



Republic of Uganda

Ministry of Education and Sports

Uganda Learning Acceleration Program-ULEARN (P179397)

STAKEHOLDER ENGAGEMENT PLAN

Prepared

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ACRONYMS

AHA	Anti-Homosexuality Act, 2023
CAO	Chief Administrative Officer
CAE	Child Abuse and Exploitation
CBOs	Community Based Organizations
CDOs	Community Development Officers
CESMP	Contractors Environmental and Social Management Plan
CLOs	Community Liaison Officers
CMU	Construction Management Unit
COVID-19	Corona virus disease
CRRP	Comprehensive Refugee Response Plan
DEO	District Environment Officer/District Education Officer
DCDO	District Community Development Officer
DIS	District Inspector of Schools
EISM	Enhanced Implementation Support and Monitoring
ESSA	Environmental and Social Systems Assessment
ESCP	Environmental and Social Commitment Plan
EMIS	Education Management Information System
ERB	Engineers Registration Board
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
ESSP	Education and Sports Sector Strategic Plan
ESRS	Environmental and Social Review Summaries
FPI	Free, Prior and Informed
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GoU	Government of Uganda
GRAM	Grievance Redress Agreement Minute
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunological Virus/Acquired Immune Deficiency Syndrome
HSE	Health Safety and Environment
ICT	Information Communication Technology
IDA	International Development Assistance
IGG	Inspector General of Government
IVA	Independent Verification Agency
LCs	Local Councils
LGs	Local Governments
LMP	Labor Management Plan
MoFPED	Ministry of Finance, Planning and Economic Development
MDAs	Ministries, Departments and Agencies
MoES	Ministry of Education and Sports
MoH	Ministry of Health

MoLHUD	Ministry of Lands, Housing and Urban Development
MoLG	Ministry of Local Government
MoGLSD	Ministry of Gender Labour and Social Development
NCDC	National Curriculum Development Centre
NDP III	National Development Plan Phase III
NGOs	Non-Governmental Organizations
PAI	Project Area of Influence
PAPs	Project Affected Persons
PCU	Project Coordination Unit
PDO	Project Development Objective
PforR	Program for Results
RPF	Resettlement Policy Framework
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEL	Social and Emotional Learning
SEP/SEF	Stakeholder Engagement Plan/Framework
SESA	Strategic Environmental and Social Assessment
SMC	School Management Committee
SOPs	Standard Operating Procedures
STG	System Transformation Grant
TA	Technical Assistance
TVET	Technical Vocational Education and Training
ULEARN	Uganda Learning Acceleration Program
UNBS	Uganda National Bureau of Standards
UNEB	Uganda National Examinations Board
UNICEF	United Nations Children's Fund
UTSEP	Uganda Teacher and School Effectiveness Project
USDP	Uganda Skills Development Project
VAC	Violence Against Children
VACiS	Violence Against Children in schools
WB EHS	World Bank Environmental Health and Safety

DEFINITIONS

For the purposes of this Framework, the following definitions apply:

- ❖ **Covid-19:** The coronavirus disease 2019 (COVID-19) is a communicable respiratory disease caused by a new strain of coronavirus that causes illness in humans.
- ❖ **Community:** A community is a group of people who have a relationship or a shared interest
- ❖ **Ebola Virus Disease (EVD):** is a rare and deadly disease in people and nonhuman primates. The viruses that cause EVD are located mainly in sub-Saharan Africa. People can get EVD through direct contact with an infected animal (bat or nonhuman primate) or a sick or dead person infected with Ebola virus.
- ❖ **Engagement:** Engagement is a planned process with the specific purpose of working with individuals and groups to encourage active involvement in the project. Engagement refers to the range of opportunities stakeholders and the communities have to participate in the project. This ranges from educating individuals or groups about a project; obtaining community feedback at a key project stage or milestone; or working collaboratively with stakeholders to address local issues. It can also be referred to as public participation.
- ❖ **Grievance:** An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve.
- ❖ **Grievance Mechanism:** A locally based, formalized way to receive, assess, and resolve stakeholder complaints about the performance or behavior of project proponents, including its contractors or employees.
- ❖ **Marginalized Groups:** The term Marginalization generally describes the overt actions or tendencies of human societies whereby those perceived as being without desirability or function are removed or excluded (i.e., are "marginalized") from the prevalent systems of protection and integration, so limiting their opportunities and means for survival.
- ❖ **Project beneficiaries:** those who will derive some benefit from the implementation of the project. Two types of beneficiaries can be defined i.e. direct and indirect beneficiaries. Direct beneficiaries: those who will participate directly in the project, and thus benefit from its existence while indirect beneficiaries sometimes also called secondary beneficiaries being/is someone who is not directly connected with the project, but will still benefit from it.
- ❖ **Public:** refers to members of the general public who may not belong to a specific community relevant to the project but they still have an interest in the project.
- ❖ **Stakeholders:** Persons or groups who are directly or indirectly affected by a project as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. They may include locally affected communities or individuals and their formal or informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.
- ❖ **Stakeholder Analysis:** is a process of identifying the people before the project begins; grouping them according to their levels of participation, interest, and influence in the project; and determining how best to involve and communicate each of these stakeholder groups throughout the project cycle.
- ❖ **Stakeholder Mapping:** The process of identifying a project's stakeholders.
- ❖ **Vulnerable Groups:** Vulnerability refers to the conditions determined by physical, social, economic and environmental factors or processes, which increase the susceptibility of a community to the impact of hazards. A vulnerable group is therefore a population that has some specific characteristics that make it at higher risk of falling into poverty than others.

1 INTRODUCTION

1.1 BACKGROUND

The Government of Uganda (GoU) recognizes the importance of improvement of education services in promoting sustainable development through improving the people's skills as well as raising awareness on various issues of national importance including improving general standards of living. The GoU introduced the UPE in 1997 with the goal of providing tuition-free elementary education to four children per Ugandan family. The government eventually extended tuition-free education to every Ugandan of elementary school age, a concession to the needs of Uganda's large families, who, from the policy's initial rollout, had been sending more than four children to school simultaneously. The Government hoped that UPE would help reduce poverty and develop the country's vast store of human resources. The program's success in expanding access to elementary education is undeniable. However, due to the limited awareness, narrow importance placed on education and need for children to help the family work, approximately just one in every four Ugandan children enrolled in primary school makes it to secondary school and less than half of those students who finish primary school can read. Additionally, children with disabilities are left out of any formal education. Only a quarter of adolescents are enrolled at the secondary level. Factors such as school fees, abuse in school, and teenage pregnancy keep children, especially girls, out of school, among others.

Despite the stunning successes of the UPE program, significant challenges persist. Growing enrolment rates have not been accompanied by rising completion rates, especially for the upper primary classes (P5 to P7). In Uganda's schools today, students crowd classrooms, overwhelming the country's understaffed teachers. The negative effects of the Country's teacher shortage are exacerbated by high rates of teacher absenteeism. In more than half of all Ugandan schools, at least three in five teachers are absent. School infrastructure is also often inadequate, with many schools lacking basic sanitation facilities. In certain regions of the Country, such as northern and eastern Uganda, conditions are even worse. As a result, numeracy and literacy rates remain low. Today, just two in five students who complete elementary school are literate.

Uganda's progress in achieving universal elementary education identified widespread poverty, a lack of nearby schools, and inadequate and overcrowded learning facilities as the most critical drivers of the country's high dropout rates. The expenses incurred by families sending their children to school in Uganda can be considerable. Although UPE guarantees tuition-free elementary education to all Ugandan children, other expenses, such as school uniforms, books, and even "school development funds" for projects such as building maintenance, must be provided by the students and their families as well as lack of school meals for learners. For most of Uganda's poorer families, these additional expenses pose a major barrier in keeping learners in schools.

1.2 THE DESCRIPTION OF THE ULEARN PROGRAM

The ULEARN Program is grounded in the Education and Sports Sector Strategic Plan (ESSP), 2020-2025. The ESSP is based on the goals of the National Development Plan (NDP III & NDP IV),

including the target of increasing Learning Adjusted Years of Schooling (LAYS) from 4.5 to 7 through increases in access and learning. The ESSP has three strategic objectives: (i) achieve equitable access to relevant and quality education and training; (ii) ensure delivery of relevant and quality education and training; and (iii) enhance efficiency and effectiveness of education and sports service delivery at all levels. These objectives cut across six core subprograms, which are defined by levels of education: pre-primary; primary; secondary; business, technical, vocational education and training (BTNET); higher education; and physical education and sports. There are additional subprograms for cross-cutting issues which affect all levels of education.

The Uganda Learning Acceleration Program (ULEARN) is a hybrid Program-for-Results (PforR) and Investment Project Financing (IPF) operation, will support the government's Program, ESSP at the primary and secondary level. The objective of the ESSP is to promote equitable access to relevant and quality education and training with the overall goal of improving service delivery in the education sector of Uganda. The results based PforR will strengthen the capacity of the Ministry of Education and Sports (MoES), and District Local Governments by addressing the identified system gaps to improve access to equitable and quality primary and secondary education. The IPF component will mainly support the strengthening of program management by providing technical assistance to MoES and Local Governments to facilitate achievement of results by minimizing technical, safeguards, and fiduciary risks as per the actions in the Program Action Plan (PAP). The IPF component will also support an independent verification agency (IVA) for the verification of achievement of Disbursement Linked Indicators (DLIs).

The World Bank financing of US\$ 324.8million to the ULEARN Program will be over a period of five years from the date of approval of the operation. The financing comprises of US\$ 298million assistance to the Program using the PforR instrument and a US\$ 26.8 million for the Investment Project Financing (IPF) instrument.

1.3 SCOPE OF THE PROGRAM

The scope of the Program supports a sub-set of core sub-programs, namely, primary, and secondary education, and the Teachers Policy. It also supports several cross-cutting subprograms including special needs and inclusive education, teacher development and management, inspection of schools and institutions, gender in education and safe school environment, monitoring and evaluation system and EMIS, and ICT in the education sector. The timing of the Program is expected to be aligned with the ESSP and NDPIV. The scope of the ESSP is national, and the scope of the operation will be national except for RA2 (which will include all national regions, within targeted schools according to infrastructure needs)..

1.3.1 RESULTS AREA 1: QUALITY TEACHING AND LEARNING

Under RA1, the Program will focus on implementing structured pedagogical approaches in EGR, Kiswahili, and inclusive pedagogies, with attention to teacher continuous professional development (CPD). The approach will enhance quality and availability of textbooks and teacher guides, strengthen teacher training, and implement a structured teacher support program. Student assessments will be improved to enhance classroom instruction. These program activities

will support a review and revision of the primary curriculum to make it more competency-based and student-focused. The structured pedagogy approach will include: (i) introduction of EGR (for P1-P4) in all new districts; (ii) replenishment of materials and retraining of teachers in existing EGR districts; (iii) specialized pedagogy for teaching students with disabilities; (iv) Kiswahili instruction (for P4-7 nationwide and in P1-P4 where used as an EGR language for refugee hosting and border districts); (v) integrating remedial education in teacher training; and (vi) piloting of the new curriculum including EGM. The Program will support quality improvements and cost-effective production and distribution of teaching and learning materials in EGR, EGM, Kiswahili, and remedial education. Teacher professional development will focus on modeling and practice. It will also provide structured support to teachers in the classroom and ensure the effective use of assessment data at both the classroom and system level, that will be embedded in program interventions.

1.3.2 RESULTS AREA 2: EQUITABLE ACCESS TO IMPROVED LEARNING ENVIRONMENTS

Result Area 2 promotes improved learning environments through rehabilitation, expansion and equipping of select government and government-aided traditional secondary schools and primary- and secondary-level special schools and inclusive schools. The Program will benefit at least 100 government and government-aided traditional secondary schools and 66 primary- and secondary-level special and inclusive schools. Selection of beneficiary schools will consider refugee hosting districts, post-war sub-regions, sub-regions practicing FGM, and sub-regions with high poverty rates. The rehabilitation scope will be guided by site-specific needs assessments and use a community-driven development approach for construction to enhance community engagement, efficiency, monitoring and sustainability. The Program will support civil works, furniture, and equipment in line with MoES BRMS, including for pupil-classroom and pupil-latrines ratios. The BRMS will be upgraded to align with the UN Convention on the Rights of Persons with Disabilities which Uganda ratified in 2008. In the BRMS upgrade, climate adaptation and mitigation measures will be incorporated to ensure resilience and learning continuity in light of climate events such as heat and floods, and to reduce GHG emissions.

Infrastructure projects will prioritize environmental and social sustainability, climate change mitigation and energy efficiency. This includes using smart energy appliances, architectural elements and building techniques (to maximize natural light and reduce energy consumption for cooling, and ventilation systems), renewable sources (solar systems and energy-saving bulbs), green design elements, and rainwater harvesting. A nationwide school greening program will plant trees, prioritizing fruit trees including as natural fencing, and educate students on climate change and environmental stewardship.

The Program will support assistive devices, including training on use, for students with disabilities nationwide. It will also support interventions focusing on making schools safe and inclusive for all, especially girls. These interventions will include implementation of codes of conduct for school leaders, teachers, and civil works contractors and confidential reporting and referral mechanisms. Teacher training on GBV prevention and response and anti-bullying will be incorporated into the training packages in RA1. Schools will select among and receive support to implement

complementary interventions including (i) community engagement, including on promoting healthy child development, prevention of violence, inclusion of children with disabilities, and climate change awareness; (ii) gender-specific safe spaces (boys' and girls' clubs) facilitated by same-gender teachers when possible; and (iii) social and emotional learning modules. Schools will implement MoES guidelines for prevention and management of teenage pregnancy and supporting re-entry of child mothers into school. These activities, together with physical improvements to the learning environment, will contribute to safer, more inclusive schools, thereby addressing barriers affecting girls' transition to secondary school.

1.3.3 RESULTS AREA 3: USE OF DATA FOR IMPROVED SYSTEM MANAGEMENT

Uganda's Educational Management Information System (EMIS) will transition to a robust web-based centralized system allowing direct and timely data entry by schools and automated production of individual school reports. At the school level, head teachers and teachers will be supported to enter and track enrolment, teacher and student attendance, and student learning. The data will be used to determine whether specific interventions that are required for individual students, to report and track status of school infrastructure (like impacts from climate events and adequacy of WASH facilities) and to report student continuous assessment results to UNEB. The Program will provide all schools with devices, train school heads and teachers, and create maintenance and support structures for the devices. The expansion of coverage of data systems and use of data will be crucial to monitor of progress in Results Areas 1 and 2 and improve the overall management of the education system. The IPF component will support central-level interventions including integration of EMIS with related data systems.

1.3.4 PROJECT DEVELOPMENT OBJECTIVE-PDO

The Program Development Objective (PDO) is to improve teaching and learning in Early Grade Reading in target schools, improve learning environments in target schools, and increase the coverage of the Education Management Information System (EMIS) in Uganda. The proposed PDO indicators are:

- a. Increase in percentage of teachers meeting minimum expectations in EGR lesson delivery
- b. Percentage of beneficiaries improving by at least one proficiency band in English literacy in the NAPE Assessments
- c. Students benefiting from improved climate-resilient physical learning environments (by gender)
- d. Increased coverage of EMIS system

1.3.5 PROGRAM IMPLEMENTATION ARRANGEMENTS

The Program will be implemented by MoES as the main implementing agency, using existing institutional establishments. The overall responsibility for the program implementation lies with the Permanent Secretary, with day-to-day implementation support of the Department of Education Planning.

For RA1: implementing agencies are MoES (Departments of Basic Education; Teacher Training, Education, and Development; Special Needs Education; and Education Standards); the National

Curriculum Development Centre (NCDC) and Uganda National Examinations Board (UNEB), which are semi-autonomous agencies; and LGs. The Department of Basic Education (Pre-primary and Primary) will coordinate implementation EGR and EGM. The NCDC will lead development of new EGR/M and remedial curricula and materials, and UNEB will be responsible for mainstreaming aligned Early Grade Reading Assessments (EGRA) and an Early Grade Mathematics Assessments (EGMA) into national assessments including NAPE. The Teacher and Instructor Education Training Department has the overall responsibility for coordinating teacher training until the establishment of UNITE. The Directorate of Education Standards (DES) will guide and coordinate the scaling up of e-learning platform.

For RA2: MoES is the main implementing agency, with participating agencies including Ministry of Land, Housing and Urban Development, and Ministry of Water and Environment. For expansion of existing primary schools, as well as rehabilitation of traditional secondary schools, Local Governments will be responsible for construction contract supervision and payment, staffing of new and expanded schools, and teacher training support and school grants. MOES may engage other agencies in the implementation of the activities under the IPF Component.

For the Child Friendly School Program will be implemented by the Gender Unit within the MoES and well as offer technical support on the awareness programs for new schools and administration of benefiting LGs.

Under RA 3: DES and ICT-department within the MoES will be responsible for implementation of integration of data systems including EMIS, Teacher Effectiveness and Learner Achievement (TELA), e-inspection and the e-learning platform. LGs will be responsible for day-to-day supervision of HTs and teachers in implementing Program activities. For the IPF Component, the MoES will engage other agencies in the implementation of the activities to provide support to technical and safeguards support.

1.4 IPF COMPONENT

The IPF component (\$26.8 million total) will provide comprehensive technical assistance to MoES and Local Governments to better support achievement of key results and Program management.. Annual work plans and associated procurement plans for the IPF will be developed as part of the POM prior to effectiveness. This includes support to analytical and design work in the conceptual stages of project preparation, technical support and expertise (including in the areas of project management and fiduciary and environmental and social activities) during implementation, and institution building throughout the project. This component is designed to strengthen MOES capacity to implement a results-based operation and provide Technical assistance to transition to ICT in Education Policy development, support technical assistance (TA) required towards achieving key results, and finance contracting of independent verification agencies (IVA).

Tentative areas of Technical Assistance include support to fiduciary and safeguards management for local governments including training for LG fiduciary and safeguards staff, facilitation for school

inspectors, and an implementation support team based at MoES which will provide hands-on support based on weaknesses identified in the program assessments and/or LG requests, development and quality enhancement of teaching and learning materials, implementation of national assessments, and technical support on the use of data and evidence, and institutions of higher learning including Kyambogo University, NCDC, and PTCs, and LGs on EGR and EGM, on development of a Languages of Instruction Policy and delivery arrangements. Likely activities under the IPF component would require hiring of technocrats, consultants and IVAs to provide technical assistance, develop materials, provide training and carry out the mentioned assessments in line with ESS2. In undertaking the various trainings and assessments, the TORs shall include consideration of ESF aspects.

To ensure a coherent approach across different systems, the Program will update and support implementation of the MoES Sector EdTech Strategy, carry out an audit of existing systems, and develop Enterprise Architecture to guide development and inter-operation of different information systems. This therefore means that the project shall need to hire consultants to build capacity on data system and analysis and set up and rehabilitation of the EMIS. Under Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts; under this technical support will be required to support the local governments to produce the project briefs and ESMPS.

Technical support will be required to support the development of social and environmental safeguards documentation for example under Environmental and Social Standard 2: Labor and Working Conditions: a labour management plan (LMP) will be developed and implemented including a Community Health and Safety plan and Stakeholder Engagement and Information Disclosure under Environmental and Social Standard 10.

1.5 ENVIRONMENTAL AND SOCIAL IMPACTS OF THE PROGRAM

The project will support civil works activities with a potential to generate localized, site-specific environmental impacts and social impacts as well. During construction, the generic impacts may include, among others: dust and noise pollution during civil works, occupational safety and health of the workers and the nearby members of the public, construction waste and debris management, and public safety risks at or near construction sites, increased traffic and accidents near the school, likely land take and loss of livelihoods concerns, loss of vegetation through site clearance, soil erosion concerns, setting and operations of temporary worker's camp sites, impacts relating to sourcing of construction materials, risks of HIV/AIDS, STIs/STDs, or other contagious diseases, GBV/SEA/SH, potential risks of child labor and school drop outs in search of employment damage to community/private property due to civil works, and impact on resources of cultural heritage.

In order to comprehensively address and guide implementation of environmental and social aspects of the project, an Environmental and Social Systems Assessment (ESSA) was prepared by the Bank, consultations done and publicly disclosed during project preparation. An Environmental

and Social Commitment Plan (ESCP) will be prepared and disclosed by Program appraisal. All the structures to be rehabilitated shall be designed in consideration of inclusion, gender and disability requirements.

In addition, issues arising from labor mobility and influx resulting from construction of schools across the country, will be managed through processes for identification of risks related to gender-based violence, child labor and other forms of violence against children, women and other workers and propose potential measures for prevention and response, including using the labor management plans.

In June 2024, following the enactment of the Anti-Homosexuality Act (AHA), 2023, the ULEARN SEP and other ULEARN documents include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals or groups in providing or receiving benefits in World Bank–financed projects and program in Uganda. These measures are described in various sections of the ULEARN ESSA, the A-ESRS and its obligations in the ESCP.

In response, the Government of Uganda issued five Circulars concerning this law that included the Circular on Uganda’s Social Safeguard Policies, issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development.

As such, various actions (see Appendix 6) have been taken by the GoU to ensure non-discrimination with regard to World Bank [financed] projects in Uganda. Of particular importance is the Letter of Assurance of September 21, 2023, from the Permanent Secretary / Secretary to the Treasury on Uganda’s Social Safeguard Policies, which holds the following:

- “All World Bank-financed projects [in Uganda] must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements
- Under these projects, no person will be discriminated against or stigmatized, and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank [financed] projects should agree and implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities, including third-party monitoring where applicable.
- Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.

The World Bank will ensure monitoring of discrimination and exclusion aimed at Project beneficiaries or workers, especially in relation to the AHA, with special support provided, as needed, for individuals or groups who may be vulnerable or marginalized. Furthermore, training will be offered to all concerned parties to promote sensitization to discrimination and exclusion.

Finally, the GRM will be adapted to take into consideration complaints related to discrimination and exclusion.

The World Bank has hired a credible international entity (firm, agency) with strong knowledge of the Ugandan context and a track record of enhanced third-party implementation support and performance monitoring to undertake this role on behalf of the Bank. The entity (the Enhanced Implementation Support and Monitoring, or EISM, mechanism) is expected to work with NGO/CSOs and country-based development partners, and will focus primarily on supporting project teams to implement mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination from project benefits. (The details are provided in Appendix 07). The objectives of the EISM include:

- Assisting project teams to enhance existing project-level grievance mechanisms and develop and operate the independent mechanism (the EISM) that would identify, manage, and monitor cases of discrimination.
- Assisting the Bank in strengthening the capacity of Project Implementation Units (PIUs), workers, and contractors, subcontractors, and service providers.
- Ensuring contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.
- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the case.
- Support the WB to monitor the efficacy of the agreed measures to mitigate the impacts on WB financed operations.

The EISM will establish mechanisms for monitoring non-discrimination policies and grievance handling within PIUs by requesting monthly reports from the PIUs/PSUs on their progress with policy implementation and grievance handling. This will involve reporting on actions to implement the mitigation measures and data on grievance handling in each World Bank supported project under implementation or planned for implementation in Uganda, including the ULEARN Program.

1.6 OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders, in particular members of vulnerable and other disadvantaged groups, including persons with disabilities, women, the poorest of the poor, persons in remote areas, and historically underserved traditional local communities.

The SEP includes a mechanism by which people can raise concerns, provide feedback, offer insights about project design and potential project risks, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project to ensure smooth collaboration between project staff and local communities, ensure stakeholder feedback to influence project design, secure a social license to operate and to minimize and mitigate environmental and social risks related to the proposed project activities.

2 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK FOR PUBLIC PARTICIPATION

This Stakeholder Engagement Plan (SEP) is underpinned by the Uganda’s policy and legal framework which guarantees the right to information and public participation and to management of environmental and social aspects of the proposed ULEARN project. Please refer to section 3, pages 18-23 of the ESMF.

The supporting Environment and social policy framework applicable to the project includes; Uganda Vision 2040, the Third National Development Plan (NDP III) 2020/21–2024/25, The 1992 Government White Paper on Education, Technical Vocational Education and Training (TVET) Policy 2019, Education and Sports Sector Strategic Plan (ESSP) 2021/22-2024/25, Education Response Plan for Refugees and Host Communities in Uganda 2018-2021, the Comprehensive Refugee Response Framework for Uganda 2017, Ministry of Education and Sports National Strategy for Girls’ Education (NSGE) in Uganda (2014–2019), the National Environment Management Policy 1994, Universal Secondary Education Policy 2007, MoES Gender in Education Sector Policy 2016, the Education Sector Workplace Policy on HIV/AIDS 2013, and the Business, Technical, Vocational Education and Training (BTJET) Strategic Plan (2012/3-2021/2)

In terms of legal instruments, the following are applicable in the proposed project. These include; the Constitution of the Republic of Uganda 1995, the Education (Pre-primary, Primary and Post-Primary) Act 2008, the Children Act Cap 59, Domestic Violence Act 2010, the National Environment Act, No. 5 of 2019, the Land Act Cap 227, the Public Health Act Cap 281, the Occupational Safety and Health Act 2006, the Employment Act 2006, the Local Governments Act Cap 243, The Refugees Act, 2006, The Physical Planning Act 2010 and the Physical Planning (Amendment) Act 2020 and the Workers’ Compensation Act Cap.225. Details on the applicable legal and policy framework are documented in the ESMF under section 3 Pages 18 -23.

The project will be implemented under the World Bank ESF standards. Specifically, the proposed project triggers; ESS1: Assessment and Management of Environmental and Social Risks and Impacts, ESS2: Labour and Working Conditions, ESS3: Resource Efficiency and Pollution Prevention and Management, ESS4: Community Health and Safety, ESS5: Land acquisition, restrictions on land use and involuntary resettlement, ESS8: Cultural Heritage and ESS10: Stakeholder Engagement and Information Disclosure.

ESS10 Clause 21 holds that “The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolves.” Point (g) of Clause 22 requires that stakeholder consultation must be “... free of external manipulation, interference, coercion, discrimination, and intimidation.” This principle is embodied by the agreement between the World Bank and the GoU regarding the AHA, including various commitments contained within the Letter of Assurance of September 21, 2023 (see Section 1.5, above and Appendix 6).

2.1 INTRODUCTION

Stakeholder engagement is an inclusive process that will be conducted throughout the phases of the project. It is aimed to support the development of strong, constructive, and responsive relationships which are important for the sustainability and acceptability of the project. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

2.2 STAKEHOLDER ENGAGEMENT TOOLS

The SEP seeks to define a structured, purposeful and appropriate approach to stakeholder consultation and disclosure. Its aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to enhance participation and improved decision making regarding a development intervention. Overall, the SEP will serve the purpose such as stakeholder identification and analysis; planning engagement modalities through effective communication, consultations and disclosure and defining roles and responsibilities for its implementation amongst others.

MoES and project IPs will maintain dialogue with the relevant regulators and locally affected communities and their representatives as well as non-government organizations (NGOs), community-based organizations (CBOs) and other interest groups. ESS10 recognizes the importance of open and transparent engagement with project stakeholders. Success of any project is hinged on the level and quality of stakeholder engagement, which is to be an inclusive process expected to occur throughout the project life cycle. Engagement is more useful when introduced in the early phases of project development and is mainstreamed into all levels of decision-making. To this end, this Stakeholder Engagement Plan (SEP) has been prepared and will be disclosed alongside other safeguards instruments, especially the ESSA, LMP and ESCP.

2.3 OBJECTIVES AND SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN-SEP

2.3.1 OBJECTIVES OF THE SEP

The broad objectives of this SEP are to:

- a. Describe the applicable regulatory and/or other requirements for disclosure, consultation and engagement with the Project's stakeholders;
- b. To enable identify elaborately different stakeholders including their roles and develop an approach for reaching each of the sub-groups;
- c. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance;
- d. To provides an appropriate approach for consultations and disclosure of Project information throughout the project cycle;

- e. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format; and
- f. Define monitoring and reporting procedures.

2.3.2 SCOPE OF SEP

The SEP is part of the environmental and social safeguards frameworks developed for the Uganda Learning Acceleration Program (ULEARN) and focuses on project activities that require engagement with local communities and other stakeholders. It covers (where applicable) subproject conceptualization, feasibility studies, planning and Environmental and Social Impact Assessment (ESIA), grievance redress, construction and later operations phases. The Table 3-1 below sets out the six phases, engagement objectives and engagement outcomes.

Table 1-1: Phased Engagement Program

Phase	Engagement objectives	Engagement outcomes
Phase 01: Project preparation, Design, scoping, preparation of environmental and social safeguards instruments (ESCP, SEF and LMP) and their disclosure.	<ul style="list-style-type: none"> a. Raise public awareness and understanding of the project and early engagement. b. Raise public awareness of the project and approval process. c. Inform community members of how they can be involved. d. Gather inputs for project design process and obtain feedback from stakeholders and the community. e. Raise public awareness and understanding about the project benefits and outcomes. f. Participation in the project impact assessments and mitigation measures. g. To obtain relevant approvals. 	<ul style="list-style-type: none"> a. Community and stakeholders understand and appreciate the project benefits and impacts. b. Framework for participation established. the project and are motivated to be involved. c. Project design improved for better outcomes. b. Stakeholder input and understanding of the project impacts and mitigation measures. c. Approvals obtained.
Phase 2: Construction and mobilization activities	<ul style="list-style-type: none"> a. Support project, procurements and any acquisitions as may be applicable. b. Support landowners and tenants through the land acquisition process (where land take is required). c. Establish clear processes for notifying stakeholders and the community about potential 	<p>Multiple communications channels and opportunities provided for stakeholders and the community to ask questions about the project and raise issues.</p> <p>Community and stakeholders are aware of the project benefits, timing and impacts.</p>

Phase	Engagement objectives	Engagement outcomes
	<p>impacts from works, including a transparent complaints management process.</p> <p>d. Engage with and provide advance notice to local businesses, farmers and communities about the project activities or works.</p> <p>e. Support the detailed design work undertaken including providing opportunities for stakeholder and community input and feedback.</p>	
Phase 3: Operation and maintenance	<p>a. Support the transition from project activities delivery to operation and maintenance.</p> <p>b. Engage with and provide advance notice, including direct contact where required, to local businesses, farmers, residents, users about operation of the new infrastructure.</p>	<p>Community and stakeholders are aware of the project's completion and understand how the new infrastructure will operate. and</p> <p>Community and stakeholders have the opportunity to take part in celebrating project achievements.</p>

2.4 STAKEHOLDERS IDENTIFICATION AND ANALYSIS

Stakeholder identification

Project stakeholders are defined as individuals, groups or other entities who:

- (i) Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'). and
- (ii) May have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Engagement and negotiation with the stakeholders throughout the Project development often requires the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e., the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project, e.g., elders or opinion leaders in the community.

Structured engagement of community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a

primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e., the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders.

Stakeholders Analysis

Analysis involves mapping stakeholder using the following three key determinants:

- a. The stakeholder’s projected level of interest in the Project;
- b. The Project’s potential impact on the stakeholder; and
- c. The stakeholder’s degree of influence/power on or value to the Project.

By plotting influence together with impact/interest on a matrix and taking due account of further criteria such as expertise (i.e., knowledge to contribute and legitimacy) and the stakeholders’ willingness to engage, the relative needs of key stakeholders in terms of the level and type of consultation and engagement are determined and can therefore be properly planned.

Table 1-2: Table: Definitions for Stakeholder Analysis and Mapping

Significance	Impact/Interest axis	Influence/Power axis
High	<ul style="list-style-type: none"> ❖ The stakeholder will experience a high degree of impact as a result of the Project (e.g. resettlement, complete loss of livelihood, loss of pasture/water, etc.); or ❖ The project is directly related to stakeholder’s institutional field of interest and/or responsibilities. 	The stakeholder has decision-making powers regarding whether the project will go ahead or not and/or about the adequacy of the ESIA process and/or ULERAN mitigation strategies.
Medium	<ul style="list-style-type: none"> ❖ The stakeholder will experience some degree of impact but impacts can be managed and/or mitigated, or ❖ The project or aspect thereof has some relevance to the stakeholder’s institutional field of interest and/or responsibilities 	The stakeholder can influence the scope and timing of the ESIA and/or ULEARN’s mitigation strategies.
Low	<ul style="list-style-type: none"> ❖ The stakeholder will experience very few effects as a result of the project; or ❖ The project has limited relevance to the stakeholder’s institutional field of interest and/or responsibilities 	The stakeholder has very little control over the project.

2.4.1 KEY STAKEHOLDERS IN THE ULEARN PROGRAM

Stakeholders planned to be consulted will involve, but not limited to the following:

Government Ministries/Agencies/Local Governments

- a. Ministry of Finance, Planning & Economic Development (MoFPED)

- b. Office of the Prime Minister, Department of Refugees
- c. Ministry of Education and Sports (MoES)
- d. Ministry of Gender, Labour & Social Development (MoGLSD)
- e. Ministry of Health (MoH)
- f. Ministry of Local Government (MoLG)
- g. Ministry of Lands, Housing & Urban Development (MoLHUD)
- h. National Environment Management Authority (NEMA)
- i. National Curriculum Development Centre (NCDC)
- j. National Building Review Board (NBRB)
- k. Tertiary Institutions (universities and vocational institutions)
- l. The World Bank
- m. Local Council Leaders of the respective villages
- n. Local community members living near/neighbouring the institutions-
- o. Schools (Learners, school administrators and managers etc)
- p. Primary and secondary Teacher's Colleges
- q. The media.

2.5 STAKEHOLDER ENGAGEMENT STRATEGY/METHODOLOGY

The project makes use of various methods of engagement to facilitate continuous interaction with the stakeholders. For effective and meaningful engagement, specific techniques need to be applied to the identified stakeholder groups. Every consultation activity meets general requirements on accessibility, namely; (i) easily reachable venues to avoid long commutes, entrance fees or preliminary access authorization, (ii) cultural appropriateness (i.e., with due respect to the local customs and norms), and inclusiveness, engaging all segments of the local society, including disabled persons, the elderly, minorities, and other vulnerable individuals. (iii) If necessary, logistical assistance can be provided

2.6 CATEGORIES OF STAKEHOLDERS

Stakeholders are largely placed under two main categories, i.e., those who will be or are likely to be directly or indirectly affected, positively or negatively, by a project (commonly referred to as project-affected persons/,households or communities) and those who might have an interest in or may influence the project. For the purposes of effective and tailored engagement in the planned project, its stakeholders can be divided into the following core categories:

- ❖ **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- ❖ **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- ❖ **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable

status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, colour, gender, gender orientation, sexual identity, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups is done to ensure a full understanding of project activities and benefits.

Within the Project, the vulnerable or disadvantaged groups may include, Marginalized Groups and Vulnerable groups that include the elderly, refugee and displaced persons' communities, disabled people, HIV/AIDS infected and affected individuals and households, women, and orphans and vulnerable children (girl child, street children, children from extremely poor households, HIV/AIDS infected and affected children, children with disabilities, children living with elderly or disabled parents, and children in paid employment). These people have historically suffered, and continue to suffer, disempowerment and discrimination on economic, social and cultural grounds. Their livelihood is threatened mainly by the dwindling access they have to land and natural resources on which they depended on.

2.6.1 ENGAGEMENT PRINCIPLES

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement, while tailoring the engagement to comply with government parameters for observing diseases control measures (Standard Operating Procedures-SOPs) as well as Good International Industry Practice/Standards (GIIP) for stakeholder engagement which include:

- a. **Openness and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- b. **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format using various approaches e.g. by way of face-to-face meetings (guided by the set SOPs) or by using other available channels of communication to reach out to all key stakeholders without face-to-face interaction including virtual meetings, audio-visual materials, social media, electronic publications and press releases, among other. Opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns.
- c. **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders, ensuring consideration

of cultural sensitivities, accessibility for persons with disabilities, and literacy levels. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups as identified under ESS1 in particular women, youth, persons with disabilities, the elderly, illiterate persons, refugees and the cultural sensitivities of diverse ethnic groups including Vulnerable and marginalized groups under ESS7.

- d. **Flexibility:** if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet, telephone, postal or other means of communication. Stakeholder engagement will be carried out in compliance with the national (MoH) SOPs and the World Bank Technical Note on Public Consultations and Stakeholder Engagement.

Stakeholder engagement planning-involving planning consultations with key stakeholders. Methods that will be used to get information from stakeholders, where appropriate, will include but not limited to:

- ❖ Interviews;
- ❖ questionnaire;
- ❖ meetings and focus groups;
- ❖ photography; and
- ❖ Public hearings.

2.7 DISADVANTAGED/VULNERABLE INDIVIDUALS OR GROUPS

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project.

The following can help outline an approach to understand the viewpoints of these groups:

- a. Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process;
- b. What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, disability, lack of understanding of a consultation process);
- c. How do they normally get information about the community, projects, and activities?
- d. Do they have limitations about time of day or location for public consultation?
- e. What additional support or resources might be needed to enable these people to participate in the consultation process? (examples are providing translation into a minority language, sign language, large print or braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns).

If there are no organizations active in the project area that work with vulnerable groups, such as persons with disability, contact medical providers, who may be more aware of marginalized groups

and how best to communicate with them. What recent engagement has the project had with vulnerable stakeholders and their representatives?



2.8 STAKEHOLDER ANALYSIS

The key stakeholders identified as a result of the analysis are listed below in the following Table 3-3. Other details from the consultations are in **Appendix 01**.

Table 1-3: Stakeholder Analysis for key stakeholders in the ULEARN

Nº.	Stakeholder	Possible role in the project	Expectations/concerns/interests
Government Agencies/Ministries			
01.	Ministry of Finance, Planning & Economic Development-MoFPED	Release of funds/Budget Monitoring and Implementation	Interested in the success of the projects/including prudent financial management/absorption of funds
02.	Department of Refugees, Office of the Prime Minister-OPM.	Advising government and other stakeholders on refugee matters in the project.	
03.	Ministry of Education and Sports-MoES	Approval and follow-up on implementation of the project activities. Monitoring and supervision through various departments user departments	<ul style="list-style-type: none"> ❖ Overall supervision and implementation of the project activities through PCU; and ❖ Consultation with key Departments recommended
04.	Ministry of Local Government-MoLG	Participation in Public Consultations. Monitoring, Supervision and approval of plans.	<ul style="list-style-type: none"> ❖ Consultations recommended. ❖ Interested in education, economic and social development in the areas
05.	Ministry of Lands, Housing & Urban Development-MoLHUD	Land allocation, physical planning aspects of the project	<ul style="list-style-type: none"> ❖ Consultations recommended. ❖ Approval of all land related issues/including RAPs, if done.
07.	Ministry of Gender, Labor & Social Development- MoGLSD	Technical guidance on approval and implementation of the Health and Safety Plans/Compliance with Occupational safety and health aspects of the project.	<ul style="list-style-type: none"> ❖ Consultations recommended. ❖ Can be interested in social aspects of the project.
08.	Ministry of Health-MoH	Responsible for reporting and control of diseases outbreaks.	<ul style="list-style-type: none"> ❖ Mainstreaming guidelines and SOPs for prevention of disease spread.

Nº.	Stakeholder	Possible role in the project	Expectations/concerns/interests
09.	Ministry of Works and Transport-MoWT	Monitoring to ensure construction of project infrastructure and all its support facilities are in accordance with standards and specifications for such facilities.	❖ That, MoES should hire engineers who are registered with Engineers Registration Board (ERB)
Local Governments and Communities			
01.	Community members nearest to the schools (using school land for livelihood activities, e.g., cultivation, brick laying etc.) where this land may be used for civil works	Affected community/interested in employment/business	<ul style="list-style-type: none"> ❖ Consultations recommended. ❖ Employment opportunities/market for goods/HIV/AIDS/Gender/Child labour, etc.
02.	Local Council Leaders, religious leaders, Foundation bodies of the respective villages/Opinion Leaders	Knowledge of affected community/leaders/decision making regarding social and environmental impacts at the village level/college level	<ul style="list-style-type: none"> ❖ Consultations recommended. ❖ Employment opportunities/market for goods/HIV/AIDS/Gender/Child labour, et.
03.	Local Governments in the respective districts where the project is to be implemented	Knowledge of affected community /beneficiary LGS/interested in the success of the project/ decision making regarding social and environmental impacts at the District level/approval of plans/supervision and monitoring	<ul style="list-style-type: none"> ❖ Consultations recommended ❖ Interested in the success of the projects.
04.	Students	Beneficiaries of the project	❖ Creation of safe school environment core stakeholders and need to be sensitized on their roles and responsibilities
05	Parents	Affected by the construction and also play a critical role in the land acquisition process They will also promote enrollment of learners into the new and old schools	❖ Consultations on land acquisition and sensitizations or dialogues on school enrollment

Nº.	Stakeholder	Possible role in the project	Expectations/concerns/interests
Statutory Agencies			
01.	National Environment Management Authority (NEMA)	Carries out environmental expert review and subsequent approval of environmental and social aspects/oversight role of environmental compliance.	<ul style="list-style-type: none"> ❖ Oversees compliance with national environmental requirements. ❖ Consultations will be recommended.
02.	National Curriculum Development Centre-NCDC	Responsible for design of responsive curricula in line with the needs and aspirations of MoES	<ul style="list-style-type: none"> ❖ Ensuring project delivery is in line the curriculum objectives.
03.	National Building Review Board-NBRB	Compliance of structures integrity with Buildings Standards.	<ul style="list-style-type: none"> ❖ Routine inspection of the facilities.
04.	National Union of Disabled Persons of Uganda-NUDIPU	Advocates for the inclusion of persons with disabilities' and their concerns in the mainstream development.	<ul style="list-style-type: none"> ❖ Interest is on the opportunities accorded to disabled learners in the program to access education.
Institutions			
	Universities and tertiary institutions	Fostering growth, reducing poverty and boosting shared and accessible prosperity.	Education programs that are accessible under suitable facilities for delivery of such programs.
01.	Primary schools	<ul style="list-style-type: none"> ❖ Construction/ rehabilitation centres/ CDD Committe ❖ Protect the learners, GRM/GRC ❖ Beneficiaries of the project ❖ Learning centers ❖ Key monitoring structure 	<ul style="list-style-type: none"> ❖ Oversees compliance with national environmental requirements. ❖ Sensitization processes –continuous throughout the project life ❖ Enforcement of the GRM and Code of Conduct
02.	Traditional Secondary Schools	<ul style="list-style-type: none"> ❖ Construction/ rehabilitation centres ❖ Protect the learners ❖ Beneficiaries of the project ❖ Learning centers 	<ul style="list-style-type: none"> ❖ Oversees compliance with national environmental requirements. ❖ Sensitization processes –continuous throughout the project life

Nº.	Stakeholder	Possible role in the project	Expectations/concerns/interests
			❖ Enforcement of the GRM and Code of Conduct
03.	Teacher Training colleges -PTCs	Training centers	❖ Sensitization processes –continuous throughout the project life
04.	Media	<ul style="list-style-type: none"> ❖ Popularization of project goals ❖ Sensitization platform 	Sensitization processes –continuous throughout the project life
Development Partners			
01.	World Bank	❖ Provides financing as well as plays supervisory role.	Compliance of the project execution in keeping with Aid Agreement conditions.
02.		❖	
03.	UNICEF	<ul style="list-style-type: none"> ❖ Support the delivery of the outcomes as well as mobilizing partners ❖ Head of the LEG 	Access of the education service to the targeted refugee groups.

2.9 STAKEHOLDER ENGAGEMENT PROGRAM

The stakeholder engagement program will cover the following: timely provision of relevant project information to stakeholders, specifically to the affected people; two-way stakeholder consultation activities; and grievance redress mechanism for effective feed-back and problem solving.

Table 1-4: Project Cycle Stakeholder Consultation

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Project Inception	<ul style="list-style-type: none"> ❖ Introduction of the project and intended benefits, impacts of the project, Scope of the project/infrastructure requirements, project beneficiaries. ❖ Preparation of ESSA, ESCP, LMP and SEP. ❖ General information of the project as stipulated in the PAD; fiduciary considerations; schedules of planned activities, associated risks and mitigation measures. ❖ Safeguard issues- grievance redress management (GRM) tools for filing complaints and providing feedback. 	<p>Emails, official letters, face to face meetings, phone calls, SMS, Social media and virtual meetings with relevant organizations.</p>	<ul style="list-style-type: none"> ❖ MoES ❖ LGS (Districts and S/County Local Govts') ❖ Vulnerable learners Head teachers and school administration ❖ Government officials; media, private sector; civil society groups and NGOs. 	<p>World Bank</p>
Project Implementation	<ul style="list-style-type: none"> ❖ Project progress-performance of financial, safeguards including health and safety. ❖ Project progress-hosting community and refugee education support, improving teachers support and policy development nationally, and project management, monitoring and evaluation. ❖ Communication campaign: Press releases in the local media (both print and electronic), written information will be disclosed including brochures, 	<ul style="list-style-type: none"> ❖ Face to face, virtual meetings, Information leaflets, posters and brochures; audio-visual materials, social media, direct communication channels such as mobile/ telephone calls, SMS, etc.; Public notices; Electronic publications and press releases on the MoES websites; Press releases in 	<p>General population, including Vulnerable and marginalized households Government Ministries/agencies, media, private sector etc.</p>	<ul style="list-style-type: none"> ❖ World Bank ❖ MoES (Gender Unit)

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<p>flyers, posters, etc., MoES website, to be updated regularly.</p> <ul style="list-style-type: none"> ❖ Information about Project development updates, health and safety, employment environmental and social aspects, ❖ Project-related materials. 	<p>the local media (both print and electronic)</p> <ul style="list-style-type: none"> ❖ Official letters, emails, phone calls and individual meetings (if needed). ❖ All stakeholders ❖ More consultation meetings (if and when permitted in line with government social distancing requirements). 		
Supervision & Monitoring	Project's outcomes, overall progress, major achievements and challenges	Press releases in the local media; Consultation meetings (virtual), face to face meetings; and round table discussions	Government officials; Civil society groups and NGOs;	<ul style="list-style-type: none"> ❖ World Bank ❖ MoES ❖ local governments

2.10 STAKEHOLDER CONSULTATIONS CONDUCTED

The project conducted stakeholder consultation with relevant District Local Governments (DLGs) in the sampled Districts and to engage relevant technical officers at Local Governments including Chief Administrative Officers (CAOs), District Education Officers (DEOs), District Inspector of Schools (DISs), Environmental Officers (EOs), Physical Planners, Engineers, and Community Development Officers (CDOs); among other stakeholders. The Bank team conducted stakeholder consultations from November 23rd 2022, to January, 27th, 2023.

The stakeholder engagements were carried out in the in the following sampled DLGs: Amudat, Kween, Bukwo, Moyo, Kabaramaido, Abim, Busia, Nebbi, Packwach, Zombo, Koboko, Yumbe, Bulliisa, Ntoroko and Kisoro. Additionally, consultations were also conducted with various Ministries, Departments and Agencies (MDAs): Ministry of Finance, Planning and economic development (MoFPED), MoGLSD, MoES, Ministry of Lands, Housing and Urban Development (MoLHUD), Ministry of Local Government, Ministry of Health, NEMA, National Union for Disabled Persons in Uganda (NUDIPU), National Curriculum Development Centre (NCDC). See details of engagement in Appendix 01 on summaries of stakeholder consultative meetings held

2.11 INFORMATION DISCLOSURE

Stakeholders will be provided access to reliable and complete Program information through the following documents written in English:

- a. Project Appraisal Document (PAD);
- b. Environmental and Social Systems Assessment (ESSA);
- c. Environmental and Social Commitment Plan (ESCP);
- d. Environmental and Social Management Plans (ESMPs);
- e. Land use rescreening and reassessment (**Appendix 02**);
- f. Safeguards Supervision and Monitoring Plan;
- g. Stakeholder Engagement Plan (SEP);
- h. More information about the project will be in form of brochures/fliers and posters.

The above documents following disclosure will be available to the public as follows:

- On the Ministry of Education and Sports Website (www.education.go.ug);
- At the Ministry of Education and Sports-BTVET-Legacy Towers/ Wing B
- At the Colleges-Principals Offices and Libraries;
- At the National Environment Management Authority (NEMA Library)

- At the Offices of the relevant Governments/Agency/Ministry/Local Government.
- Through the Media-Newspapers-summary of the ESMPS.

Table 1-5: Strategy for information disclosure

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Project Inception	<ul style="list-style-type: none"> • World Bank • MoES and MDAs; • Local Governments; • Community and Faith Based Organisations • National & International NGOs; 	<p>PAD</p> <ul style="list-style-type: none"> ❖ Social Assessment ❖ Non-technical summary documents and reports and field work reports. 	<p>Meetings, Ministry Web site, World Bank info shop, Press releases in the local media; Virtual meetings</p>
Project Implementation	<ul style="list-style-type: none"> ▪ Project affected person; and ▪ Other interested Parties 	<ul style="list-style-type: none"> ❖ ESMPS ❖ Grievance Redress Procedures-GRMs/GRCs; ❖ Permits/Certificates of Approval. ❖ Various awareness messages on benefits of Education and the Project, ❖ Awareness on social distancing strategy; ❖ Availability of resources to report cases of Gender Based Violence (GBV)/Violence Against Children (VAC), and to access psychosocial support services. ❖ Availability of psycho social support for teachers and school administration ❖ Relevant E&S documents; and ❖ Update on project implementation and progress. 	<p>Information leaflets, posters and brochures; audio-visual materials, social media and other direct communication channels such as mobile/ telephone calls, SMS, etc.; Public notices; Electronic publications and press releases on the MoES websites; Press releases in the local media (both print and electronic); Consultation with vulnerable and marginalized groups using mobile/ telephone calls, SMS, etc. in a culturally appropriate manner; training and meetings; help desk mechanism; virtual meetings; virtual roundtable discussions, Virtual/Face to Face Implementation Missions.</p>

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Project Close Out	MoES and ministries, departments and agencies (MDAs); Project affected persons; and Other interested Parties	<ul style="list-style-type: none"> ❖ Project exit strategy/closure plan; ❖ Dissemination of final project completion reports. ❖ Decommissioning plans and schedules 	Consultation meetings, information leaflets, posters and brochures; audio-visual materials, social media; Electronic publications and press releases on the MoES websites; Press releases in local media (both print and electronic); media; roundtable discussions, and Virtual/Face to Face Closure Missions/Meetings.

3 GRIEVANCE REDRESS MECHANISM

A well-designed and implemented grievance/complaints handling mechanism significantly enhances operational efficiency in a variety of ways, including generating public awareness about the project and its objectives; deterring fraud and corruption; mitigating risks; providing project staff with practical suggestions/feedback that allow them to be more accountable, transparent, and responsive to beneficiaries; assessing the effectiveness of internal organizational processes; and increasing stakeholder involvement in the project.

3.1 GUIDING PRINCIPLES FOR EFFECTIVE GRIEVANCE REDRESS MECHANISM

Effective and timely response to community complaints is essential for maintaining good community relations. ULEARN is committed to having an effective complaint handling system that reflects the needs, expectations and rights of complainants.

The guiding principles for managing complaints are:

- a. **Fairness:** The grievance redress system will treat complainants with respect and courtesy. The rules of natural justice apply and, where appropriate, all parties involved in the complaint will be given the opportunity to respond to any issues raised.
- b. **Transparency and accessibility:** The complaints handling system will be well known to stakeholders, staff and contractors. It includes information about the right to complain, how to do it, where to do it and how the complaint will be handled. Details on the complaints handling process will be available to all. There is no charge to the complainant for accessing the complaints handling system. The complaints handling system and supporting information aims to be easy to understand, use, and be in plain language. Interpreter services should be provided.
- c. **Responsiveness:** Complaints will be dealt with quickly, courteously, fairly and within established timelines. Complainants will be advised of how long it will take to deal with the complaint in accordance with complaint handling timelines and kept informed of the progress. If additional time is required to resolve the issues the complainant will be kept informed and advised of the additional time required and the reasons for the delay. If the complaint is still not resolved to the complainant's satisfaction, will explain our decision clearly, and offer any possible alternative actions or review opportunities.
- d. **Privacy and confidentiality:** The complaint handling process will ensure complainant confidentiality and ensure confidentiality in the case of complaints against staff. Details of complaints should only be known by those directly concerned.
- e. **Accountability:** The complaint handling system is open to scrutiny by members of the public and other oversight bodies, e.g., the Inspectorate of Government-IGG (Ombudsman). An appropriate reporting mechanism on the operation of the complaints process will be maintained. ULEARN shall maintain a complaint register and regularly audit the complaints handling system with appropriate action plans formulated to address any deficiencies.

Avoidance of discrimination and exclusion: In addition to the Project GRM described above, the Project EISM GRM is an alternative to lodging complaints through a PIU-led Project-level GRM, with special provision for cases of discrimination and exclusion of vulnerable or marginalized individuals or groups. The EISM GRM is described in detail in Appendix 08.

3.2 OBJECTIVES OF THE GRIEVANCE REDRESS MECHANISM

The main objective of a GRM is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. Ideally, the GRM:

- a. Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- b. Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- c. Avoids the need to resort to judicial proceedings, which may be costly and time consuming.

Any grievances arising during implementation of the **Uganda Learning Acceleration Program (ULEARN)** project in/at the school will be redressed through a systematic and documentable GRM. The grievance redress mechanism will provide avenues for affected persons to lodge complaints or grievances against the project or contractors (**A sample is in Appendix 3**). The Principals of the Colleges and members of the Management Board will be involved to address grievances raised by any person or organization. The proposed GRM will follow the same mechanism, but address issues at two levels, that is:

3.3 GRM PROCEDURE

Under this project, the GRM procedure can be summarized as below. The grievance procedure at project level will be simple and administered to the extent possible at the local levels to facilitate access, flexibility and ensure transparency.

The procedure will have six major stages. These stages include:

Step 1: Submission of grievances

Multiple channels will be availed to the public for channeling complaints on the project, including:

- a. Toll-free telephone hotline;
- b. E-mail; a dedicated email address will be shared for public use; and
- c. Letters to grievance focal points at schools;
- d. Complaint form to be lodged via any of the above channels;
- e. Walk-ins may register a complaint on a grievance logbook at schools or complaint box at schools; and
- f. Verbal communications-talking to the affected parties directly, that may involve negotiations, mediation and arbitration.

The project GRMs will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH), Child Abuse and Rape cases that may, among others, include use of Child protection Committees that are already established for children outside of school, and Referrals and appeals, depending on the rating of the grievances. The other institutions expected to be part of this referral pathway include Local Leaders (LCI, LC11 & LCIII), Police, Health Centers/facilities, Courts, Community Development/Labor Officers, Religious Leaders and Civil Society Organizations (CSOs).

Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance/grievance by completing a written grievance **Registration Form (Grievance Reporting Form-Annex II)** that will be available at the Project Site/GMC level offices including the LC1,

School and district Education offices as well as at the Ministry/PCU. Complaints may also be submitted orally and the details of the complaint entered in the GM log. When complainants make their submissions verbally, they should take consideration of social distancing norms and lockdown restrictions as much as possible.

The complainant will attach all copies of documents that support their complaints. Staff at MoES/PCU and GCs will ensure that the form is filled accurately. The complainant will receive a receipt or a confirmation email of acknowledgment with a reference number to track their complaint(s).

Stage 2: Assessment, Analysis and Response

When a complaint is received, a maximum of 5 days has been provided for a receiving GRC to resolve the complaint or respond to the Project Affected Persons (PAP). This is so to make sure that grievances/complaints are resolved quickly as early as possible. Once complaints are received, the GRCs shall assess whether the complaint or grievance is related to this Project activity implementation or not. In a situation where the complaints are not related to the project, PAPs shall be advised to channel their complaints to the right institutions. For Project specific complaints or grievances, GRCs shall hear such cases and make necessary follow ups to gather evidence and make necessary determination. The outcome of the analysis shall be communicated to the PAP and shall be recorded on a **grievance resolution agreement minute (GRAM-Annex III)**. Grievance feedback shall be communicated with complainants, among others, by telephone, fax, email, or in writing and authorized meetings where necessary.

Stage 3: Resolution and Closure

Where a resolution has been arrived at and the PAP accepts the resolution, the PAP shall be required to sign the resolution and closure section as attached in a **grievance resolution implementation minuted (Annex IV)**. Two members of the specific GRC (Chairperson and Secretary) shall also be required to counter sign. This shall signify that the complaint or grievance, which was presented, has been fully discussed, resolved and closed.

Stage 4: GRM Registry

All received complaints will be recorded in the **complaints logbook (Annex-V)** or grievance excel-sheet/grievance database. A register shall be kept at all GRCs at all levels to ensure proper record of all complaints and their resolutions. For any case heard, closed or referred to an upper level GRC, a copy of logs and resolution forms for every case shall be submitted as well. This shall enable the GRCs to keep a register, of all cases recoded and handled by them. Using this information, the GRM will be able to generate a matrix of cases and agreed resolutions and be able to follow up if the resolutions are being implemented.

Step 5: Appeals process

The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolutions of the complaints at different levels of the GRMS. Where the PAP is not satisfied with the outcome of his/her complaint, the GRC shall make provision for him/her to appeal to an upper level GRC for further re-address up to the legal recourse. Some cases such as defilement rape and theft, which are criminal in nature and need evidence in Courts of Law may go through referral pathway including the police to avoid destruction of evidence required legally. The project personnel will be required to provide additional information or evidence as witnesses in a court of law in case of need. Figure4-1 below provides a summary of the processes and institutional arrangement for the Grievance Redress Mechanism.

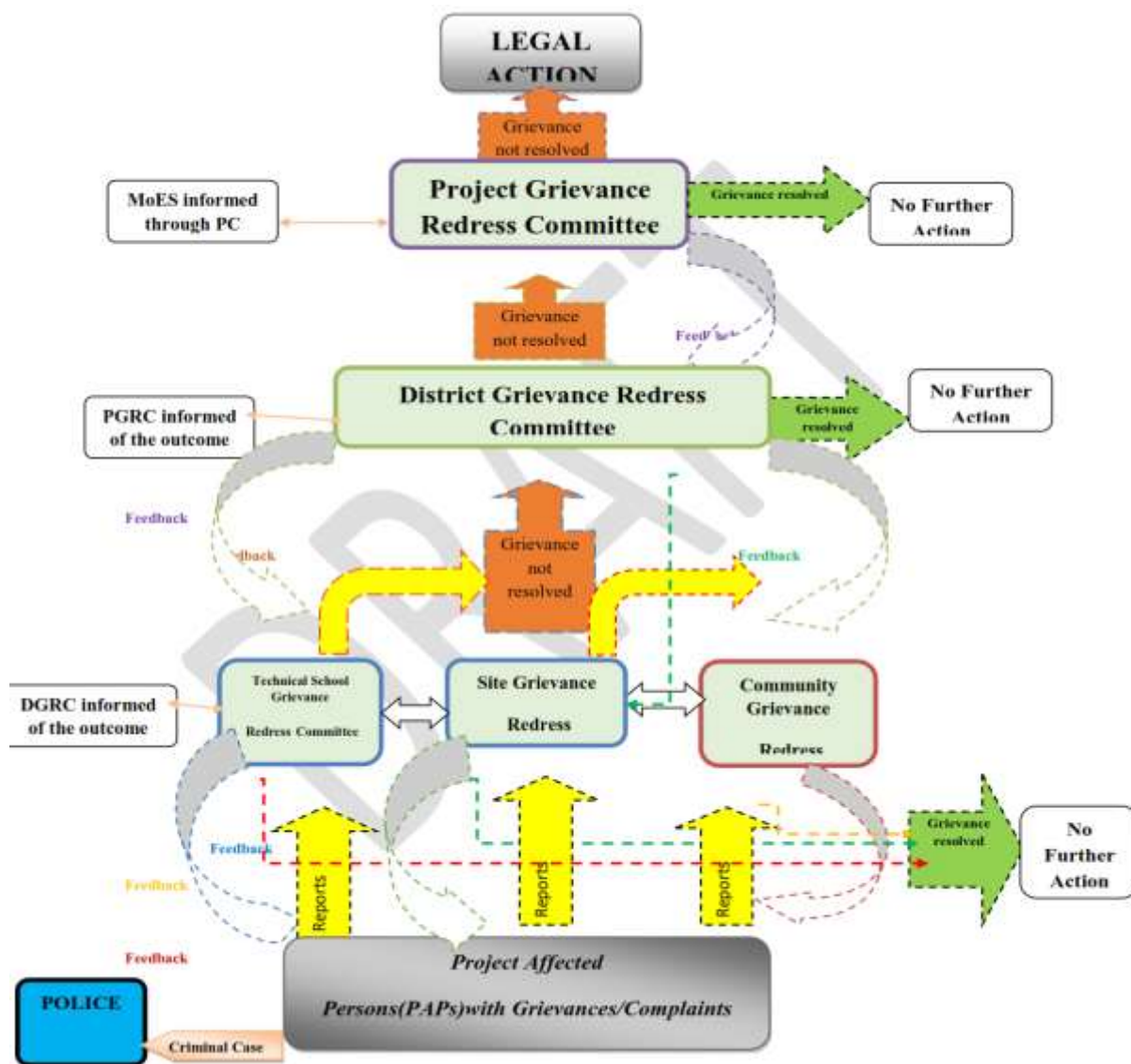


Figure 3-1: A summary of the processes and institutional arrangement for the GRM

3.3.1 LABOUR RELATED GRM

In order to create a working environment that provides safety and security to all workers, a separate GRM, will be established for project workers to lodge their complaints relating to their working environment or conditions. For direct workers, the mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides feedback to those concerned, without any retribution.

The appropriate level of management will be the workers GRM comprised of the Site Engineer/Supervisor, Contractors Sociologist, the Health and Safety Officer and two elected/nominated workers' representatives (male and female). These will work closely/and or report to the Project sociologist for guidance and involve the LCI Chairperson as part of the team. The contracted workers and suppliers will inform their teams of the grievance mechanism at the time of hiring and make it easily accessible to them.

3.4 GRIEVANCE CHANNEL FOR GENDER BASED VIOLENCE

All GRCs will be engaged on how to manage Violence Against Children in Schools (VACiS) and GBV cases and all referral pathways involved (both in health centers and police) to successfully handle VACiS and GBV cases as highlighted in the MoES RTRR guidelines.

The RTRR guidelines specifically address VACiS and the main roles of the guidelines are to:

- a. To create awareness and sensitization on children rights especially the right to a violence free environment;
- b. Identify the key actors and their roles and responsibilities in handling cases of VACiS;
- c. Assign the role of reporting and tracking of VACiS to the Senior Female/Male Teachers and School Management Boards;
- d. Empowering the school disciplinary Committee to deal with case of VACiS perpetrated by Staff; and
- e. Enforce the Professional code of conduct for teaching and non-teaching staff and other school rules and regulations and
- f. Build the capacity of the school to report and track cases of VACiS.

In terms of referral, the institutions (medical centers and police) roles and responsibilities includes: for medical centers: medical examination for bodily harm or other injuries cause, producing medical reports for police investigations and other evidence for the courts of law, and provide medical care for the child survivor or victims of GBV; for the polices this includes: investigating cases, providing evidence to support court proceedings, and providing support for child survivor/and or victims of GBV to access required support services and evidences such as medical reports.

In addition, a GBV Action Plan will be prepared that will identify service providers in the project areas with a minimum package of services (health, psychosocial, legal/security, safe house/shelter, livelihood). The project will adopt the survivor centered approach in all case management processes, which will be shared during stakeholder engagements

In addition, an elaborate Workers' Code of Conduct in which gender-based violence and violence against children are integrated as an offence will be put in place. Workers will be sensitized about the Workers' Code of Conduct, and each will commit to abide by it by signing a copy which should be kept on site by the Project Contractor; and each worker is given a separate copy for their records. In addition, the SEP has incorporated methods that include radio disclosure, display of signage, posters and pamphlets around the project site that signal to workers and the community that the project site is an area where GBV is prohibited.

5.3 World Bank Grievance Redress Mechanism

Communities and individuals who believe that they are adversely affected by a WB-supported project may submit complaints to existing project-level grievance redress mechanism or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address ULEARN related concerns.

Communities and individuals affected by ULEARN may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and WB Management has been given an opportunity to respond.

Information on how to submit complaints to the WB’s corporate GRS is provided in <http://www.worldbank.org/GRS>. Information on how to submit complaints to the WB Inspection Panel is provided in www.inspectionpanel.org.

Further to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing GRS to manage complaints related to any World Bank supported project globally. A protocol has been developed to process all complaints related to exclusion or discrimination against vulnerable or marginalized individuals or groups following the enactment of the AHA 2023, in the Uganda portfolio.

Table 3-1: Proposed Members of the Grievance Redress Mechanism for each tier

GRC Level	Proposed Composition
National Grievance Redress Committee	<ul style="list-style-type: none"> ▪ The Project Coordinator, ▪ Commissioner TVT, ▪ Environmental and Social Specialist, ▪ Gender Unit- Technical advisor ▪ Technical Officer from user department, ▪ Supervising Engineers, and ▪ Planning M&E officers ▪ Engineer (Civil) shall be part of the team.
District Grievance Redress Committee	<ul style="list-style-type: none"> ▪ Chief Administrative Officer (CAO), ▪ District Education Officer (DEO), ▪ District Inspector of Schools (DIS), ▪ District Engineer (DE), ▪ District Community Development Officer (DCDO), ▪ Environment Officer, and ▪ LC1 Chairperson of the village where the School is located.
Grievance Handling at Community level	<ul style="list-style-type: none"> ▪ Secretary for Defence as Chairperson ▪ LC1 or LC II Chairperson ▪ Principal representative ▪ Representative of the student body ▪ Site Manager/Site Engineer for the Contractor ▪ Another member/Elder as specified by the Chairperson
Grievance Handling at Project Site Level	<ul style="list-style-type: none"> ▪ Site Manager/Site Engineer as the Contractors Representative, ▪ Site foreman as the worker’s representative, ▪ Clerk of Works representing Government, ▪ Site Health Safety Officer, ▪ Sociologist/Environment officer, ▪ School focal person/representative where the Constructions are taking place, and ▪ the LC 1 chairperson of the area

The Grievance Management (GM) platforms will be accessible to all stakeholders, including learners, students, workers, parents, instructors, community members, media, and any interested parties. Stakeholders will use the GM platforms to submit complaints related to the overall management and implementation of the project. In addition, the various Grievance Committees (GCs) will be required

to submit monthly reports to the District level GRCs who will then submit monthly reports to national level GRC at the MoES. All the GRCs for the various GRM tiers will receive training in receipt of complaints, logging complaints, IEC materials, grievance resolution, documentation and record keeping, and appeal process.

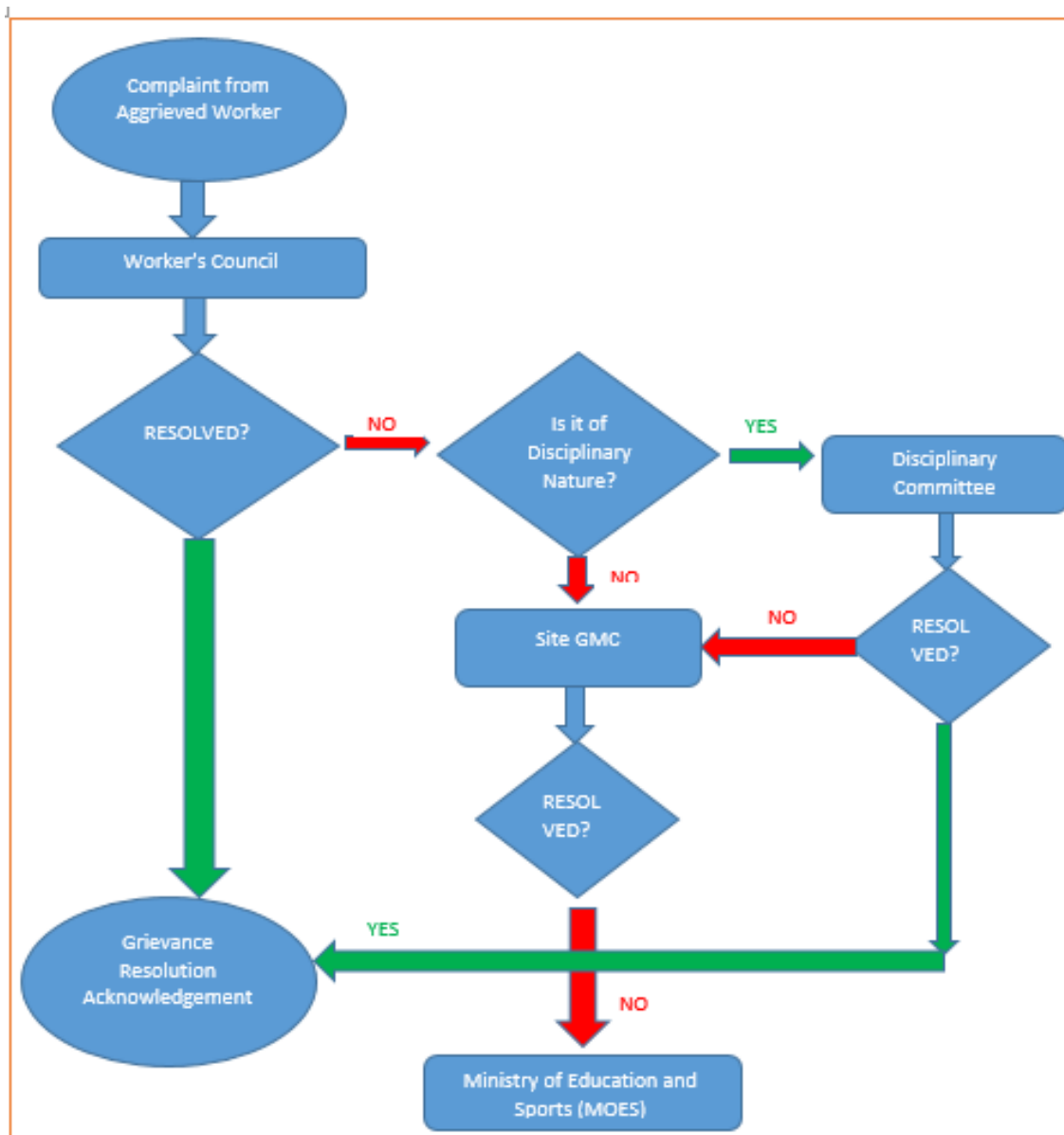


Figure 3-2: Flow Chart for Site/Workers' Grievance Redress Pathway and Referral

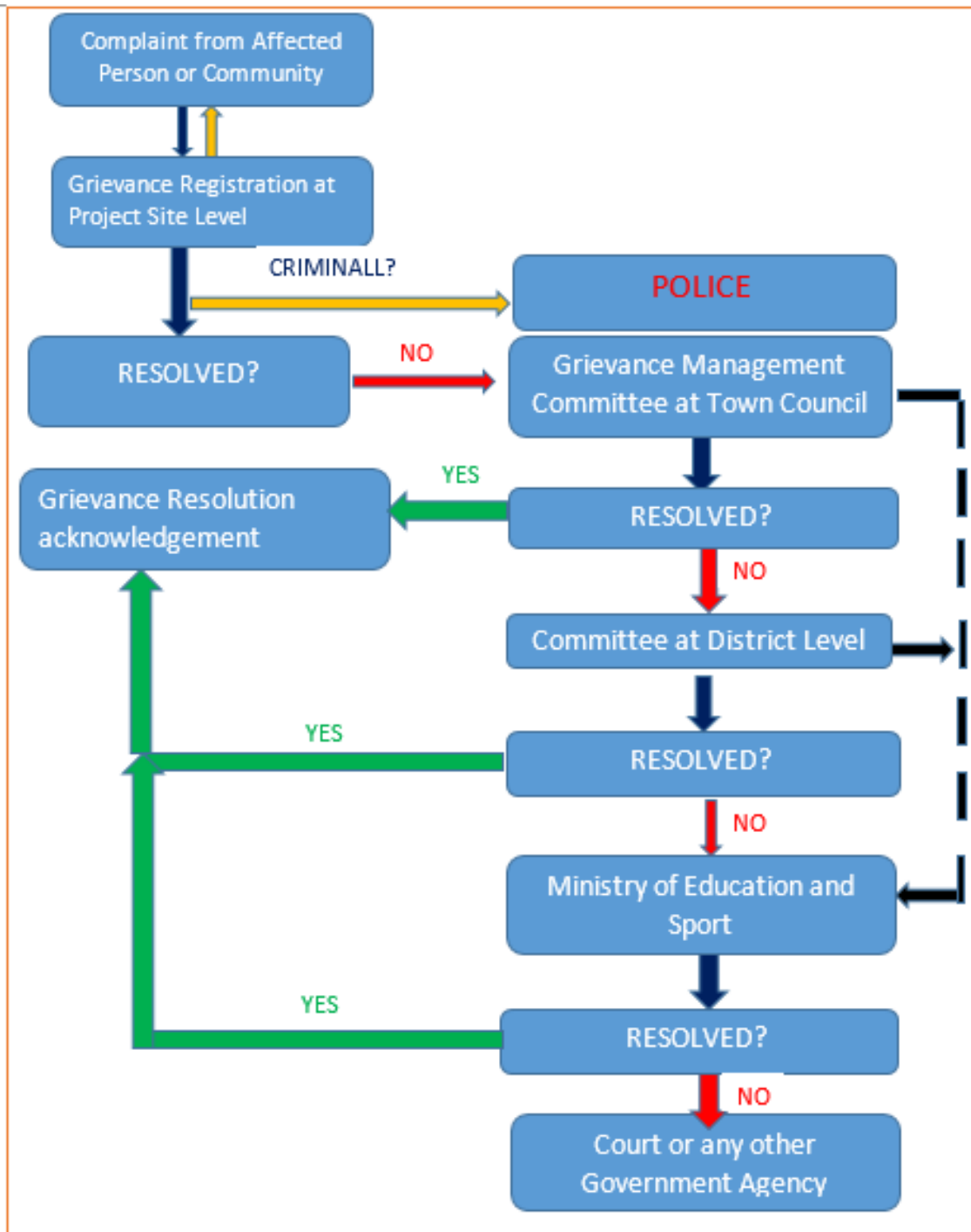


Figure 3-3: Flow Chart for referral process and Community GRM

5.0 MONITORING, REPORTING AND MANAGEMENT OF THE PLAN

The project stakeholders may be involved in the monitoring of the project through any of the following means: formal/informal meetings, inspections/field observations, group discussions on the success of the mitigation measures and how to manage emerging/new issues including the challenges during implementation of the project.

It is important that information is disclosed, and consultations are undertaken with all stakeholders during undertaking of various studies; and the following indicators used to monitor and improve stakeholder engagement during implementation of the projects:

A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:

1. Number consultations/participants consulted and their record;
2. Number of stakeholders' comments and suggestions received by the Colleges/MoES through various feedback channels;
3. Number of stakeholder grievances and claims recorded regarding the projects;
4. Number of publications on Project implementation process in local, regional, and national media;
5. Type/Category of stakeholder comments and suggestions addressed by the Colleges/MoES and what it means;
6. Key categories of grievances received (employment, land use, child labour, gender violence, HIV/AIDS, health and safety, noise, pollution issues, etc.);
7. Number of grievances resolved within the maximum established time; and
8. Number of grievances remaining unsolved. Type of public grievances received; and
9. Number of press materials published/broadcasted in the local, regional, and national media

5.1 TOOLS FOR MONITORING

The following tools will be used to achieve the objectives of monitoring and hence fulfilling the responsibility of reporting to the affected/broader stakeholder groups:

- a. Environmental and Social Assessment Reports/Projects Framework;
- b. Contractor Environmental and Social Management Implementation Plans (CESMPs)—these will guide the contractors in addressing environmental and social issues at the colleges;
- c. Occupational Safety and Health Plans to address safety and health issues that will cover the workers, school children and the public;
- d. Social Risk Management including preparation of Gender, HIV/AIDS strategies & Child protection Plans;
- e. Quarterly monitoring reports will be prepared by the TVET-PCU showing the status of implementation of mitigation measures, challenges and emerging/unforeseen impacts during projects implementation;
- f. The contractor/supervising engineers will prepare monthly reports showing progress in implementation of the project and performance in addressing environmental and social issues; and
- g. Sharing the various approval permits/licences from the relevant government/lead agencies with the affected/broader stakeholders in order to guide safeguards implementation.

5.2 REPORTING BACK TO THE WORLD BANK ON DISCRIMINATION AND EXCLUSION

The EISM provides for establishing monitoring implementation of non-discrimination policies and grievance handling within Project Implementation Units and IFC clients, by requesting monthly reports from the PIUs/PSUs on their progress in those areas. This will involve reporting on actions to implement the mitigation measures and data on grievance handling in each project.

5.3 MANAGEMENT OF THE PLAN

- a. The Stakeholder Engagement Plan will be implemented as part and partial of the broader framework of environmental and social safeguards management for the project that involves consultations, infrastructure condition assessment, environmental and social screening, feasibility studies, environmental and social impacts assessments, construction and operation of infrastructure and supervision and monitoring as well as overall project implementation.
- b. During the initial stages of stakeholder consultations, specifically, environmental and social screening stage. All the information, record and proceedings of stakeholder engagement will be the responsibility of the Environmental and Social Safeguards Specialist (ESSS), working together with the Supervising Engineers and the Technical schools.
- c. The Technical schools are required to have a management structure or Board of Governors to handle stakeholder issues and report upwards as appropriate. In addition, for purposes of interaction of the contractor (s) with community, it is advisable that the contractors recruit a Community Liaison Officer (CLO) to handle stakeholder issues.
- d. The stakeholder engagement plan will be shared will all the stakeholders already outlined in the previous sections, through email and disclosure on the Ministry's/Colleges website once approved. And a stakeholder database comprised of hard and soft files /registers will be kept at the MoES/Schools.

6.0 ESTIMATED STAKEHOLDER ENGAGEMENT BUDGET

Focus Area	Stakeholder Engagement Activities	Total cost (USD)
Communication materials & Hotline	Development of Communication materials (leaflets, posters, press releases)	12,000
	Printing of Communication materials (leaflets, posters,)	15,000
	Dissemination of Communication materials (Stakeholder Engagement,)	18,000
Media Engagements	Broadcast communication Materials and airing of Radios /TVs/spots/jingles and programmes	25,000
	Project press conferences	14,000
Capacity Building	Trainings (Social issues, outreach, GRM and GRC formation, etc.) for MoES, Districts & some selected school officials	70,000
Case management, & Monitoring	GRM, MIS case management process, data base (including running of hotline, record keeping etc.)	15,000
	Conducting Monthly monitoring for implementation of the SEP	30,000
Subtotal		199,000
Contingency		19,000
TOTAL		218,000

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15. The National Environment Management Authority, Guidelines for Environmental Impact Assessment in Uganda, 1998.
16. The Water Act CAP. 152.

APPENDIX 01: SUMMARIES OF STAKEHOLDER CONSULTATIVE MEETINGS

LOCAL GOVERNMENT OFFICIALS MET DURING DECEMBER MISSION

Name	Institution	Designation
Kamusongwe Benan Steven	Moroto Core PTC 0772668349	Principal
Opio Paul	Moroto Core PTC	Deputy Principal Outreach-DPO
Kumakech Charles Oluba	Moroto DLG	Chief Administrative Officer-CAO
Oputa Paul	Moroto DLG	DEO
Aleper Joseph	Moroto DLG	District Inspector of Schools- DIS
Akol Maxom Ojao	Moroto DLG	Inspector
Aligo Hellen	Moroto DLG	Inspector- IS
Lokwii Moses	Moroto Municipality	Municipal Education Officer-MEO
Susan Asekenye	Tororo DLG	Ass CAO
Odoi Richard	Tororo DLG	MIS
Teopista Nyadoi	Tororo DLG	IS
Okello Nowa	Tororo DLG	IS
Akongo Catherine	Tororo DLG	SEO
Owino Joseph	Tororo DLG	EO
Tabu Dennis Francis	Tororo DLG	DIS
Obol Bernard	Tororo DLG	IS
Okware Stephen	Tororo DLG	IS
Muhindo Joshua	Mukuju CPTC 0772496469	Principal
Akech Cecilia Rosleen	MukujuCptc 0772-591529 0752-591529	DPO
Obiyayi Raymond	Arua City	MEO
Batanda Paul	Arua City	Town Clerk
Zipora Athieno Jojina	Arua CPTC-0772455164	Principal
Loka Benard Benson	Arua CPTC	DPO
Okullo Ben Alfred	Arua CPTC	DPP

CHIEF ADMINISTRATIVE OFFICER (CAO)

- a. Which roles does the office of the CAO/ City Clerk play in the new constructions, maintenance of old schools, and provision of school furniture and learning support materials; in education institutions.
- b. The Clerk is the accounting officer so manages the funds. He prefers district funding to MoES because it is easier to supervise construction that way.
- c. For construction of primary schools, MoES sends money and district which plans and procures service providers and monitors them. For secondary schools, they send money to the local govt

but they don't hand over procurement duties; the institutional red tape delays the activities. Service providers do not pay allegiance to local government, so supervision becomes difficult.

- d. What supervision roles do you have on the District Education Officer (DEO) and the District Inspector of school (DIS)
- e. I ensure that money is used for purpose for which it is requested. ensure payment of services, supervision of works
- f. How does the office of the CAO/ Clerk relate with the School Management Committees of primary schools?
- g. I appoint them, induct them and ensure that they are in all schools, they are inducted on roles. I also ensure that their roles are not mixed up with those of the head teachers, the SMC chair approves budgets, sees that regular meetings are held, some support teachers. They need regular training on their roles. The district put in place an ordinance setting S.4 as the minimum for members of SMCs but it is difficult to get such representation.
- h. Head teacher' and teacher' absenteeism, are a common phenomenon in Uganda schools, how does your office monitor this practice? What sanctions does your office apply to those who are culpable?
- i. If someone absents themselves, the policy stipulates the number of days after which sanctions can be made; so, I stop their salary. The rewards and sanctions committee are headed by the DEO/MEO.

Challenges that may make learners stay away from school

- a. No food at home or at school. Infrastructure may not get children
- b. Keep children out of school
- c. Location as a boarder city
- d. Unfriendly school environments e.g. classroom: pupil ratios or latrine: pupil ratios
- e. Dirty latrines
- f. Mid-day meal- parents cannot afford to pay 10,500 for a child per term. Political leadership should mobilize and sensitize.
- g. Many children are struggling in school; Arua needs to accelerate learning- Arua needs to use the bridge curriculum. NCDC should consider bridge curriculum in more districts. Accelerated learning, e.g., TaRL like learning to cater for overgrown children.
- h. Toilet facilities are full, municipality needs water borne toilets. There are 97,000 learners in 70 schools. The pupil stance ratio is 158 girls vs the standard of 40 and 128 boys per stance.

Challenges - Clerk

- a. Large catchment area for town clerk
- b. Political leaders are of very low capacity; this makes support and allocation of resources difficult
- c. Inadequate infrastructure
- d. Dilapidated infrastructure
- e. 9 parishes/ wards do not have schools
- f. Some schools, e.g. Ediofe is heavily enrolled with 1900 learners
- g. Some schools, e.g., Mvara still have asbestos

Municipal education Officer

- a. Relationship with college
- b. The relationship between the college and the district is very good. Salaries and capitation grant for the college are through district. The college hosts district meetings. CCTs work as associate assessors for district and district uses tutors as trainers.

- c. Would you consider identifying mentor teachers who can support colleagues? What would you consider as incentives for these teachers? Mentor teachers would be good, but they need incentivizing.
- d. What relationship do you have with DES? How do you work with them?
- e. DES is supportive but has not started TELA system. Inspectors have been trained and have tablets. MoES Do your inspection tools capture EGR? **No**

What are the needs of the schools?

Schools need buildings 70 government aided; 10 wards do not have primary schools, so some pupils travel 5 km. A typical primary school classroom has 100-150 in one room; the worst-case scenario is Aroyi and Ombachi which have 400 pupils in a class. They have to remove furniture to accommodate pupils.

More teachers: The city has early grade reading books and trained teachers but the teacher: pupil ratio very high

Role of SESIL

SESIL runs learning centers in the community. It uses volunteer teachers who meet learners twice a week. They are given UGX 10,000 for each day of work. During Covid lockdown, the centers catered for all children but now it is for remediation and the meetings are held on weekends. There isn't a close working relationship between SESIL and district.

What do you need to make your support to teachers meaningful? ICT skills for reporting

What major challenges does your office face, in the management of education services in your District

- a. Dept has 8 inspectors- transport is a challenge
- b. Inspectors have low capacity
- c. Poor ICT skills
- d. Before Covid training in schools was termly but now we train specific groups
- e. Teachers in private schools cannot be monitored

Participants for the meeting were the Principal and the Deputy Principal in charge of outreach activities (DPO).

Districts of operation

Kotido, Moroto, Nakapiripirit, Nabilatuk, Napak, Kaabong, Karenga are EGR implementing districts. Non EGR districts are Amudat and Abim.

On lesson delivery

The principal reported that tutors prepare schemes of work, lesson plans and teaching materials. He reported that teaching is interactive, and students participate through small group discussions. They are given small group tasks and then they make presentations. Demonstration lessons are done in Term 3 of Year 1.

In a typical lesson a tutor assigns tasks to groups and moves around guiding students.

What is the quality assurance (QA) tools or mechanism in place?

The DPO presented a checklist which he uses to assess CCT performance. Principal reported that he receives performance reports from heads of department. It was not clear how the reports are generated.

On the diploma program

- a. How much information do you have regarding the shift from a certificate to a diploma awarding institution?
- b. The college does not have information yet about the transition. However, college has lobbied for seating facilities, and they have 100 new chairs and lockers. They also have a new girls' dormitory with a 60-person capacity.
- c. The principal has written to MoES for more teaching staff.

Conditions for teaching and learning

- a. There are 2 ill equipped laboratories.
- b. The college does not have a functional library or a librarian but has a bookstore. MoES advises that colleges use a tutor of English language as a librarian.
- c. The college 4 classrooms with a capacity of 20 each.
- d. There is a dining hall which can seat 200 students and a main hall which can seat 100 students. These are used for teaching, but dining hall needs some renovation.
- e. 1 latrine for boys -3 stances.
- f. 1 latrine for girls- 4 stances.

What changes have you made in preparation?

Tutors encouraged to upgrade. College lobbied and got some furniture- 100 desks and chairs.

Staffing

The college has 21 tutors but lacks tutors for Kiswahili, Local Language, SST, ICT, librarian, MTC has 1, Agriculture has 1.

What are the critical capacity development needs?

Only 5 members of staff have Masters' degrees and 3 are still at Diploma level. Staff lack ICT skills so cannot do online classes.

Investment in ICT

The college has 20 functional computers, but tutors are not trained in delivering online classes. College is supposed to levy a 30,000 charge per student annually towards ICT, but students do not pay and if administration insists students drop out. College has sensitized through church and radio to bring natives to college, so college does not insist on charges in order to keep natives.

What are the strategies to ensure staff get skills they need?

Tutors have been encouraged to upgrade and are given a small incentive of UGX 200,000.

There is a small vote to support upgrading tutors. 4 are in in Kyambogo University and 2 are in Makerere. The college offers tutor accommodation, but it is shared. It also offers meals for tutors. CPDs are done by the DPO's office. DPO identifies tutor needs through school support activities and prepares accordingly.

On EGR

EGR is streamlined in ECD for Year 1

What challenges/ constraints do you foresee?

- a. Staff capacity: staff are not trained to offer diploma; they need to be retooled.
- b. Lack of sufficient skills and equipment for ICT.
- c. Lack of policy guidance; administration needs to understand if they will be governed by National Council for Higher Education or some other body.
- d. Facilities – the college has been teaching in class system but now they are going to operate a subject system. This implies they need more rooms. As it is, there is no laboratory and no reading space in the library.
- e. Inadequate staffing.
- f. This is a hard-to-reach district and tutors need incentive to work here.
- g. Tutors share housing; college has 15 units of housing.

SUMMARY OF MEETING WITH CHIEF ADMINISTRATIVE OFFICER (CAO) MOROTO

- a. Which roles does the office of the CAO play in the new constructions, maintenance of old schools, and provision of school furniture and learning support materials; in education institutions.
- b. He is the accounting officer so manages the funds. He prefers that the funding be directed through given to district so district can directly supervise construction.
- c. What supervision roles do you have on the District Education Officer (DEO) and the District Inspector of school (DIS).
- d. Ensure that money is used for purpose for which it is requested, ensure payment of services, supervision of works.

How does the office of the CAO relate with the School Management Committees of primary schools?

- a. The CAO's office ensures that they are in all schools and are inducted on their roles. SMCs approve budget, hold regular meetings, some support to teachers.
- b. They need training and, in this region, it is difficult to find those that have completed Primary school, yet the district leadership would want them to be at least of O' Level standard.
- c. Head teachers' and Teachers' absenteeism, are a common phenomenon in Uganda schools, how does your office monitor this practice?

- d. What sanctions do your office apply to those who are culpable? If someone absents themselves, I stop their salary

Major challenge

There is no food in the homes or at school. Infrastructure may not get children into school. Parents do not value education

Suggestions

- a. Dams and irrigation schemes and bore holes; most important gap is food and water. Two-pronged approach- can we provide food as an incentive for children being in school.
- b. In Karamoja, children should be in boarding schools
- c. Karamoja is a special region and should be handled as such
- d. Region has a school feeding program under WFP but 5 years ago WFP scaled down their ratios. Can WB work with and WFP and bring back supper for children? Can WB, UNICEF and WFP talk about food in schools?
- e. Is it possible to start a “Make Karamoja Green” campaign?
- f. Schools don’t have classrooms, teacher’s houses and dormitories
- g. Sensitize community involvement in education so they prioritize education
- h. Put children in boarding schools so we also reduce child marriages
- i. Can there be a special meeting with all the Karamoja districts?

District Education Officer (DEO) - 6 district participants – 2 from the college

- a. Is there a connection between the college and your office?
- b. How do you work with the CCTs?
 - ❖ There is a lot of teamwork; district and college plan together
 - ❖ The DPO gives updates to district education office
 - ❖ CCT is part of the education department- how many CCTs?
 - ❖ District mobilizes students for the college

Would you consider identifying mentor teachers who can support colleagues? What would you consider as incentives for these teachers? Mentor teachers would be good, but they need incentivizing.

What relationship do you have with DES? How do you work with them?

District works harmoniously with DES and if they need more details, they customize the inspection tools. They have tablets though network is sometimes challenging.

Are there any improvements because of inspection through the TELA system?

Yes.

Time management

- a. Presence improved- reduced absenteeism
- b. Learner performance because teaching and learning are being monitored
- c. Better syllabus coverage

Do your inspection tools capture EGR? Done together with district – Moroto, Napak, Kotido, Nakapiripirit, Kabong.

- a. Would you consider harmonizing your tool with those of DES?
- b. Using tablets to inspect, officers trained
- c. What do you need to make your support to teachers meaningful?

- ❖ Training support
- ❖ Schools visited once a term and yet the officers would like to conduct meetings with teachers and head teachers – to mentor and motivate
- ❖ Because the inspectors use DES tool and need to work with DES, they sometimes do not get specific time to check on sub-counties assigned to them
- ❖ Get a shorter tool in order to manage time better- DES tool is long

What roles do the office of the DEO, play in the construction of new schools?

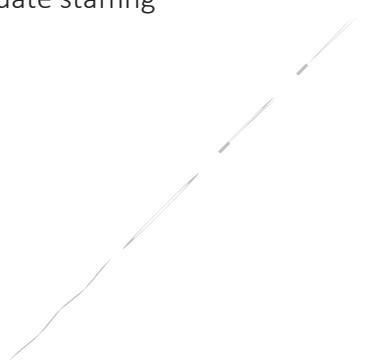
The DEO is the project manager so he monitors and does project appraisal and processes payments for capital projects. He therefore is a member of procurement and contacts committee and participates in evaluation of construction.

How many times do you visit schools?

Once a term

Challenges

- a. Most teachers, upwards of 80% are non-natives so Iteso are the best options, making EGR, which is delivered in local language difficult.
- b. There has been no refresher training for teachers since the project closed in 2019. Support needed- to build competences, facilitate, retooling on methodology and 21st century skills and production of materials. Some of the trained teachers have retired and the CCT and some education officers are new recruits.
- c. Karamoja needs a special attention. The people have a negative attitude towards the teaching profession. Natives may make only 5% of the teaching force.
- d. Schools face challenges of charging but can charge if given solar panel
- e. Some untrained head teachers
- f. DES tools- capture much of the data but they are too bulky
- g. Transport, inadequate funding for inspection,
- h. Data analysis
- i. Inadequate staffing



Participants for the meeting were the Principal and the Deputy Principal in charge of outreach activities (DPO) and Deputy Principal in charge of pre-service training

College Catchment area

Mainly the districts of: Maracha, Arua, Arua City, Terego have some EGR. Nebbi, Packwach and Zombo have never implemented EGR.

On lesson delivery

Typical lesson- scheme preparation done jointly and work shared, then lesson plans and materials are done thereafter. Encourage participatory learning and students may be asked to do some research. Although there was a prompt about demonstration, there does not seem to be any.

What are the quality assurance (QA) tools or mechanism in place?

Student class leaders have a form that is endorsed by tutor after each lesson.

On the diploma program

- a. How much information do you have regarding the shift from a certificate to a diploma awarding institution?
- b. Oral communication was given by the commissioner, and staff have been informed accordingly. The Commissioner told us that the PS would communicate an official position in September 2022 but it has not yet come.
- c. We were also told that staff from non-core would be posted to core PTCs but that too has not been done.
- d. The PS wrote to Kyambogo University (Kyu) telling them to admit a one-off cohort of students because UNITE was not yet ready. Kyu advertised and advised colleges to ensure students could apply.
- e. The communication told colleges to publicize advert and students applied. Doesn't know when they are taking off. No curriculum, no official communication-all verbal

Conditions for teaching and learning

- a. There is no laboratory
- b. The college 2 classrooms each with a capacity of 60, 3 rooms each with a capacity of 40 and a main hall dining hall that can seat 260 students.
- c. The college has library with very limited reading space. There is no librarian, but it is managed according to availability of staff.
- d. 17 staff members are accommodated.
- e. College has a sick bay.
- f. None of the CCTs has a functional motorcycle.

What changes have you made in preparation? We are encouraging people to study. Presently, 11 tutors have enrolled for Masters programs in different universities; 3 are sponsored by Aga Khan and one tutor has enrolled for a degree program.

Staffing

The college lacks tutors for the subjects of Kiswahili and SST. It has 10 CCTs for 22 CCs

What are the critical capacity development needs?

ICT skills and infrastructure to support its use for teaching.

Investment in ICT

The college has 45 functional computers but does not have a server. Most tutors lack ICT skills.

What are the strategies to ensure staff get skills they need?

Topics for professional development are identified during staff meetings. Some may be suggested by the Principals' Association **On EGR:** EGR is streamlined in ECE

What challenges/ constraints do you foresee?

- a. Staff capacity: staff are not trained to offer diploma; they need to be retooled
- b. Lack of sufficient skills and equipment for ICT
- c. Lack of policy guidance; administration needs to understand if they will be governed by National Council for Higher Education or some other body.
- d. Facilities – the college has been teaching in class system but now they are going to operate a subject system. This implies they need more rooms. As it is, there is no laboratory and no reading space in the library.
- e. Inadequate staffing.

MUKUJU CPTC INFRASTRUCTURE STATUS COMMENTS

ICT: The college has 50 functional computers and an officer in charge of ICT.

Classrooms: The college has 4 classrooms each with a capacity of 40 learners. There is no functional laboratory but there is an ill-equipped science room.

Dormitories: The college has 3 girls' dormitories which can accommodate 186 ladies altogether. There is sleeping space for 132 male students.

Library: There is no functional library.

Staff houses: There are 3 staff houses

APPENDIX 02: MANAGEMET TOOLS

GRIEVANCE RECEIPT FORM

Grievance Form			
Reference:		Date Received:	
Complainant/site details			
Name (or withhold name if you wish To be anonymous):			
Address:			
Telephone/other contact details:			
Details of complaint:			
Form completed by:			
Name:		Position:	
Location/Organization:			
Actions required and details of complaint passed to:			
Name:			
Position:			
Sub-project/Department/Organization:			
Project/site:			
Date:			
Resolution and notification of completion to be sent on:			

GREVIANCE ACKNOWLEDGEMENT FORM

Grievance Acknowledgement Template (use if formal reply needed, otherwise telephone)

Claimant Address Date:

Reference:

Dear Claimant (name):

I refer to [*correspondence/meeting*] on [*date, month*]. We understand that you wish to lodge a complaint associated with the ULEARN Project in relation to [*subject of grievance*].

We will attempt to contact you within **14days** of the date of this letter in order to discuss your concerns and to decide up an appropriate course of actions should this be appropriate. This will be without prejudice to your statutory rights.

Sincerely yours,

Social Safeguards Specialist/Officer [*or other respondent*] ULEARN

--

CLOSE OUT RECORD FOR GRIEVANCE

Close-out Records (where legal record required)		
Reference Details:		
Grievance Reference Number:	Safeguards Specialist/Officer:	
Summary of Grievance:		
Steps Identified for Corrective Action:	Due Date:	
1		
2		
3		
Resolution Actions and Close-out:		
Notes:		
Complainant Signature	(Title-Name- ULEARN Representative Name-Signature)	(Title- Official Witness Signature)
Date:		

GRIEVANCE HANDLING Mechanism FOR THE VULNERABLE AND MARGINALISED GROUPS

A Vulnerable Marginalized Groups may encounter a grievance or a complaint against the project, its staff or contractors during project implementation. To address or resolve the grievance, a mechanism describing procedures, roles and responsibilities in grievance management process is given below. To be effective, the mechanism shall utilize existing local administrative and community structures. All grievances concerning non-fulfillment of contracts, levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation shall be addressed to the Local Council Chairperson.

MoES's Social Development Specialist shall work with community leaders in the project area to set up an LC1 Grievance Committee to be the first point where grievances are addressed. All attempts shall be made to settle grievances amicably before resorting to courts of law.

Entities seeking redress and wishing to record grievances will do so by notifying their Local Leader (LC 1 Chairperson) who will chair a Local Grievance Committee at LC 1 level set up with guidance of MoES's Social Development Specialist. The Local Leader will inform and consult with the District Administration to determine validity of claims. If valid, the Local Leader will convene a meeting of the LC1 Grievance Committee to resolve the grievance and notify the complainant of the outcome. If the complainant's claim is rejected, the matter shall be brought before the District government authority for settlement.

Any objections or grievances related to exclusion/marginalization shall be made in writing, in the language that the VMGs understands and are familiar with, to the Local Leader. Copies of the complaint shall be sent to MoES, within 20 days after the public notice. Channeling complaints through the Local Council Grievance Committee is aimed at addressing the problem of distance and cost the VMGs may have to face.

The Local Leaders (trained by MoES's Social Development Specialist) shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made. The procedure for handling grievances should be as follows:

- a. The affected person should file his/her grievance in writing, to the Local Leader. The grievance note should be signed and dated by the aggrieved person. Where the affected person is unable to write, s/he should obtain assistance to write the note and emboss the letter with his/her thumbprint.
- b. A sample grievance form is provided hereto below
- c. The Local Leader should respond within 14 days during which any meetings and discussions to be held with the aggrieved person should be conducted. If the grievance relates to valuation of assets, a valuer may need to revalue the assets. In this case, the aggrieved person must be notified by the Local Leader that his/her complaint is being considered.
- d. If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time (s)/he can lodge his grievance to the Local Administration (District).
- e. The Local Administration will then attempt to resolve the problem (through dialogue and negotiation) within 14 days of the complaint being lodged. If no agreement is reached at this stage, then the complaint is taken to MoES's Grievance Committee comprising the following entities:
 - i. A Grievance Officer (MoES Staff)
 - ii. A Local Council 1(LC1) Chairperson
 - iii. District Representative (e.g. CDO or Member of District Land Board)

- iv. A community representative in project area (e.g. religious leader)
- v. Head Teacher and a Member of the School Management Committee

Note that persons in ii)-iv) will be location specific. If the complainant is still dissatisfied with the handling of his complaint, then he/she can take up the complaint through the court system.

APPENDIX 03: GRIEVANCE LOG AND RESOLUTION FORM

Name (Filer of Complaint):
ID Number (PAPs ID number):
Contact Information (house number/ mobile phone):.....
Nature of Grievance or Complaint:
Date Individuals Contacted Summary of Discussion:
.....
Signature..... Date:
Signed (Filer of Complaint):
Name of Person Filing Complaint (if different from Filer):
Position or Relationship to Filer:

Review/Resolution

Date of Conciliation Session:
Was Filer Present? Yes/No
Was field verification of complaint conducted? Yes/No
Findings of field investigation:.....

Summary of Conciliation Session Discussion.....
Issues.....
Was agreement reached on the issues? Yes/No
If agreement was reached, detail the agreement below/if agreement was not reached, specify the points of disagreement below:
.....
.....
Signed (Conciliator): Signed (Filer).....
Signed:
(Independent Observer)
Date: GRIEVANCE REPORTING FORM

GRIEVANCE REPORTING FORM

Reference Number:					
2. Complainant's Information					
(This information must be provided. The identity of complainants will be kept confidential if they request so.)					
Names and (Dr/Mr./Ms./Mrs.)	Titles	Signatures	Positions/ Organizations (If any)	Addresses: Contact Tel.	E-mail:
Authorized Representative?	No <input type="checkbox"/> Yes <input type="checkbox"/>	If yes, Description of Group			
Please indicate how you prefer to be contacted (e-mail, mobile, etc.):					
3. Brief Description of the problem: What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and Duration of the Problem?					
4. Date of Incident/grievance					
		<input type="checkbox"/>	One-time incident/grievance (date)		
		<input type="checkbox"/>	Happened more than once (how many times?)		
		<input type="checkbox"/>	On-going (currently experiencing problem)		
5. Previous Efforts to Resolve the Complaint					
(a) Have you raised your complaint with any other authorities? <input type="checkbox"/> No <input type="checkbox"/> Yes					
If Yes (Please, provide the following details): When?					
How and with whom the issues were raised?					
Please describe any response received from and/or any actions taken by the project level grievance mechanism.					
Please also explain why the response or actions taken are not satisfactory.					
If No, Why?					
(b) What would you like to see happen to resolve the problem?					
6. Name of the person who completed this form:				Signature:	Date:

GRIEVANCE RESOLUTION AGREEMENT MINUTE (GRAM)

Reference Number:			
Complainant's Information			
RESPONDENT DETAILS		COMPLAINANT DETAILS	
Full name		Full name	
Address:		Address:	
Phone No. (home/cell) IF ANY		Phone No. (home/cell) IF ANY	
Email:		Email:	
Date of complaint resolution		Location	
SUMMARY OF RESOLUTION			
Brief description of Complaint:			
Brief description of Resolution:			
SIGNATURES			
Chairperson Signature		Complainant Signature	
Name of Chairperson		Name of Complainant	
Date		Date	
Secretary Signature		Witness Signature	
Name of Secretary		Name of Complainant's Witness	
Date		Date	

GRIEVANCE RESOLUTION IMPLEMENTATION MINUTE (GRIM)

1. Reference Number:			
2. Complainant's Information			
RESPONDENT DETAILS		COMPLAINANT DETAILS	
Full name		Full name	
Address:		Address:	
Phone No. (home/cell) IF ANY		Phone No. (home/cell) IF ANY	
Email:		Email:	
Date of complaint resolution		Location	
SUMMARY OF RESOLUTION IMPLEMENTATION			
SIGNATURES			
Chairperson Signature		Complainant Signature	
Name of Chairperson		Name of Complainant	
Date		Date	
Secretary Signature		Witness Signature	
Name of Secretary		Name of Complainant's Witness	
Date		Date	


COMPLAINTS LOG

Complaints/Grievance Log								
Date	Name of Complainant	Complaint (e.g., nonpayment of salary)	Officer/department complained against (Co./Finance Dpt)	Nature of complaint/service issue, e.g., delayed salary)	Type of cause (Delayed payment by MoES)	Remedy granted	Mitigation/preventive action to be taken	Follow-up/Feedback given to the Complainant

APPENDIX 04: POST COVID LOCKDOWN STANDARD OPERATING PROCEDURES FOR OPERATION IN UGANDA

Minister: +256 414 232 213/8
 +256 414 232 000
 Minister of State: +256 414 232 004
 Permanent Secretary: +256 414 232 002
 Email: ps@updservice.ug
 Website: www.updservice.ug

In any correspondence on this subject please quote the **FMD 80001** Vol 7



MINISTRY OF PUBLIC SERVICE
 PLOT 12 NAKASERO HILL ROAD
 P.O. BOX 7003
 KAMPALA
 UGANDA

5th June 2020

To all Responsible Officers
 Ministries, Departments, Agencies and Local Governments

CIRCULAR LETTER NO. 7 OF 2020


POST-LOCKDOWN STANDARD OPERATING PROCEDURES FOR OFFICE OPERATIONS IN THE PUBLIC SERVICE OF UGANDA

Following the directive of His Excellency the President of Uganda on partial lifting of the lockdown specifically permitting private vehicles and Public Transport services to operate at one half capacity, movement of Public Officers to and from their work premises has been eased and a number of them have resumed work.

To ensure that Government continues to deliver quality services while mitigating the spread of COVID-19, the Ministry of Public Service has developed post-lockdown Standard Operating Procedures (SOPs) to guide the operations of the Public Service.

1. Staffing:

- a) Each Ministry, Department, Agency and Local Government should identify 30% of its total workforce to remain on duty to ensure that critical services are provided promptly.
- b) 70% of the workforce will continue to offer their services remotely in line with Circular letter No. 6 of 2020.
- c) When exigencies of duty/service demand that an employee in category (b) above is required to handle specific assignments that may require his/her physical presence at the workplace, nothing in this circular will deter a Responsible Officer from calling the Officer back to office.
- d) Employees in category (a) and (b) should avail themselves physically or remotely whenever called upon to perform their duties.



Minister: To ensure service excellence, transparency, accountability and efficiency, all employees should adhere to the official public service standards for external and internal clients of the Government.

2. Decongesting office premises and limiting physical interaction:

- a) Responsible Officers must put in place crowd management strategies at the work premises while ensuring social distancing in all their engagements with their external and internal clients.
- b) Responsible Officers should provide the general Public with vital institutional contacts. Clients seeking for guidance or intending to make consultations with Public Officers should be encouraged to use the officially publicized websites, emails and telephone lines of Ministries, Departments, Agencies and Local Governments. This will limit physical interaction.

- c) Visitors/clients should not be allowed entry into office premises with exception of services where personal presence is inevitable for example Medical treatment.

3. Employee Health and safety:

- a) Ensure and enforce mandatory use of face masks, thermal scanning, sanitization at entrances and office premises. Employees are required to sanitize their hands before proceeding to their work spaces. Inevitable visitors are required to sanitize their hands before approaching Public offices and staff.
- b) Employees with flu, cough, cold and fever must stay home and seek medical treatment after informing their respective Responsible Officers.
- c) While within the office premises, employees should limit physical interaction with fellow employees.
- d) Responsible officers must ensure that appropriate protective equipment as guided by Ministry of Health is made available to all employees and usage is adhered to by all employees.
- e) Employees should be encouraged to use their personal vehicles or officially allocated vehicles for commuting to and from the workplace. Official vehicles may be provided to pick and drop required Officers who don't have private vehicles.
- f) Physical Meetings should not be held, Video conferences/conference calls should be used as an alternative. For emergency situations where a physical meeting is inevitable, it should be held outdoors, with a composition of up to

Mission: To provide best-in-class services, management systems and structures that facilitate efficient and effective public service performance for national development and improved quality of life in Guyana.



a maximum of ten (10) participants and social distance should be observed in line with the guidelines issued by Ministry of Health.

- g) Employees within the advanced age bracket, persons with co-morbidities and breast-feeding mothers should be supported to work from home.
- h) Intensive communication and training on good hygiene practices should be undertaken following the Ministry of Health guidelines.
- i) Responsible Officers should ensure that there is a gap of one hour between shifts for employees working in shifts. Lunch breaks should also be staggered to ensure social distancing in cafeteria/canteens hosted at work premises. Alternatively, employees should be encouraged to come with their own packed food.
- j) Responsible Officers should ensure that lifts/hoists/elevators operate at one half capacity where they exist. Use of staircase/ramps is highly encouraged.
- k) Frequent disinfection of high-touch surfaces such as door handles, lifts/elevators and their buttons, vehicles (especially commonly used vehicles), shuttle buses, and all other surfaces such as hand railings and office tables should be done.

4. Emergency response:

- a) A list of hospitals/clinics/health facilities authorized to test and treat COVID-19 patients in areas near the office premises should be displayed in strategic places at the work place at all the times.
- b) In case of emergence of Covid-19 like symptoms in any employee, Responsible Officers should report the case to the contacts given by the Ministry of Health.

You are required to implement and bring the content of this Circular letter to the attention of all staff under your jurisdiction. It should be implemented together with the earlier guidelines issued by this Ministry and the Ministry of Health.



Mission: To provide best-in-class services, management systems and structures that facilitate efficient and effective public service performance for national development and improved quality of life in Guyana.

This circular letter can be accessed on the Ministry of Public Service Website:
www.publicservice.gov.gy


Catherine Dinarakwate Musingwira (Mrs.)
PERMANENT SECRETARY

Gender-Based Violence and Child Protection Code of Conduct

The company is obliged to create and maintain an environment which prevents gender-based violence (GBV) and child abuse/exploitation (CAE) issues, and where the unacceptability of GBV and actions against children are clearly communicated to all those engaged on the project. The Code of Conduct will require avoidance of discrimination or exclusion of Project beneficiaries and workers, especially within the context of the AHA. Workers will be required to participate in training and awareness raising on this subject. Sensitization on this issue will be undertaken with respect to the concerned members of the community.

In order to prevent GBV and CAE, the following core principles and minimum standards of behavior will apply to all employees without exception:

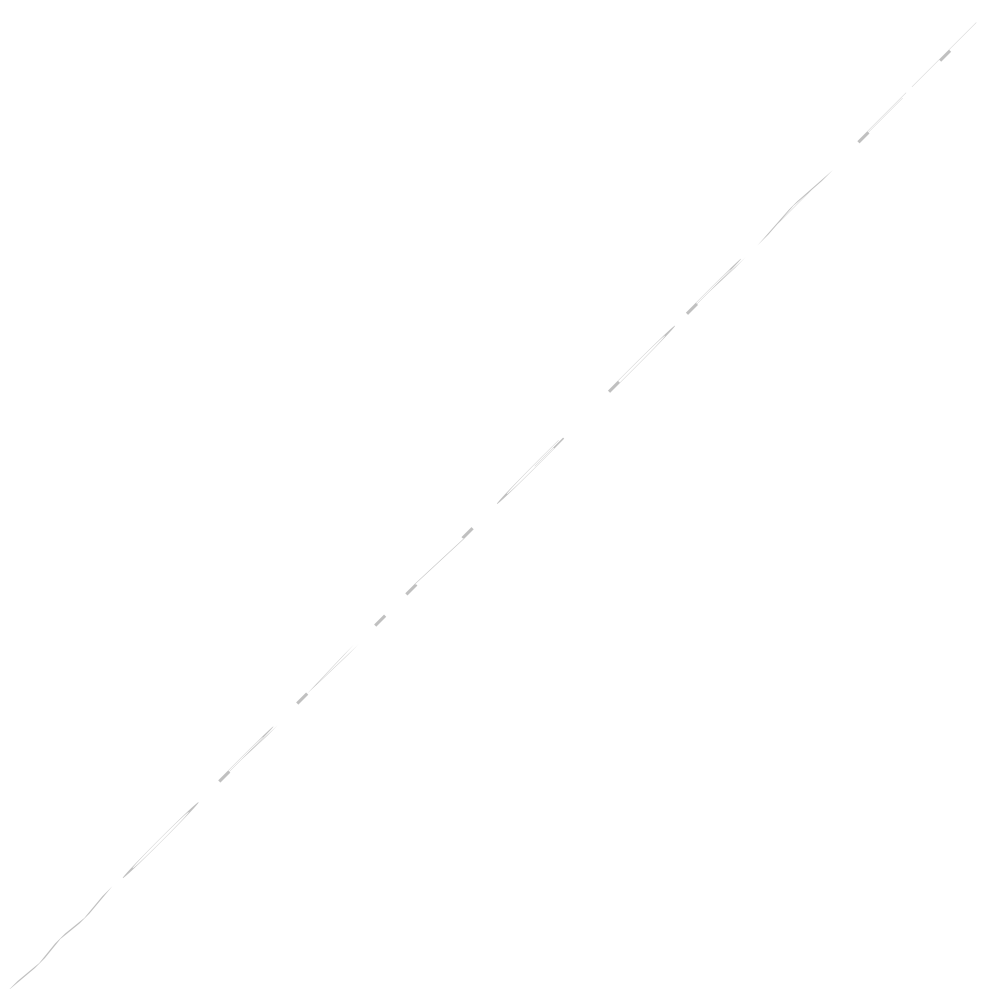
- a. GBV or CAE constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment. All forms of GBV and CAE including grooming are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit GBV or CAE will be pursued.
- b. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- c. Do not use language or behavior towards women, children and men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- d. Sexual activity with children under 18 - is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
- e. Sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited.
- f. Sexual interactions between contractor's and consultant's employees at any level and member of the communities surrounding the work place that are not agreed to with full consent by all parties involved in the sexual act are prohibited (see definition of consent above). This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this Code.
- g. All staff, volunteers, consultants and sub-contractors are highly encouraged to report suspected or actual GBV and/or CAE by a fellow worker, whether in the same contracting firm or not. Reports must be made in accordance with Standard Reporting Procedures.
- h. All employees are required to attend an induction training course prior to commencing work on site to ensure they are familiar with the GBV and CAE Code of Conduct.
- i. All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV and CAE Code of Conduct.
- j. All employees will be required to sign an individual Code of Conduct confirming their agreement to support GBV and CAE activities.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and CAE. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

FOR THE COMPANY

Signed by _____

Title: _____ Date: _____



Manager's Gender Based Violence and Child Protection Code of Conduct

Managers at all levels have particular responsibilities to create and maintain an environment that prevents GBV and CAE. They need to support and promote the implementation of the Company Codes of Conduct. To that end, they must adhere to the Manager's Codes of Conduct and also sign the Individual Codes of Conduct. This commits them to support and develop systems that facilitate the implementation of this action plan and maintain a GBV free and child-safe work environment. These responsibilities include but are not limited to:

Mobilization

1. Establish a GBV and CAE Compliance Team (GCCT) from the contractor's and consultant's staff to write an Action Plan that will implement the GBV and CAE Codes of Conduct.
2. The Action Plan shall, as a minimum, include the
 - i. Standard Reporting Procedure to report GBV and CAE issues through the project GRM;
 - ii. Accountability Measures to protect confidentiality of all involved; and,
 - iii. Response Protocol applicable to GBV survivors/survivors and perpetrators.
3. Coordinate and monitor the development of the Action Plan and submit for review to the CPU and SE safeguards teams, as well as the World Bank prior to mobilization.
4. Update the Action Plan to reflect feedback and ensure the Action Plan is carried out in its entirety.
5. Provide appropriate resources and training opportunities for capacity building so members of the GCCT feel confident in performing their duties. Participation in the GCCT will be recognized in employee's scope of work and performance evaluations.
6. Ensure that contractor, consultant and client staff are familiar with the MoES GRM and that they can use it to anonymously report concerns over GBV and CAE.
7. Hold quarterly update meetings with the GCCT to discuss ways to strengthen resources and GBV and CAE support for employees and community members.
8. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
9. Ensure that when engaging in partnership, sub-grant or sub-recipient agreements, these agreements
 - i. incorporate this Code of Conduct as an attachment;
 - ii. include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to comply with this Code of Conduct; and
 - iii. expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against GBV and CAE, to investigate allegations thereof, or to take corrective actions when GBV and/or CAE has occurred, shall constitute grounds for sanctions and penalties.

Training

- a. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and CAE Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the Action Plan for addressing GBV and CAE issues.
- b. Provide time during work hours to ensure that direct reports attend the mandatory CEDP facilitated induction GBV and CAE training required of all employees prior to commencing work on site.

- c. Ensure that direct reports attend the monthly mandatory refresher training course required of all employees to combat increased risk of GBV and CAE during civil works.
- d. Managers are required to attend and assist with the CEDP facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations.
- e. Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

Prevention

- a. All managers and employees shall receive a clear written statement of the company's requirements with regards to preventing GBV and CAE in addition to the training.
- b. Managers must verbally and in writing explain the company and individual codes of conduct to all direct reports.
- c. All must sign the individual 'Code of Conduct for GBV and CAE', including acknowledgment that they have read and agree with the code of conduct.
- d. To ensure maximum effectiveness of the Codes of Conduct, managers are required to prominently display the Company and Individual Codes of Conduct in clear view in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.
- e. All posted and distributed copies of the Company and Individual Codes of Conduct should be translated into the appropriate language of use in the work site areas (Local languages, Kiswahili, etc.).
- f. Managers will explain the GRM process to all employees and encourage them to report suspected or actual GBV and/or CAE.
- g. Managers should also promote internal sensitization initiatives (e.g. workshops, campaigns, on-site demonstrations etc.) throughout the entire duration of their appointment in collaboration with the GCCT and in accordance to the Action Plan.
- h. Managers must provide support and resources to the GCCT to create and disseminate the internal sensitization initiatives through the Awareness-raising strategy under the Action Plan.

Response

- a. Managers will be required to provide input, final decisions and sign off on the **Standard Reporting Procedures and Response Protocol** developed by the GCCT as part of the Action Plan.
- b. Once signed off, managers will uphold the **Accountability Measures** set forth in the Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV and CAE (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
- c. If a manager develops concerns or suspicions regarding any form of GBV or CAE by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is highly encouraged to report the case using the identified reporting mechanism.
- d. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of **14 days** from the date on which the decision was made.
- e. Managers failing to comply with such provision can be in turn subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:
 - i. Informal warning
 - ii. Formal warning
 - iii. Additional Training

- iv. Loss of up to one week's salary.
- v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- vi. Termination of employment.

Ultimately, failure to effectively respond to GBV and CAE cases on the work site by the contractor's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and CAE. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

FOR THE EMPLOYER

Signed by _____

Title: _____

Date: _____

Individual Gender Based Violence and Child Protection Code of Conduct:

I, _____, acknowledge that preventing gender-based violence (GBV) and child abuse/exploitation (CAE) are important. GBV or CAE activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or termination of employment. All forms of GBV or CAE are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit GBV or CAE will be pursued as appropriate. I agree that while working on the CEDP project, I will:

- a. Consent to police background check.
- b. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- c. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- d. Not participate in sexual activity with children—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence.
- e. Not engage in sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- f. Not have sexual interactions with members of the communities surrounding the work place and worker's camps that are not agreed to with full consent by all parties involved in the sexual act (see definition of consent above). This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- g. Attend and actively partake in training courses related to HIV/AIDS, GBV and CAE as requested by my employer.
- h. Report through the GRM or to my manager suspected or actual GBV and/or CAE by a fellow worker, whether in my company or not, or any breaches of this code of conduct.

With regard to children under the age of 18:

- a. Wherever possible, ensure that another adult is present when working in the proximity of children.
- b. Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.

- c. Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible.
- d. Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children’s images for work related purposes”).
- e. Refrain from physical punishment or discipline of children.
- f. Refrain from hiring children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- g. Comply with all relevant local legislation, including labor laws in relation to child labor.

Use of children’s images for work related purposes

When photographing or filming a child for work related purposes, I must:

- a. Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- b. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- c. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- d. Ensure images are honest representations of the context and the facts.
- e. Ensure file labels do not reveal identifying information about a child when sending images electronically.

I understand that it is my responsibility to use common sense and avoid actions or behaviors that could be construed as GBV or CAE or breach this code of conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and CAE. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signed by _____

Title: _____ Date: _____

APPENDIX 06: GOVERNMENT OF UGANDA ACTIONS ON NON-DISCRIMINATION

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, RPF, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio now include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. This SEP for the ULEARN Program includes such mitigation measures in various sections as appropriate.

This appendix highlights recent actions and circulars (attached) issued by the GOU to ensure inclusion and non-discrimination of vulnerable or marginalized individuals or groups. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU.

The Anti-Homosexuality Act was passed on May 26, 2023. The Government has continued to ensure inclusion and non-discrimination in all its projects and consistent with this, the Government has taken the following measures:

- **Letter of Assurance** (Sept 21, 2023) to all Ministries, Agencies, and local governments to implement mitigation measures on non-discrimination in WB-financed operations.
- **Budget execution circular** (July 10, 2023) to all public servants to ensure that projects are in line with Ugandan Constitution which emphasizes equality of all persons without prejudice or discrimination.
- **Circular on provision of health services** (June 5, 2023) that includes measures not to discriminate or stigmatize any individuals who seek health care for any reason.
- **Circular on provision of education** (August 18, 2023) services to all people without discrimination and exclusion in the delivery of education services, programs, and projects.
- **Circular issued by the Director of Public Prosecutions** (August 29, 2023) stating that prosecutors should seek guidance from Office of the Director of Public Prosecutions (ODPP) before decision to charge is made under the AHA.

The measures involve ensuring access to a project-level Grievance Redress Mechanism (GRM), establishing a dedicated hotline for receiving AHA-related complaints, requiring contract clauses and codes of conduct on nondiscrimination, and training project workers and contractors and community outreach activities on Inclusion and Nondiscrimination (IND).

Through a competitive process, the World Bank and International Finance Corporation (IFC) have contracted an international firm SREO Consulting Ltd. (SREO) to

support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and nondiscrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs including the PSU for ULEARN Program, contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.

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In any correspondence on
This subject please quote No. ALD 141/259/01 TC



Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

21st September 2023

The World Bank Country Manager
Uganda Country Office
Kampala, Uganda.



UGANDA'S SOCIAL SAFEGUARD POLICIES

I am writing in reference to the above subject. Further reference is made to our letter dated 28th July, 2023 on the same.

Government of Uganda wishes to reiterate that World Bank-financed projects will be implemented in a manner consistent with the principles of non-discrimination within the provisions of Article 21 of our Constitution.

The Government confirms that it will ensure that under these projects, no person will be discriminated against or stigmatized and that the principles of non-discrimination and inclusion will be adhered to. The Public Finance Management Act, 2015 also emphasizes equality of all persons to access opportunities and benefits from projects and programs without prejudice and discrimination.

Further to the above, we have issued the attached instructions to all implementing entities of Government projects and programs which communicate about specific mitigation measures to take and the legal requirement for non-discrimination.

Please accept Country Manager, the assurances of my highest consideration and esteem.

Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Rt.Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance Planning and Economic Development

Mission

"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

Solicitor General, Ministry of Justice and Constitutional Affairs

The Director of Public Prosecutions

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This subject please quote No.



Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

ALD 141/259/01 TC

21st September 2023

All Accounting Officers
All Ministries, Departments and Agencies
All Local Governments



UGANDA'S SOCIAL SAFEGUARD POLICIES

I am writing in reference to the above subject. Further reference is made to the Anti-Homosexuality Act, 2023 (AHA) that came into force on 30th May 2023.

Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexuality Act, 2023 and as communicated in the Budget Execution Circular of FY 2023/2024 on 18th July 2023, we guide that;

- All World Bank-financed projects must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no person will be discriminated against or stigmatized and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring where applicable.
- Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.

Mission

"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"

Specific Measures for High Risk Sectors

Health

- The Ministry of Health issued a circular on August 8, 2023 that guarantees access to health care services for all and prohibits the discrimination or stigmatization of any individual who seeks health care services on any grounds.
- The Ministry of Health will widely disseminate and socialize health sector guidelines for the effective implementation of the circular.
- Implementating entities should strengthen grievance redress mechanisms, and third-party monitoring systems in collaboration with national and international partners.

Education

- The Permanent Secretary in the Ministry of Education and Sports on 18th August 2023 issued a circular stating that the Ministry of Education and Sports does not permit any form of discrimination against any persons in the delivery of education services, programs and projects.
- In light of that circular, the Ministry should ensure that there is no discrimination (including any form of bullying) against teachers and students on any grounds.
- The Ministry of Education and Sports will prepare project specific guidelines to address non-discrimination.
- Implementating entities should strengthen grievance redress mechanisms, including an independent hotline and third-party monitoring systems where necessary.



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Rt. Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports
Hon. Minister of Health
Hon. Minister of Gender, Labour and Social Development
Hon. Minister of Energy and Mineral Development
The Principal Private Secretary to H.E. the President
The Solicitor General, Ministry of Justice and Constitutional Affairs
The Permanent Secretary, Ministry of Health
The Permanent Secretary, Ministry of Education and Sports
The Permanent Secretary, Ministry of Gender, Labour and Social
Development
The Director of Public Prosecutions

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This subject please quote No.



Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

BPD 86/179/01

10th July, 2023

All Accounting Officers (Central Government, Missions Abroad, and Local Governments)

All Chief Executive Officers of State-Owned Enterprises and Public Corporations

THE BUDGET EXECUTION CIRCULAR (BEC) FOR FINANCIAL YEAR 2023/2024

A. INTRODUCTION

1. This Circular is issued in fulfilment of Article 155 (1) of the Constitution, and Sections 13 (5) and 14 (1) of the Public Finance Management Act, 2015 (Amended).
2. The theme for the FY 2023/2024 Budget has been retained as: ***"Full Monetization of the Ugandan Economy through Commercial Agriculture, Industrialization, Expanding and Broadening Services, Digital Transformation and Market Access"***. The Budget for FY 2023/2024 was approved to address the strategic mission of facilitating more Ugandans to join the money economy.
3. The purpose of this Circular is to communicate the following:
 - i. The FY 2023/2024 Annual Cash Flow Plan (**Annex 1**);
 - ii. The Policy, Operational and Administrative Guidelines for execution of the Budget in FY 2023/2024.
4. As you execute the Budget for FY 2023/2024, I urge all Accounting Officers to ensure that all program activities contribute towards addressing the following objectives:
 - i. Completion of public investments with higher multiplier effects on attainment of NDP III and the NRM 2021-2026 Manifesto;
 - ii. Full-scale implementation of the Parish Development Model (PDM);
 - iii. Enhanced revenue mobilization and collection; and


Minister

"Effectively meet economic policy, revenue mobilization, and efficient utilization and accountability for public resources in order to achieve the most rapid and sustainable economic growth and development"

- iv. Ensuring efficiency and effectiveness of Government through rationalization of public expenditure.
5. The key priorities to achieve the above objectives are detailed in the approved Budget for FY 2023/2024. For ease of reference, please follow the link <https://www.budget.finance.go.ug> to access the following key documents, among others:
 - i. The Budget Speech for FY 2023/2024;
 - ii. Approved Estimates of Revenue and Expenditure Volume I (Central Government Votes and Missions Abroad);
 - iii. Approved Estimates of Revenue and Expenditure Volume II (Local Governments); and
 - iv. Approved Estimates of Revenue and Expenditure Volume III for the State-Owned Enterprises and Public Corporations.

B. THE ANNUAL CASH FLOW PLAN FOR FY 2023/2024

6. In accordance with Section 36 (b) of the PFM Act 2015 (Amended), the Annual Cash Flow Plan for FY 2023/2024 has been generated off the Program Budgeting System (PBS) based on the quarterly projections in your respective Vote work plans for FY 2023/2024.
7. The purpose of the Cash Flow Plan is to guide and ensure that Government maintains sufficient liquidity to be able to sustain and make timely payments to meet service delivery requirements by aligning Vote cash inflows and outflows to your respective Program Implementation Action Plans (PIAPs).
8. In view of the above, and in line with Sections 15 and 21 (i) of the PFM Act, 2015 (Amended), all Accounting Officers are urged NOT to overcommit the vote budgets beyond the Annual Cash Flow Plan issued in this Circular. Furthermore, you should submit expenditure commitments, in line with the PIAPs, indicating the actual forecast commitments and the cash position of your respective Votes as per Section 16 (i) of the PFMA, 2015 (Amended) to inform decision-making on the subsequent quarterly expenditure releases.



C. POLICY DIRECTIVES, ADMINISTRATIVE AND OPERATIONAL GUIDELINES FOR IMPLEMENTATION OF THE BUDGET FOR FY 2023/2024

Policy Directives

9. The FY 2023/2024 Budget allocations directed resources to program areas meant for enhanced socio-economic transformation for all Ugandans through job and wealth creation, and increasing household incomes, by targeting the 39% of Ugandans still in the non-money economy. All Accounting Officers are urged to adhere to the following policy directives that guided the preparation of the Budget for FY 2023/24:
- i. Fund key Government priorities to increase the momentum in socio-economic transformation, for example: the standard-gauge railway, the meter-gauge railway, solar-powered irrigation, PDM, Emyooga, road maintenance, coffee value addition, vaccines and pharmaceutical manufacturing etc.;
 - ii. Support development initiatives that drive private sector growth;
 - iii. Implement only ongoing projects and other multi-year commitments as approved in the Budget;
 - iv. Halt new non-concessional projects, except those already provided for in the fiscal framework, or those with no direct or indirect claim on the Consolidated Fund;
 - v. Hold back any recruitment plans in FY 2023/2024 except on a replacement basis where the resources are already available;
 - vi. No travel abroad, except for critical positions of the Executive, Legislature, Judiciary, security, diplomatic relations and resource mobilization; and
 - vii. **NO** purchase of new vehicles except hospital ambulances, tailored vehicles for medical supplies/distribution, and for agricultural extension services, security and revenue mobilization.

Non-Discrimination

10. Accounting Officers should ensure that all projects (whether Government of Uganda or externally funded) are implemented within the provisions of Article 21 (1) and (2) of the Constitution and Section 13 (11) (e) (i-iii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,

color, ethnic origin, tribe, birth, creed or religion, social or economic standing, political opinion or disability.

Advertising by Ministries, Agencies and Local Governments

11. In his letter of Ref. No. PO/3 dated 6th March 2023, H.E. The President directed that in FY 2023/2024, **“all Government advertising must be through the Uganda Broadcasting Corporation. Any Accounting Officer who deviates from this will be sanctioned including dismissal”**. Print media advertising should be done through the New Vision. I therefore urge all Accounting Officers to strictly adhere to this directive.

Contracting in Ugandan Shillings versus Foreign Currencies

12. I have received numerous requests from a number of Ministries, Departments and Agencies (MDAs) to undertake contracts in foreign currency, especially in United States Dollars and Euros. In line with the fiscal and monetary policies agreed with Bank of Uganda, I wish to reiterate this Ministry's position that no procurements should be undertaken in foreign currency as previously communicated in FY 2016/17, FY 2017/18 and FY 2018/19. Contracting in the local currency, is meant to preserve the sanctity and value of the Shilling since the budget is appropriated in the local currency which is easily convertible.
13. Therefore, this is to guide all Accounting Officers as follows:
 - i. **That all contracts for works, goods and services shall be awarded in Ugandan Shillings to hedge against cost overruns due to global forex rates fluctuations that impact on the stability of the Shilling; and**
 - ii. **All contracts, including those that follow international competitive bidding procedures, shall be quoted in Ugandan Shillings. The only exemption will be where it is clearly expressed in the financing agreements with Development Partners to use other currencies in the bidding process, if necessary. This should be strictly the exception and not the norm. I request the Honorable Attorney General's chambers to take note and enforce this guideline while approving agreements.**



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IN ANY CORRESPONDENCE ON



Ministry of Health
P. O. Box 7272
Plot 6, Lourdel Road
KAMPALA
UGANDA

THIS SUBJECT PLEASE QUOTE NO. **ADM:180/01**

THE REPUBLIC OF UGANDA

5th June 2023

Circular

All Hospital Directors, National and Regional Referral Hospitals
All District Health Officers
All Medical Superintendents
All Health Facility In-charges
Executive Directors of Implementing Partners
Executive Directors of Faith Based Medical Bureaus
The Executive Director Uganda Healthcare Federation

PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

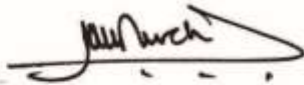
The constitution of the republic of Uganda recognises that health is a fundamental right and guarantees access to health care services for all. The Ministry of Health is mandated to provide Preventive, Promotive, Curative and Rehabilitative Health Services to all people in Uganda in their diversity **without any form of discrimination**. Furthermore, all services should be provided in a manner that ensures **Safety, Privacy and Confidentiality to all clients that seek health services in all facilities, both Public and Private.**

The Ministry of Health therefore reminds all health care workers and stakeholders about the above National commitments, and reiterates the following;

- **Not to deny services to ANY client who present themselves for services.**
- **Not to discriminate or stigmatize any individual who seeks health care services, for any reason – gender, religion, tribe, economic status, social status or sexual orientation.**
- **Patient rights and ethical values – Confidentiality, Privacy, Patient Safety as stipulated in the Patient's Charter should be upheld each time a patient seeks health care services at your facility**

Your cooperation in this matter is of great importance to improving access to service delivery for all our people.

A handwritten signature in black ink, appearing to be 'M. N. N.', written over a horizontal line.



Dr. Henry G. Mwebesa
DIRECTOR GENERAL HEALTH SERVICES

- cc. Hon. Minister of Health
Hon. Minister of State for Health (GD)
Hon. Minister of State for Health (PHC)
Permanent Secretary, Ministry of Health
All UN Agencies
PEPFAR Coordinator
Head Country Team Global Fund, Geneva
Country Manager, World Bank
Country Director – CDC, USAID, DOD
Director General, Uganda AIDS Commission
Directors, Ministry of Health
All Chief Administrative Officers
Registrars, Health Professional Councils

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In any correspondence on
this subject please quote: EPD 191/336/03



Ministry of Education and Sports
Embassy House
P.O. Box 7063
E-Mail: permasec@education.go.ug
Website: www.education.go.ug
Kampala, Uganda

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

The Government of Uganda recognizes the Constitutional social objective to ensure all Ugandans enjoy rights, opportunities and access to education. Under our education objectives, the State is obligated to promote free and compulsory basic education, afford every citizen equal opportunity to attain the highest educational standard possible, and facilitate individuals, religious bodies and other non-governmental organizations to found and operate educational institutions if they comply with the general educational policy of the country and maintain national standards.

The Ministry is implementing the Gender in Education Policy which provides for equitable access to education for all without discrimination. To operationalize the Policy a number of policy strategies and guidelines exist including the National Strategy of Elimination of Violence Against Children, the Life Skills Toolkit, manuals on growth and sexual maturation. In addition, the Ministry has incorporated Sexuality Education into the curriculum to ensure age-appropriate information to enable young people to maneuver through the different challenges of life.

The purpose of this Circular, therefore, is to reiterate Article 21 (1) of our constitution with states that "All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law". The Ministry does not condone any forms of discrimination and exclusion of any persons, in delivery of education services, programs and projects.

You are, therefore, called upon to observe and ensure the above standards in the delivery of education services, programmes and projects.

Ketty Lamaro
PERMANENT SECRETARY

Cc: First Lady and Hon Minister of Education and Sports
Ministers of State, Education and Sports

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P.O. Box 1550,
Kampala (Uganda)
admin@dpp.go.ug
www.dpp.go.ug

Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

RE: MANAGEMENT OF CASES WITH CHARGES PREFERRED UNDER THE ANTI-HOMOSEXUALITY ACT 2023.

The Anti-Homosexuality Act (AHA) came into force on 30th May 2023. It has come to the attention of management that a number of charges of Homosexuality and Aggravated Homosexuality are now being preferred by some officers without internalizing some crucial aspects of the act.

It is important to note that the AHA only criminalises offences where a sexual act has been performed. The term "*sexual act*" is defined under Section 1 of the Act.

It is also important to note that Sections 2 (5) and 3 (5) of the AHA provide that "*for the avoidance of doubt, a person who is alleged or suspected of being a homosexual, who has not committed a sexual act with another person of the same sex, does not commit the offence of homosexuality under this section*".

Officers are therefore advised to peruse files with offences under the AHA cautiously while taking into account the abovementioned provisions.

You are hereby directed to ensure that all files with charges preferred under the AHA should first be submitted to Headquarters with a written legal opinion for further guidance before a decision to charge is made.

Management will soon organize sensitization meetings for all officers on the key aspects of the AHA.

Handwritten signature of Jane Frances Abodo in black ink.

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

APPENDIX 07: ENHANCED IMPLEMENTATION SUPPORT AND MONITORING ON NON-DISCRIMINATION

The World Bank and IFC have hired an international and credible entity (firm, agency) with a strong knowledge of the Ugandan context and a track record of enhanced third-party implementation support and performance monitoring to undertake the tasks described in this section for all projects presently being implemented in the Uganda portfolio. The entity is expected to work with NGO/CSOs and country-based development partners.

The Enhanced Implementation Support and Monitoring (EISM) will primarily focus on supporting project teams to implement mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination from project benefits.

The objectives of the Enhanced Implementation Support and Monitoring include:

- Assisting project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assisting the WB in strengthening the capacity of PIUs, workers, and contractors, subcontractors, and service providers.
- Ensuring contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.
- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the cases.
- Support the WB/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

Table 4-4 illustrates the enhanced implementation support and monitoring steps. Figure 4-4 contains the Enhanced Implementation Support and Monitoring process. Figure 4-5 contains the Complaint Management for vulnerable or marginalized individuals or groups.

1. SCOPE OF WORK AND ACTIVITIES

To

provide enhanced implementation and monitoring support to the World Bank/IFC operations in Uganda the EISM will:

1.1 Establish an effective and confidential mechanism to receive, manage, refer, and monitor grievances related to discrimination across the WB/IFC portfolio.

To do so the EISM will:

- Enhance existing project-level grievance redress mechanisms to safely, ethically, and coincidentally receive cases related to discrimination on World Bank/IFC financed operations and refer them to an appropriate grievance handling mechanism.

- Design and operate a mechanism for receiving grievances related to discrimination on WB/IFC financed operations (including from project level grievance mechanisms noted above).
- Establish a hotline or an alternative complaint mechanism, for individuals to lodge complaints of discrimination on WB/IFC financed projects or voice their concerns without fear of reprisal. The EISM is an alternative to lodging complaints through a GOU-led project-level GRMs

NOTE: The EISM firm has established a nationwide GRM hotline – **0800 333125**, designed specifically to receive grievances or concerns from vulnerable or marginalised individuals or groups that may be discriminated against or excluded from benefiting from all World Bank and IFC financed projects due to enactment of the AHA. The hotline is hosted and operated by a local NGO. The ULEARN Program will also benefit from the same hotline.

Table 4-5 Enhanced Implementation Support and Monitoring Steps	
Act as a key first step in the referral process from project-level GRMs	Designed specifically to handle complaints restricted to WB/IFC projects
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities.
Step 2	Develops specific security protocols to ensure that communications are safe, ethical, and confidential.
Step 3	Establishes a data management system on an international server guaranteed by the provider as safe and secure encryption and privacy.
Step 4	Implements a data privacy and protection policy to include confidentiality clauses to be signed by all personnel entrusted with managing referrals or referral-related information.
Step 5	Handles complaints in a confidential, anonymous, and non-judgmental manner which is sensitive to local context and in local languages.
Step 6	Provides detailed monthly reports of complaints received to the WB/IFC
Step 7	Provides ad hoc incident reports of all allegations to WB/IFC within 48 hours of receipt.
Step 8	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.
Step 9	Maps available services for vulnerable or marginalized individuals or groups including counselling, legal services, protection, and other services.
Step 10	Refers individuals to the appropriate local services or organizations as needed.

Step 11	Regularly evaluates the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning.
Step 12	Recommends and supports the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

1.2 Outreach and sensitization to project beneficiaries and communities involved with the World Bank/IFC Bank/IFC Portfolios.

Activities related to Outreach and sensitization to project beneficiaries and communities include:

- **Assist the WB/IFC to prepare and implement a plan to disseminate information** about the support provided by the entity including support to existent GRMs.
- **Prepare community/beneficiary information materials** on their rights within the Constitution of Uganda and World Bank/IFC policies informed by various official circulars issued by the GOU on non-discrimination and World Bank/IFC policies.
- **Develop and implement a methodology to conduct periodic outreach to beneficiaries/communities** to hold consultations on non-discrimination to identify issues and risks in a safe, ethical, and confidential manner.

1.3 Capacity strengthening and technical support

Activities related to capacity strengthening and technical support include:

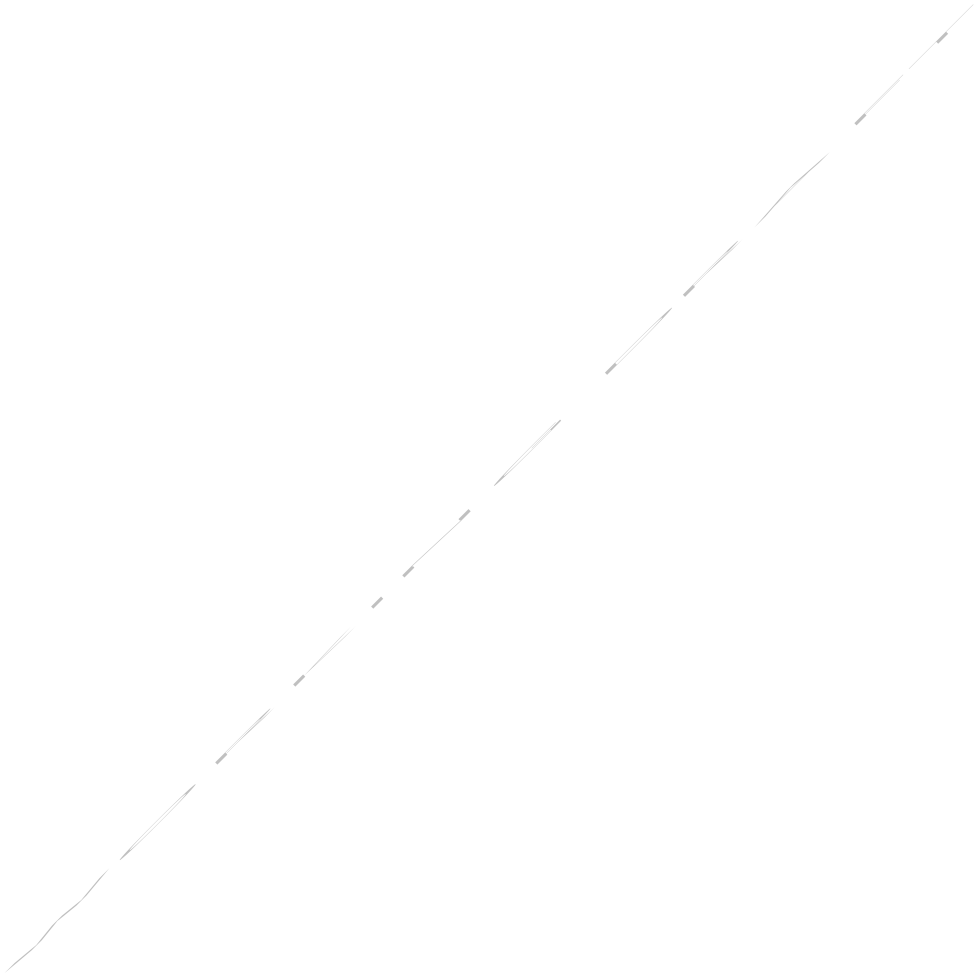
- **Support to the WB/IFC on training** of government staff and private sector consultants/clients, workers, and contractors on non-discrimination by developing training materials, identifying venues, providing trainers, etc.
- **Support to the WB/IFC with training project level GRMs** on non-discrimination in World Bank and IFC financed Projects by developing training materials, identifying venues, providing trainers, etc.
- **Preparing training modules for call center operators, data management personnel, and community outreach personnel** on appropriate handling of sensitive information.
- **Providing technical support to the GOU for the development of Guidelines** on Nondiscrimination of Workers.

1.4 Monitoring and Evaluation

Activities related to monitoring and evaluation include:

- **Developing a system to regularly monitor WB/IFC projects** for 1) implementation of agreed GOU actions to mitigate the risk of discrimination on WB/ IFC projects, 2) incidents of discrimination on World WB/IFC financed projects.
- **Regularly evaluating the effectiveness of mitigation measures** to determine whether and how well the mitigation measures are functioning to improve WB/IFC awareness of incidents of discrimination on WB/IFC financed operations.
- **Recommending and supporting the implementation of adjustments to mitigation | measures** based on regular evaluations and their impact.

3. Roles and responsibilities



The GOU and its PIUs remain responsible for the implementation of all project activities including mitigation measures supported by the EISM. The enhanced implementation and monitoring support mandate is specifically focused on:

1. supporting the WB/IFC to ensure the agreed measures on non-discrimination in the portfolio are implemented fully, ethically, safely, and to an appropriate standard of quality; and
2. to support the WB/IFC to enhance our awareness of cases of discrimination across the WB/IFC portfolio.

The GOU will facilitate the work of the Entity and collaborate as needed on all activities requiring their direct involvement, such as outreach and sensitization activities, capacity strengthening and technical support as well as the monitoring and evaluation of mitigation measures. The GOU will also ensure that the work under the EISM can be undertaken safely in accordance with existing circulars and their dissemination.

Figure 4-4: Description of Enhanced Implementation Support and Monitoring (EISM) Process

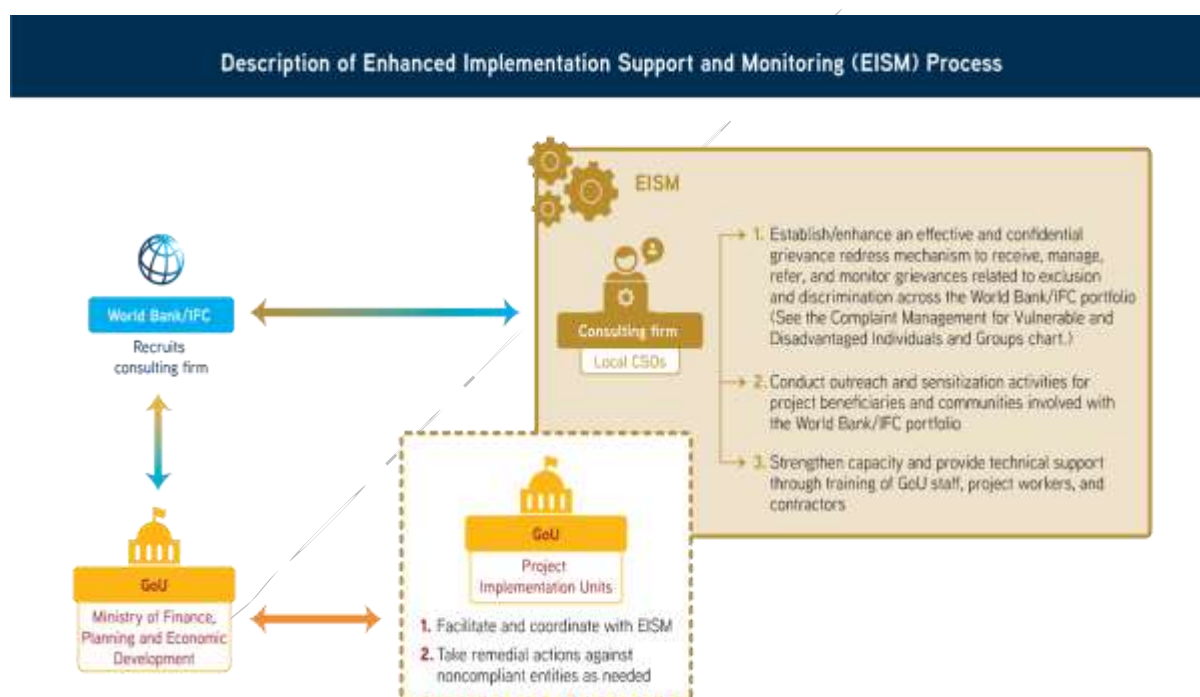
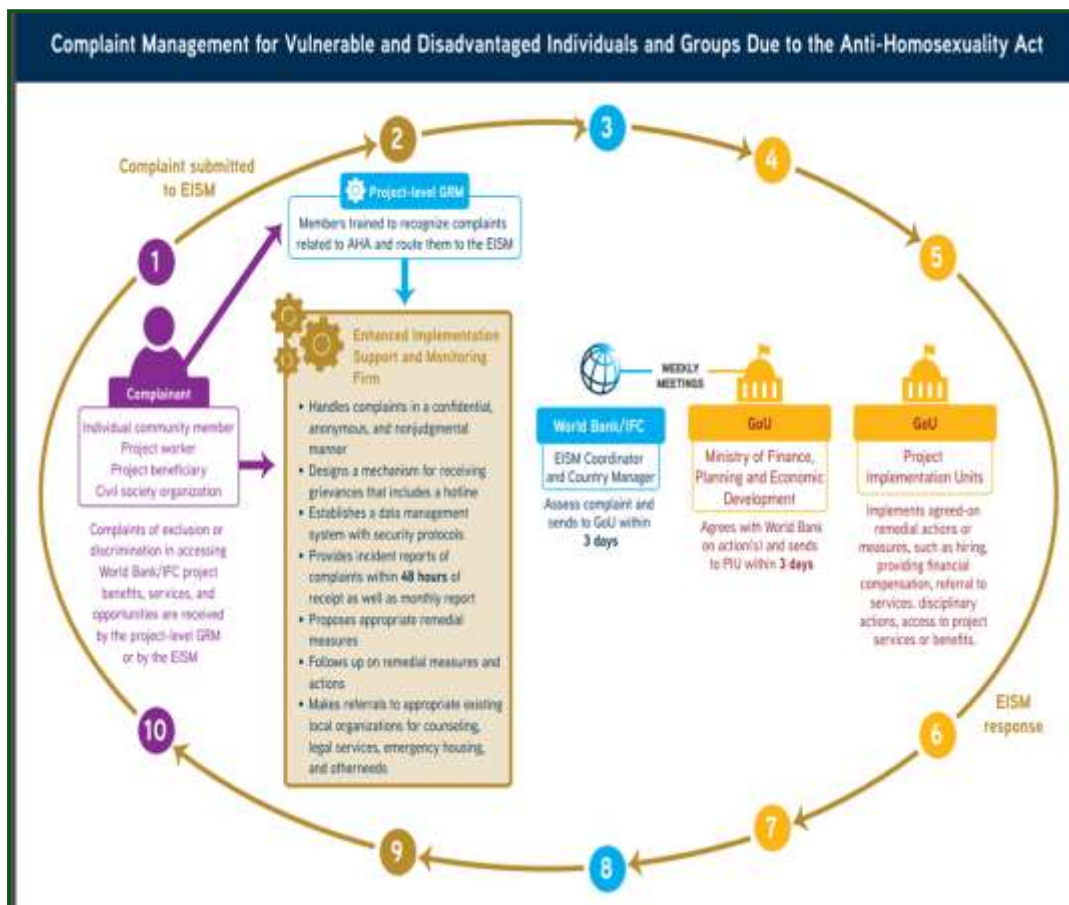


Figure 4-5: Complaint Management for Vulnerable and Disadvantaged Individuals or Groups due to AHA



APPENDIX 08: GUIDELINES FOR IMPLEMENTING MITIGATION MEASURES TO ADDRESS AHA

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, RPF, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. This ESSA for ULEARN includes such mitigation measures in various sections as appropriate.

The measures involve ensuring access to a project-level Grievance Redress Mechanism (GRM), establishing a dedicated hotline for receiving AHA-related complaints, requiring contract clauses and codes of conduct on nondiscrimination, and training project workers and contractors and community outreach activities on Inclusion and Nondiscrimination (IND).

Through a competitive process, the World Bank and International Finance Corporation (IFC) have contracted an international firm SREO Consulting Ltd. (SREO) to support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and nondiscrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs including the PSU for the ULEARN Program, contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.

This Appendix presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/PSUs, the World Bank, CSOs, SREO, and other stakeholders.

Steps for Implementing Mitigation Measures

Depending on the status of a particular project, the following steps may or may not be followed sequentially. One or more of the steps might not be relevant to a project, or it might be possible to accomplish two or more steps at the same time.

SREO and the relevant World Bank task team leader, social development specialist, and PIU/PSU should discuss and agree on the relevance and sequence of steps prior to their implementation.

1. Assess the Status of the Project

The approach, type, and level of effort will vary depending on a project's implementation status:

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since the enactment of the AHA or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.

The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.

- **Pipeline projects.** A project that has not yet begun implementation provides the opportunity to integrate AHA risk mitigation measures and monitoring into its design.

ULEARN as a pipeline program has presented such an opportunity to integrate these mitigation measures and monitoring into its design.

2. Enhance Existing Project-Level Grievance Redress Mechanisms and Establish a Hotline

SREO will distribute a questionnaire to World Bank and PIU/PSU social development specialists to assess existing project-level GRMs. Based on a review of responses, it will recommend actions that the PIU/PSU or service providers can take to improve the GRMs.

With the support of SREO, the PIU/PSU and the social development specialist will revise the project GRMs to include effective, safe, ethical, and confidential referral pathways, ensuring that individuals or groups feel secure reporting incidents and that grievances are addressed quickly, efficiently, and appropriately.

SREO will provide training to GRM staff so they can recognize AHA-related complaints and route them to the EISM. The enhanced process will enable the PIU/PSU to identify complaints of exclusion or discrimination sent to the GRM and forward them to SREO within 48 hours of receipt.

Hotline on Discrimination and Exclusion

SREO has designed and operates a hotline (**0800 333125**) as an alternative way to receive complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups related to accessing benefits, services, or opportunities in World Bank/IFC operations. The design of the hotline will allow it to:

- Receive complaints in a confidential, anonymous, and nonjudgmental manner that is sensitive to local context and available in local languages.
- Compile detailed monthly reports of complaints.
- Advise complainants on remedial actions.
- Map available services for vulnerable or marginalized individuals or groups, including counseling, legal services, and protection.
- Refer individuals to appropriate local services or organizations.
- Implement a data privacy and protection policy that includes confidentiality clauses which must be signed by all personnel handling referrals
- Establish a data management system that guarantees safety through secure encryption and privacy protocols.
- Develop specific security protocols to ensure communications are safe, ethical, and confidential.
- Ensure all grievance mechanisms have appropriate whistle-blower protection protocols in place that enable safe reporting.

World Bank's Grievance Redress Service. In addition to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank project globally. A protocol has been developed to process all complaints related to exclusion or discrimination in the Uganda portfolio.

3. Conduct Outreach and Sensitization Activities

The World Bank team, PIUs/PSUs, and service providers should contact SREO to assist with:

- The preparation and implementation of a plan to disseminate information about existing GRMs and the dedicated hotline.
- The development and implementation of outreach activities on nondiscrimination delivered to beneficiaries and communities in a safe, ethical, and confidential manner.

4. Strengthen Capacity and Deliver Technical Support

The World Bank team, PIUs/PSUs, and service providers should contact SREO to assist with:

- Training workers, contractors, and project-level GRM staff on nondiscrimination and inclusion, including developing training materials, identifying venues, and hiring trainers.
- Delivering any other needed technical support related to the implementation of the mitigation measures.

SREO will prepare training modules for call center operators, data management personnel, and community outreach personnel on the appropriate handling of sensitive information given the AHA context.

5. Conduct Monitoring and Evaluation

Task team leaders, social development specialists, PIUs/PSUs, and service providers should contact SREO to:

- Support the monthly and quarterly monitoring and evaluation of the implementation of agreed measures and actions to mitigate the risk of exclusion and discrimination and to reduce incidents of discrimination or exclusion due to the AHA.
- Provide comments on regular evaluations of the effectiveness of mitigation measures.
- Offer feedback on recommendations and support the implementation of adjustments to mitigation measures based on their effectiveness.

6. Take Remedial Action

When a discrimination or exclusion complaint is reported to the dedicated hotline, the following process should be followed:

- SREO will report the grievance to the World Bank, propose appropriate remedial actions, and follow up on agreed actions to resolve the case.
- The World Bank's EISM coordinator and country manager will assess the complaint and then forward it to the Ministry of Finance, Planning and Economic Development. If the Ministry does not object to the World Bank's recommendations, they will be forwarded to the PIU/PSU.
- The PIU/PSU is responsible for implementing the agreed measures, which might include training and retraining, hiring, offering financial compensation, providing service referrals, taking disciplinary actions, and providing access to project services and benefits.

Roles and responsibilities for the Implementation of Mitigation Measures

The different steps presented are guidance on the how to do and the sequencing for the implementation of the mitigation measures bearing in mind that the sequencing can vary from one project to another, and activities done in parallel in some instances. Each Step identifies the roles and responsibilities of the GOU, PIU/PSU, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section in table 4-6.

This section also provides more specific information on roles and responsibilities to implement the mitigation measures of the EISM firm RSEO and the PIUs/PSUs. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/PSU with the support of

the EISM firm RSEO hired by the World Bank with NGO/CSOs and country-based development partners in implementing these mitigation measures. SREO's specific responsibilities include:

- Helping project teams improve existing project-level grievance redress mechanisms, and developing and operating an independent mechanism to identify, manage, and monitor cases of discrimination.
- Developing a robust data management system and process that secures personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs/PSUs, workers, contractors, subcontractors, and service providers.
- Ensuring that contracts, codes of conduct, hiring procedures, whistle-blower protections, and all other needed protocols are in place to remediate cases of discrimination.
- Supporting the World Bank in monitoring the efficacy of the agreed mitigation measures.
- Reporting complaints of discrimination to the World Bank, proposing appropriate remedial actions, and following up on agreed actions to resolve cases.

With the support of SREO, PIUs/PSU are responsible for implementing mitigation measures as described in the environmental and social instruments, including:

- Developing training, sensitization, information, educational, and communication materials on the principle of nondiscrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on nondiscrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on nondiscrimination and codes of conduct on nondiscrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.
- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

Table 4-6: Roles and Responsibilities for the Implementation of Mitigation Measures

Government of Uganda

- Facilitating the implementation of mitigation measures under the leadership of the Ministry of Finance, Planning and Economic Development and through PIUs/PSUs.
- Following up on reported cases of discrimination in coordination with the World Bank EISM coordinator and country manager.
- Achieving agreement with the World Bank on remedial actions and forwarding recommendations to PIUs/PSUs.

Project Implementation Units/Program Support Units

- Reviewing and enhancing project-level GRMs.
- Ensuring the implementation of mitigation measures.
- Facilitating capacity strengthening and community outreach efforts.
- Implementing agreed-on remedial actions and measures.

World Bank (task team leaders, social development specialists, and the EISM coordinator)

- Supporting capacity strengthening and training sessions.
- Facilitating communication between SREO and the Ugandan government, SREO and task team leaders, and SREO and PIUs/PSUs.
- Overseeing the remediation of reported cases, makes recommendations, and follows up to ensure their resolution.

Civil Society Organizations

- Hired by the EISM firm (SREO) to coordinate the monitoring of activities in Uganda.
- Participate in capacity-building and outreach activities to disseminate information about the hotline and the GRS to relevant populations.
- Receive and manage referrals for issues outside the EISM's scope.

SREO Consulting, Ltd.

- Establishes a dedicated hotline and assists PIUs/PSUs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/PSUs.
- Monitors and evaluates discrimination complaints.