authorities should engage the Benet set- cultural-systems to penetrate the community to educate them about the good benefits of education. Teachers who defile girls should be dealt with severe punishments of life imprisonment.
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<p>Date: 27/09/2018 District: Kween (Benet sub-county) Name of stakeholders: C John Toskin (Headmaster Kitawoi S.S.S)</p>	<ul style="list-style-type: none"> • S.4 candidates sit for their final exams from the nearby school which is so inconveniencing to the students and school management. • The locals have tried to lobby for government to grant aid to build classrooms, laboratories and staff quarters because teachers travel long distances to reach school. 	<ul style="list-style-type: none"> • We are happy as a community that a secondary school is going to be constructed in the sub-county because they love developments. • Currently we have a community secondary school which needs support.
<p>Date: 27/09/2018 District: Kween (Benet sub-county) Name of stakeholders: Siwa Fred (community member)</p>	<ul style="list-style-type: none"> • Long distance to secondary schools is a big challenge in the area. Students walk long distances to get a secondary school. • People love education; the nearest schools are a challenge. Kitawoi has 4 primary schools so joining secondary education is very difficult that is why most girls get married after P.7. 	<ul style="list-style-type: none"> • So when schools are brought nearer to the community, then they can also produce doctors and teachers. Most of the workers come from different districts. So Kitawoi is the best place to locate the project school.
<p>Date: 28/09/2018 District: Namayingo Name of stakeholders: Kaano Kawere (DEO)</p>	<ul style="list-style-type: none"> • Lack of role models in the district because whoever gets education does not come back to the district to work. They get jobs elsewhere. • There are two major activities in Namayingo. Gold mining and fishing. Fishing is done in Sigulu Island and gold mining is in Buyinya, Banda, Sigulu and Bukhana sub-counties. Young men get money from these activities and confuse school going girls with this money and the girls drop out of school. • High level of poverty in the district. The community does fish and gold mining, the money got is spent lavishly for example in Sigulu Island the HIV prevalence rate is between 16 – 18% compared to the national rate of 6.2%. • Gwena dance – this is where the rich men hire about 10 girls, own them, dress them up and take them to the stage for men to take them 	<ul style="list-style-type: none"> • The district has done sensitization and formed a joint Board of Governors for the whole district, moved to schools which should be facilitated well for better results. • Capitation grant to increase from 41/= to 80/= per student, midday meals, pads etc. to be provided to students. • Some people at St. Phillips Ramasha constructed grass thatched houses within the town council to be used as hostels but unfortunately, they are being used as brothels. • Since the school has land through OWC, they can be given the seeds to plant. • Government should look at constructing boarding secondary schools in the district. • Recruit more teachers. The project should look at working on this problem. • The district should be very strict on school going children not to go for fishing and mining. • Ministry of Education and Sports does not listen to advise from the district.

	<p>for sex and money is paid to the rich men.</p> <ul style="list-style-type: none"> • Capitation grants are very little to cater for the girl child in schools for buying pads, changing rooms etc. • There is also political interference by the RDC who doesn't allow parents to do anything for the students. However, some schools are now providing food, and this was after the First Lady wrote a circular that all parents and schools must feed students. The school administrations had to encourage parents to feed the children. • Lack of interest by leaders because they are in "prison" and where they stay in school the whole day hungry. 	
<p>Date: 28/09/2018</p> <p>District: Namayingo</p> <p>Name of stakeholders: Ouma Joseph (chairperson Butajja)</p>	<ul style="list-style-type: none"> • Government should come to Namayingo and educate the community on good fishing methods; • The environment we stay is not very conducive for learning. Gold mining and fishing should be restricted to older people only and not allowing even school going age children to be involved in it; • Tougher restrictions by the district should be emphasized. • The ministry should issue teaching certificates of teachers who are indicted of making students pregnant and never allowed to teach in any other school in the country. • In some cases, girls are impregnated by their own teachers. • In Namayingo, the community is largely poor and illiterate; the lake is their economic lifeline. Fishing helps them to educate their children. 	<p>Uplift education in Namayingo, the district leadership needs to sensitize the communities on values of education and to see they send their children to and help them even stay at school.</p> <p>The issue of abuse of school property needs to be addressed by having in place, security guards and fencing the schools;</p> <p>On issue of early pregnancies, the schools through senior teachers should educate the girls on dangers of early pregnancies.</p>

<p>Date: 1/10/2018 District: Sembabule Name of stakeholders: Wambuzi Paul (Inspector of schools)</p>	<p>Unfortunately, the UPDF has made this impossible by beating both fishermen using the right gear and those ones with bad fishing methods. So, our children cannot go to school due to lack of income from the lake.</p> <ol style="list-style-type: none"> 1. The major cause of low performance is low staffing for example Rwemiyaga has only 3 teachers on the payroll. One teacher can teach from S. 1 to S.4 2. Geographical retention of teachers is a big challenge too. Most teachers when transferred to the district do not turn up due to the location of the district. For example, new teachers sent here by the Ministry are already asking for transfers, and the Ministry of Education honours transfer of teachers. 3. Attitude of parents due to their culture of amassing cattle. For the example the Ntusi and Rwemiyaga cattle corridor marry off their girls to get more cows at an early age. 4. Mal-administration by some of the head teachers by being absent from the schools most of the time. 5. PTA lacks transparency in terms of expenditure of government funds. 6. Head teachers are not easily replaced, they always say that they are under Central Government, so they are untouchable. 7. Irregular teachers are not disciplined. And when their salaries are withheld they report directly to Ministry of Education and Sports where the Ministry writes directing the CAO to release their salaries, so disciplining teachers becomes a challenge too. 	<ol style="list-style-type: none"> 1. Supervision of works by the Staffing; government has helped with decentralization of recruitment. Now teachers are sourced locally by the head teachers. This should continue to bridge the gap of lack of teachers in the district. 2. Mobilize and sensitize the community especially in the Ntusi where there are many cases of early marriages. 3. Disciplinary measures of the head teachers especially those recruited by the Education Commission 4. Recruit more inspectors of schools in the district. 5. Standardize the inspection of schools by providing gadgets like tablets for easy communicate immediately and also IT training for staff. 6. The project has a component dealing with rainwater harvesting which will address water availability.
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	<ol style="list-style-type: none"> 8. Public land has been grabbed by the big wings in the district; 9. Quality of contractors – dual supervision the by the district and local government should work as a team, close supervision, procurement of Engineers and development of bills of quantities. But you find in Sembabule most times the district is not consulted or involved in supervision of projects which end up being mismanaged. 10. There is also a challenge of high school inspection ratio which stands at 1:150 instead of 1:40. This is caused by the low enumeration of the Inspectors who earns less than primary head teachers. Government should look at this critically. 11. The School Inspector also has a challenge of transport, where they have only one vehicle in the whole district. 12. There is also political and community interference as far as private schools are concerned in Sembabule. 13. Drill water sources for schools. The project should consider provision of water harvesting facilities in all schools. 	
<p>Date: 1/10/2018 District: Sembabule Name of stakeholders: Lagemwa Huzaruani (Head teacher Kawanda COU S.S)</p>	<ul style="list-style-type: none"> • Kawanda S.S is well equipped with everything but have a challenge of water. Staff quarters is also lacking where the teachers stay in Sembabule and yet it is very far, about 8 km, this one of the major causes of late coming for lessons. • The students share water with animals in the water dams. They have tried to harvest rain water, but it is not sustainable. 	<ul style="list-style-type: none"> • Government should look at the issue of water for Kawanda S.S • The project has a component to do with building teachers houses, as such, it will go a long way to address such a challenge to do with teachers' accommodation. • The should be strong political support among the district politicians to sensitize parents on the values of education in the district be done. • Help to erase the attitude of many parents that education is only for

	<ul style="list-style-type: none"> • Housing for teachers are also not available not even for rent in the nearby trading centre, so teachers stay as far as Sembabule which 8 km from the school is. • Another problem is that the parents are misled by politicians who do not want children to go to school because the richest people in the district did not go school, but they are billionaires. • In sub-county level, secondary education is new to them because they think secondary education is for only the rich. • Lack of role models in the district to motivate the young people the benefits of education. • There is need for a girl's only school and boarding too to encourage the girl child to remain at school up to A 'level. 	<p>the rich.</p> <ul style="list-style-type: none"> • Role models from Sembabule should come back to the district and encourage students to read hard so as be like them. • More boarding schools are needed in the district especially for the girl child who is more vulnerable than the boy. • Government should work hand-in-hand with local leaders and get back land taken by politicians and also get land titles for the schools.
<p>Date: 1/10/2018 District: Sembabule Name of stakeholders: Samadu Muwonge (Chairperson L/C1 Kawanda village)</p> <p>Date: 1/10//2018 District: Sembabule Name of stakeholders: Nabisere Catherine (community member)</p>	<ul style="list-style-type: none"> • There are a few secondary schools in the district and yet government promised the community that it was to construct a secondary school in every sub-county. • At least the cattle keepers have money and can send their children to schools outside Sembabule. Unlike some of us who are farmers, we get little money from our crops. We cannot afford schools fees which ranges from 150,000/= per term. • Government should at least look at the prices of our produce because middlemen really cheat us. <ul style="list-style-type: none"> • Early marriages were very rampant in the community has reduced especially with the program of Dream which provides skills in tailoring, cooker, solon, poultry, goat 	<ul style="list-style-type: none"> • Government is working around this and this USEEP is one such intervention at hand; • should fulfil its promise to the people of Kawanda. • The issue

<p>Date: 1/10//2018 District: Sembabule Name of stakeholders: Mutumbwa Godi (community member)</p>	<p>rearing, etc.</p> <ul style="list-style-type: none"> • The Ministry should find a solution to high girl school drop outs in the district, like offering bursaries to motivate best performing students so that others can also emulate them. • • The long distances to schools also contribute to girls dropping out of school because they find many obstacles on the way, like businessmen, boda-boda riders who deceive them with little money to buy small things 	<ul style="list-style-type: none"> • Let the authorities with the help of elders have very strict punishments for such people who are here to spoil other people's school going children
<p>Date: 1/10//2018 District: Sembabule Name of stakeholders: Tayiba G.W, Board member Kawanda P/S</p> <p>Date: 1/10//2018 District: Sembabule Name of stakeholders: Nabukenya Sanyu (community member Kawanda L/C I)</p>	<p>World Vision International is educating parents on the benefits of educating their children and especially the girl child.</p> <ul style="list-style-type: none"> • The schools are very far, and students have to walk long distances to attain education. There is need for more boarding schools in the district. Parents take some of their children to distant schools like in Masaka. Primary schools are many but with a few secondary schools. Government schools are here to help the low-income earners who cannot afford the private schools. 	<ul style="list-style-type: none"> • Let other NGOs also come in to help World Vision in doing this noble cause • Government should at constructing more schools in the district.
<p>Date: 3/10//2018 District: Isingiro</p> <p>Name of stakeholders: Nkuba Godfrey (DEO)</p>	<ul style="list-style-type: none"> • The land is available especially from the founding bodies like the Roman Catholic Church, the Church of Uganda, Moslems and SDA and they already applying for the construction of secondary schools in the district. So, more schools should be constructed to ease the students increasing 	<ul style="list-style-type: none"> • Where land is to be offered for the project, there should be evidence of that and be duly signed by the clan and the families offering such land; • The refugees have enough land for the construction of secondary schools which should be used for this purpose. • Build new schools to reduce congestion of students in one available school.

	<p>population daily.</p> <ul style="list-style-type: none"> • There are gaps in the availability of secondary schools in the district. In the existing 18 secondary schools, there is a very big gap between teacher/learner ratio. There is a need for about 200 new teachers. A school which should have 45 teachers has only 8 teachers. • No facilities like laboratories, libraries, this is one of the reasons the schools don't get many students passing science subjects in first grade. • Inadequate furniture for the students which highly affects their performance in class. • Poor road network in the whole district this makes transport costly for teachers who come from afar to teach because they are not paid transport allowances. • It was noted that in Isingiro school enrolment, girls are more than the boys because boys are involved in lucrative businesses at an early age. The boys are involved in businesses like matooke selling, stone quarrying, farming of matooke, beans, maize, cassava, and cattle keeping. The boys are further frustrated for lack of jobs after school. • The refugee population has increased leading to the gap of teacher to pupil ratio. • Language barrier as some of the refugees come from countries which are Francophone speaking so adjusting 	<ul style="list-style-type: none"> • When new schools are built, distances to the schools will be solved hence encouraging more students to enrol in education. • When schools are being constructed, the nationals and the refugee communities will have jobs hence improved income for their household which means better living conditions, and also schools fees can be got from those jobs. • Construct more teachers' quarters to ease accommodation for teachers in the district. • Sensitize the Congolese about children's benefits of education.
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<p>Date: 3/10//2018 District: Isingiro Name of stakeholders: Among Sharifa (Windle International Uganda Resettlement Manager – Nakivale refugee camp)</p>	<p>becomes a challenge and different curriculum.</p> <ul style="list-style-type: none"> • There is only one secondary school serving the following sub-counties of Nakivale, Kashamba, Rugarama, Rushera, Ruggaga, Oruchunga, Kikagati and Isingiro T/C which is tough. • 90% of the population is from French speaking countries and hence there is Adult education and teaching of English language is ongoing, this has created more employment. • • A 'Level we only have Arts combination due to inadequate science teachers. So, for those who wish to pursue sciences are left out, so parents have to take them outside the camp or they drop out, yet it is very expensive. • Another secondary school be constructed in Rubondo Base Camp. This was tried in 2015/2017 but it closed due to lack of funding. It is now only for emergency. • Teacher student ratio stands at 1:69 and yet Ministry of Education should be 1:53 which is very unfair. There is need for more 17 teachers, now we have 48 teachers for O'Level and 36 teachers for A 'Level. This has led to high staff turn-off especially science teachers who are on high demand everywhere. • Long distance to the school, a day scholar has got to travel for 25 km to reach school, which adds up to 50 km in a day. • Parents can't afford even bicycles for transport 	<ul style="list-style-type: none"> • Expand the existing secondary school because it is not well equipped, teachers' houses, laboratories, library, classrooms, boarding section. This will work well because it will be fed by the old secondary school. • Give support to the new secondary school where materials can be borrowed from the old schools to kick-start such schools; • Land is available for expansion through OPM. • Minimize school drop-outs due to congestion in class due to limited space. • USEEP should be rolled out to in the whole district. • Sensitize the communities where some cultural believes deny girls education and prefer the boys, like when it comes to paying for fees, the boys are paid for first. Other cultures want to marry off as early as in P.5 especially the Congolese.
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<p>Date: 3/10//2018 District: Isingiro Name of stakeholders: Mr. Ali Lugemwa– Head teacher, Nakivale S.S</p>	<p>of their children to school.</p> <ul style="list-style-type: none"> • Most parents are failing to contribute the top-up that the agencies require them to give. • Science equipment is a challenge, no laboratories, no libraries, the existing library is not well stocked, and this becomes a big challenge during practical exams, no enough books. • The school has 1,316 students but more are still coming. The number of learners is increasing daily. More structures are needed to accommodate the high number. Classrooms are congested. • One school in the whole settlement serving over 11 primary schools. 1,000 learners sit for PLE per year. The location is 2 km away from the first government aided school. Imagine a student moving to Garama S.S which is 20 km away, Kabula is 19 km and Kihando is 20 km away. • Accommodation for teachers is also a big problem because teachers cannot stay far away from school. • The school needs to be fenced in order to secure the safety of the students while at school. • A modern library and well stocked is needed in the school. • More schools needed in the settlement camp to accommodate the shelling number of refugees who coming daily. • UNHCR should think about supporting even the nationals because most of them come 	<ul style="list-style-type: none"> • The being planned are also earmarking refugee settlements and host communities as well; • Teachers house is part of the planned project investments as well; • There should also be strong school boards of governors to give policy direction to the schools and enforce discipline. •
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<p>Date: 4/10//2018 District: Kikuube Name of stakeholders: Jolly Kebirungi. Commandant Kyangwali settlement camp</p>	<p>from very poor homes and cannot afford to pay all the fees.</p> <ul style="list-style-type: none"> • Improve on the existing school to accommodate the many students who yearning to study before the new schools are constructed as the current classrooms are so congested. • The schools to be built should be boarding facilities this help the girl child because she will be safer at school than home where some of them are forced to get married against their will. • UNHCR only provides for refugees but the nationals drop out of schools because they come from very far. Recently I advised UNHCR to support also the nationals so that they can get education. Many nationals study with refugees in primary section but where do they go after that. • Safety of learners from home to school should be looked at critically. • Teacher student ratio is abnormal. • Government should accommodate teachers. • Nakivale S.S has 21 permanent structures with dormitories for 300 girls and 200 boys, well facilitated with beddings, water and sanitation, solar power, etc. The school needs to be fenced to protect the girl child. <ol style="list-style-type: none"> 1. The ratio of teacher to student is so low, 2. Damage to school's property is high from trespassers, thieves and livestock; 3. Scholastic materials like books, desks, pens, uniforms are lacking 	<ol style="list-style-type: none"> 6. Construction of other secondary schools is welcome as the numbers in the current schools is over-whelmingly high; 7. There will be need to enclose schools to improve security of the properties; 8. During the land demarcation, land be allocated other needs such
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	<ol style="list-style-type: none"> 4. Parents cannot afford especially the new refugees where they depend on entirely on partners 5. The Congolese culture don't care about the education of their children 6. The little available social services are shared with the local community 7. Language barrier where most of the refugees are Francophone students with education certificates face difficulty in enrolling in Ugandan education system. They have to get their documents interpreted into Ugandan curriculum. 8. Refugees continue to arrive in the settlement camp. 9. Feeding program is still a challenge where some parents cannot even afford, and this highly affects students' learning. WFP only gives food to households but does not feed students at school. Accommodation for teachers is wanting, this is one of the reasons why teachers arrive late at school. 1. Government should increase the awareness and demand for education, sensitizing the community about the good effects of education. 2. A lot of sensitization regarding rules and regulations of Uganda should continue so that we have less or no people breaking Ugandan laws. 3. UNHCR gives pads to students which are not enough, will appreciate if UNHCR is supported in this. Changing rooms for girls are not 	<p>as playground, clinic and dump ground;</p> <ol style="list-style-type: none"> 9. The conflict of land between refugees and nationals is being handled properly by government which should be concluded amicably; 10. Damage to schools is rampant because schools are o
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	<p>enough, need to be added.</p> <p>4. Give incentives of uniforms to all students, you find some students don't have uniforms which discourages them from going to school because they look odd from others who are smartly dressed in school uniforms.</p> <p>5. We thank the Japanese government for constructing a laboratory for the school, government should add equipment to it to enable students study science in KyangwaliS, S.</p>	
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ANNEX 2: ENVIRONMENTAL AND SOCIAL SCREENING DATASHEET FOR USEEP INTERVENTIONS

- a. **Geographical Location:** National project for expansion of secondary education in Uganda
- b. **Project Name:** Uganda Secondary School Expansion Project-USEEP.
- c. **Program Location:** Covers selected districts in entire country.
- d. **Environmental Issues:** Preliminarily, USEEP presents no major environmental issues except localized loss of vegetation during site preparation works, dust during excavations works and noise from workers. Sedimentation and erosion can be checked through rain water harvesting and re-grazing sites after works.
- e. **Justification/Rationale for Environmental Category:** the project impacts will be small-scale, localized and of short-term nature hence, preliminarily, category B type of project.
- f. **Reporting Schedule:** An Environmental and Social Management Framework is being prepared on the project though later, other environmental and social assessment tools will be prepared during USEEP implementation.
- g. **Remarks:** The preparation of this ESMF was undertaken in a participatory and consultative manner with involvement of MoES, the districts and their line technical staff (DEOs i.e. District Environment/Education Officers, Labor officers, CDOs), as well refugees and refugee hosting communities.

SUBPROJECT DESCRIPTION

Description of the project and its major components:

Under this project, the following infrastructure will be constructed:

- a. 6 new classrooms including furniture (though furniture will be a separate contract after);
- b. 2-unit science laboratory with furniture;
- c. An administration block - furnished and 2 stance latrines;
- d. 2-unit teachers' house (for hard to reach and hard to stay schools), with kitchen, 2 stance latrine and wash rooms;
- e. Water harvesting system for teachers and classrooms;
- f. Semi-detached house for head teacher and deputy with wash rooms, kitchen and 2 stance latrines;
- g. Library/ ICT Laboratory- furnished;
- h. Play ground;
- i. Installation of power-solar; where there is no main grid; first fix where there is grid; and
- j. 2 no 5 stance VIP latrines.

SUBPROJECT LOCATION

Site Information

Name of Locality	National coverage in selected districts.
Land availability	Land for the project infrastructures will be set out in consultations with the districts and local governments. Where need be, land will be acquired on willing buyer, willing seller basis based on the prevailing market forces in the areas. Full and adequate documentations will be secured before embarking on construction process.
Public Services	It is suggested; new schools will be constructed and should have in place, all basic facilities for complete functionality.

POTENTIALLY SIGNIFICANT ENVIRONMENTAL OR SOCIAL IMPACTS

The following checklist indicates the potential level of impact and is abbreviated as follows:

S Significant impacts

S/M Potentially significant impacts but mitigatable to less than significant levels

NS No significant impacts

GEOLOGIC PROCESSES

Will the project result in?	S	S/M	NS
Exposure to or production of unstable earth conditions such as landslides, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils)			X
Disruptions, displacements, compaction or over covering of the soil by cuts, fills, or grading?			X
Permanent changes in topography?			X
The destruction, covering or modification of any unique geologic or physical features?			X
Any increase in wind or water erosion of soils, either on or off the site?			X
Changes in deposition, or erosion or siltation that may modify the channel of a river, or stream, or any water body?			X
The placement of lined drainable pit latrines in impermeable soils with severe: constraints to disposal of liquid effluent?			X
Excessive grading on slopes of over 20%?			X
Sand or gravel removal or loss of topsoil?			X
Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?			X
Excessive spoils, tailings or over-burden?			X

Impact Discussion: The impacts will be of small scale and will arise from excavation of soils for the construction of classroom blocks, teachershouse, pit latrines and after, the areas will be compacted thereby restoring it to its original status. Any loose soil materials will be contained through restoration of areas around the areas around the construction sites; hence the impact will be localized.

Mitigation Measures: Good construction practices will mitigate any impacts arising from the activities above.

WATER RESOURCES/FLOODING			
Will the project result in?	S	S/M	NS
Changes in the course or direction of water movements?			X
Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?			X
Change in the amount of surface water in any water body?			X

Discharge into surface waters, or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, solids?			X
Alterations to the course or flow of flood waters, or need for private or public flood control projects			X
Exposure of people or property to water related hazards such as flooding, or accelerated runoff			X
Alteration of the direction or rate of flow of groundwater?			X
Change in the quantity of ground waters, either through direct additions or withdrawals?			X
Overdraft of any groundwater basin? Or, an increase in the existing overdraft of any groundwater basin?			X
The substantial degradation of groundwater quality			X
Substantial reduction in the amount of water otherwise available for public water supplies?			X

Impact Discussion: The project impacts on water courses will be very minimal and likely to arise from transportation of loose soils whose quantities will be minimal and less significant and localized. The project will put in place water conservation measures which will go a long way to addressing erosion and conservation of soil and water harvesting.

Mitigation Measures: The mitigation measures will be through application of good construction practices.

TRANSPORTATION/CIRCULATION

Will the project result in?	S	S/M	NS
Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system?			X
A need for private or public road maintenance, or need for new road(s)? Effects on existing parking facilities, or demand for new parking?			X
Substantial impact on alteration of present patterns of circulation or movement of people or goods?			X
Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long term operational)?			X

Impact Discussion: The project will have small scale impacts on transportation or on the operations of traffic on the areas for the planned interventions.

Mitigation Measures: Though at this time negative impacts relating to transportation are not evident, it is suggested that during implementation, any negative impacts will be addressed through traffic management as enshrined in the works contract.

AIR QUALITY

Will the project result in?	S	S/M	NS
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a.	The generation of air pollutants, a contribution to an existing or projected air quality violation or exposure of sensitive receptors to substantial pollutant?			X
b.	The creation of smoke, ash or odors?			X
c.	Dust generation?		√	

Impact Discussion: The project will have small-scale impacts on air quality from localized dust from creation of soil and water conservation structures.

Mitigation Measures: This is short-term negative impact and mitigated through application of good construction measures.

BIOLOGICAL RESOURCES

Will the project result in?		S	S/M	NS
FLORA				
a.	Removal or disturbance of natural vegetation?		√	
b.	A loss or disturbance to a unique, rare or threatened plant community?			X
c.	A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants?			X
d.	A reduction in the extent, diversity, or quality of native vegetation (including bush removal for fire prevention and flood control improvements?			X
e.	Introduction of herbicides, pesticides, or other factors that would change or hamper the existing habitat?			X
FAUNA				
a.	A reduction in the diversity or numbers of animals onsite?			X
b.	A deterioration of existing fish or wildlife habitat?			X
c.	Introduction of barriers to movement of any resident or migratory wildlife species?			X
d.	Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) that could hinder the normal activities of wildlife			X

Existing Plant and Animal Communities/Conditions: The plants in the settlements occur as shrub vegetation types. The common plants are largely shrub types and food crops such as maize, cassava, sorghum etc. None is rare, endangered or threatened from IUCN Red Data List.

Impact Discussion: There will be minimal localized negative impact on vegetation during erection of infrastructures. The project through soil and water conservation will improve vegetation cover of the area which will be large positive impact.

ENERGY

Will the project result in?		S	S/M	NS
a.	Substantial increase in demand, especially during peak periods,			X

	upon existing sources of energy?			
b.	Requirement for the development or extension of sources of energy?			X

Impact Discussion: The project will not have impacts relating to energy consumption in the project areas.

Mitigation Measures: Since there will be no impacts relating to energy consumption, mitigation measures will not be required.

ARCHAEOLOGICAL/CULTURAL RESOURCES

Will the project result in?		S	S/M	NS
a.	Disruption, alteration, destruction, or adverse effect on a recorded historic or archaeological site?			X
b.	Disruption or removal of human remains?			X
c.	Increased potential for vandalizing, or sabotaging archaeological resources?			X
d.	Ground disturbances in an area with potential cultural resource sensitivity based on the location of known historic sites?			X

Impact Discussion: There are no observed or reported archaeological resources in the project areas.

Mitigation Measures: If any archaeological resources are encountered accidentally, then the Chance Finds Procedure here in appended will guide compliance of the project.

HISTORIC AND CULTURAL RESOURCES

Will the project result in?		S	S/M	NS
a.	Adverse physical or aesthetic impacts on a structure or property at least 50 years old and/or of historic or cultural significance to the community?			X
b.	Beneficial impacts to a historic resource by providing rehabilitation, protection, conservation, etc.?			X

Impact Discussion: No impacts are envisaged on the historic-cultural resources

Mitigation Measures: No measures needed since there were historic-cultural resources encountered.

SCREENING FOR WORLD BANK SAFEGUARDS POLICIES

OP No.	Summary of Safeguard Policy	Triggered/Not Triggered	Remarks
OP 4.01	Environmental Assessment	X	All civil works such as classrooms construction, teachers' houses and pit latrines will require some levels of Environmental Assessments preferably; preparation of ESMPs. For now, this ESMF has given a framework assessment to guide future assessments.
OP 4.04	Natural Habitat	X	Potential/candidate sites are outside

OP No.	Summary of Safeguard Policy	Triggered/Not Triggered	Remarks
			natural habitats.
OP 4.09	Pest Management	X	No agro-chemicals will be supported in the project, so this policy is not triggered
OP 4.10	Indigenous peoples	√	USEEP is a national project in its outlook hence; the indigenous people are to benefit as such an Indigenous People Policy Framework (IPPF) has been prepared alongside this ESMF.
OP 4.11	Physical Properties Cultural	√	During excavation works, it could be possible that, some physical cultural materials could be un-earthed thereby triggering this policy and a Chance Finds Procedure will be annexed to the ESMF to guide manage any accidental discoveries if encountered.
OP 4.12	Involuntary Resettlement	√ X	The proposed project will likely trigger some degree of involuntary resettlements since the project envisages constructing new schools as opposed to rehabilitation of existing ones.
OP 4.36	Forests	X	No forested lands will be taken up by the project hence this policy will not be triggered.
OP 4.37	Safety of Dams	X	The project will not establish any dam as such; this safeguards policy will not be triggered.
OP 7.50	Projects on International Waterways	X	The project is not on international waters, and therefore this policy is not triggered.
OP 7.60	Projects in Disputed Areas	X	The project will not support or implement activities in disputed areas.

LAND USE

Will the project result in?		S	S/M	NS
a.	Structures and/or land use incompatible with existing land use?		√	
b.	The induction of substantial growth or concentration of population?			X
c.	The extension of water pipe lines or access roads with capacity to serve new development beyond this proposed project interventions?			X
d.	The conversion of prime agricultural land to non-agricultural?			X

e.	The loss of open space?			X
f.	An economic or social effect that would result in a physical change?			X

Impact Discussion: There will be small scale impacts on the existing land use through construction of schools facilities proposed in the project.

Mitigation Measures: There will be minimal localized negative impact on vegetation during erection of infrastructures.

HOUSING

Will the project result in?		S	S/M	NS
a.	Loss of existing dwellings through demolition, conversion, or removal?			X
b.	Displacement of current residents?			X

Impact Discussion: There will be no loss of dwellings since the areas for the project ought to be free of settlements.

Mitigation Measures: There will be no requirement to provide alternate accommodation since the area is currently unoccupied.

Summary of screening of the project

Nº.	Criteria	Level of Impact	Level of impact for USEEP Interventions
01.	Magnitude	How severe is the impact? Is the impact reversible?	Impacts are likely to be less severe and largely reversible.
02.	Prevalence	Is it a one-off impact? Even if it is of low magnitude, a large number of similar developments (such as housing developments) could lead to a severe cumulative impact.	It is one off but though there will be need for implementation of mitigation measures to ensure continued compliance at all phases of the project.
03.	Duration and frequency of the impact.	Is the impact likely to be short or long term? The frequency of occurrence is also important, especially in relation to natural systems.	Duration is likely to be short term and one-off occurrence.
04.	Risks	What is the probability of a serious event related to the project happening?	This is not envisaged to arise
05.	Importance	What importance do we attach to the issue being discussed?	Low importance impact.
06.	Mitigation	If the potential risks/impacts can be mitigated, there may not be any significant difficulties involved and hence need for low key assessment (ESMPs could be prepared during	The impacts can be mitigated through some low-key environmental assessment during the implementation of USEEP

		project implementation).	and ESMPs could be prepared.
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USEEP Project categorization

Based on the above, the proposed USEEP IDA supported project with a focus on expansion in the delivery of secondary school education has been screened and placed as a Category B type whose impacts are small-scale, localized, reversible and impacted limited areas within the project implementation sites and later, some levels of small level environmental assessments in terms of ESMPs could be adequate to guide compliance requirements alongside provisions in this ESMF.

RECOMMENDATIONS

Environmental category (based on available information during ESMF preparation)

Category	Yes/No	Justification
Does require further environmental or social studies	Yes	ESMPs could suffice
Requires submission of only a Project Brief	Yes	ESMP/Project briefs could suffice during implementation
Requires a full ESIA to be submitted on date	No	Scale of works are low key
Requires an ESMP to be submitted on date	Yes	To guide site specific compliance
Requires a RAP to be submitted on date	No	No major land-take envisaged
Requires an Indigenous Peoples Plan (IPP)	Yes	Being a national project, such category will be benefit.
Requires a Physical Cultural Resources Plan	No	Not envisaged to use known PCR sites.

CERTIFICATION

We certify that we have thoroughly examined all the potential adverse effects of this subproject.

Reviewer:

Name:

Signature:

Date:

ANNEX 3: GENERAL ENVIRONMENTAL MANAGEMENT CONDITIONS FOR CONSTRUCTION CONTRACTS

GENERAL

1. In addition to these general conditions, the Contractor shall comply with any specific Environmental Management Plan (EMP) or Environmental and Social Management Plan (ESMP) for the works he is responsible for. The Contractor shall inform himself about such an EMP, and prepare his work strategy and plan to fully take into account relevant provisions of that EMP. If the Contractor fails to implement the approved EMP after written instruction by the Supervising Engineer (SE) to fulfil his obligation within the requested time, the Owner reserves the right to arrange through the SE for execution of the missing action by a third party on account of the Contractor.
2. Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an EMP. In general, these measures shall include but not be limited to:
 - a. Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, dispersing coal ashes, vibrating equipment, temporary access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities.
 - b. Ensure that noise levels emanating from machinery, vehicles and noisy construction activities (e.g. excavation, blasting) are kept at a minimum for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities.
 - c. Ensure that existing water flow regimes in rivers, streams and other natural or irrigation channels is maintained and/or re-established where they are disrupted due to works being carried out.
 - d. Prevent bitumen, oils, lubricants and waste water used or produced during the execution of works from entering into rivers, streams, irrigation channels and other natural water bodies/reservoirs, and also ensure that stagnant water in uncovered borrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes.
 - e. Prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary construction camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards.
 - f. Upon discovery of ancient heritage, relics or anything that might or believed to be of archaeological or historical importance during the execution of works, immediately report such findings to the SE so that the appropriate authorities may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.
 - g. Discourage construction workers from engaging in the exploitation of natural resources such as hunting, fishing, and collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities.
 - h. Implement soil erosion control measures in order to avoid surface run off and prevents siltation, etc.
 - i. Ensure that garbage, sanitation and drinking water facilities are provided in construction workers camps.

- j. Ensure that, in as much as possible, local materials are used to avoid importation of foreign material and long-distance transportation.
 - k. Ensure public safety and meet traffic safety requirements for the operation of work to avoid accidents.
3. The Contractor shall indicate the period within which he/she shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.
 4. The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan / strategy to ensure effective feedback of monitoring information to project management so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.
 5. Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the Owner may appoint an Inspector to oversee the compliance with these environmental conditions and any proposed mitigation measures. State environmental authorities may carry out similar inspection duties. In all cases, as directed by the SE, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of any works.

WORKSITE/CAMPSITE WASTE MANAGEMENT

- a. All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be banded in order to contain spillage. All waste containers, litter and any other waste generated during the construction shall be collected and disposed at designated disposal sites in line with applicable government waste management regulations.
- b. All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.
- c. Used oil from maintenance shall be collected and disposed of appropriately at designated sites or be re-used or sold for re-use locally.
- d. Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution.
- e. Construction waste shall not be left in stockpiles along the road but removed and reused or disposed of daily.
- f. If disposal sites for clean spoil are necessary, they shall be in areas, approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

MATERIAL EXCAVATION AND DEPOSIT

12. The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or borrow areas.
13. The location of quarries and borrow areas shall be subject to approval by relevant local and national authorities, including traditional authorities if the land on which the quarry or borrow areas fall in traditional land.
14. New extraction sites:

- a. Shall not be located in the vicinity of settlement areas, cultural sites, wetlands or any other valued ecosystem component, or on high or steep ground or in areas of high scenic value, and shall not be located less than 1km from such areas.
 - b. Shall not be located adjacent to stream channels wherever possible to avoid siltation of river channels. Where they are located near water sources, borrow pits and perimeter drains shall surround quarry sites.
 - c. Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be done in the presence of government authorities having a mandate for their protection.
 - d. Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted.
 - e. Shall be easily rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.
 - f. Shall have clearly demarcated and marked boundaries to minimize vegetation clearing.
15. Vegetation clearing shall be restricted to the area required for safe operation of construction work. Vegetation clearing shall not be done more than two months in advance of operations.
 16. Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits from workings.
 17. The Contractor shall deposit any excess material in accordance with the principles of these general conditions, and any applicable EMP, in areas approved by local authorities and/or the SE.
 18. Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the SE and appropriate local and/or national authorities before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

REHABILITATION AND SOIL EROSION PREVENTION

19. To the extent practicable, the Contractor shall rehabilitate the site progressively so that the rate of rehabilitation is like the rate of construction.
20. Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.
21. Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2m high are recommended.
22. Re-vegetate stockpiles to protect the soil from erosion, discourage weeds and maintain an active population of beneficial soil microbes.
23. Locate stockpiles where they will not be disturbed by future construction activities.
24. To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired.
25. Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.
26. Identify potentially toxic overburden and screen with suitable material to prevent mobilization of toxins.
27. Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use and allow natural regeneration of vegetation.

28. Minimize the long-term visual impact by creating landforms that are compatible with the adjacent landscape.
29. Minimize erosion by wind and water both during and after the process of reinstatement.
30. Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.
31. Revegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, forest department and the local people.

WATER RESOURCES MANAGEMENT

32. The Contractor shall at all costs avoid conflicting with water demands of local communities.
33. Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the relevant Water Authority.
34. Abstraction of water from wetlands shall be avoided. Where necessary, authority has to be obtained from relevant authorities.
35. Temporary damming of streams and rivers shall be done in such a way avoids disrupting water supplies to communities downstream and maintains the ecological balance of the river system.
36. No construction water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses.
37. Wash water from washing out of equipment shall not be discharged into water courses or road drains.
38. Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

ANNEX 4: CHANCE FIND PROCEDURES

A Chance Finds Procedure to guide management of any accidental discoveries of histo-cultural resources in the process of implementing the RRF. The procedure will be as follows:

- a. Stop the construction activities in the chance find;
- b. Delineate the discovered site or area;
- c. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Directorate of Museums and Monuments take-over;
- d. Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Directorate of Museums and Monuments under the Ministry of Tourism, Wildlife and Antiquities (within 24-48 hrs or less);
- e. The Directorate of Museums and Monuments would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Directorate of Museums and Monuments (within 24 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;
- f. Decisions on how to handle the finding shall be taken by the Directorate of Museums and Monuments. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage;
- g. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Directorate of Museums and Monuments; and
- h. Construction work could resume only after permission is given from the responsible local authorities and the Directorate of Museums and Monuments concerning safeguard of the heritage;
- i. These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed;
- j. Construction work will resume only after authorization is given by the responsible local authorities and the National Museum concerning the safeguard of the heritage; and
- k. Relevant findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

ANNEX 5: SCHOOL LABORATORY ACCIDENTAL SPILLAGE MANAGEMENT ARRANGEMENTS AND GUIDANCE

The most common laboratory emergencies include chemical spills, fire or explosion, electric shock, and personnel injuries. Most laboratory accidents occur due to poor planning or lack of attention. Therefore, it's always better to prevent accidents (being proactive) than having to take any actions during an emergency (being reactive). For example, always wear proper personal protective equipment (PPE) in the laboratory. Regular laboratory inspection and equipment maintenance is beneficial to prevent laboratory accidents. However, once the emergency occurs, it's also essential to know what to do. Ensure your personal safety first and then call local emergency responders, when and if necessary. The extent of your response will depend on the seriousness of the incident and documented laboratory protocols for dealing with such incidents. Stay calm and take proper actions according to the type and level of emergency.

PRINCIPLES

Be aware of possible laboratory accidents in advance before working in the lab and prevent accidents from happening by following safety regulations. Take precautions when dealing with hazardous chemicals and/or severe working conditions. Plan in advance what should be done in all kinds of accidents. In case of an emergency, keep calm and attend to your own safety first. Next, call local emergency responders for assistance and alert people in the vicinity of the emergency and its potential impact on them. Take proper actions to decrease damage or injuries.

PROCEDURE

Chemical Spills

Chemical spills are the most common accidents when working in a laboratory requiring chemicals. Improper or careless opening, handling, or storage of chemicals might lead to chemical spills. Large-volume spills of a non-hazardous chemical or even a small-quantity spill of a hazardous chemical spill might threaten the lives of laboratory personnel. Therefore, caution needs to be taken when working with chemicals and always wear proper personal protective equipment (PPE) to prevent bodily exposure in the case of a spill.

Chemical spilling onto surroundings

Key steps

1. Identify the area of the chemical spill and inform your laboratory co-workers of the spill. Evacuate the location and areas surrounding the spill, when necessary.
2. Identify the spilled chemicals and the amount of chemical that has spilled. Depending on the hazardous properties and quantities of the spilled chemicals, proper actions need to be taken. Refer to the chemical's safety data sheet (SDS) for hazard assessments.
3. Minor spills refer to spills of less than 1 gallon of low-hazard chemicals or less than 20 ml of hazardous chemicals:
 - a. Wear proper PPE first before taking any action. Care should be taken to avoid bodily exposure to chemicals;
 - b. If possible, modify the spill source to avoid further issues;
 - c. If possible, turn off any nearby heat or ignition source if the chemical is flammable;
 - d. Avoid breathing any vapours from spilled chemicals. This applies especially to chemicals that are toxic and volatile;
 - e. Locate the spill kit and use appropriate kit tools to confine and contain the spill area;

- f. Use suitable adsorbent to cover the spill and neutralize the spill, if the chemicals are acidic or basic in nature;
- g. Collect the residues and place them into a suitable container;
- h. Report to EHS to dispose of any chemical spill waste; and
- i. Refill the spill kit.

2. Chemical spills onto the body

- a. Wash off all chemicals spilled on a body immediately using a safety shower for at least 15 min. If clothes are saturated with spilled chemical, remove clothing immediately.
- b. If the spill splashed into eyes, use eyewash right away for at least 15 min. Open the eyes to allow complete washing. Only attempt to remove contact lenses after eye washing has commenced.
- c. If the spilled chemical is a strong acid, wipe out the residues first before washing to avoid excessive or painful burning.
- d. Remove contaminated clothing immediately to avoid further exposure to chemicals.
- e. Call local responders or EHS for emergency assistance and alert people in the vicinity of the spill.

3. Fire or Explosion

- a. Fire or explosion may occur from overheating, leakage, or spillage of flammable chemicals, or gases exposed to excessive heat, an open flame, or electric sparks in the laboratory. Be careful when working with flammable or explosive chemicals and avoid heat or electric sparks nearby. Safely operate electric equipment and any source of heat to prevent fire or explosion.
- b. In case of a fire involving an individual's clothing, do not run since it might accelerate the fire. Stop, drop onto the ground with hands covering the face, and roll to extinguish the fire. If possible, use the safety shower to extinguish the fire.
- c. In case of a lab fire or explosion, ensure your safety first and call emergency responders immediately for help.
- d. Evacuate the building safely and pull fire alarms or notify nearby people, if possible.
- e. Don't use elevators. Use stairs and locate the nearest exit.
- f. If possible, shut down the electric power before evacuating.
- g. Use a wet towel to cover the mouth and nose, if there is heavy smoke.
- h. In case of a small fire, use a proper fire extinguisher and make sure an easy exit is available if you fail in extinguishing the fire. Here we listed the types of extinguisher and discussed the circumstances in which each extinguisher type should be used.

Types of extinguisher

- a. Water and Foam: for Class A fires only. Not suitable for class B or C fires. Water and foam extinguish fire by reducing the heat and the foam helps to separate oxygen from the objects.
- b. Carbon Dioxide: for Class B and C fires. Not effective for Class A fire. Carbon dioxide extinguishes fire by separating oxygen from the object and removing heat.
- c. Dry Chemical: multipurpose dry chemical works for Class A, B and C and ordinary dry chemicals works for Class B and C only. Dry chemical extinguishes fire by interrupting the chemical reaction.
- d. Wet Chemical: for Class K fire only. Wet chemical extinguishes fire by removing heat and separates oxygen from fuel elements.

- e. Clean agent: for Class B and C. Clean extinguishers used halon or halocarbon agents to interrupt the chemical reactions.
- f. Dry Power: for Class D only. Dry power takes away heat and separates oxygen to extinguish fire.

Personnel Injuries

Besides chemical spills, fire, or explosion, there are many other accidents that might happen in the lab, such as electric shock, heat burn, bleeding, or poisoning. Here are some general principles to follow for personnel injuries.

- a. Assess the situation before taking any actions.
- b. Ask the person what happened to them first, if they are conscious. Look for possible signs of injury if the person is unconscious and/or unresponsive.
- c. Call local emergency responders immediately if the person is in danger.
- d. Don't move the injured personnel unless imminent danger is present.
- e. If an individual has received an electrical shock, shut down the power first, if possible. Do not touch the person with bare hands. Use non-conductive material such as wood, glass, or rubber to pull the person away from the electric contact.
- f. If bleeding from minor cuts, flush with water to avoid contamination and treat with first aid supplies. If cuts are more serious, call for medical assistance.
- g. Initiate first aid to help, if possible.

ANNEX 6: SECONDARY ENROLMENT BY NATIONALITY AND DISTRICT 2017/2018

Region	District	Nationality									Overall
		Burundians	Congolese	Kenyans	Others	Rest of Africa	Rwandese	Sudanese	Tanzanians	Ugandans	
ACHOLI	Agago	-	-	-	-	-	-	-	-	4,849	4,849
	Amuru	-	-	-	-	-	-	-	-	3,237	3,237
	Gulu	-	-	3	2	-	-	182	1	16,282	16,470
	Kitgum	-	-	-	-	-	-	14	-	12,115	12,129
	Lamwo	-	-	-	-	-	-	1	-	2,762	2,763
	Nwoya	-	-	-	-	-	-	-	-	1,951	1,951
	Pader	-	-	-	-	-	-	-	-	4,102	4,102
ACHOLI Total		-	-	3	2	-	-	197	1	45,298	45,501
ANKOLE	Buhweju	-	-	-	-	-	-	-	-	2,895	2,895
	Bushenyi	1	-	2	-	1	9	5	1	17,308	17,327
	Ibanda	-	-	-	-	-	4	-	5	14,096	14,105
	Isingiro	260	383	18	-	13	170	6	16	9,707	10,573
	Kiruhura	-	-	-	-	-	-	-	-	7,806	7,806
	Mbarara	5	-	4	-	2	67	8	8	21,921	22,015
	Mitooma	-	-	-	-	-	-	-	-	12,907	12,907
	Ntungamo	-	-	-	-	-	2	-	3	20,014	20,019
	Rubirizi	-	-	1	-	-	-	-	-	5,154	5,155
	Sheema	-	-	-	-	-	9	2	2	16,654	16,667
	ANKOLE Total	266	383	25	-	16	261	21	35	128,462	129,469
BUGANDA	Buikwe	-	-	5	2	-	4	3	-	24,553	24,567
	Bukomansimbi	6	1	2	-	-	28	-	2	8,213	8,252
	Butambala	-	-	-	-	-	-	4	5	14,046	14,055
	Buvuma	-	-	-	-	-	-	-	-	687	687
	Gomba	-	-	-	-	-	-	-	-	5,415	5,415
	Kalangala	-	-	-	-	-	-	-	-	526	526
	Kalungu	-	-	2	-	-	5	-	4	14,255	14,266
	Kampala	75	160	244	346	228	390	689	202	90,591	92,925
	Kayunga	-	-	1	-	-	-	-	-	16,941	16,942
	Kiboga	-	-	-	-	-	1	10	-	6,257	6,268
	Kyankwanzi	-	-	-	-	-	-	-	-	4,464	4,464
	Luwero	-	-	8	-	-	30	19	34	35,333	35,424
	Lwengo	-	-	-	-	-	1	-	17	9,545	9,563
	Lyantonde	-	-	-	-	-	-	-	-	3,621	3,621
	Masaka	-	-	3	3	-	30	1	50	20,517	20,604
	Mityana	-	-	-	-	-	1	3	-	16,947	16,951
	Mpigi	129	16	13	-	-	163	170	16	15,879	16,386
	Mubende	-	-	2	-	-	-	-	-	17,893	17,895
	Mukono	1	2	10	3	3	10	15	2	35,574	35,620
	Nakaseke	-	-	2	-	-	26	-	12	8,933	8,973
	Nakasongola	-	-	-	-	-	-	-	-	7,397	7,397
	Rakai	-	-	2	-	-	-	-	44	23,481	23,527
	Sembabule	-	-	-	-	-	-	-	-	8,917	8,917

Region	District	Nationality									Overall
		Burundians	Congolese	Kenyans	Others	Rest of Africa	Rwandese	Sudanese	Tanzanians	Ugandans	
	Wakiso	35	49	69	7	34	327	403	90	61,826	62,840
BUGANDA Total		246	228	363	361	265	1,016	1,317	478	451,811	456,085
BUKEDI	Budaka	-	-	-	-	-	-	-	-	14,188	14,188
	Busia	-	-	176	1	1	-	-	1	18,217	18,396
	Butaleja	-	-	-	-	-	-	-	-	8,746	8,746
	Kibuku	-	-	1	-	-	-	-	-	11,799	11,800
	Pallisa	-	-	-	-	-	-	-	-	19,645	19,645
	Tororo	-	1	42	-	-	-	-	-	28,949	28,992
BUKEDI Total		-	1	219	1	1	-	-	1	101,544	101,767
BUNYORO	Bulisa	-	-	-	-	-	-	-	-	2,164	2,164
	Hoima	-	-	22	-	-	1	-	8	17,985	18,016
	Kibaale	2	-	3	-	-	23	1	-	24,005	24,034
	Kiryandongo	-	2	-	-	-	5	178	-	9,765	9,950
	Masindi	-	-	1	-	-	1	58	-	9,944	10,004
BUNYORO Total		2	2	26	-	-	30	237	8	63,863	64,168
BUSOGA	Bugiri	-	-	26	-	-	-	-	6	15,283	15,315
	Buyende	-	-	-	-	-	-	-	-	10,350	10,350
	Iganga	-	-	62	-	-	-	-	1	42,253	42,316
	Jinja	1	2	26	50	-	6	13	38	36,656	36,792
	Kaliro	-	-	4	-	-	-	-	4	13,683	13,691
	Kamuli	-	-	-	-	-	-	-	-	27,560	27,560
	Luuka	-	-	-	-	-	-	-	-	15,043	15,043
	Mayuge	-	-	-	-	-	-	-	-	20,760	20,760
	Namayingo	-	-	3	-	-	-	-	-	4,016	4,019
	Namutumba	2	-	6	-	-	24	-	-	16,719	16,751
BUSOGA Total		3	2	127	50	-	30	13	49	202,323	202,597
ELGON	Bududa	-	-	-	-	-	-	-	-	6,833	6,833
	Bukwo	-	-	34	-	-	-	-	-	7,365	7,399
	Bulambuli	-	-	-	-	-	-	-	-	8,154	8,154
	Kapchorwa	-	-	1	-	-	-	-	-	8,359	8,360
	Kween	-	-	-	-	-	-	-	-	6,686	6,686
	Manafwa	-	-	15	-	-	-	-	-	20,970	20,985
	Mbale	-	-	29	-	-	-	-	-	42,983	43,012
	Sironko	-	-	-	-	-	-	-	-	10,273	10,273
ELGON Total		-	-	79	-	-	-	-	-	111,623	111,702
KARAMOJA	Abim	-	-	-	-	-	-	-	-	2,631	2,631
	Amudat	-	-	14	-	-	-	-	-	449	463
	Kaabong	-	-	-	-	-	-	-	-	1,519	1,519
	Kotido	-	-	-	-	-	-	-	-	3,269	3,269
	Moroto	-	-	-	-	-	-	-	-	1,804	1,804
	Nakapiripint	-	-	-	-	-	-	-	-	1,158	1,158
	Napak	-	-	-	-	-	-	-	-	1,214	1,214
KARAMOJA Total		-	-	14	-	-	-	-	-	12,044	12,058

Region	District	Nationality									Overall
		Burundians	Congolese	Kenyans	Others	Rest of Africa	Rwandese	Sudanese	Tanzanians	Ugandans	
KIGEZI	Kabale	2	1	-	-	-	26	-	16	27,689	27,734
	Kamungu	-	-	-	-	-	-	-	-	12,630	12,630
	Kisoro	1	-	-	-	-	24	-	1	9,694	9,720
	Rukungiri	-	-	-	-	-	-	-	-	19,283	19,283
KIGEZI Total		3	1	-	-	-	50	-	17	69,296	69,367
LANGO	Alebtong	-	-	-	-	-	-	-	-	2,618	2,618
	Amolatar	-	-	-	-	-	-	-	-	2,571	2,571
	Apac	-	-	-	-	-	-	-	-	4,431	4,431
	Dokolo	-	-	-	-	-	-	-	-	3,292	3,292
	Kole	-	-	-	-	-	-	-	-	6,318	6,318
	Lira	1	-	-	-	-	-	30	-	19,694	19,725
	Ouke	-	-	-	-	-	-	-	-	2,785	2,785
	Oyam	-	-	-	-	-	-	-	-	2,850	2,850
LANGO Total		1	-	-	-	-	-	30	-	44,559	44,590
TESO	Amuria	-	-	-	-	-	-	-	-	7,949	7,949
	Bukedea	-	-	1	-	-	-	-	-	6,952	6,953
	Kaberaido	-	-	-	-	-	-	-	-	5,499	5,499
	Katakwi	-	-	-	-	-	-	-	-	4,047	4,047
	Kumi	-	-	-	-	-	-	-	-	7,366	7,366
	Ngora	-	-	-	-	-	-	-	-	7,600	7,600
	Serere	-	-	-	-	-	-	-	-	8,924	8,924
	Soroti	-	-	3	-	-	-	-	-	21,909	21,912
TESO Total		-	-	4	-	-	-	-	-	70,246	70,250
TORO	Bundibugyo	-	-	3	-	-	-	-	-	6,827	6,830
	Kabarole	-	-	-	-	-	4	-	2	24,089	24,095
	Kamwenge	-	-	1	-	-	-	-	-	9,286	9,287
	Kasese	-	1	-	-	-	-	-	-	29,507	29,508
	Kyegegwa	-	164	-	-	-	9	-	-	4,818	4,991
	Kyenjojo	-	-	1	-	-	-	-	-	9,846	9,847
	Ntoroko	-	-	-	-	-	-	-	-	1,687	1,687
TORO Total		-	165	5	-	-	13	-	2	86,060	86,245
WEST_NILE	Adjumani	-	-	-	-	-	-	470	-	2,721	3,191
	Arua	1	76	1	1	-	1	1,105	-	21,085	22,270
	Koboko	-	22	-	-	-	-	327	-	6,071	6,420
	Maracha	-	-	-	-	-	-	-	-	3,831	3,831
	Moyo	-	-	-	-	-	-	-	-	5,161	5,161
	Nebbi	-	-	-	-	-	-	-	-	9,796	9,796
	Yumbe	-	-	-	-	-	-	76	-	8,923	8,999
	Zombo	-	-	-	-	-	-	-	-	3,810	3,810
WEST_NILE Total		1	98	1	1	-	1	1,978	-	61,398	63,478
Grand Total		522	880	866	415	282	1,401	3,793	591	1,448,527	1,457,277

ANNEX 7: ATTENDANCE DURING M&E WORKING GROUP PRESENTATION IN MOES

