



REPUBLIC OF UGANDA

STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

**UGANDA STRENGTHENING PUBLIC INVESTMENT AND
ASSET MANAGEMENT FOR GROWTH AND RESILIENCE (PIM
PLUS, P511206)**

June 2025

LIST OF ACRONYMS/ABBREVIATIONS

CEDAW	Convention on Elimination of all Forms of Discrimination Against Women
CITES	Convention on International Trade in Endangered Species
CoC	Codes of Conduct
COVID	Corona Virus Disease
CSO	Civil Society Organization
EHS	Environment, Health, and Safety
EHSGs	Environmental and Health Safety Guidelines
EIA	Environmental Impact Assessment
ESCP	The Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	The Environmental Social Management Framework
ESMP	The Environmental Social Management Plan
ESS	Environment and Social Standards
FGM/C	female genital mutilation and cutting
FPIC	Free Prior Informed Consent
GBV	Gender Based Violence
GoU	Government of Uganda
GRCs	Grievance Resolution Committees
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Services of the World Bank
HIV/AIDS	Human Immuno-deficiency Virus/Acquired Immune Deficiency Syndrome
ILO	International Labour Organization
LIPW	Labor-Intensive Public Works
MDAs	Ministries, Departments and Agencies
MoES	Ministry of Education and Sports
MoFPED	Ministry of Finance, Planning and Economic Development
MoGLSD	Ministry of Gender, Labor and Social Development
MoLHUD	Ministry of Lands, Housing and Urban Development
MWE	Ministry of Water and Environment
NDP	National Development Plan
NEMA	National Environment Management Authority
NFA	National Forest Authority
NGO	Non-Government Organization
NSPP	National Social Protection Policy
OHS	Occupational Health and Safety
OPM	Office of the Prime Minister
PbMIS	Parish-Based Management Information System
PDM	Parish Development Model
PDO	Project Development Objective
PIST	Project Implementation Support Team
PMT	Proxy Means Testing
PSC	Project Steering Committee
PSFU	Private sector Foundation of Uganda
RPF	Resettlement Policy Framework

RPF	The Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
(S)GBV	(Sexual and) Gender Based Violence
(S)VAC	Sexual Violence Against Children
SEP	Stakeholder Engagement Plan
SOPs	Standard Operating Procedures
STAAC	Strengthening Transparency, Accountability, and Anti-Corruption
STD	Sexually transmitted Disease
TB	Tuberculosis
UBOS	Uganda Bureau of Statistics
UNDP	United Nations Development Programme
UNHCR	United Nations High Commission for Refugees
UNHS	Uganda National Household Survey
UPF	Uganda Police Force
UWA	Uganda Wildlife Authority
VAC	Violence Against Children
VMGF	Vulnerable and Marginalized Group Framework
VMGP	Vulnerable and Marginalized Groups Plan
VMGs	Vulnerable and/or Marginalized Groups
WB	World Bank
WFP	World Food Programme
YOP	Youth Opportunities Project

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1 Introduction/Project Description

Uganda's Public Investment Management (PIM) system has undergone significant reforms since the mid-2010s, spearheaded by the Ministry of Finance, Planning, and Economic Development (MoFPED). These reforms aimed to strengthen project screening, appraisal, and implementation processes, including the establishment of a Development Committee, mandatory feasibility studies, and the introduction of the Integrated Bank of Projects (IBP). Despite these efforts, challenges persist across the PIM cycle, affecting project prioritization, budgeting, procurement, and implementation.

The current PIM system is plagued by inefficiencies such as cost overruns, payment arrears, and project delays, as highlighted in annual compliance audits. Climate risk considerations remain underdeveloped, with inadequate integration of resilience planning into infrastructure projects. Additionally, weaknesses in budgeting and financial planning result in funding gaps, particularly for domestically funded projects. Land acquisition issues further exacerbate project delays, with prolonged processes for identifying and compensating Project Affected Persons (PAPs).

Procurement and contract management challenges contribute to inefficiencies in project execution. Procurement lead times are significantly longer than stipulated, often due to corruption and lengthy appeals. Management of environment and social aspects has improved overtime however still faces inadequate early integration of projects formulations, design and implementation coupled with delays in review and approval impact assessment reports by the regulator – the National Environment Management Authority. Contract management systems are largely manual, limiting oversight and accountability. PIM monitoring remains inefficient, with outdated data collection methods and weak integration between monitoring tools and financial systems. Further, asset maintenance remains underfunded, leading to deteriorating infrastructure conditions.

The Government of Uganda (GoU) has requested financial support from the World Bank to address these challenges through a number of multi-faceted interventions, focused on improving PIM planning, attention to climate resilience, strengthened budgeting and implementation, and post-completion asset management.

Following the enactment of the Anti-Homosexuality Act, 2023, the preparation of this document and its annexes include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing benefits in World Bank-financed projects and program in Uganda. These measures are described in various sections of this document including Annexes 8, 9 and 10.

Uganda Strengthening Public Investment Management, Public Finance Systems, and Public Sector Capacity (PIMPLUS), P180700, aims to strengthen the GoU's performance and accountability in public investment and asset management, including mainstreaming attention to climate risks and resilience. PIMPLUS, P180700 comprises the following components:

a) Result Area 1: Resource and Sector planning and budgeting improved and climate responsive

- Develop policy framework for multi-year budgeting and commitment monitoring
- Align MTEF with the multi-year commitments by sectors and MDA-LGs
- Planning guidance on climate resilience priorities
- Guidance and support for costing climate resilience measures

b) Result Area 2: Project readiness strengthened, including resilience and sustainability.

- Feasibility Studies conducted on selected projects (through PPF)
 - Preparation processes strengthened
 - Review process of acquiring ESIA
 - Regular monitoring of ESIA compliance
 - Develop PIM guidelines on climate risk and mitigation
 - Revise budget classification and SCOA to track resource allocation.
 - Environmental mitigation costs included in project designs
- c) Results Area 3: Strengthening public sector capacity and change management for better PIM**
- Redesign E-GP modules procurement and contract management
 - Full integration of IBP and IFMIS; IBP and E-GP; IFMIS and E-GP
 - Strengthen processes for monitoring and reporting on project execution
- d) Results Area 4: Asset management and maintenance strengthened**
- Develop O&M standards and guidelines
 - Develop an asset risk mitigation response strategy to climate change shocks
 - Develop an assets management system
 - Establish a framework for monitoring, evaluation and reporting on assets and its implementation.

PIMPLUS (P180700) is being prepared as a PforR support under the World Bank's Environment and Social Framework (ESF).

1.1 Program Description and Scope

The Strengthening Public Investment Management, Public Finance Systems, and Public Sector Capacity project aims to enhance public investment efficiency, improve financial management systems, and strengthen institutional capacity in Uganda. The Uganda PIM Plus Program is aligned with Uganda's Vision 2040 and National Development Plans, seeking to support sustainable economic growth by ensuring efficient resource allocation and public sector transparency.

The Uganda PIM Plus Program has been designed to support the PFM Reform strategy (2025-2029) and the associated Resource Enhancement and Accountability Program (REAP) II Program, which serves to implement the PFMRS. It also supports two of the six strategic objectives of Uganda's National Development Plan IV: (iv) building and maintaining strategic sustainable infrastructure, and (v) strengthening good governance, security, and the role of the state in development, as well as the adaptation objectives set out in Uganda's Updated NDCs (2022).

1.2 Project Scope

The Uganda PIM Plus Program has two components, including the Program for Results component and the Investment Project Financing (IPF) Component which includes Technical Assistance. Particularly, the IPF component will consist of the Project Preparation Fund hosted by the National Planning Authority (NPA); and a window dedicated to technical assistance, to be provided to the participating beneficiary institutions.

Prioritization criteria for the PPF are: (i) preparation of public investment projects enhancing Uganda's mitigation or adaptation goals (e.g. irrigation and other water management, resilient infrastructure [adaptation] and railroads and urban public transport [mitigation]; nature-based solutions); and (ii) ensuring high-quality and timely environmental assessments. Areas for feasibilities include sectors in energy, transport, ICT, agriculture, tourism, minerals, human capital development, STI, education and health among others.

2 Stakeholder Engagement Plan

2.1 Description of SEP

The Stakeholder Engagement Plan (SEP) seeks to define a structured, purposeful, and culturally appropriate approach to stakeholder engagement and disclosure of information throughout the entire project cycle, in accordance with ESS10. The SEP outlines the ways in which the NPA will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable, which are at risk of being left out of project benefits. It recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities in which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders, leading to improved decision-making. Having a robust SEP will ensure that right information including updates, changes, challenges, or risks related to the project is provided at the right time to stakeholders. The SEP will also require thorough engagement of stakeholders during preparation of the project's Environmental and Social Management Plan (ESMP), SESA that will be developed for this PIMPlus project. The SEP will be disclosed publicly and will be updated as and when necessary.

Specifically, this SEP serves the following purposes: stakeholder identification and analysis; outlining engagement methods for effective communication and consultation; defining roles and responsibilities for implementing the SEP; defining monitoring and reporting requirements to ensure the effectiveness of the SEP; elaborating on the role of grievance redress mechanism (GRM) and outlining strategies for disclosure or relevant instruments and reports. Thus, the SEP will provide a platform for influencing decisions at different stages of the project.

2.2 Objective/Description of SEP

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 PIMPLUS (P180700) will communicate with stakeholders and includes a mechanism by which all people (without exclusion or discrimination of vulnerable or marginalized individuals and groups can raise concerns, provide feedback, or make complaints about the project and any activities related to the project.

The SEP specifically emphasizes methods to engage groups considered most vulnerable, which are at risk of being left out of project benefits. In accordance with ESF's ESS 1 and ESS 10, the SEP will ensure social inclusion and non-discrimination, and implementation of measures to mitigate the risk of discrimination against or exclusion of any individuals or groups affected as specified in the ESSA, and these measures will subsequently be reflected in the project operational manual and implemented throughout the life of the project.

3 Stakeholder identification and analysis per project component

3.1 Methodology

For the PIMPLUS (P180700), the following stakeholders have been identified and analyzed through comprehensive consultations including meetings with central government ministries, departments, and agencies such as MoFPED, MoLHUD, MGLSD, NEMA, MoWT, MWE, MEMD, National planning authority (NPA, and Office of the Auditor General (OAG). The team also consulted with development partners, associations, Practitioners (UAIA), academia (Makerere University Department of Environment). In addition, the consultants used a checklist and interview guides which upon receipt of feedback, analysed the information provided and followed up with the relevant Officers as was considered appropriate.

These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

3.2 Affected parties

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- i. The directly concerned parties will be the Ministries, Departments and Authorities (MDAs) and especially sectors that play a critical role in public investment management with significant capital expenditures. The direct affected parties include: MoFPED, NPA, NEMA, MoLHUD, MWE, MoGLSD, MAAIF, MEMD, DLGs among others. Central Government MDAs will benefit from more accurate planning and budgeting for PIM projects and more efficient systems for procurement, contract management, asset maintenance and monitoring, enabling more sustainable projects to be delivered on time and within budget.
- ii. Government officials, including district, city, municipal administration of the in the project area, including environmental protection authorities
- iii. PIMPLUS employees and contractors.

3.3 Other interested parties

The projects' stakeholders also include parties other than the directly affected/beneficiary communities, including:

- i. Households and private sector enterprises as taxpayers and as infrastructure users.
- ii. Ugandan citizens.
- iii. Private sector entities contracted by MDAs to deliver PIM projects will benefit, as stronger government systems for project budgeting and execution are expected to reduce payment delays to service providers which otherwise hinder their cashflow, raise financing costs, limit economic activity, and create tax arrears.
- iv. Broadly, Ugandan households and private sector enterprises will benefit from accessing better maintained and more climate resilient infrastructure, with fewer climate-induced interruptions to the transport network. As taxpayers, they will benefit from more efficient use of the revenue raised.
- v. Community-Based Groups (CBOs) and Non-Governmental Organizations (NGOs) that represent local residents and other local interest groups, and act on their behalf
- vi. Academic institutions such as Makerere University, UMI, Nsamizi that can provide capacity building E&S risk management.

3.4 Disadvantaged / vulnerable individuals or groups

Because the project covers the entire country, there are potentials of affecting the VMGs. In addition to the VMGs, there is potential exclusion from and discrimination against the vulnerable or marginalized individuals and groups from project benefits and opportunities. The vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, dependence on unique natural resources, etc.

Within the Project, the vulnerable or disadvantaged groups may include but are not limited to the following:

- Female-headed households, who may be impaired from accessing information because they are disproportionately impacted by poverty, access to resources or lack of voice in the community, or because they have limited time to participate because of their activities and various commitments but could be adversely impacted by Project activities such as workers' influx.
- Elderly people, who may be impaired from accessing information, maybe because they are incapacitated to read, to hear or to walk, or because they live alone and at a distance that prevent them from accessing information available in public places or near the sub-project sites, even though they might be adversely impacted by construction activities such as noise;
- People with disability who may also be impaired from accessing information and yet be adversely impacted by Project activities if for instance these generate obstruction works on a road which would adversely impact people using wheelchairs or visually impaired persons;
- Youth and persons, whose views may not be listened to but who may be adversely impacted by Project activities such as increased traffic or community health and safety impacts; and
- Households (women, and orphans and vulnerable children (girl child, street children, children from extremely poor households) deemed to reside below the poverty lines, or whose income is significantly lower than the average income of their surrounding communities, that may be affected by the Project and therefore their income status could be further impacted.
- HIV/AIDS infected and affected children, children with disabilities, children living with elderly or disabled parents, and children in paid employment.
- Given the project country-wide coverage, this category could also include Vulnerable or Marginalized Groups (VMGs) or ethnic minorities/historically disadvantaged groups in Uganda, namely, the IK, TEPET, BATWA, BENET (and generally Karamoja region which is referred to as historically disadvantaged).
- Any other individuals and groups that may be identified and assessed as vulnerable or marginalized during the implementation project period
- Refugees and internally displaced persons

On overall, strengthening of gender and equity considerations in public investment management will benefit women and disadvantaged groups

Vulnerable groups within the communities and institutions affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project including email, virtual and/or face-to-face workshops and meetings is also provided in sections 4.3 & 4.4.

3.5 Stakeholder identification and analysis

Table 3-1: Stakeholders Identified

Stakeholder Group	Interest/Cause in Engagement
National level	
<ul style="list-style-type: none"> World Bank Team (Task team leader, Country manager, technical officers) 	<ul style="list-style-type: none"> Ultimate high interest the results but along the way also interested in the fulfillment of the process guidelines.
<ul style="list-style-type: none"> UN Agencies and other development partners 	<ul style="list-style-type: none"> Represents the interests of different interested parties and vulnerable groups
<ul style="list-style-type: none"> Ministries, Departments Agencies (MDAs) Ministries: NPA, MoFPED, MTIC, MAAIF, MoGLSD, MLHUD, MWE, MoH and MoLG Departments and Agencies: NEMA, NFA, NPA, EOC, OAG and Academia (Makerere University) 	<ul style="list-style-type: none"> Legislative and executive authorities. Functions of supervision and monitoring
<ul style="list-style-type: none"> NGOs/CBOs 	<ul style="list-style-type: none"> Represents the interests of different interested parties including vulnerable or marginalized individuals or groups
<ul style="list-style-type: none"> Mass media 	<ul style="list-style-type: none"> They are intermediaries for informing the general public about the planned activities of the project developer(s) and for information disclosure in connection with the proposed project(s).
<ul style="list-style-type: none"> Academic, Research and Scientific Institutions 	<ul style="list-style-type: none"> Scientific understanding of the range or problems associated with the proposed project(s). Scientific approach to the relevant issues. Possible specialists' provision for further activity in project implementation.
<ul style="list-style-type: none"> Business community / Private sector 	<ul style="list-style-type: none"> Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
<ul style="list-style-type: none"> Project employees and Project's sub-contractors 	<ul style="list-style-type: none"> Technical understanding of the range or problems associated with the proposed project(s).
District level	
<ul style="list-style-type: none"> Local Governments of Project Area Districts/ Sub counties 	<ul style="list-style-type: none"> Legislative and executive authorities. Functions of supervision and monitoring
<ul style="list-style-type: none"> Local NGOs/CBO/ faith-based institutions 	<ul style="list-style-type: none"> Represents interests of different interested parties including vulnerable or marginalized individuals or groups
<ul style="list-style-type: none"> Mass media 	<ul style="list-style-type: none"> They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed project.
<ul style="list-style-type: none"> Business community 	<ul style="list-style-type: none"> Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
<ul style="list-style-type: none"> Local communities 	<ul style="list-style-type: none"> Interested parties living in regions/ districts of project activities that could be indirectly affected by the realization of the projects
Local level	

Stakeholder Group	Interest/Cause in Engagement
<ul style="list-style-type: none"> • The Parish Development Council (PDCs), including Area counselors 	<ul style="list-style-type: none"> • Represents interests of affected communities and vulnerable groups
<ul style="list-style-type: none"> • Local Business community/ Private sector including chain Stores 	<ul style="list-style-type: none"> • Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
<ul style="list-style-type: none"> • Local land users and other local population (Cultural Institutions and Opinion leaders (Religious leaders and Institutions, LC1s and area councilors • VMGs and Ethnic Minorities namely the IK, TEPET, BATWA, BENET and other Vulnerable or Marginalized Individuals or Groups, 	<ul style="list-style-type: none"> • Potential vulnerable or marginalized individuals or groups affected communities and other interested parties living in the close vicinity. • Project proponents appreciate their vulnerable position and to put in place appropriate measures that will enable them to access project benefits. • Project proponents to appreciate their disproportionate higher risk of exposure to project related risks and adverse impacts and put in place appropriate mitigation measures • Inclusion of VMGs and any other any other vulnerable individuals in national programs is a constitutional requirement ESS7 was triggered which makes it mandatory for the project to engage with the identified ethnic minorities -the ESCP requires that a VMG plan be prepared three months after project effectiveness. • Many VMGs s and other Vulnerable or Marginalized Individuals or Groups such as PWD and PLHIV are represented by influential CSOs which gives them a strong voice

3.6 Literature Review

Literature review involved desktop reviews of documents to check for consideration of the Project's key themes as well as planning, methodological and implementation requirements. It was very useful for triangulation purposes to seek convergence and corroboration of approaches and findings from different data sources and methods. The review entailed reading legal and policy instruments, guidelines, and reports on related projects.

Some of the key documents that have been reviewed include:

- a) The World Bank Environmental and Social Framework 2017, Washington, D.C.
- b) Stakeholder Engagement Plan, GROW Project, Ministry of Gender Labour and Social Development.
- c) Stakeholder Engagement Plan, GROW Project, Development Response to Displacement Impacts Project Phase II (DRDIP II)
- d) Stakeholder Engagement Plan, Food Systems Resilience Program for Eastern and Southern Africa, April 2022
- e) Stakeholder Engagement Plan, Prime Minister's Delivery Unit, Enhancement of Productivity, Accountability and Knowledge Systems Project

- f) Environmental Guidelines to Local Governments for strengthening Compliance with Safeguards Requirements in Development Projects November 2020, Ministry of Water and Environment, Uganda.
- g) Social, Safety and Health Safeguards Implementation Guidelines for Local Government October 2020, Ministry of Gender Labour and Social Development, Uganda.

3.7 Meetings

The World Bank's ESS 10 recognizes the importance of inclusive and meaningful engagement between the Borrower and Project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The consultant utilized both physical meetings, and online platforms such as Zoom, Google meet, WebEx, and Email exchanges to conduct extensive, meaningful and timely consultations. The use of multiple platforms helped ensure that stakeholders with different preferences and accessibility needs could participate in the consultation process. The process resulted in identification and consultation of various stakeholders at strategic level.

4 Stakeholder Engagement Program

4.1 Summary of stakeholder engagement done during project preparation

The SEP focuses on the key field findings following consultations with the key stakeholders specifically MDAs, NGOs, Academia and other professional associations. The findings from the consultation of stakeholders for the ESSA will inform the overall project implementation including the SEP. It will also propose actions to strengthen engagement including management of grievances in the implementing MDA and DLG systems, hence contributing to Environmental and Social sustainability. The Consultants did get in direct contact with the relevant technical officers so that they could follow up on identified concerns including making clarifications in the drafting of the instruments as appropriate.

The consultations focused on the general scope of the Project, and particularly on ways integration of Environment and Social Risk Management project preparation, selection, and approval in Public Infrastructure Management. The views from these consultations were recorded, presented as part of the SEP. A summary of the views about the project provided by the stakeholders, in the table below. During project preparation, the following public consultation meetings were conducted.

Table 4-1: Stakeholders Identified and Consulted So Far

Stakeholder	Key personnel consulted*	Date	Method of Engagement	Gender		
				Male	Female	Total
National Environment Management Authority (NEMA)	Principal Monitoring and Evaluation Officer, Manager Strategic Planning and Partnership,	17 th 02 2025	Physical Meeting	2	-	
Ministry of Gender Labour and Social Development (MoGLSD)	Commissioners, Principal General Health Inspector, Department of Social Risk Management, Principal Specialized Safety Inspector (Construction), Principal Community Development Officer	17 th , 02 2025, 14 th 03 2025	Physical Meeting	11	4	
Uganda Association of Impact Assessors (UAIA)	Practitioners	24 th 02 2025	Online	6	3	
Ministry of Environment and Mineral Development (MEMD)	Senior Environment Officer, Social Development Officer, Land officer		Physical Meeting	1	2	

Ministry of Lands Housing and Urban Development (MLHUD)-CGV Department	Chief Government Valuer, Deputy Chief Government Valuer, Senior Government Valuer	28 th 02 2025	Physical Meeting	3	-	
National Planning Authority (NPA)	Manager Production, Trade and Tourism Planning	26 th 02 2025	Physical Meeting	1	-	
Ministry of Finance and Planning and Economic Development (MoFPED)	Agt Assistant Commissioner PAP Department, Senior Economist PAP Department, BMAU, Asset Management Unit, REAP	6 th 03 2025, 11 th 03 2025,	Physical Meeting	5	8	
United Nations Development Programme (UNDP)	BIOFIN Coordinator, Team Leader-Nature, Climate, Energy and Resilience (NCER)	28 th 02 2025	Physical Meeting	1	1	
Makerere University	Head Department Department of Environment	28 th 02 2025	Physical Meeting	1	1	
Office of the Auditor General	Principal specialists, Senior Principal Auditor	5 th 03 2025	Physical Meeting	4	-	
Ministry of and Works Transport (MoWT)	Senior Environmental Officer, Senior Sociologist	3 rd 03 2020	Online meeting	2	2	
Environmental Governance Institute (EGI)	Environmentalist	26 th 02 2025	Online	2	-	
Ministry of Water and Environment (MWE)	Senior Environment and Social Safeguards	7 th 03 2025	Online	1	2	
Total				40	23	

Table 4-2: Key Stakeholder Issues Raised and responses

Institution	Issues Raised
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Ministry of Gender Labour and Social Development (MoGLSD)	<ul style="list-style-type: none"> • The issue of SRM is so core to MGLSD <p>The Ministry of Gender, Labour and Social Development (MGLSD) comprises 11 departments, each led by a commissioner and supported by Technical Teams. These departments include Youth and Children Affairs, Culture and Family, Equal Opportunities, Inclusion, Diversity, Persons with Disabilities (PWD), Gender and Women Affairs, Community Development and Literacy, Labour, Employment Services and Productivity, Occupational Safety and Health (OSH), Finance and Administration. Each department adheres to specific laws and policies designed to address its mandate effectively.</p> <p>There is a huge gap to do with SR Management at MoGLSD</p> <ul style="list-style-type: none"> • In terms of policy and regulatory framework, there is a gap as no law consolidates all social risk management (SRM) together. To address this issue, the Ministry introduced the SIA and Accountability Bill, which addresses all social risk matters. This bill aims to empower Community Development Officers (CDOs) and designates everyone as an inspector to manage social risks. • No Community Development Officers (CDOs) or labour officers at lower government levels to manage social risks. • Lack of a comprehensive regulatory or policy framework to integrate SRM into governance. • There are no laws that empower the gender officers or that give the officers the mandate to manage SRM (eg GBV, SEA/SH). Gender officers are not gazetted to enforce social risks (GBV, SEA/SH). <p>SRM Capacity Issues: (Capacity gap in terms of staffing)</p> <ul style="list-style-type: none"> • Limited number of inspectors to monitor SRM at MGLSD. Inspectors for SRM or social safeguards at the MGLSD are very few, they are either labour officers or OHS officers. However, the law was giving powers of the inspectorate to evoke their powers once they notice any non-compliance. • Capacity gaps among engineers, MGLSD officers, local leaders, and communities regarding SRM. • Inadequate capacity for local governments to implement the grievance redress mechanism (GRM) including ensuring inclusiveness and non-discrimination in engaging stakeholders and managing sensitive complaints related to potential vulnerable or marginalized individuals and groups. <ul style="list-style-type: none"> • Limited coordination in ESIA reviews affects input from lead agencies, leading to delay or failure to provide comments/feedback, especially LGs and MoGLSD. Regarding the review of ESIAs and RAPs, MGLSD expressed concerns about inadequate information sharing from lead agencies, particularly the NEMA and the MoLHUD. • Social safeguards are not fully appreciated or integrated into projects, often treated as mere formalities. • Limited resources and tools for local government officers to monitor and supervise SRM compliance.
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	<ul style="list-style-type: none"> • Poor coordination between MGLSD and other MDAs on SRM and project implementation. • Compensation practices neglect social capital aspects like GBV, psychosocial support, child rights, and accessibility for PWDs. • Districts use outdated or pre-determined land values, leading to unfair compensation. • Physical infrastructure often overshadows social infrastructure (human-centric interventions). eg Many road designs fail to include common conveniences like toilets or accommodating PWDs. <p>Cultural Heritage and Social Capital Valuation: Guidelines overlook intangible cultural heritage and underappreciate social capital in compensation processes.</p> <p>Proposed Solutions and Initiatives</p> <p>a. Policy and Legal Framework:</p> <ul style="list-style-type: none"> • Development of the Social Impact Assessment (SIA) and Accountability Bill to address SRM comprehensively and empower CDOs. <p>There is a capacity-building course for SRM through partnerships with Makerere University (MAK), Nsamizi Training Institute, and Uganda Management Institute (UMI) to develop a professional course equivalent to the NEMA certification.</p> <p>Capacity Building:</p> <ul style="list-style-type: none"> • Train CDOs, labour officers, and engineers in SRM to improve monitoring and supervision. • Enhance community capacity to voice concerns effectively. <p>d. Coordination and Awareness:</p> <ul style="list-style-type: none"> • Improve coordination between MGLSD and MDAs on SRM matters. • Cascade the 2013 GRM circular to sub-county and town council levels. <p>e. Infrastructure Design and Inclusion:</p> <ul style="list-style-type: none"> • Ensure road and building designs consider PWDs and include reasonable accommodations. • Balance investment between physical and social infrastructure, e.g., allocating 45% to social protection and the rest to Physical infrastructure. <p>f. Cultural Heritage:</p> <ul style="list-style-type: none"> • Develop mechanisms to value both tangible and intangible cultural heritage during compensation. <p>g. Funding and Resources:</p> <ul style="list-style-type: none"> • Secure funding to support functionality and follow-up of Grievance Redress Committees (GRCs).
<p>Ministry of Housing Lands and Urban Development (MLHUD)</p>	<p>There is ongoing Policy formulation and legislation including new Bills and amendments at the Ministry</p> <ul style="list-style-type: none"> • A Valuation Bill (2024) is before Parliament to formalize CGV's role, set report validity periods (2 years), and establish cut-off dates for compensation. • Valuation standards established by CGV • The MLHUD has Complaints management system which was

	<p>developed in 2019</p> <ul style="list-style-type: none"> • The Ministry has implemented the Land Valuation Management Information System (LVMIS) and a new GIS-enabled system to manage valuation requests, inspections, and record-keeping. These systems aim to enhance transparency and efficiency in land acquisition planning. Nevertheless, the challenge lies in securing funding for deployment, addressing bug fixes, and ensuring seamless data integration, including utility layers and environmental maps. <p>Challenges:</p> <ul style="list-style-type: none"> • There is no legal clarity on approval of RAP, as CGV only approves valuation and survey. • Existing laws do not penalize delayed payments, leading to inflated compensation claims over time (e.g., a 340 million UGX valuation escalated to 4.4 billion UGX in court). • Projects often proceed without assured funds for land acquisition, hence causing delays. • There is a big challenge on unpaid Compensation: For example, there is over 500 billion UGX in unpaid compensation reports, exacerbating project delays and costs. • Discrepancies in valuation and compensation amounts. • The Office of the Chief Government Valuer (CGV) currently operates without multidisciplinary teams necessary for a comprehensive assessment of land acquisition impacts. There is insufficient staff capacity, particularly in areas such as natural and cultural heritage, plant and machinery, and public infrastructure. Additionally, there are staffing gaps, including environmentalists, sociologists, legal experts, and personnel specializing in surveying and mapping. Furthermore, the budget allocated to support resettlement processes is inadequate. • Social aspects (e.g., livelihood restoration) are not systematically addressed in Resettlement Action Plans (RAPs). • Staff are primarily valuation-focused, limiting their ability to address social and environmental risks. • Lack competence staff in assessing the quantum of cultural heritage, natural resources and fixed plants • Weak coordination between ministries (e.g., Lands, Finance) and implementing agencies. Weak linkages between Ministries of Lands, Finance, and NEMA (National Environment Management Authority). • Delays in acquisition of land which in turn affects implementation of projects and increasing costs. • CGV has human resource gaps such as legal expertise, social specialists, environmental specialists, cultural heritage. • CGV has a Land Valuation Management Information System (LMIS) but requires rolling, but lacks required handheld GPS, computers, data collection tables, vehicles • The Ministry of Lands gazettes land for public projects and
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	<p>assesses compensation but is often under-resourced.</p> <ul style="list-style-type: none"> • Private consultants are hired for evaluations, but oversight remains a challenge. <p>Recommendations and Proposed</p> <ul style="list-style-type: none"> • Capacity Building: Train CGV staff in social impact assessment, environmental safeguards, and multidisciplinary evaluation. • Legal Reforms: Expedite passage of the Valuation and Real Estate Bills to standardize practices and curb speculation. • Funding Mechanisms: • Explore interest penalties for delayed payments (benchmarked from Ghana's 6% annual rate). • Advocate for dedicated budget lines for land acquisition in project planning. • Strengthen Coordination: Formalize roles between Ministries of Lands, Finance, and MDAs to align budgeting with valuation timelines.
NPA	<p>National Vision and Development Plans:</p> <ul style="list-style-type: none"> • The national vision is long-term, extending up to 2040, implemented through multiple development plans. • Three plans have been implemented so far, with the fourth (NDP4) underway. • Emphasis on anchoring public investment to national development goals and reducing regional and income inequalities. <p>2. Inclusiveness and Social Impact:</p> <ul style="list-style-type: none"> • Projects are vetted based on their inclusivity, social impact, and contribution to socio-economic transformation. • Key criteria include reducing regional disparities, income inequality, and ensuring no one is left behind. • Indicators focus on poverty reduction, employment creation, and social equity. <p>3. Environmental and Climate Change Considerations:</p> <ul style="list-style-type: none"> • There is a significant gap in addressing environmental and climate change issues in project planning. • Limited capacity and understanding of the link between climate change and project success. • Environmental and Social Impact Assessments (ESIAs) are weak, particularly in cost-benefit analysis and environmental economics. <p>4. Institutional Challenges:</p> <ul style="list-style-type: none"> • Lack of environmental and climate change expertise within institutions, particularly in the Ministry of Finance.

	<ul style="list-style-type: none"> • Environmental considerations are often treated as donor conditions rather than integral to project goals. • Weak coordination between the National Planning Authority (NPA) and other stakeholders like NEMA and the Ministry of Gender. <p>5. Capacity Building and Institutional Strengthening:</p> <ul style="list-style-type: none"> • NPA has a project unit focused on building capacity for project analysis and appraisal. • Efforts are being made to recruit environmental and social specialists to strengthen project units. • Need for dedicated project units in every ministry to improve project preparation and review. <p>6. Project Development and Implementation Challenges:</p> <ul style="list-style-type: none"> • Projects often remain as ideas for years, with delays in moving from concept to feasibility and funding. • Environmental assessments are often an afterthought, leading to delays and increased costs. • Poor maintenance of infrastructure is a critical issue, with NDP4 prioritizing maintenance over new construction. <p>7. Climate Change Integration:</p> <ul style="list-style-type: none"> • Climate change is not fully integrated into institutional mandates. • Incorporate climate compliance budgeting and mechanisms into project planning to ensure environmental and climate considerations. • Training and tools are required to improve skills in climate science, policy, and project screening. <p>8. Proposals for Improvement:</p> <ul style="list-style-type: none"> • Establish dedicated project units in all ministries to streamline project development and review. • Strengthen linkages between social, environmental, and project planning departments. • Implement climate compliance budgeting and provide incentives (carrot and stick) for adherence. • Invest in training, tools, and methodologies to enhance capacity in environmental and climate-related project analysis.
OAG	<ul style="list-style-type: none"> • Audit a few and their audits are limited to value for money • Audit selected projects especially Oil and Gas • Lack staffing specific to E&S projects
MEMD	<ul style="list-style-type: none"> • Uganda still relies on outdated 1997 EIA Guidelines, despite updated regulations. • Air and water quality standards exist but lack stringent

	<p>enforcement.</p> <ul style="list-style-type: none"> • Restoration practices are weak, particularly among small-scale developers who lack funding. • Lack of updated guidelines for EIAs and environmental audits. • Inconsistent enforcement of mitigation measures post-project completion. • There are outdated laws (e.g., Land Acquisition Act of 1965) which cause delays in compensation to unclear valuation rates. • There are no standardized valuation rates, leading to disputes and court cases. • Resettlement Action Plans (RAPs) are often delayed, implemented after project commencement. • No standardized framework for monitoring and compliance. • The Ministry of Energy is developing a Climate Change Strategy and Action Plan • Lack of funding for environmental monitoring and compensation.
NEMA	<p>On Automation</p> <ul style="list-style-type: none"> • Significant progress has been made in reducing the time taken to review reports. • However, there is a need to enhance automation capacities, especially at the district level. • Challenge: DLG officials often lack basic resources like computers and internet access, causing delays. • Recommendation: Provide necessary resources and build capacity to ensure timely and efficient system-based reviews. <p>On Capacity Building</p> <ul style="list-style-type: none"> • Practitioners: There is a need to strengthen practitioners' skills for improved performance. • NEMA Staff: Address skills gaps with refresher training, focusing on critical aspects like report reviewing and key considerations. <p>On Coordination</p> <ul style="list-style-type: none"> • There is a very big gap on coordination between NEMA and all MDAs <p>On Resources</p> <ul style="list-style-type: none"> • NEMA faces challenges due to a lack of tools such as fleets, equipment, and mobile laboratories. There is to invest in acquiring essential tools to enhance operational efficiency. <p>On Monitoring</p> <ul style="list-style-type: none"> • While progress has been made in automating reviews, the monitoring process is lagging behind. • There is inadequate regional presence and insufficient staffing hinder effective follow-up. There is therefore a need to strengthen monitoring systems and increase staffing to ensure regional coverage. <p>On Compliance Assistance and Enforcement</p> <ul style="list-style-type: none"> • NEMA's compliance department needs improved skillsets,

	<p>including certification methods and effective case management. There is a need to provide targeted training and capacity development to enhance enforcement processes.</p> <p>On Public Awareness and Sensitization</p> <ul style="list-style-type: none"> Public education programs are crucial but underfunded. There is a challenge of high costs compromising NEMA's ability to execute environmental awareness campaigns. Explore partnerships and alternative funding mechanisms to support routine sensitization programs. <p>On Audits and Accountability</p> <ul style="list-style-type: none"> While audits are conducted, their findings are often underutilized. There is a need to enforce audit outcomes by imposing consequences for non-compliance and integrating audit feedback into project improvement mechanisms. <p>On Reporting Mechanisms</p> <ul style="list-style-type: none"> Reporting needs to be automated and standardized and be accessible to all MDAs.
UAIA	<p>There are delays in EIA Reviews and Approvals by NEMA:</p> <ul style="list-style-type: none"> Projects face prolonged delays due to NEMA's slow review processes, often exceeding statutory timelines (e.g., 21-day review period ignored). <p>There is weak enforcement of safeguards</p> <ul style="list-style-type: none"> Non-compliance with E&S conditions (e.g., post-project restoration) due to lax monitoring. For Examples, Contractor's bypass EIA approvals, starting construction without NEMA clearance. Environmental audits lack follow-up; corrective actions are rarely enforced. <p>Outdated Legal Frameworks:</p> <ul style="list-style-type: none"> Land Acquisition Act (1965): Causes compensation delays due to unclear valuation rates. Draft Resettlement Policy (2018): Remains unapproved, leaving resettlement actions unstandardized. Conflicts with World Bank standards: E.g., Uganda's compensation rates differ from Bank requirements, causing disputes. <p>Capacity and Operational Gaps:</p> <ul style="list-style-type: none"> There is inadequate technical Capacity at both NEMA and at the districts. They are understaffed and underfunded (e.g., district environment officers lack tools like computers/internet). There is limited expertise in areas such as climate risk assessments. <p>Implementing agencies often conduct poor stakeholder engagement, typically holding consultations late in project cycles.</p> <ul style="list-style-type: none"> Grievance Redress Mechanisms: The established committees face funding shortages for facilitation, resulting in unresolved

	<p>complaints. Additionally, there is no structured follow-up on reported grievances.</p> <ul style="list-style-type: none"> • Engineers dominate project teams, sidelining E&S specialists. • Consultants hired for EIAs are given unrealistic timelines (e.g., 2 months for complex assessments). <p>Climate Change Integration:</p> <ul style="list-style-type: none"> • There is a lack of understanding and implementation of climate resilience measures. For example, flood risk assessments do not have standardized mitigation plans for 25/50/100-year return periods.
Makerere-Department of Environment	<p>1. Strategic Direction and Curriculum Development The university seeks to extend its scope beyond conventional education by collaborating with industry sectors and addressing significant issues such as climate change and agri-food systems, in accordance with the National Development Plan (NDP). This marks a transition towards becoming a "knowledge hub" that actively contributes to solving societal challenges.</p> <p>Curriculum Review: The Department of Geography and Climate Science has updated its Master's and PhD curricula to incorporate social science components, based on feedback from graduates. This update includes partnerships with the College of Humanities to include social, agri-media, and governance elements into environmental studies.</p> <p>Short Courses: The department offers targeted short courses (e.g., Certificate in Environmental and Social Impact Assessment for Practitioners) to retool professionals and newcomers. These courses are demand-driven, with content adjusted based on cohort needs (e.g., risk assessment, COVID-19 impacts).</p> <p>Partnerships and MOUs: The university has two active MOUs with NEMA:</p> <ul style="list-style-type: none"> ✓ Capacity Building: Focused on identifying gaps, joint research, and resource mobilization. NEMA commits to recommending capacity-building initiatives. • A tripartite MOU has been established with NEMA and the Association of Local Processors to co-develop and deliver training programs, including a short course on environmental and social impact assessment. These partnerships aim to provide practical training, align with industry needs, and promote interdisciplinary collaboration. <p>Emphasis on Environmental and Social Sustainability: The curriculum underscores the foundational principles of environmental and social impact assessments (ESIAs), ensuring practitioners comprehend their purpose and application. Core modules include:</p> <ul style="list-style-type: none"> - Institutional frameworks and legal compliance.

	<ul style="list-style-type: none"> - Stakeholder engagement and social impact analysis. - Project management, budgeting, and professional ethics. - Climate risk assessment and mitigation. <p>Gaps Addressed: Weaknesses in alternatives evaluation, grievance redress mechanisms, and audit compliance were highlighted as areas for improvement.</p> <p>New Short Courses Proposed Six new short courses were outlined, targeting government officials, practitioners, and private sector actors:</p> <ol style="list-style-type: none"> 1. Integrating Environment, Social, and Climate Change in Investment Cycles**: Focused on public investment management. 2. Fundamentals of Environment and Social Sustainability**: Core principles for all stakeholders. 3. Climate Risk Assessment and Climate Proofing Investments**: Addresses climate resilience in projects. 4. Assessment and Management of Environmental and Social Risks**: Includes report review skills for MDA staff. 5. Management of Health and Safety in Projects**: Covers occupational and community health. 6. Integration of ESHs in Procurement**: Ensures environmental and social criteria in contracts. <p>Demand for standalone audit courses and stronger social impact modules was noted.</p>
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In addition to the above consultations, Consultations were done in March 2023 to January 2024, with civil society organizations, donors, and other interested parties regarding the exclusions and discrimination risks and impacts, which apply to PIM PLUs project. The engagement was led by the World Bank, and included meetings with Government of Uganda representation, other Development partners and NGOs/CSOs. The identified risks and concerns included:

- i. Limited capacity of project teams in assessing and addressing vulnerable or marginalized individuals or groups -related risks
- ii. Vulnerable or marginalized individuals or groups may decline to take part in consultations for fear of being reported.
- iii. The possibility of exclusion from employment opportunities
- iv. Project teams may not be equipped to adequately address complaints related to discrimination, particularly as complaints may be challenging to address without causing harm to the parties involved.
- v. Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries
- vi. The need to provide safe spaces and other psychological support for vulnerable or marginalized individuals and groups.

4.2 Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement.

The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations, target stakeholders and inclusive and non-discriminative approaches of addressing risks and impacts that may adversely affect the vulnerable or marginalized individuals and groups. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects. Thus, stakeholders will be encouraged to express their views freely without fear of reprisal. In addition, the project will ensure confidentiality for stakeholders who request it.

Table 4-3: Stakeholder Engagement Plan

No .	Project Phase	Targeted Stakeholders	Topic of consultation/ message	Method Used	Responsible Personnel	Frequency/Timeliness	Engagement Activity
1	Project Preparation Phase	Development Partner, CSOs, All MDAs	Collect views on the design of the project. Present the project and receive feedback on project. ESMP, SESA development (ES risks & mitigation measures, GRMs, and SEP	Formal meetings Focus group discussions. One-on-one interviews Formal meetings Focus group discussions. One-on-one interviews	PIU Department Safeguards Department		National stakeholder consultations
		Members of the District Local Government and Lower Local Government, Beneficiary Institutions Persons with disabilities. Vulnerable or marginalized individuals and groups	Collect views on the design of the project, ESMP, SESA development (ES risks & mitigation measures), GRM and SEP	Formal meetings Focus Group Discussions Formal meetings Site visits	PIU Department Safeguards Department		District level Stakeholder consultations

No .	Project Phase	Targeted Stakeholders	Topic of consultation/ message	Method Used	Responsible Personnel	Frequency/Timeline	Engagement Activity
		Local leaders, Traditional and Religious Leaders, Ordinary members of the community including women, youths, the elderly, and the disabled.	Collect views on the design of the project, ESMP development (ES risks & mitigation measures), GRM, and SEP	Community meetings, Electronic Media Fliers and Posters	PIU Department Safeguards department		Community level Stakeholders (Those around construction sites)
2	Project Implementation Phase	Members of the District Local Government and Lower Local Government, Beneficiary Institutions. Vulnerable or marginalized individuals and groups	Provide feedback on approved project design and orient district-level stakeholders on their roles Give information on GRM.	Formal Meetings Media (Print & Electronic), Emails, Project Website Community meetings Site visits	PIU department	Bi-annually	Project meetings with District Local Governments
		Members of target communities Traditional, Religious and Political leaders, Persons with disabilities. General Public.	Sensitize communities on upcoming project interventions and how to minimise Project negative impacts. Inform on project progress.	Community Meetings, Media Electronic Fliers and Posters	Safeguards Department		Community Sensitization
		National, District & Community	Provide and obtain ongoing	Meetings Site visits	Safeguards Department	Ongoing at least on quarterly basis throughout the	Project implementation monitoring

No .	Project Phase	Targeted Stakeholders	Topic of consultation/ message	Method Used	Responsible Personnel	Frequency/Timeline	Engagement Activity
		level stakeholders	information and support on project performance	Direct communication with affected parties		project.	and supervision missions
		National, District & Community level stakeholders	Provide and get periodic feedback on project implementation progress and any emerging issues	Formal Meetings Emails Focus Group Discussions Community meetings	Safeguards Department	Twice a year from March 2025 to February 2030	Project review meetings with selected stakeholders from National, District, and Community level
3	Project Close Out Phase	Beneficiary institutions National & District stakeholders	Engage stakeholders on the project exit strategy	Formal Meetings FGDs Site visits	Safeguards Department		Project close out meetings

4.3 The Methods and Tools of Engagement of Stakeholders

Stakeholders under PIMPLUS will be potentially engaged in three ways including: i) Providing Information, ii) Information Feedback, and iii) Participation and consultation. In all the three approaches, the project will be informed by the EISM guidelines in ensuring inclusion and non-discrimination of any potential vulnerable or marginalized individuals and groups, which may be adversely affected by the project.

- i. Under Information Provision, the project will use the following tools/methods:
 - Printed advertisements in the media
 - Radio or television entries
 - Visual presentations
 - Notice boards
- ii. For Information Feedback, the following tools and methods will be used:
 - Dedicated telephone (including the hotline for EISM GRM for the vulnerable or marginalized individuals and groups)
 - Internet/Digital Media
 - Surveys, Interviews and Questionnaires
 - Feedback & Suggestion Box including for the GRMs
- iii. To enhance stakeholder Participation and Consultation, the following tools and methods will be utilized:
 - Public hearings
 - Field institutional and community visits
 - Focus Group Discussions

- Round Table Workshops
- Information centers and field offices
- Site Tours and exchange visits across the MDAs and regions.

4.3 Proposed strategy to incorporate the views of vulnerable groups

The project will seek the views of vulnerable or disadvantaged groups identified through the following methods virtual and/or face-to-face workshops and meetings and emails. The following measures will be taken to remove obstacles to full and enabling participation / access to information: Prior information and scheduling of the meetings, translation of the information and having meetings in local or appropriate languages, flexibility in scheduling meetings, and being sensitive to the concerns and addressing them appropriately.

In view of the potential risks and impacts associated with exclusion and discrimination, PIMPLUS SEP and other project associated documents are being prepared to include specific measures to take into consideration of adverse effects on any vulnerable or marginalized individuals or groups in accessing benefits and opportunities accruing from World Bank-financed projects and programs in Uganda. These measures are described in various sections of the PIMPLUS 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 inclusion and 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, 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 against 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 09). 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 PIMPLUS Program. A hotline (0800 333125) as an alternative way to receive complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups has been secured for used.

4.4 Proposed strategy for information disclosure

The electronic copies of the disclosure materials will be placed on the NPA/MoFPED, other MDAs and World Bank websites to allow easy access for all stakeholders. The disclosure materials will also be shared with the targeted stakeholders through email, and during project-related meetings mainly for the stakeholders that lack internet services. In addition to disclosure of the various project materials (ESCP, SEP, PID), formal channels will be put in place to register and document comments and suggestions from the public. These grievance arrangements shall also be made publicly available to receive and facilitate resolution of concerns in relation to the Project.

Table 4-4: Information disclosure plan

Project stage	List of information to be disclosed	Communication channels	Target stakeholders	Timetable: location/date	Responsibilities
Project Preparation Phase	Project Concept note ESF documentation that is required for disclosure by the WB -SEP with GRM -ESSA -ESCP	Email, intranet, website, meetings	Project Design Team and implementing entities/divisions of MoFPED and other MDAs -Ministries, Departments and Agencies (MDAs) -District Local	In person or virtual up to one month after project effectiveness	NPA/MoFPED/RCU/Design Team

			Governments		
Project Launch	<ul style="list-style-type: none"> -Project information document -key activities, work plan -Implementation modalities -Key elements of ESCP, SESA, ESMP and SEP 	Shared via Email with an official invitation letter	Project Design Team and implementing entities/divisions of MoFPED and other MDAs and all other stakeholders listed above	15 days before the meeting, all stakeholders will be informed and shared with them the key documents by email as 100% target.	NPA/MoFPED/RCU
During implementation (after the launch)	Progress Reports on: <ul style="list-style-type: none"> -Activities -M&E framework - studies -ESIA /RAP plus audits 	Via email, workshops consultative meetings	Project Implementation Support Team and implementing entities/divisions of MoFPED, other MDAs and other stakeholders listed above	Throughout the implementation period	NPA /MoFPED/RCU

5 Resources and Responsibilities for implementing stakeholder engagement

5.1 Implementation Arrangements and Resources

The overall responsibility for SEP implementation lies with the Project Manager at the PIU while the Environmental and Social Specialists will coordinate stakeholder engagement activities by PIU departments. The entities that will be key in the implementation of stakeholder engagement are NPA, MoFPED, District Local Governments and other relevant beneficiary implementing entities. The implementation arrangement for the project will partly use the existing decentralized government structures at District level as well as using structures at the community level.

At national level, the Implementation of the SEP will be coordinated by the NPA and members of the project team. The project team will comprise qualified and experienced Specialists including Monitoring and Evaluation Specialist. This team will be responsible for:

- Implementing the Stakeholder Engagement Program
- Providing guidance for strategic engagement at all institutional levels.
- Ensuring inclusion of the vulnerable or disadvantaged groups in engagement activities.
- Monitoring implementation of the SEP.
- Ensuring disclosure of project and ESS documents
- Providing feedback to various affected and interested parties on their concerns and recommendations.

At District level, the implementation of this SEP will include District Local Government officers including Community Development Officers. The District GRM Committee and Councillors will also be involved in the SEP activities. These entities will be required to:

- Identify SEP interventions.
- Organizing communities for public meetings, setting up of information desks for project communication and disclosure of information.
- Identifying the disadvantaged and vulnerable members of the community that required to be included in stakeholder engagements.
- Providing guidance on engagement methods for including the disadvantaged and vulnerable members of the public.
- Monitoring SEP implementation.
- Coordinating monitoring and evaluation activities e.g. joint monitoring with CSOs, and NGOs.
- Providing guidance for addressing views on the project from members of the public.

At community level, the Community GRM Committees will be part of the SEP implementation apart from their role in GRM and will be responsible for:

- Being focal points for provision of project information desks in communities surrounding project sites
- Safe keeping and distribution of project information in terms of fliers and posters for project communications.
- Custodians of GRM boxes for receiving project related grievances.

- Receiving and record all grievances as submitted to them by the PAPs.
- Investigating and facilitating grievance resolution process.
- Refers non-resolved grievances to DGRC for action.
- Provides feedback on grievance to PAPs.

The PIMPlus Project implementing entities are responsible for ensuring that all the program investments are screened for environment and social risks and impacts, preparation of the relevant E&S risks/impacts mitigation measures documents including the SEP and seek approval before program implementation.

The NPA will be in charge of stakeholder engagement activities in concert with other implementing entities. The entities responsible for carrying out stakeholder engagement activities are all the directly responsible parties MDAs led by NPA. Core institutions, including MoFPED, , NEMA, MoGLSD, MoLHUD, PPDA, MoWT, and MoPS, will be responsible for achieving project objectives in line with the Disbursement Linked Indicators (DLIs) and implementing relevant components including E&S risk management and SEP. They will track progress, gather evidence on DLIs, and report to NPA that will share with RCU under REAP/MoFPED. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU)/ NPA Director. The NPA will be assisted by MoFPED and MDAs Communication team which will be composed of professional staff with complementary background communication skills. They will mainly support project information production and dissemination (preparation of webinars/video and GRM PR-materials).

The NPA will oversee communication and engagement with key stakeholders. The project formulating team from NPA, MoFPED and MDAs will be in charge of the document records, facilitation of logistical support to all consultation events, technical support for conducting online public consultations, meetings with Institutions, communities, and other interested parties, assisting consultant(s) access to field trips in the DLGs and any other duties related to stakeholder engagement.

In response to mitigating the potential risks of exclusion and discrimination, 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 09). 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

5.2 Proposed strategy for engagement, including consultation

The project's stakeholder engagement implementation arrangements will be as follows:

For the stakeholder consultation, as described in table below, the strategies foreseen will be through email, virtual and/or face-to-face workshops and meetings. All engagement will integrate provisions for the mobilization of technical expertise for safe consultations with vulnerable groups, and/or on sensitive topics, as and when needed

Once consultations have taken place, stakeholders will want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored. Such feedback will be provided through continuous engagements with the stakeholders.

Table 5-1: Proposed strategy for stakeholder consultations

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Preparation Phase	- Project Appraisal Document Environmental and Social Commitment Plan Project design activities, SEP including	Virtual and face-to-face consultation meetings, documents shared via e-mails, Formal meetings, public meetings Print & Electronic media (Newspaper, Radio (Community and National Radio stations) & TV) Website publications Social media	During project preparation and formulation phase	PIU and NPA NPA, MoFPED, Government MDAs, Development Partners and NGOs The general Public Civil Society Organization	NPA, MoFPED/MDAs & RCU
Project Launch	Project 1 st year work plan with budget SEP including GM and ESCP Project Design	Virtual and / or Face-to-face consultations meetings, documents shared via e-mails	Within 3 months after the project's effectiveness date	PIU and NPA NPA, MoFPED, Government MDAs, Development Partners and NGOs The general Public Civil Society Organization	NPA, MoFPED/MDAs & RCU
During implementation (after the launch)	-Progress reports -Policy issues at Higher level -SEP including GM, ESCP, etc. if revisions needed	Workshops/ meetings, e-mail for dissemination of documents, Website publications In-person meetings Virtual meetings	-Biannual meetings -As and when needs arise	PIU and NPA Community – PAPs and vulnerable groups Contractors Civil Society Organizations (CSO)s	NPA, MoFPED/MDAs & RCU
Project Closure	Project Completion Report	Website publications In-person meetings Virtual meetings	At end of Project	NPA, MoFPED Government MDAs Project beneficiaries Local Authorities Community – PAPs and vulnerable groups Contractors	NPA, MoFPED/MDAs & RCU, DLS, LLGs

Procedures for Management of Environmental and Social Risks and Impacts including engagement of stakeholders is guided by the ESSA Process in Uganda. The implementation of stakeholder engagement will also be built on the provisions of ESIA procedure/ guidelines including the following:

- Environmental Screening for category/level of project.
- Prepare Scoping Report and Terms of Reference (ToR) for ESIA study.

- Approval of Scoping Report and ToR by NEMA.
- Undertake ESIA as prescribed in the EIA Regulations.
- Submit ESIA report to NEMA.
- Public to comment, and public hearing held if deemed necessary.
- NEMA reviews with input from Lead Agencies and Districts.
- NEMA decision to reject or approve the ESIA (with conditions).

All the above processes will involve engagement. The SEP will also be informed by these processes. The stakeholder engagement activities will be documented through periodical reports according to the SEP.

5.3 Estimated Budget for SEP

The budget estimate for the preparing and implementing SEP is Six Hundred Sixty-Three Thousand, and Two Hundred Dollars. See the sample budget line items listed in Annex 2.

5.4 Capacity Building

In addition to the general capacity assessment requirements for the projects and specifically regarding the environmental and social requirements, the Recipient shall support the Enhanced Implementation Support and Monitoring (EISM) to ensure:

- Training of government staff and private sector consultants/clients, workers, and contractors on non-discrimination under the Project, including by identifying individuals and venues, as well as providing other logistical support.
- Training project level GRM on inclusion and non-discrimination under the Project, including by developing training materials, identifying venues, and providing trainers.
- Preparation of training modules for call center operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information, including operation of the secured hotline (0800 333125) to be used as an alternative way of receiving complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups.

6 Grievance Mechanism

The Grievance Redress Mechanism (GRM) has been designed to ensure transparency, responsiveness, accountability, inclusiveness or non-discrimination of the vulnerable or marginalized individuals and groups throughout the implementation of the Investment Project Financing (IPF) component. In light of the nature of this project, which focuses on public investment planning, capacity strengthening, institutional strengthening and technical assistance, grievances are expected to centre around issues of access to information, participation, procurement processes, inclusion and discrimination, and performance of service providers or consultants.

The GRM will provide stakeholders, including government personnel, consultants, and service providers among others, a formal and transparent avenue to raise concerns, seek clarification, and express dissatisfaction related to the implementation of program activities. An EISM GRM will be established and operated by a hired It also reinforces the program's commitment to upholding the World Bank's Environmental and Social Standards (ESS), particularly ESS10 on Stakeholder Engagement and Information Disclosure.

The implementation of the PIMPlus project is expected to receive grievances from different institutional levels i.e. from members of the community, targeted institutions, beneficiary District councils and bidders of various works among others. Some of the grievances that may be lodged include procurement related grievances, payments to service providers, contractors and contractor workers, compensation issues, gender-based violence, child labour issues, safety incidents and accidents, pollution, theft and corruption among others.

The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-components. Accessibility, Predictability, Fairness, Appeal, Transparency and Consensus and negotiations, Accountability, Gender equality, Equity and Justice are the key principles that will underpin the grievance redress mechanism for the Project.

6.1 Description of Grievance Mechanism

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner. The project will update the existing Grievance Redress Mechanism, which will be a platform for addressing concerns related to the PIMPlus project. The updates are described in Table 6-1 below. The project will ensure that Grievance Redress and Management Committees are established at Institutional level and District Level. These institutions will be adequately capacitated and will be required to have representation of the youth and women to ensure accessibility. Women as well as sexual and gender minority representatives should be included in the committee, with at least 30% representation.

The following Grievance Redressal Committees will be established and/or revived at four levels, namely, Community, Contractor workers, Local authorities (District, Municipal & City Councils) and at the PIU. Grievances will be lodged by PAPs and interested parties at any of these institutions depending on proximity of the complainant to the GRC location, the type of grievance being lodged and the mandate of the institutions. The project has set up a three tier Grievance Redressal Mechanism in which unresolved grievances will be referred to successive GRM institutions until a satisfactory outcome is achieved. The other institutions involved in the management of PIMPlus Project related grievances will include the Uganda Police Service and the Courts of Law. These institutions will handle criminal cases which cannot be heard by the GRCs. Cases of GBV and SEA and

SH, theft, corruption, and child labour will require the attention of these institutions. The courts of Law will in addition be involved in cases that are not satisfactorily resolved at the high level GRC under the project. In addition, the World Bank will support the strengthening of the GRM and all the various levels to ensure it includes an effective, safe and confidential mechanism to receive, to manage, refer, and monitor grievances related to exclusion and discrimination. Further details of this support can be found in Annex 9 and 10

The roles of the four GRC are described below.

6.2 Grievance Redressal Committees

6.2.1 Roles and Responsibilities of Community Grievance Redressal Committee

The committee shall consist of bona fide members of the community including: a Government worker (Community Development Officers) working within the area, representatives of Village Development Committees (VDC) to entail local leaders, youth representative, women's representative, representative from Community Policing and a Community Land Tribunal representative.

The community GR committee shall have the following duties:

- Receives and record all grievances as submitted to them by the PAPs.
- Reviews and screens all received grievances.
- Investigating and facilitating grievance resolution process.
- Documenting status of the complaint and its resolution.
- Refers non-resolved grievances to DGRC for action.
- Refers Gender-based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and other serious cases to relevant institutions for action.
- Ensures inclusion and non-discrimination of vulnerable or marginalized individuals and groups that may be affected by the project.
- Refer potential cases of exclusion and discrimination to the EISM GRC as may arise
- Provides feedback on grievance to PAP.
- Submits monthly reports to PIU.

6.2.2 Roles and Responsibilities of Contractor Workers Grievance Redressal Committee

The Workers Grievance Redressal Committee (WGRC) shall be established by the contractors who shall undertake any sub-project of the PIMPlus Project. This committee will be established for contractor workers to have a platform for raising their grievances during the time they will be working with the project. The WGRC is an entry point for worker-related grievances. This may include but not limited to labour related concerns, theft, SEA and SH incidents and safety concerns regarding the works. Employee representatives shall be selected by fellow workers to serve in the committee which will ensure female representation. The WGRC shall have the following duties:

- Conducts grievance redress sensitisation or awareness meetings for workers.
- Ensures that the grievance box is accessible to all workers in a secure manner.
- Opens grievance boxes every week.
- Records all grievances as submitted to them by the complainant.
- Vets, reviews and assesses the grievance to filter those not related to the project.
- Ensures that there is transparency and accountability in handling the cases.

- Investigates and facilitates grievance resolution process.
- Hears and determines all cases reported by workers or PAPs.
- Document's status of the complaint and its resolution.
- Refers GBV/SEA/SH and other criminal cases to relevant institutions for action.
- Ensures inclusion and non-discrimination of vulnerable or marginalized individuals and groups that may be affected by the project.
- Refer potential cases of exclusion and discrimination to the EISM GRC as may arise
- Refers non-resolved grievances and other grievances beyond their capacity to relevant DGRC or CGRC.
- Provides feedback on grievance to the PAPS.
- Prepares grievance progress reports and presents them to DGRC during monthly meetings.

6.2.3 Roles and Responsibilities of District Grievance Management Committee

The District Grievance Management Committee (DGMC) will be established at the District Local Government level. The DGMC will handle cases submitted to it by PAPs and cases referred to it by the CGRC and WGRC. Thus, the DGMC will act as entry or appeal point for grievances arising from PIMPlus Project activities. If PAPs are not satisfied with the resolution made by the DGMC, the case shall be referred to the Project Grievances Redress Committee (PGRC). The following is the membership of DGMC: Chief Administrative Officer- Chairperson, District Community Development Officer-Secretary, District Lands Officer, District Environmental Officer, District Labour Officer, Uganda Police representative- family support unit and NGO representative. The following shall be duties of DGMC:

- Facilitates establishment of CGRCs and WGRCs.
- Facilitates GRM training and awareness meetings at community level where applicable.
- Records all grievances as submitted to them by the complainant.
- Reviews all grievances referred by the CGRC and WGRC.
- Investigates and facilitates grievance resolution process.
- Determines cases and provides feedback to the CGRC, WGRC and the aggrieved persons.
- Ensures that there is transparency and accountability in the implementation of Digital Foundation Project interventions.
- Ensures that safety standards, labour requirements, human rights, economic empowerment, gender, disability, environment and community health standards are adhered to during and after Digital Foundation Project implementation.
- Periodically reviews (monthly) all grievances in the district.
- Refers unresolved grievances to Project GRC for action.
- Referring GBV/SEA/SH and other serious cases to relevant authorities for action.
- Ensures inclusion and non-discrimination of vulnerable or marginalized individuals and groups that may be affected by the project.
- Refer potential cases of exclusion and discrimination to the EISM GRC as may arise

6.2.4 Roles and Responsibilities of Project Grievances Redress Committee

The Project Grievances Redress Committee (PGRC) shall be at the Project Implementation Unit (PIU) level at NPA. It shall hear cases submitted to it by PAPs and cases referred to it by the lower committees. If the PAP is satisfied with the resolution of the PGRC, the case is closed. If the PAP is not satisfied and the case is not closed at PGRC, the PAP shall be directed to seek justice from any court of law and the court shall make the final decision. The committee will be valid as long as the PIMPlus Project is being implemented. The following is the membership of the PGRC: Project Manager-Chairperson, Environmental and Social Safeguard Specialist, Representative from National Environment Management Authority (NEMA), Representative from Ministry of Gender Labour and Social Development (MoGLSD). Ministry of Lands Housing and Urban Development (MoLHUD). The following shall be roles and responsibilities of PGRC:

- Facilitates establishment of CGRCs, DGRCs and WGRCs.
- Ensures that there is transparency and accountability in the implementation of PIMPLus Project.
- Records all grievances submitted to them by the PAPs.
- Reviews unresolved grievances referred by DGMs.
- Investigates and facilitates grievance resolution process.
- Refers unresolved grievances to court.
- Refers GBV/SEA/SH and other criminal cases to relevant authorities for action.
- Ensures inclusion and non-discrimination of vulnerable or marginalized individuals and groups that may be affected by the project.
- Refer potential cases of exclusion and discrimination to the EISM GRC as may arise
- Provides feedback to DGMs on referred cases.
- Carries out quarterly reviews of all grievances from the districts and provides appropriate policy guidance to the Councils and other stakeholders.
- Prepares periodic national level grievance handling progress reports and presents them to the relevant agencies and stakeholders.
- Supports the capacity building of DGMs.
- Supervises, monitors and evaluates the effectiveness of GRCs.

The PIMPLus Project will be the custodian of the whole Grievance Redress Mechanism and the Grievance Redress Committees. The project will be responsible for coordinating the functions of the GRCs, provision of required resources and technical assistance to ensure effective grievance management. The focal point for the PIMPLus Project GRM will be the Environmental and Social Safeguards Specialists from NPA. The Environmental and Social Safeguards Specialists will among other things work as the secretary in the Project GRC, undertake monitoring activities to verify functionality of the GRM.

The grievance redress committees will conduct meetings as and when required by the GRM processes. The chairperson of the committee shall preside over and maintain due and proper conduct of meetings and ensure that the rules and regulations of the committee sets for its operation are properly administered at all times. The secretary of the committee will be responsible for calling meetings, taking minutes, circulating the duly signed copy of the minutes, and filing the minutes. The quorum at any meeting of the committee shall be 50% of the members of the committee eligible to attend the meeting. The committee shall always enforce transparency and accountability in the conduct of its affairs.

EISM GRC

If deemed needed, differentiated consultations and/or outreach activities will be organized for vulnerable or marginalized individuals or groups. EISM GRM is an alternative to lodging complaints through a GOU led Project-level GRM. The EISM GRM shall ensure mitigation of the potential impacts of the exclusion and discrimination through the following:

- Enhance existing project-level grievance redress mechanisms to safely, ethically, and confidentially 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 World Bank-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 World Bank-financed projects or voice their concerns without fear of reprisal. As indicated earlier, a hotline (0800 333125) hosted and operated by a local NGO on behalf of the EISM firm has been established

for vulnerable or marginalized individuals or groups to lodge their complaints of discrimination.

- The guidelines on how the hotline will be used and cases managed are outlined in Annexes 9 & 10. This will also be integrated in the Project Operations Manual (POM).

6.3 GRM Processes

There are five main steps that are supposed to be undertaken in grievance redressal processes. These stages include: (i) The grievance uptake (ii) complaint handling and assessment (iii) Case resolution and closure (iv) Registry update (v) GRM monitoring and evaluation.

The Grievance Management steps that are explained below (in table 6-1) will be informed by the EISM guidance given in Annex 9 & 10, which are related to mitigating the social risks and impacts that are associated with exclusion and discrimination of vulnerable or marginalized individuals and groups that may be adversely affected by the project. These GRM processes are outlined in through the Table below.

Table 6-1: Illustrative Table on the GM Steps

Step	Description of process	Timeframe	Responsibility
GM implementation structure	Project Implementation Unit (PGRC) District Council (DGMC) Contractor Workers (CWGRC) Community (CGRC)	Throughout project life cycle	NPA, DLGs, MoGLSD, MoLHUD, Contractor, Local Council leaders
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <p>NPA</p> <ul style="list-style-type: none"> • Toll-free telephone hotline: • Short Message Service (SMS) or WhatsApp to: +256XXXXXX • E-mail to XXXXX • Letter to: NPA, P.O. XXXX <p>MGLSD SAUTI Help Line: 116</p> <p>DLG Offices Community Services Department</p> <p>LLG Offices Community Services Department</p>		<p>Environmental and Social Safeguards Department/PIU</p> <p>Local council GRCs</p> <p>Community GRCs</p> <p>Contractor worker GRCs</p>
Acknowledgement and follow-up	<p>All received complaints or grievances will be recorded in a GRM Logbook which contains Grievance Reporting Forms. The GRM Reporting Form is attached in Annex 3. However, the sensitive grievances arising from EISM GRMs may not explicitly be recorded in the public GRM register. This will be guided by the EISM guidelines in Annex 9 & 10.</p> <p>The GRM Logbooks will be available at all the GRC locations.</p> <p>The grievance recipient should ensure to collect all the relevant information including, name, contact details and description of the complaint. Preference of confidentiality should be established.</p> <p>Once a grievance is received and recorded, the secretary of the GRM committee shall provide an acknowledgement of receipt of the grievance to the complainant.</p>	Within 2 days of receipt	Grievance focal points under all GRCs

	<p>The acknowledgement will be in form of an email, phone call or WhatsApp text. A template of acknowledgement is provided in annex 4.</p> <p>The acknowledgement indicates that the grievance will be assessed for eligibility before the complainant can be called for a dialogue with the respondent.</p> <p>A GRM tracking number for the grievance and the timeline for resolution and closure is included in the acknowledgement.</p> <p>The complainant will be advised on the contact numbers/ emails to be used in following up on the grievance as well as contact person.</p>		
Sorting, processing	<p>The reported grievances should be screened to ensure that they are relevant or related to the PIMPlus Project.</p> <p>The relevant GRC shall meet within 3 to 5 working days to assess whether the complaint or grievance is related to PIMPlus Project activities or not.</p> <p>In case complaints are not related to the projects, PAPs shall be advised to channel their complaints to the right institutions.</p> <p>The committee shall use a GRM screening checklist to ascertain how the complaint relates to the project. The Grievance Eligibility Assessment Checklist is provided in Annex 5.</p>	3-5 days of grievance receipt	Grievance focal points under all GRCs
Verification, investigation, action	<p>After the committee has verified the eligibility of the grievance, the appropriate respondent (individual, group, contractor, or institution) should be identified and notified of the grievance.</p> <p>The respondent should be appraised on the grievance and the GRM procedures that will be followed to resolve the complaint.</p> <p>An investigation of the grievance will be undertaken by the GRCs for them to fully understand the complaint and make an informed decision for an effective settlement of the grievance.</p> <p>The investigation will gather all the facts and collect evidence related to the grievance investigation and will involve both respondent and complainant to crosscheck the information provided.</p> <p>The GRCs should establish the respondents stand on the grievance as well as the outcome that the</p>	Within 10 working days	Complaint Committee composed of Chairman, Secretary, and committee members

	<p>complainant is looking for through the GRM process.</p> <p>The GRC will then make a recommendation on the resolution to address the grievance, and this will be communicated to both grievance parties.</p> <p>The respondent should commit to a timeline for completion of the required action. The GRCs as well as the PIU must verify that the proposed response or action by the respondent has been completed to warrant closure of the grievance.</p>		
Monitoring and evaluation	Data on complaints and status of resolution implementation are collected in the Grievance Register including the EISM GRM register and reported to the Project Manager every month through Monthly progress reports.	Monthly	Environmental and Social Safeguards department/PIU
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected through the Grievance resolution form in Annex 6.	14 working days	PAPs
Training	<p>Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants are:</p> <ul style="list-style-type: none"> i. Operation of EISM GRM ii. Recording of grievances. iii. Complaint investigation techniques. iv. GBV (SEA/ SH) case management. 		PIU Contractors
If relevant, payment of reparations following complaint resolution	<p>Grievance respondents will be required to remit payments to complainants.</p> <p>Where this fails, respondents will be requested to write and approval the PIU to pay the aggrieved party from their contract sum.</p>		
Appeals process	<p>With the project having three levels or points of GRM resolution, unresolved grievances will be referred to higher level GRM committees for another attempt at resolution.</p> <p>When all GRC levels are exhausted, the complainant is advised of other referral paths including the courts of law and the police.</p> <p>The complaint appeal process will also be informed by the sensitivity of EISM GRM</p>		GRCs at all levels

Table 7: GRM updates required for the PIMPlus Project

	GRM Aspect	Required updates.
1	GRM Manual	The GRM Manual will be revised to capture the changes that will be brought in by the upcoming PIMPlus project.
2	GRM Reporting and resolution forms	The GRM reporting and resolution forms will be revised according to the new project informed by the EISM guidelines (Annex 9). New Logbooks will be printed and circulated to all the GRM committees.
3	GRM Committees	Existing committees at the District Local Government, local community will require re-orientation of the GRM based on the new project requirements and newly constituted PIU unit will receive training. The make-up of the PIU GRM committee will be revised to ensure effective participation of committee members. The District GMC will be renamed to Local Authority GRC to cover committees at Municipality and City Council levels as some project sites might fall under these authorities jurisdiction. New GRM committees will be established in newly identified project sites.
5	Publicity	New GRM posters and fliers will be required to capture new project information and changes in the GRM structure.
6	Disclosure	New GRM Manual and reporting forms will be re-disclosed once they are duly updated.
7	Communication	The GRM Toll-free number contract will be renewed to ensure continued operations. Exclusion and discrimination hotline: A delegated operated 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 is in place. The design of the hotline is described under Annex 10.

Due to the nature and scale of E&S impacts of the PIMPlus Project, a separate Labour grievance mechanism will be required and will be included in the stand-alone Labour Management Procedure (LMP). The LMP will be informed by the EISM guidelines (Annex 2) to enhance its implementation including the workers GRM.

6.4 Management of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints

Potential Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints will be safely and ethically received and managed, through the different stages of the GM, as and where possible.¹

¹ In some projects, the GM could be adapted to receive SEA/SH allegations/complaints. If so, the responses should follow a survivor-centered approach that prioritizes survivors' dignity, confidentiality and safety, and the project accountability and response framework. Kindly refer to the Good Practice Notes on Addressing

Sexual Exploitation and abuse, Abuse and neglect in family and even in places of work/Institutions may include: child labour, physical violence, psychological aggression, trafficking, family wrangles, economic and labour exclusion, infanticide, Rape (sang rape, male rape-sodomy and marital, forced early marriage, domestic violence.

GBV/SEA/SH/VAC related grievances may entail a more specialized approach and complex investigation and resolution processes as they require ethical and confidentiality to effectively support victims and affected families. Therefore, it is important to ensure that these have appropriate options for reporting, including options to report anonymously. GRCs will be appropriately structured and trained to handle these cases. In addition, Contractors will be required to sign a document (Code of Conduct) that clearly states the rules as regards to the vulnerable groups in the area. Further guidance on dealing with GBV grievances will also be provided by the Ministry of Gender, Labor and Social Development (MoGLSD) and/or the Departments of District Community-Based Services of the respective District Local Governments.

6.4 Management of GBV Grievances

Sexual Exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. A clear distinction must be drawn between SEA and SH. SEA occurs against a beneficiary or member of the community while SH occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature². Projects that involve civil works many times are potential avenues for people who wield power to abuse their positions hence the need to have a GBV/SEA/SH risk mitigation and referral pathway.

Reporting sexual harassment helps put an end to offensive behavioural and encourages other victims to speak up. The contractor should always guide and advice the community, workers and agents to report any suspected case of GBV/SEA/SH.

Perpetrators of Gender based violence/ sexual harassment may be subject to disciplinary action and criminal charges. Disciplinary and criminal procedures are independent of one another and may be undertaken simultaneously.

In a formal reporting, the following procedure will be undertaken using the report form.

- Getting the details of the Victim of GBV-by-GBV focal person
- Documenting the details of the Case
- Preparing witnesses to engage other Legal Actors like the Police
- Establishing the appropriate procedure including the need to for medical examination of the victim and the perpetrator
- Producing a comprehensive report to enable duty bearers assess and take appropriate actions
- Submitting the report to Duty Bearers like Uganda Police, State Attorneys and Courts
- Follow up of GBV Cases and victims to ensure appropriate services are accessed by the Victim

Below is the recommended MGLSD referral pathway for mitigating the risk of workplace and community based GBV/SEA/SH

SEA/SH in Investment Project Financing involving [Major Civil Works](#) (page 53) and in [Human Development Operations](#) (page 38).

² World Bank Good Practice note: Addressing Sexual Exploitation and Abuse and Sexual Harassment in Investment Project Financing involving major civil works.

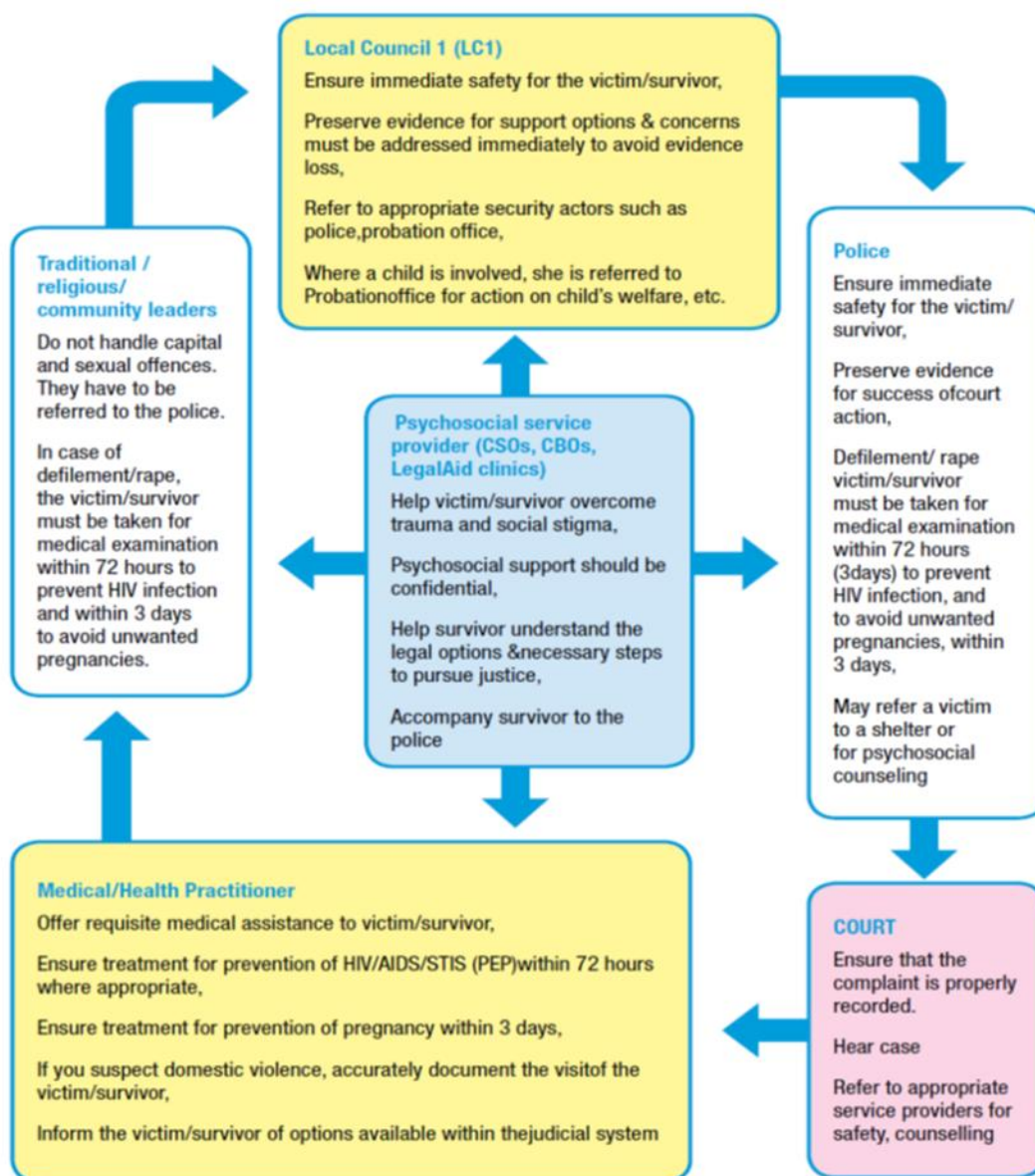


Figure 6-1: GBV/ SEA/ SH pathway referral pathways

6.5 Avoidance of discrimination and exclusion

In addition to the Project GRM described above, the GRM will include a mechanism to enable vulnerable or marginalized individuals or groups to report incidents of exclusion or discrimination safely, ethically, and confidentially and to ensure such grievances are resolved in an efficient and effective way commensurate with the principle of non-discrimination and inclusion for all. The Project EISM GRM is an alternative to lodging complaints through a GoU/PIU/RCU-led Project-level GRM, with special provision for cases of discrimination and exclusion of vulnerable or marginalized individuals or groups. Therefore, PIMPLUS shall use the EISM GRM to address risks and impacts on exclusion and discrimination.

A hotline (0800 333125) has been established, hosted and operated by a local NGO on behalf of the EISM firm for vulnerable or marginalized groups or individuals who may be adversely affected by risks and impacts on exclusion and discrimination, to lodge their complaints. The guidelines on how the hotline will be used and cases managed are provided in the Project E&S documents. As part of the regular project reporting,

Complaints received through the EISM, and progress made in addressing them will be monitored. This referral pathway will be developed with the support of the World Bank-provided Enhanced Implementation and Monitoring Support (EISM) outlined in the PIMPLUS ESSA. The EISM GRM is described in detail in Appendix 8 & 9

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 in the Uganda portfolio.

World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected as a result of a Bank supported IPF/PforR operation, as defined by the applicable policy and procedures, may submit complaints to the existing program grievance mechanism or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address pertinent concerns. Project affected communities and individuals may submit their complaint to the Bank's independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted at any time after concerns have been brought directly to the Bank's attention, and Bank Management has been given an opportunity to respond. *For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <https://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.*

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.

7 Monitoring and Reporting

7.1 Summary of how SEP will be monitored and reported upon (including indicators)

Monitoring of the SEP will be done by the Monitoring and Evaluation Specialist in conjunction with the District Monitoring and Evaluation Officers. The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Complaints and incidents received through the EISM, and progress made in addressing them
- (iii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular
 - (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed;
 - (b) issues that have been raised and can be addressed during project implementation;
 - (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and

- (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- (iv) Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in Annex 7.

7.2 Reporting back to stakeholder groups

The SEP will be revised and updated as necessary during project implementation.

Monthly, quarterly or annual summaries and internal reports on public grievances as well as EISM grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the project managers.

Specific mechanisms to report back to the stakeholders include the following: Capturing and recording of all key emerging issues raised by stakeholders, through engagement and feedback meetings and reports from surveys and monitoring of the SEP implementation. This reporting back to the stakeholders will be Monthly, quarterly or annual or as may be defined during the engagements. The reporting time could be revised based on the information from the monitoring activities including activities affecting vulnerable or marginalized individuals and groups.

8 DISCLOSURE OF THE SEP

This SEP will be approved by the NPA and WB and disclosed on NPA website and through the World Bank's external website for public access. Other environmental and social safeguard instruments under the PIMPLUS project will also be disclosed.

ANNEXES

Annex 1. Template to capture minutes/records of consultation meetings

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

Annex 2: Stakeholder Engagement Budget

Budget categories	Quantity	Unit costs (US\$)	Times / Years	Total costs (US\$)	Remarks
1. Estimated Staff salaries* and related expenses					
1a. Communications consultant	1	48,000	5	240,000	Individual or Firm
1b. Travel costs for staff	1	10,000	5	70,000	Accommodation and allowances
1c. Estimated monthly facilitation for focal point/Community Development Officers	5	3,000	1	15,000	Allowances for focal point/Community Development Officers per sub-region
2. Consultations/ Participatory Planning, Decision-Making Meetings					
2a. Project launch meetings	5	10,000	1	50,000	Launch of completed activities under various project components in all Uganda's Sub-regions
2b. Facilitation of Technical working groups (TWGs)	5	5,000	3	75,000	To be held at Sub-regional level to provide technical back stopping for the project.
3. Communication campaigns					
3a. Posters, flyers	1	5,000	2	10,000	10,000 posters and fliers
3b. Social media campaign	3	100	4	1,200	3 campaigns every other year
3c. Radio adverts	3	1,500	3	13,500	3 adverts at least every other year
3d. Television adverts	3	3,000	3	27,000	3 adverts at least every other year
3e. Newspapers	2	1,000	3	6,000	3 adverts at least every other year
4. Trainings					
4a. Training on social/environmental issues for PIU and contractor staff	1	10,000	3	30,000	One training once every 3 years
4b. Training on Gender-Based	1	6,000	2	12,000	One training once every 3

Violence (GBV) for PIU and contractor staff					years
6. Grievance Mechanism					
5a. Training of GM committees	1	80,000	1	80,000	At community, district, and PIU level
5b. Suggestion boxes in villages	250	20	1	5,000	For all community GRCs
5c. GM communication materials	1	1,000	3	3,000	
5d. Grievance investigations/site visits	1	1,500	7	10,500	
5e. GM Information System (setting up or maintenance)	1	15,000	1	15,000	
5f. GM Logistical Costs	1	5,000	3	15,000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				663,200.00	

Annex 3. Sample Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	<ul style="list-style-type: none"> Are project-affected parties raising issues and grievances? How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> Usage of GM and/or feedback mechanisms Requests for information from relevant agencies. Use of suggestion boxes placed in the villages/project communities. Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	Records from the implementing agency and other relevant agencies
Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project	<ul style="list-style-type: none"> Was there interest and support for the project? Were there any adjustments made during project design and implementation based on the feedback received? Was priority 	<ul style="list-style-type: none"> Active participation of stakeholders in activities Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. Number of consultation meetings and public discussions 	Stakeholder Consultation Attendance Sheets/Minutes Evaluation forms Structured surveys Social media/traditional media entries on the project results

design and implementation?	information disclosed to relevant parties throughout the project cycle?	where the feedback and recommendation received is reflected in project design and implementation. <ul style="list-style-type: none"> Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	
Implementation effectiveness. Were stakeholder engagement activities effective in implementation?	<ul style="list-style-type: none"> Were the activities implemented as planned? Why or why not? Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> Percentage of SEP activities implemented. Key barriers to participation identified with stakeholder representatives. Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion, and effectiveness. 	Communication Strategy (Consultation Schedule) Periodic Focus Group Discussions Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives

Annex 3: GRM Reporting Form

PIMPLUS PROJECT

SUB-PROJECT NAME:
PROJECT SITE (Location of grievance):

Grievance Tracking Number: _____

1. RECEIVING DETAILS				2. COMPLAINANT'S DETAILS	
Received on (Date):				Full Name:	
Receiving time:				Gender: Male <input type="checkbox"/> Female <input type="checkbox"/>	
Means used to log a complaint (tick against options provided)				ID Number:	
Email	Verbally	Phone	Others(specify)	Contact Address:	
Type of grievance(tick against options provided)				Phone Number:	
				Email:	
Damage	Theft	GBV/ SEA/ SH		Request for Confidentiality? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Project progress	Work quality	Other(specify) _____		Category of complainant:	Beneficiary <input type="checkbox"/> Contractor <input type="checkbox"/> Implementer <input type="checkbox"/> Other _____
3. DESCRIPTION OF THE GRIEVANCE (Provide the nature of the complaint including; what happened, when it happened, where it happened, who was involved, and the problem that occurred etc.)					

Received by		Complainant	
Signature		Signature	
Date		Date	

Annex 4. Grievance Receipt Acknowledgement

[Insert the name and address of the Grievance Redressal Committee]

[Insert the Date]

Dear [Insert complainant name]

CONFIRMATION OF RECEIPT OF THE GRIEVANCE

I write to acknowledge receipt of the grievance that you logged with this committee on **[date of receipt]**. In your grievance, you raised the following issue(s) **[Insert brief description of the complaint]**.

Be advised that the committee met on **[Insert date]** and assessed the eligibility of your grievance in relation to the Digital Foundation Project activities. Your grievance has been recorded in the GRM register and is assigned a Grievance Tracking Number **[Insert the unique code]**.

The committee would like to invite you to the hearing session of your case scheduled as follows:

Date	
Venue	
Time	

The alleged offender will also be present during the hearing to accord him fair trial.

Yours Faithfully,

Grievance Redress Committee Chairperson.

Annex 5. Grievance Eligibility Assessment Checklist

This checklist is prepared to guide the Grievance Redressal Committee at any level when determining the eligibility of the grievances submitted by PAP

Question(s)	Answer(s)
Describe the grievance logged as recorded in the grievance registration form	
(a) What harm did the Digital Foundation Project caused or is likely to cause?	
(b) Is the alleged problem resulting from the Digital Foundation Project activities?	No <input type="checkbox"/> Yes <input type="checkbox"/>
	If yes, please explain
(c) Are there any other supporting documents that have been shared as proof of the alleged problem?	
(d) Is the complaint raised with any other authorities?	No <input type="checkbox"/> Yes <input type="checkbox"/>
If Yes (Please, provide the following details):	
(i) When?	
(ii) How and with whom the issues were raised?	
(iii) What response were received from and/or any actions taken?	
(iv) Why the response or actions taken were not satisfactory?	
If No	
(i) Why?	
(ii) How should the complaint be resolved?	
5. Name of the person who completed this form	Signature
	Date

Annex 6: GRM Resolution Form

PIMPLUS PROJECT

Grievance Tracking Number: _____

Grievance Resolution updated by:

1. GENERAL INFORMATION		2. RESPONDENT'S DETAILS	
Name of Complainant:		Full name:	
Project Site:		Name of Organization:	
Type of Grievance:		Designation:	
Date of Grievance Registration:		Phone number:	
Date of Grievance Resolution:		Email:	
3. SUMMARY OF GRIEVANCE RESOLUTION PROCESS			
(a) Brief description of complaint			
(b) Brief description of the Resolution/Recommendations from GRC			
4. GRIEVANCE RESOLUTION AGREEMENT			
Level of redress: Institutional <input type="checkbox"/> Community <input type="checkbox"/> District Council <input type="checkbox"/> Project Level <input type="checkbox"/>			
Was the Grievance Resolution satisfactory: Yes <input type="checkbox"/> No <input type="checkbox"/>			
If No, Grievance to be escalated to:			
Agreement and Consent of the Complainant to the above Decision			
I _____ Agree /Disagree with the resolution.			
Signature _____ Date _____			
Grievance Redress Committee Members (At least three members to sign)			
Name	Position	Signature	

Annex 7. Sample Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	<ul style="list-style-type: none"> • Are project-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	Records from the implementing agency and other relevant agencies
Stakeholder engagement impact on project design and implementation How have engagement activities made a difference in project design and implementation?	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. • Number of disaggregated and inclusive engagement sessions held, focused on at-risk groups in the project. • Number and location of formal and informal meetings with PAPs. 	Stakeholder Consultation Attendance Sheets/Minutes Evaluation forms Structured surveys Social media/traditional media entries on the project results

		<p>umber and nature of engagement activities with other stakeholders.</p> <ul style="list-style-type: none"> • umber and nature of Project documents publicly disclosed. • umber and location of community awareness meetings. • umber of men, women and vulnerable groups that attended meetings. • umber and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project design and/or instruments. • umber of grievances (inclusive of exclusive and discriminative complaints) received. 	
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation ?</p>	<ul style="list-style-type: none"> • ere the activities implemented as planned? Why or why not? • as the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • ercentage of SEP activities implemented. • ey barriers to participation identified with stakeholder representatives. • umber of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

Annex 8: Actions Taken by Gou to Ensure Inclusion and Non-Discrimination

Appendix F highlights recent actions taken 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 services** (August 18, 2023) 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 ODPP before decision to charge is made with respect to social exclusion and discrimination of the vulnerable or marginalized individuals and groups.

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 following excerpts:

"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 2023 of FY 2023/2024 on 18th July 2023, we guide:

- *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.*
- *ies.*
- *All implementing entities of World Bank [supported] 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 following transcripts of relevant Guidelines and Circulars issued by the GOU are included in this annex: Letter of Assurance; Circular on provision of health services; Circular on provision of education services; Circular issued by the Director of Public Prosecutions, and relevant excerpts from the Circular on Budget Execution.

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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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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.

BPD 86/179/01



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

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 NDPIII and the NRM 2021-2026 Manifesto;
 - ii. Full-scale implementation of the Parish Development Model (PDM);
 - iii. Enhanced revenue mobilization and collection; and


Minister

"To formulate sound economic policies, maximize revenue mobilization, ensure effective allocation 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 (1) (e) (i-ii) 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

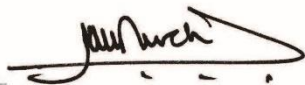
PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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.



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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Office of The Director of Public Prosecutions,
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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.

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

Annex 9: 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.

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 11 illustrates the enhanced implementation support and monitoring steps. Figure 8 contains the Enhanced Implementation Support and Monitoring process. Figure 9 contains 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. The

hotline is hosted and operated by a local NGO. PIMPLUS will also benefit from the same hotline.

Table 12: 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 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 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 9: Description of Enhanced Implementation Support and Monitoring (EISM) Process

Description of Enhanced Implementation Support and Monitoring (EISM) Process

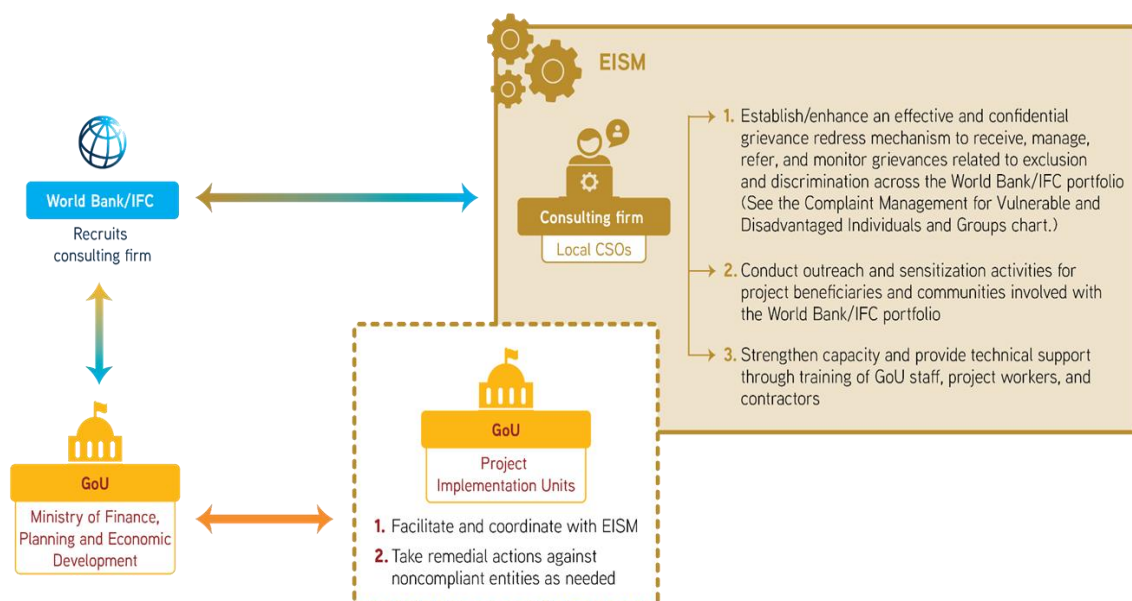
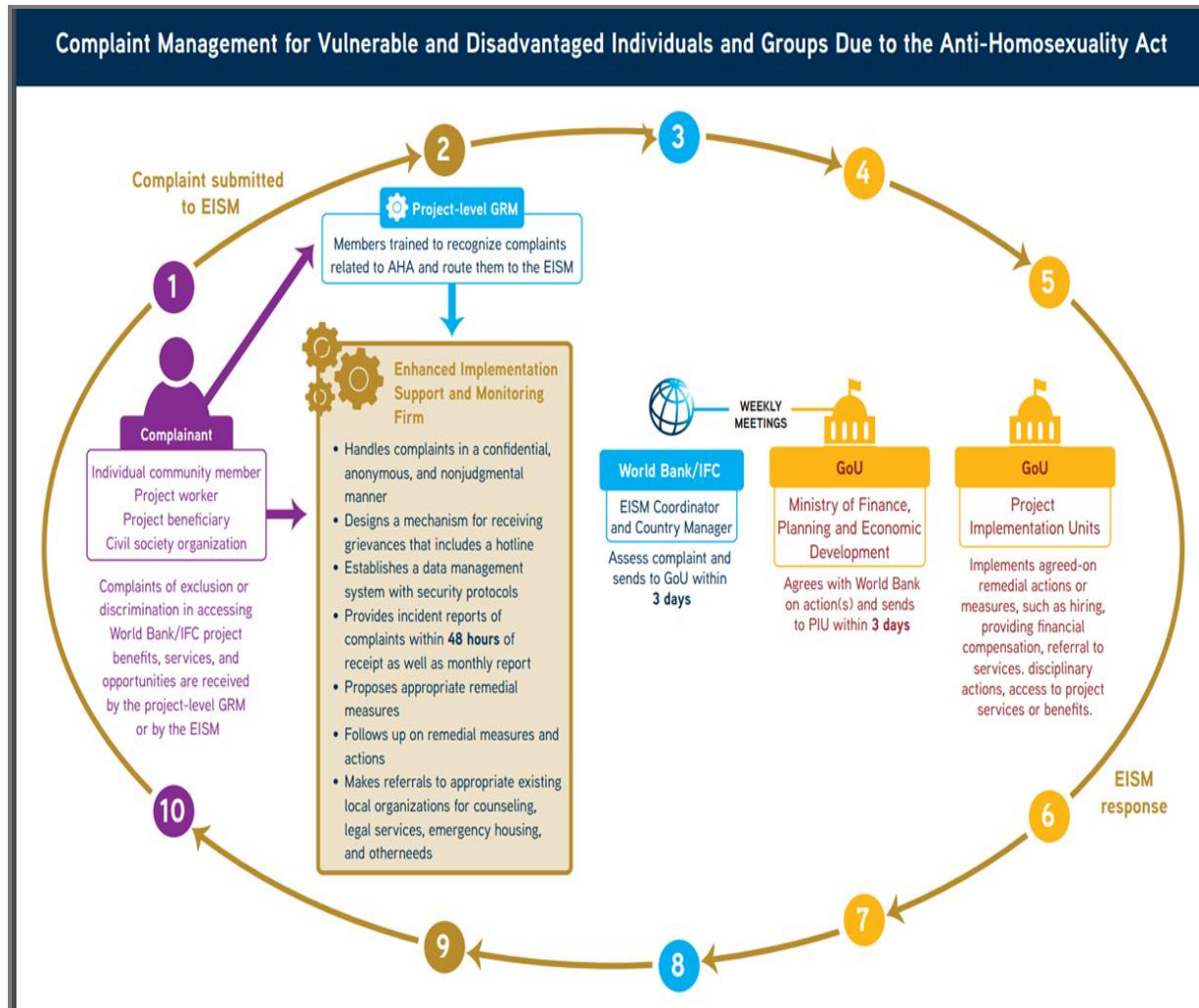


Figure 10: Complaint Management for Vulnerable or Disadvantaged Individuals or Groups



ANNEX 10: Guidelines For Implementing Mitigation Measures To Address Exclusion and Discrimination -Related Risk

In July 2024, the Environmental and Social documentation and its annexes including ESMF, VLD guideline, 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 PIMPLUS 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 exclusion and discrimination-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.

h 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 PIST for PIMPLUS contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.

This annex presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/PISTs, 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/PIST 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 June 2023 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 exclusion and discrimination related risk mitigation measures and monitoring into its design.

PIMPLUS as a pipeline project 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/PIST social development specialists to assess existing project-level GRMs. Based on a review of responses, it will recommend actions that the PIU/PIST or service providers can take to improve the GRMs.

With the support of SREO, the PIU/PIST 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.

that grievances are addressed quickly, efficiently, and appropriately.

SREO will provide training to GRM staff so they can recognize social exclusion and discrimination-related complaints and route them to the EISM. The enhanced process will enable the PIU/PIST 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/PISTs, 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/PISTs, 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 exclusion and discrimination context.

5. Conduct Monitoring and Evaluation

Task team leaders, social development specialists, PIUs/PISTs, 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 due to the same.
- 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/PIST.
- The PIU/PIST 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.
- ct 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/PIST, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section in the box below.

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

Box 1: 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.
- 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.

Project Implementation Units/Project Implementation Support Teams

- 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/PISTs.
- 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/PISTs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/PISTs.
- Monitors and evaluates discrimination complaints.