

UGANDA DIGITAL ACCELERATION PROJECT –
GOVERNMENT NETWORK (UDAP-GOVNET)

LABOR MANAGEMENT PLAN



JUNE 05, 2025

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ACRONYMS/ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
CAO	Chief Administrative Officer
CDO	Community Development Officer
AHA	Anti-Homosexuality Act, 2023
EHSS	Environment Health Safety and Social
EISM	Enhanced Implementation Support and Monitoring
ESIA	Environment and Social Impact Assessment
ESS	Environmental and Social Standards
ESS2	Environmental and Social Standard 2
FAT	First Aid Treatment
GBV	Gender Based Violence
GIIP	Good international and industry practices
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committees
HIV	Human Immunodeficiency Virus
HIPO	High Potential Incident
JMP	Journey Management Plan
JSA	Job Safety Analysis
LMP	Labor Management Procedures
LTI	Lost Time Injury
MTO	Medical Treatment Only
MOU	Memorandum Of Understanding
NITA-U	National Information Technology Authority Uganda
OHS	Occupational, Health and Safety
POB	Personnel On Board
POP	Persistent Organic Pollutants
PPE	Personal Protective Equipment
	Regional Communication Infrastructure Program
RCIP	Restricted Work Cases
RWC	Task Specific Safety Analysis
TSSA	
UDAP	Uganda Digital Acceleration Programme
GOVNET	Government Network

DEFINITIONS

Staff: Personnel carrying out work on a NITA-U project site or allowed to spend a night or work at NITA-U project approved facilities

Minor: Any person below the age of 18 years of age. This is the Statutory working age in Uganda. Presence/ Employment of any person below this age bracket brings in vicarious responsibility to the employing entity. According to the Labor Unions Act 2006, minor refers to any person between the age of eighteen years and twenty years.

Child: any person below the age of eighteen years (Employment Act 2006, Labor Unions Act 2006)

Casual employee: a person who works on a daily or hourly basis where payment of wages is due at completion of each day's work (Employment Act 2006)

Gender Issue: A statistical or social indicator of inequality between males and females arising from discrimination and/or marginalization.

Gender Equality: Provision of equal opportunities to access, participate and use public services to all women and men.

Accident: Any unplanned, unwanted, but controllable event which disrupts the work process and causes or results in injury or death to personnel.

Corrective Action: Upon conclusive incident investigations, these are identified initiatives/actions that are to be implemented / put to work to address the incident causal factors so as to prevent a recurrence.

Employer: the organization or entity which utilizes the services of someone or another entity for remuneration or compensation in return.

Hazard: A hazard is anything that has the potential to cause injury or illness to people and/or damage to property or the environment or reputational damage of a business entity or a combination of these. The situation could involve a task, chemical or item of equipment/machinery or leaked info to the media.

Incident: Any unplanned and unwanted event (near misses & accidents) which resulted in near miss or accident.

Near miss: A near miss is defined as any occurrence that could have resulted to an accident.

Lost Time Injury (LTI): Any occupational injury or illness which results in an employee being unable to work three (3) full consecutive assigned workdays.

Preventive action: is a proactive approach that involves acting before an incident occurs, e.g., by identifying a hazard (risk assessments) and taking steps to prevent any incident which may result from the hazard.

Recordable incidents: Are incidents that resulted from an exposure or event in the workplace and that require some type of medical treatment or first Aid.



1.0 INTRODUCTION

1.1 Context of the Document

This Labor Management Plan (LMP) has been developed to address risks related to labor and working conditions identified during the project concept and appraisal phases, in line with the project substantial risk rating. The LMP is based on National Information Technology Authority Uganda's (NITA-U) Environmental and Social Management Framework (ESMF) as the main reference document, to manage foreseen labor risks that may arise during the implementation of the Uganda Digital Acceleration Project – Government Network (UDAP-GOVNET). The LMP is in line with national requirements as well as the objectives of the World Bank's Environmental and Social Framework (ESF), specifically objectives of Environmental and Social Standard 2 (ESS2): Labor and Working Conditions and Standard 4 (ESS4): Community Health and Safety. The stand-alone LMP has been developed in fulfillment to the commitment in the Environmental and Social Commitment Plan (ESCP). This LMP forms the basis for management of labor related risks and will be updated to address risks following definition of project activities, required skills and categories of workers. The LMP will then be adopted by all contractors and suppliers engaged under the project.

1.2 Objectives of the Labor Management Plan

The main objective is to document labor requirements and identify the risks associated with the project that together with aspects of welfare in line with legal requirements and Good International and Industry Practices (GIIP). The ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. By ensuring that workers in the project are treated fairly and provided with safe and healthy working conditions, NITA-U will promote sound worker management relationships and enhance the development benefits of a project. Henceforth, the objectives of the ESS2 include the following;

- To promote safety and health at work
- To promote fair treatment, non-discrimination, inclusion and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS), vulnerable or marginalized individuals or groups, migrant workers, contracted workers and primary supply workers.
- To prevent the use of all forms of forced labor and harmful child labor.
- To support the principles of freedom of association and collective bargaining of workers.

1.3 Project Description

The UDAP-GovNet was conceived as a follow up project to Regional Communications Infrastructure Program (RCIP) which closed in August 2022. The project addresses the challenges outlined in the 2016 Systematic Country



Diagnostic (SCD) and is aligned with the 2016 Country Partnership Framework (CPF), which covered FY16-21. The proposed project was also aligned with the then Uganda's National Development Plan (NPD III), which aimed to increase the National ICT Infrastructure coverage and usage in National development, improving the efficiency and transparency of Government

The project aligns with the Uganda Vision 2040 which aspires to ensure that the country continuously builds robust and trusted high-speed ICT infrastructure all over the country; National Resistance Movement (NRM) Manifesto 2021 – 2026 which places ICT at the core of national development and the enhancement of public service delivery among others, aligned with NPDIV objective 1: Increase ICT connectivity across the country and Parish Development Model (Pillar 2 Infrastructure which intends to extend National Backbone Infrastructure to sub-counties & establish free Internet Wi-Fi zones. The project demonstrates substantial policy content by directly supporting the implementation of Refugee digital policies linked to employment and private-sector engagement. The project will expand access to affordable high-speed internet through a combination of investments and reforms. It will strengthen public sector data infrastructure and digital platforms for improved service delivery, enabling coordinated roll-out of digital services at scale across key ministries and agencies. It aims to ensure a digitally capable and inclusive Uganda, by enhancing ICT research and innovation, improving digital skills and promoting digital inclusion.

1.3.1 Project Location

The project will be implemented nationwide focusing on network expansion and strengthening of the national digital backbone. The main implementing agency, NITA-U will expand the geographical coverage of the NBI/EGI Network across the Country. Under the Digital Connectivity outreach Component 1, the project will continue to focus on improving government connectivity, expanding the National Backbone Infrastructure and connecting government facilities (MDAs, municipal councils, schools, health centers, hospitals) across the country.

1.3.2 Project Development Objectives and Components

The Project Development Objectives are to expand access to high-speed internet, improve efficiency of digital government services, and strengthen the digital inclusion of refugees and hosting communities.

The project design includes five components, covering policies and regulations, digital connectivity, digital government, digital capabilities, and finally project management. The project components are:

Component 1: Expanding Digital Connectivity to unserved and underserved population

This component will seek to bridge the digital divide by improving access to high-speed internet in underserved or unserved communities in Uganda through a combination of infrastructure investments and policy reforms, in support of the objectives set forth in the Government's Digital Transformation Program under the National Development Plan (NDP III). This component will also enhance



Uganda's digital infrastructure by expanding the government's data center hosting capacity, improving e-waste management and developing e-signature capability.

Component 2: Enabling Digital Transformation of the Government

This component will leverage the improved internet connectivity and digital government enablers developed under RCIP-5 with the aim to further accelerate the move towards 'digital first' government in Uganda. The activities in this component support the Government's plans for developing and scale-up of robust, cost-effective, secure and user friendly shared digital government infrastructure and platforms, in line with the Objective 2 of the NDP III, which aims to enhance the development of digital services in business and service delivery across Government. The goal of this component is to transform the way people, governments, businesses, and civil society interact with each other, by supporting digital transactions and e-services that are on-demand, paperless, cashless and available through the Internet without requiring physical presence. Doing so will provide a level of Government resilience to digitally respond to diseases of public health emergencies of international concern like Murburg, Mpox Covid among others. The subcomponents are: (2.1) Accelerating Digital Transformation of Service Delivery (2.2) Mainstreaming Digital Services in Priority Sectors and (2.3) Strengthening Cyber Security Resilience.

Component 3: Promoting Digital Inclusion of Refugees and Host Communities

This component will improve the supply of core digital infrastructure in remote refugee hosting districts for the benefit of both refugees and the local population. This will be achieved through implementing the numerous initiatives including expanding the backbone and provision of last mile solutions, scaling mobile access including campaigns on electronic Know Your Customer (eKYC) and counterfeit products to eleven of the fourteen settlement camps and host communities across the country. In addition, demand side barriers will be addressed, including the cost of mobile devices, the need for basic digital skills, and the limited availability of digital services. The component aims to stimulate jobs and financial opportunities, which will lay the groundwork for broader long-term social and economic benefits. The subcomponents are: (3.1) Digital inclusion of refugees and host communities through enhanced connectivity and (3.2) Digital inclusion of refugees and host communities through access enablers.

Component 4: Strategic Project Implementation Support

This component will finance project management and coordination, including procurement, financial management, monitoring & evaluation and environmental and social safeguards management.

Component 5: Contingency Emergency Response Component

This component is a 'zero-assignment' CERC that will provide funding for immediate response in the event of an eligible crisis or emergency, defined as



an event that has caused or is likely to imminently cause a major adverse economic and/or social impact associated with natural or man-made crises or disasters. This will have an initial zero value but may be financed during the project to allow for an agile response to an eligible crisis or emergency. Adding the component in from the beginning, albeit with zero funding, provides for flexibility to respond to crises as they arise. These could include, for instance, humanitarian crises which require the provision of emergency communications services to replace facilities that have been damaged, or to facilitate emergency humanitarian payments using mobile money.

Following the enactment of the Anti-Homosexuality Act (AHA), 2023, additional consultations were undertaken focusing on inclusion and non-discrimination to include in this document and its annexes specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals or groups in providing or receiving benefits in World Bank- financed projects and programs in Uganda. These measures are described in various sections of this document and in Annexes 8 and 9.

Furthermore, following the World Bank Group's communication of its concerns with the enactment of the AHA, the Government of Uganda issued five Circulars (see Annex 7). Of particular importance is the Circular on Uganda's Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

- "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 one will be discriminated against or stigmatized, and the principles of nondiscrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank [financed] projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project Grievance Redress Mechanisms (GRMs) as well as strengthening existing project monitoring by implementing entities including third-party monitoring [the Enhanced Implementation Support Mechanism] where applicable.
- Each project implementation entity shall develop comprehensive guidelines to address nondiscrimination."

Considering this, further consultations were undertaken on non-discrimination for the project environmental and social risk management documents including this SEP to identify the additional risks and describes mitigation measures to address these risks. They include the implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented in some of the ongoing World



Bank-supported projects. They also include the risks identified in the public consultations on these documents involving the Government of Uganda and civil society organizations. Noteworthy is that the World Bank will provide support to the Government of Uganda, particularly its Project Implementation Units, to help them to implement the additional mitigation measures for this project.

1.4 Current Stage of the Project

As part of the Effectiveness Conditions listed in the ESCP, the recipient has developed a LMP consistent with the requirements of the ESS2 under the World Bank Environmental and Social Framework (Labor and Working Conditions) that are due within one month of effectiveness.

1.5 Classification of workers

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers, skilled and unskilled who will be employed. These are classified as shown below;

Direct workers: The project has workers that are both directly recruited by the Implementing Agency under the Project Implementation Unit (PIU) including Project Coordinator, Procurement Specialist, Procurement Officer, Monitoring & Evaluation Specialist, Environmental Safeguards Specialist, Social Development Specialist and the Legal Experts. In addition, there are project managers handling various project activities and or components

Contracted workers: Regardless of the nature of recruitment, all workers are protected by national labor laws including Employment Act 2006, HIV Prevention & Control Act 2014, National Gender Policy 2018 among others that contractors are obliged to abide. In addition, the PIU will ensure that, the contractors and sub-contractors develop a labour management plan as part of their C-ESMP to help address the employment risks including nonpayment, gender discrimination, failure to provide contracts to worker and other workers related welfare.

Direct and primary supply workers: It should also be noted that majority of the workers will be those directly employed by different contractors and suppliers for different subprojects. Some of these workers will be engaged in the different subprojects like National Broadband Infrastructure Extension, Last Mile Connections, downstream e-waste activities (within e-waste facilities), those that will be employed on mobile broadband (erecting of 130 masts), those that will be employed on the construction of 24 Telecentres, on construction of 3rd National Data Centre among others. All these activities and infrastructure establishments are likely to lead to an influx of labour. The contractors will be mandated to ensure fair treatment and management of their workers, including giving them contracts and ensuring that the code of conduct is signed by all.



Community workers: It is assumed that most contracted workers will be unskilled and untrained from the local population, there is a likelihood that occupational health and safety risks like injuries will occur.

1.6 Potential Labor Risks and Management

Key Labor Risks: The project is anticipated to have key labor risks and impacts, although expected to be localized and manageable and these include the following;

- Likely incidences of occupational health and safety risks during activities related with use of community workers
- Potential risk of safety and security in the workers and vehicles transporting materials as well as in instances of heavy equipment that may be used in project sites where these are required.
- Very low potential risks associated with influx of labor (Gender Based Violence (GBV), Violence Against Children (VAC), etc.
- Potential attacks by wild animals; Stray wild animals from the game and national parks as some of the fibres and lines pass through these areas. However, the project is close partnership and engagement with the Uganda tourism industry to address this risk.
- Likely incidences of labor discrimination (e.g., gender based, disability etc.)
- Potential incidence of social conflict (including gender-based conflicts and violations, domestic violence);
- Likely increase in the spread of diseases including HIV/AIDS due to labor influx, water borne diseases (like cholera, typhoid and or malaria) due to contamination of water sources
- Potential risk of exclusion or discrimination against vulnerable or marginalized individuals or groups from Project benefits.

1.7 Risk management procedures

All contractors will be required to develop and implement a written and functional labor management plan as part of their overall C-ESMP, including procedures to establish and maintain a safe working environment as per requirements of ESS2. All contractors will be required to ensure that workers will use appropriate safety gears, receive appropriate safety training and other preventive actions as provided in Project ESMF.

1.7.1 Labor risks and Influx

Just like any development intervention, this project will attract additional labour force to the existing population in the implementation areas. The various activities including; digging of manholes / drilling/ excavation for either fibre or construction of masks and towers are associated with foreseen and unforeseen risks including with labour influx include (over population), over exploitation and competition for resources, pollution, environmental degradation and low quality of life, gender-based violence, other anti-social behaviors among others. Nonetheless, the contractors and or subcontractors will be required under their contractual obligations to commit to, protection of workers especially from sexual exploitation and abuse as well as gender-based violence as provided for in the ESMF. Contracts for all workers will include a code of conduct (see Annex 6) with provisions on non-discrimination, GBV, SEA, SH, VAC and they will be sensitized on the CoC before signing when hired.

1.7.2 Gender Based Violence (GBV)/ Sexual Exploitation and Harassment (SEAH)

Gender-based violence (GBV) is violence committed against a person because of his or her sex or gender. It is forcing another person to do something against his or her will through violence, coercion, threats, deception, cultural expectations, or economic means. For GBV/SEA, the project will develop a strong reporting protocol that provides for timely and safe reporting of GBV/SEA/SH incidences. Gender based discrimination to be strictly prohibited and monitored by the project. The project will, with support from focal persons, mobilize and train workers including community workers to actively engage in prevention of gender-based violence, sexual exploitation and workplace sexual harassment. The District Gender and community development units together with Safeguard focal persons in the implementing agencies will be equipped to handle complaints or provide relevant services to any likely survivors but will refer them to GBV service providers who will in turn use health facilities, law enforcement's gender unit or others, and other services for management of the issue. Grievances related to gender-based violence should also be handled with the relevant sensitivity.

The World Bank's Grievance Redress Service (GRS) requires that Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level GRMs or the WB's Grievance Redress Service (GRS).

The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For



information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

1.7.3 Child labor

According to the Constitution of the Republic of Uganda 1995, a child is a person below 18 years. The project will only employ workers aged 18 years and older. Age of participants will be verified during the employment process using tools like Voters Registration Card (VRC), National ID and letters from the resident LC 1 chairpersons. In liaison with the District Labor officers and LC 1 chairpersons, awareness sessions on child and forced labor should be conducted with clear consideration of host community cultural norms. Child labour is criminal, and the project shall ensure that this will be highly prohibited.

1.7.4 Increase in the spread of HIV/AIDS and other Sexually Transmitted Diseases (STDs)

The influx of labour leads to high populations with its associated risks such as increased rates of HIV/AIDS infections. It is therefore imperative to design mitigation measures to address such risk including strict induction to all workers on HIV/AIDS, conducting regular community sensitization on HIV/AIDS providing free condoms to the workers, and conducting voluntary counselling and testing among others

1.7.5 For management of the potential risk of exclusion or discrimination against vulnerable or marginalized individuals or groups from Project benefits refer to mitigation measures outlined in various sections of this LMP and its Annexes 8 and 9.

January 6, 2024: Additional Consultations on Non-Discrimination

In January 2024, additional consultations were undertaken on the project to specifically discuss the vulnerability of some individuals or groups to discrimination. During the consultations, key issues raised relating to the UDAP included:

- The possibility for discrimination against vulnerable or marginalized individuals or groups from access to project benefits.
- The need for a strategy to ensure that recruitment for contracts is competitive and based on merit.
- The possibility of hostility towards and stigmatization of individuals or groups based on their vulnerability.



The approach to managing these issues and other issues raised during the consultations are found at Annexes 7, 8 and 9 of this LMP. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on

<http://www.worldbank.org/en/country/uganda/brief/consultations>.

2.0 ANALYSIS OF POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK ON LABOUR MANAGEMENT

2.1 Policy Frameworks.

The following policies, guidelines and or Framework apply to this LMP:

2.1.2 National Environment Management Policy, 1994

The overall policy goal is sustainable development, which maintains and promotes environmental quality and resource productivity for socio-economic transformation.

2.1.3 National Environment Health Policy 2010

This policy establishes the environmental health priorities of the Government of Uganda and provides a framework for the development of services and programmes at national and local government levels.

2.1.4 National Policy for Older Persons 2009

The Policy promotes and contributes to the attainment of the development goals. This policy informs other policies, programmes and sectoral plans. It will provide a framework for: enhancing the recognition of the roles, contributions and potential of older people in the development process; strengthening the informal and formal community-based support systems and actions for older persons' dignity

National Equal Opportunities Policy 2006: The goal of the National Equal Opportunities policy is to provide avenues where individuals and groups' potentials are put to maximum use by availing equal opportunities and affirmative action.

2.1.5 National Policy on Disability 2006

The National Policy on Disability in Uganda aims at promoting equal opportunities for enhanced empowerment, participation and protection of rights of PWDs irrespective of gender, age and type of disability.

2.1.6 National Orphans and other Vulnerable Children's Policy 2004

The Policy focuses on full development and realization of the rights of orphans and other vulnerable children. Specifically, to ensure that the legal, policy, and institutional framework for child protection is developed and strengthened at all levels and that, orphans, vulnerable children and their families access basic essential services package as well as ensuring that, resources for interventions that benefit orphans, and other vulnerable children are mobilized and efficiently utilized.

2.1.7 National Gender Policy 2018

It is aimed at mainstreaming gender concerns in national development processes through guiding resource allocation in all sectors to address gender inequality. The project implementation team together with the contractors will ensure that gender equality is mainstreamed all through the implementation period.

2.1.8 Vision 2040

The key components of this project include Expanding Digital Connectivity to unserved and underserved population, Enabling Digital Transformation of the

Government and Promoting Digital Inclusion of Refugees and Host Communities
and these are drivers towards achieving the goals of Vision

2.1.9 National Development Plan III (2020/21-2024/25) and NDPIV (2025-2030)

The project will help improve the service sector and hence the quality of life of the population overall. The project is also well aligned to NDPIV (under its final stages by the government) under objective one; of Increasing ICT connectivity across the country.

2.1.10 Occupational Health and Safety Policy 2006

This provides for Preventative action guidelines, detailing risk assessments, job hazard analysis, and measures to avoid workplace-related injuries or illnesses. The project has a well-articulated risk assessment against all labour associated risks.

2.1.11 National Policy on HIV/AIDS and the world of Work, 2007

It strives to ensure non-discrimination, confidentiality, HIV testing in workplaces among other aspects in the workplace. All workers are provided with information on HIV/ AIDS, and it also forms part of the main induction packages for new joiners in the project. Routine awareness sessions are provided for staff in operation areas to deal with this aspect.

2.1.12 National policy on elimination of gender-based violence, 2016

The policy emphasizes early intervention to prevent re-victimization of and long-term effects for girls, including interpersonal violence, sexual coercion, alcohol and drug abuse and mental health problems, Reporting cases of violence against children immediately.

2.1.13 The National Policy on Older Persons, 2009

This provides for the inclusion of older persons in income generating projects as key social protection instruments. Where it is reasonably practicable, older persons are engaged in projects carried out in our operation areas.

2.2 Legal Framework

2.2.1 Constitution of the Republic of Uganda, 1995

The Constitution obliges citizens to maintain clean and healthy environment without endangering human health and the environment.

2.2.2 National Environment Act Cap 181

Specifically, the Act provides that, every person in Uganda has a right to a clean and healthy environment in accordance with the Constitution and the principles of sustainable development. A person may, where the right referred to herein above is threatened because of an act or omission by any person which has/is likely to cause harm to human health or the environment take a legal process against the person whose act or omission has/or is likely to cause harm to human health or the environment;

2.2.3 Employment Act of 2006

The Employment Act is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, repatriation, management and compensation of workers.

2.2.4 Public Health Act Cap.281:

Part IX Sanitation and Housing: No person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or her or of which he/she is in charge, any nuisance or other condition liable to be injurious or dangerous to health.

2.2.5 Workers' compensation Act of 2000

The Act outlines matters of compensation for injuries and accidents as well as the responsibility of employees to take care of their health, health and safety while on the project.

2.2.6 Occupational Safety and Health Act of 2006

The Occupational Safety and Health Act of 2006 makes provisions for the health, safety, welfare and appropriate training of persons employed in workplaces.

2.2.7 Employment Act of 2006

The Employment is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, management and compensation of workers. This Act provides for matters governing individual employment relationships in terms of circumstances of provision of labor.

2.2.8 Children's Act 2016 Cap 59

It provides for care and protection of children which is emphasized throughout the project cycle. Further, prohibits any form of exploitation of any child. Accordingly, a person shall not employ or engage a child (below 18 years of age) in any activity that may be harmful or hazardous to his or her health, or his or her physical, mental, spiritual, moral or social development. UDAP will have zero tolerance to child labour and hence no child below the age of 18years will be employed on any of the subprojects.

2.2.9 Worker's Compensation Act Cap 225, 2000

It provides for the compensation of works for injuries suffered and diseases incurred in the course of their employment providing clear guidance on the employers' liability in case of injury during work execution.

2.2.10 Labour disputes (arbitration and settlement act) 2006

This provides for arbitration in labour related grievances and is emphasized during project planning and implementation. The Act seeks to promote social dialogue, facilitate collective bargaining, and modernize procedures to address unresolved or mismanaged labor disputes that may have adverse effects.

2.2.11 Occupational Health and Safety Act of Uganda 2006

Article 9 and subsection (2) of this Act, where the level of air pollution and chemical in a working environment exceeds the exposure limits specified by an occupational hygienist. Employers shall provide adequate and suitable protective equipment to the workers; employer should ensure that such personal protective equipment are used adequately.

2.2.12 Local Government Act 2005

The mandates full participation of local government not only in planning, implementation but also supervision of government programs. Under this

project, the key district local governments are key stakeholders that will provide project oversight at the local level.

2.2.13 HIV Prevention and Control Act 2014

It states that, a person shall not be denied access to any employment for which he/she qualifies; or transferred, denied promotion or have his/her employment terminated on the grounds of his/her actual. Perceived or suspected HIV status.

2.2.14 Refugee Act 2006

This Act is in line with 1951 International Convention relating to the protection of refugees. The Labour management plan has and will ensure that refugee rights are adhered to.

2.3 International Conventions and guidelines.

2.3.1 Convention on Elimination of All Forms of Discrimination against Women, 1979

It looks at discrimination against women as any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field. The project shall provide for equal opportunity in recruitment and treatment of all staff.

2.3.2 UN Conventions on the Rights of Persons with Disabilities, 2007

It protects the rights and dignity of persons with disabilities and ensure full enjoyment of their human rights and equality under the law. The project offers special attention to Vulnerable Groups, the directed efforts in their inclusion and care in taken in project implementation to reduce or mitigate on the negative impacts associated with it. This is mainly in barricading off of areas under construction and timely backfilling of excavations among others.

2.3.3 World Bank Environmental and Social Standards relevant to the LMP

World Bank's Environmental and Social Standards relevant to this LMP include:

ESS2 Labor and Working Conditions: This Standard obliges the Developer (NITA-U) to develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national laws and the World Bank ESF. The World Bank ESF sets out her commitment under ESS2 to:

- Promote fair treatment, non-discrimination and equal opportunity of all project workers
- Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) vulnerable or marginalised individuals or groups, and migrant workers, contracted workers, community workers and primary supply workers, as appropriate
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law and to;
- Provide project workers with accessible means to raise workplace concerns.
- Prevent the use of all forms of forced labor and child labor.

The project will have a well established and trained Grievance Redress Committees (GRCs) under its GRMs at various levels including; workers, district, refugee settlements and parish/village levels to receive and address all project-related grievances and or refer the matters to other designated relevant authorities.

ESS4: Community Health and Safety: The Standard puts emphasis on community exposure to risks and impacts because of the project and includes road safety risks; risks associated with security personnel as well as addressing water-related, communicable and non-communicable diseases that can result from projects activities and have impact on project labor as well as the community.

ESS10: Stakeholder engagement and information disclosure

The project will provide employment opportunities among the expected project benefits. Effective stakeholder engagement can improve the environmental and social sustainability of the project, enhance stakeholder acceptance of the project and promote significant contribution towards the project design and implementation. NITA-U has prepared a Stakeholder Engagement Plan and will ensure all project workers are engaged and sensitized on issues related to the project and appropriate information disclosed to them. The community shall also be sensitized on the expected engagement with workers, training of workers on use of PPE, work related tools among others.

3.0 OVERVIEW OF LABOR USE ON THE PROJECT

This LMP applies to project workers including full-time, part-time, temporary, migrant workers¹ etc. As stated in ESS2, the term **"project worker"** refers to:

- (a) people employed or engaged directly by NITA-U (to work specifically in relation to the project (direct workers); these include PIU and NITA-U employees.
- (b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers);
- (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and
- (d) people employed or engaged in providing community labor (community workers).

3.1 Project Specific Labor Categories

3.1.1 Project Planning, Supervision and Management of Activities under Component 1 and 3

These shall mainly be manned by skilled and competent labor with formal education or skills acquired through experience and qualification. Such activities shall include project surveying, especially for the NBI route alignment and designing. In this category all personnel utilized shall be skilled. Skilled labor in this phase shall also include primary supply workers like experienced drivers with relevant defensive driving training, engineering teams, monitoring and evaluation teams, surveying teams and E&S compliance teams. They shall also include riggers certified for work at height operations.

3.1.2 Loading, Offloading of Materials and Cable Hauling

This shall, mainly have unskilled labor with basic awareness provided on manual handling and other in-house awareness sessions. These shall mainly be community members and shall ensure safe offloading activities, traffic management along routes of interest.

The successful implementation of the project shall entail skilled, semi-skilled and unskilled labor. The project shall include direct workers (working for NITA-U), contracted (working with contractors and sub-contractors), community workers (hired from host communities), and primary supply workers (workers attached to a supplier of project materials where applicable), and government civil servants (attached or relevant to the project). The unskilled Community workers and semi-skilled labor force shall earn daily wages but still hold workman's compensation during project works execution. UDAP shall enjoy benefits from a pool of personnel that have also developed required skills through apprentice

¹ A "migrant worker" is a person who either migrates within their home country or outside it to pursue work.

in past phases. In addition to the uniform 8 hours' work per day, employment terms for various workers shall be as per Table 1 below²:

² At the time of the disclosure of this LMP, upstream studies were still ongoing which include E-waste management, Data centre market study, Access Enabler, Mobile Broadband. These will generate downstream activities that will have a host of workers whose number are not known at the moment.



Table 1: Employment Terms for Each Category of Employees

Category	Employment Terms	ESS2 category
NITA-U Employees	Permanent	Direct workers
UDAP-GOVNET Project Staff	Consultants	Contracted workers
Field team members skilled	Waged (daily or monthly payment) or as agreed with the different contractors and suppliers	Contractors' workers
Field Team Unskilled/casual workers (These will be contractors' workers normally outsourced from the local communities)	Waged as per the agreed terms of engagements which could include daily, weekly or monthly	

3.2 Conditions and Management of Workers Relations categorized under ESS2

The labor management plan will be implemented in conjunction with a number of plans, policies and procedures including but not limited to Waste management plan, risk assessments, Journey Management Procedure, GRM and specifically a workers GRM as stated in section 7 that shall cater for all categories of workers including community workers, Archaeological chance finds procedure, new joiners induction procedure, park or protected areas induction forms, permit to Work System and Task Specific Safety Analysis or Job Safety Analysis and Hand tools inspection, developed overtime shall offer guidance to the teams during project implementation.

The conditions and management of workers relations categorized under ESS2 include the following;

- Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment;
- Project workers will be paid on a regular basis as required by national law and labor management procedures;
- Where required by national law or the labor management procedures, project workers will receive written notice of termination of employment and details of severance payments in a timely manner;
- The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices;

- (e) The project will provide appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as women, vulnerable or marginalized individuals or groups, people with disabilities, migrant workers and children.

3.3 Project Workforce

The successful implementation of the project shall entail skilled, semi-skilled and unskilled labor. The project extension shall enjoy benefits from a pool of personnel that have also developed required skills through apprentice in past phases. A number of plans, policies and procedures developed overtime shall also play a great role in guiding teams during project implementation. During implementation, the contractor will outsource their personnel including both skilled and unskilled (semi-skilled and unskilled will be expected to come from the local communities as a way of enhancing local content). These workers shall be given contracts by the contracting firm and sign codes of conduct. For those that will be on temporal basis like a week; job cards shall be used by the contractors to indicate how many hours a particular worker has worked on a day³.

³ This LMP shall be operationalized by the contractors and suppliers that will be contracted under the project. NITA-U directly employed workers will either follow HR manual or public service manuals. The exact numbers of workers on the project shall be known when all activities and subprojects are started.

4.0 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The project involves several activities including; conducting field surveys, development of designs for last mile connectivity sub- component and extension of the NBI, ground truthing for selected routes after design completion (final project routing and design shall be accomplished after selection of competent contractor), delivery and installation of hardware sub-systems in accordance with the approved design plan, integration of all network elements in the Network Management System for central monitoring and management at the Network Operations Center, conducting standard security verification for all network sub-systems, including configuration, testing and commissioning of all network elements as per approved design.

Site teams shall carry out section specific assessments during toolbox talks and pre-job planning meetings with reference to the ESMF and the generic risk assessment subsequently provided:

Table 2: Generic Risk Assessment

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
1. Equipm ent and personnel mobilization to site	Risks related to road accidents	Trucks/ equipment, Project personnel, third parties	3	3	M	• Ensure that drivers have relevant permits • Use permit to work, non-authorized people should not be allowed at the work place • Contractors should have an accident log to record all these occurrences • Make use of Journey movement plan (JMP) with known journey managers. • Ensure that drivers are trained in defensive driving.	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						• Provide for routine vehicle inspections and servicing	
	Conflict and community unrest associated with excavation works, low, delayed or no payments	Plant and vegetation loss, Roadside users' disturbances, water bodies' alterations, underground resources/ utilities disturbances.	4	4	M	• Acquire authorization and notify host communities and leadership prior to excavation works. • Provide for a grievance management system • All personnel shall be properly inducted • Provide for references from LC chairpersons prior to recruitment of personnel • Contractor should disclose payment structure • Conduct community entry and exit meetings including holding continuous stakeholder engagements throughout project implementation to address any issues.	L
	Occupational health and safety risks	Project staff	4	4	H	• Awareness sessions on powered tools, excavations to project implementation staff • Provide for appropriate PPE and enforce PPE usage. Also	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
2. Risks related to workers welfare		Third parties and animals				provide reflector jackets for visibility/safety of workers • Barricade off areas to be excavated and utilize warning signs understood by the host communities to reduce on spectators • Carry out community/stakeholder awareness programs including in schools that are in the proximity of project sites • Provide for rest breaks to reduce on the stress exposed to workers during project execution • Contractors shall have a sound PPE policy approved by the project management team • Provide fully stocked first aid kits and trained first aiders for project teams in the field. • Ensure that contractors have known functioning phone contacts for medical personnel or facilities where project staff	

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						can be taken for medical treatment • Follow NITA-U project incident reporting procedure for all near misses and incidents in the project area	
	Absence of resting areas, absence of safe and adequate drinking water, risks related to uncovered pits and trenches and excavations. For example, dehydration could lead to headaches and worse reactions	Workers or field teams	3	1	L	• Provide for enough clean portable drinking water for project team members • Provide for shade to be utilized during rainy spells • Provide for water pumping prior to entry into excavated points	L
	Food poisoning and hygiene related issues	Workers or field teams	2	5	M	• Utilize authorized food vendors during the operations and ensure that these are effectively paid by the contractor • Provide awareness sessions to project teams on food safety and hygiene	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	Biological hazards like snakes, wasps and disease-causing organisms.	Contractors and subcontractors	2	2	L	• Provide for proper site screening prior to excavation works especially in swampy areas. • Provide for sound waste management and ensure that workers have rangers to guide at all times while in protected areas. • Ensure that all project teams are inducted	L
	Poor or no backfilling works present trap hazards for workers, animals and pedestrians while it also brings in a cost for levelling of the area by the day-to-day users of these spots.	Developer, contractor and third parties	4	4	H	• Provide for awareness sessions on agreed backfilling practices • Carry out post backfill inspection and spot checks to ensure compliance with set practice and add fill in areas with depression • Provide proper signage, temporary covers, lighting, warnings/ caution tapes and fencing off areas • Reduce open excavation to mainly areas without tarmac, opt for non-surface destructive penetration as has been the practice	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	Noise and Dust emissions especially during the borrowing tool usage. Loose material excavated is easily blown by wind. This could also impact on workers if no protection is provided	Workers, Office users, Patients in Hospitals, Court disruptions, Neighboring households, pedestrians	1	3	L	- Utilize dust suppressing method like water sprinkling. - Utilize silencers where appropriate. Ensure that units are services to reduce on noise emissions. Provide for excavation works during off peak hours to check on potential disruptions - Provide appropriate PPE like ear muffs for project execution teams - Carry out regular equipment servicing	L
	discrimination, exploitation and abuse in the recruitment process to vulnerable groups (women, people with disabilities – forced labour, minorities These including persons with rare conditions like albinism could easily be taken advantage of and not be recruited or	Host communities and contractor staff	2	3	M	- Continuous coordination with the labour office in regards to recruitment of all personnel - Provide roles earmarked for vulnerable groups like flag personnel, record or stock taking team members among others - Have the none-discrimination project related policy discussed during inductions to all staff. - Provide secure channels for reporting any actual or	M

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	abused recruitment after					suspected abuse of human rights including aspects related to vulnerable groups and GBV. • NITA-U and its contractors and suppliers shall make reference to Equal Opportunities Commission Act Provide for appropriate Task Specific Safety Analysis (TSSA) for jobs carried out with vulnerable groups provided special attention.	
	Fall from heights/Accidents,	Personnel working, non-authorized personnel on site, existing tress, existing power lines and other utilities, motor vehicles	4	4	H	• Use well standardized and inspected scaffolds and climbers with reasonable practicability, • Non-authorized personnel should not be allowed on site, use appropriate PPE and signage, cordon off the area of work and acquire permission from the district environment officer before cutting any existing tree or altering any water body.	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
		and boda boda passing near the site.				• Provide for appropriate TSSAs and permit to work issuance prior to works executions	
3. Demobilization	Accidents and Environmental pollution		1	3	L	• Provide for proper journey planning in compliance with the NITA-U journey management plan. • Proper equipment inspection to ensure that only sound vehicles are utilized in transporting equipment • Utilize competent and certified personnel	L
	Road accidents, bad drivers, black spots, potholes on the roads, poor visibility, animals crossing, driving under the influence of drugs, Driving while talking on phone, poor journey management plan.	Workers, Communities along utilized routes (Highway), machinery and Equipment	H	H	H	• Make use of Journey movement plan (JMP), use your seat belts, don't drive while under the influence of drugs, don't drive while tacking on phone, use competent drivers, be vigilant while driving with other road users, follow road safety rules, signage and speed limits.	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						• Provide for training in defensive driving for all project drivers and disciplinary measures for non-compliance • Non-authorized people should not be allowed at the work place during loading operations • Provide for barricades and appropriate supervision during critical operations	
4. Overlapping risks	Poor human waste disposal could lead to disease outbreaks	Host communities, NITA-U and contractor	1	4	L	• Inductions and Toolbox talks should also focus on waste management practices as per the NITA-U waste management plan • Contractor should provide portable toilet facilities for stretches without toilet facilities and also discuss with facilities in areas that have to allow project staff to utilize their ablutions.	L
	Poor management of general waste streams like treated transmission poles, communities	Host communities, workers and	3	3	M	• Ensure adherence to the waste management plan • Only transport Waste using NEMA licensed waste handlers.	

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
	reusing poles for cooking	environment				• Conduct awareness sessions on hazard identification and utilization of MSDS for all project related materials • Awareness sessions on the potential impacts of treated poles used as firewood should be provided to workers and communities so that this doesn't occur • Waste management aspects should be provided for as part of the induction process. • Provide for proper chain of custody for waste and records on waste collected.	L
	Poor management of E-waste and disposal	Host communities	4	4	H	• NITA-U is participating in the initiatives by NEMA on E-waste management. • Compliance shall be in line with the draft e-waste management regulations under the proposed waste management regulations and the guidelines by the ministry of ICT & NG • Provide awareness sessions and publications to the public	M

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						on proper E-waste management and • Provide collection centres for e-waste at various points throughout the country to ease waste collection.	
	Likely incidents of child labour or forced labour	Host communities	4	2	M	• No children shall be engaged in the project particularly, those below 18 years and are in school • Request for a letter from LC1 during employment to establish residence and contact persons	L
	Likely presence of migrants or seasonal workers including risks associated with labour influx	Host communities	4	2	M	• 60% of the casual jobs shall be reserved for project affected communities/local content	L
	Gender based violence	Host Communities and female labourers	4	2	M	• All workers shall be inducted to the project code of conduct before assuming work • Sensitization on what constitutes GBV and the penalties	L

Project Steps	Impact or Risk Description	Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
			L (1-5)	C (1-5)			
						• All criminal cases shall be documented and handed over to Police • The GBV Risk mitigation measures shall be operationalized, including updating the SEP, prior to launching calls for bids, and shall be implemented throughout Project implementation	
	Non-nationals taking over many jobs	NITA-U staff and the contractor's pre-project launch team	4	2	M	• 60% of the casual jobs shall be reserved for project affected communities/local content	L
Discrimination and exclusion of vulnerable or marginalized workers.	There is a potential risk of giving out jobs based on unfair or prejudicial treatment of people and groups based on characteristics such as gender.	Workers Community members	5	2	H	• The approach to managing these risks and impacts is found at Annexes 8 and 9 of this LMP	L

Project Steps	Impact or Risk Description		Impact receptors	Initial rating		Rating	Mitigation measure (s)	Residual rating
				L (1-5)	C (1-5)			
L: Likelihood, C: Consequence		L: Low, M: Moderate		H: High	Rating: Impact significance/ consequence			



5.0 DUTIES AND RESPONSIBILITIES

National Information Technology Authority-Uganda (NITA)

NITA-U Executive Director: Overall responsibility of project delivery and showcases commitment to set compliance aspects of the project as a responsible developer

NITA-U Project Managers: are the main contract focal points throughout the project life cycle and provide final guidance in project execution.

UDAP PIU Staff: Safeguards team at NITA-U (Environmental Safeguards Specialist and Social Development Specialist): provide support to the project on compliance including but not limited to monitoring of workers' welfare, adherence to project related compliance aspects and advising on implementation of agreed or best practices in the operation. EHSS will:

- a) As part of the OHS requirements, identify potential hazards to project workers and develop OHS plans and GBV risk management plans to manage the identified risks.
- b) Carry out training to all contractors in relation environment, health and occupational safety issues. In addition, these trainings will be extended to all project managers handling various project components.
- c) Induction and training of contractors on OHS and labour management procedures ensure worker grievances are addressed
- d) Regularly monitoring and reporting on implementation of the labour management procedures and OHS requirements. The contractors' safeguards teams shall administer the contractors' codes of conduct. At NITA-U; Human Resource department will be responsible for administering and ensuring that all direct workers adhere and follow the HR manual.

Contractor Management: Contractor management presents some of the greatest risks during project implementation given the fact that most activities are contracted out. These often come with own Environment, Health, Safety and Social compliance cultures. Prompt inductions and continuous monitoring is encouraged to ensure compliance. While responsibility is provided to contractors, the client (NITA-U) remains accountable for the project.

For contract bidding and contracts for the Project, NITA U will use the World Bank's 2017 standard bidding documents, which include labor, and occupational health and safety requirements.

NITA U will incorporate a standard language, based on project requirements drawn from ESS2, ESS4 and other sections of the World Bank Environmental and Social Framework and supporting documentation, in the tender and contract documents to ensure potential bidders are aware of the environmental and social requirements to be met under the project.

Tender documentation should note that the contractor/subcontractor shall actively collaborate and consult with project workers in promoting understanding, and methods necessary for project implementation.

NITA U will require bidders for contracts for the Project to agree and to implement a workplace Code of Conduct (COC) that includes provisions prohibiting any form of exclusion, discrimination, sexual exploitation, assault or harassment of Project workers, as well as sexual exploitation or sexual assault of persons in local communities affected by the project, and any form of sexual activity with persons under the age of 18, except in case of pre-existing marriage. The CoC will apply to all persons employed or engaged, including persons employed or engaged through contractors and subcontractors, in relation to the project. The Contractor's code of conduct (CoC) shall form part of the contractual, induction processes and the routine awareness sessions.

NITA U will require bidders for contracts for the project to submit a statement confirming their firm compliance with national labor and employment and occupational health and safety laws, and LMPs in accordance with ESS2 "Labor and Working Conditions" and the LMP for the project.

NITA-U will make reasonable efforts to ensure that parties awarded contracts for the project are reliable, law-abiding entities that do not have a history of problems relating to disrespect for national labor law, unresolved labor disputes, or frequent work-related accidents.

As part of the selection process for contractors, NITA-U will request and review from prospective contractors the following information as a bare minimum:

- a) Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies
- b) Business licenses, registrations, permits, and approvals.
- c) Documents relating to a labor management system, including OHS records, for example, labor management procedures.
- d) Identification of labor management, safety, and health personnel, their qualifications, and certifications.
- e) Workers' certifications/permits/training to perform required work for example Work at Height certification and Permit to Work training certification among others.
- f) Records of safety and health violations, and responses.
- g) Accident and fatality records and notifications to authorities.
- h) Records of legally required worker benefits and proof of workers' enrolment in the related programs.
- i) Worker payroll records, including hours worked and pay received; and
- j) Identification of safety committee members and records of meetings

During the implementation of the contract, NITA-U will require that contractors to provide Weekly, Monthly and quarterly reports during project implementation to include aspects of the LMP especially around Personnel on Board (POB), Lost Time Incidents, Fatalities, inspections and audits, workplace inspections,



discrimination, exclusion, grievances raised and resolved among others as dictated by field conditions and site-specific risks. Some of the pertinent contractor roles are subsequently presented:

Contractor site supervisors: Responsible for daily monitoring of activities to ensure compliance to all project safeguards requirements and ensure close out of action points as provided in various scenarios. They hold the mantle to sound project implementation. Additionally, the contractor shall:

- a) Supervise the implementation of this LMP and OHS requirements in line with the contractors' C-ESMP and other project instruments.
- b) Provide routine occupational health and safety training to all workers involved in works and maintains records of such trainings.
- c) Maintain records of recruitment and employment of contracted workers as provided in their contracts.
- d) Ensure that workers understand and sign the code of conduct, prior to commencement of works.
- e) Provide workers with the necessary PPE wear and enforce PPE usage.
- f) Ensure availability of first-aid kits, readily accessible by workers in case of injury.
- g) Ensure availability of food and adequate potable drinking water for all project teams
- h) Documentation and reporting of occupational accidents/incidents, maintain accident/incident logs. Major accidents/incidents such as fatalities etc., shall be reported to NITA-U and World Bank immediately and investigative action undertaken to determine root causes. Minor incidents shall be recorded in the monthly monitoring reports including corrective actions undertaken to prevent recurrence. As part of OHS requirements, develop and implement emergency preparedness and response measures to effectively respond to emergency situations.

Contractor EHSS personnel: Responsible for project compliance in line with workers' rights and obligations and advising management on proper systems of work. These carry out daily and routine monitoring of activities to ensure compliance with specified safety measures and records of any incidents.

District focal persons: these include the Chief Administrative Officers, Local Leadership and Labor Officers and Community Development Officers. They ensure that all grievances provided to them are directed to the client and appropriately closed out or forwarded to the next tier as and when situations demand.

Local Council Chairpersons: They are also responsible for providing names of potential casual laborers from their communities.

Enhanced Implementation Support and Monitoring Entity shall:

- Provide capacity building on non-discrimination to all relevant stakeholders of this LMP.

- Strengthen Workers GRM to ensure it includes an effective, safe, ethical, and confidential mechanism to receive, manage, refer and monitor grievances related to exclusion and discrimination.
- Manage a hotline (0800 333125) currently hosted and operated by a local NGO on behalf of the EISM firm established purposely for vulnerable or marginalized workers to lodge their complaints of discrimination. The guidelines on how the hotline will be used and cases managed are outlined in Annexes 8 and 9
- Provide support for enhanced monitoring of the risk of exclusion or discrimination for workers who may be vulnerable or marginalized.
- Ensure that contracts, codes of conduct, hiring procedures, whistleblower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.

6.0 AGE OF EMPLOYMENT

The project will employ workers aged 18 years and above only. The project is deemed as "No Child Labor" and this shall be followed by all contractors and suppliers. For those willing to work but have no national identity cards, shall be required to get recommendation letters from local council ones who will confirm the age of such prospective employee or job seeker.

7.0 CONTRACTOR MANAGEMENT

To ensure sound and time-bound project implementation, NITA-U will utilize the available safeguards specialists (environmental safeguards and Social Safeguards specialists). This call is for sound contractor management be realized through proper agreement signing, agreement on key performance indicators and ensuring that worker related aspects of the project are embedded in contract. Contractors will be selected through an open competitive bidding process. Management of labor issues including occupational health and safety as guided by ESS 2 and the approved LMP shall form part of the contract awarded to the best evaluated bidder. There should be:

- a) Scrutiny of Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies;
- b) Business licenses, registrations, permits, and approvals; Documents relating to a labor management system, including OHS issues, for example, labor management procedures.
- c) Identification of labor management, safety, and health personnel, their qualifications, and certifications;
- d) Workers' certifications/permits/training to perform required work;
- e) Records of safety and health violations, and responses;
- f) Accident and fatality records and notifications to authorities;
- g) Records of legally required worker benefits and proof of workers' enrolment in the related programs;
- h) Worker payroll records, including hours worked and pay received;
- i) Identification of safety committee members and records of meetings; and
- j) Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms.
- k) NITA-U shall have full access to all project information collected by the contractor and supervising consultants. The project manager with support from the Independent Supervisor shall be tasked to monitor and ensure compliance by the Contractor to ESS 2.

All contractors shall have clear SOPs, closure dates and competent action parties. Continuous monitoring shall be carried out throughout the project life cycle including but not limited to anomaly sighting campaigns amongst staff, periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by third parties. While contractors shall have independent agreements or contracts signed with employees and sub-contractors, NITA-U shall ensure that all contractors and employees are employed as per National Legislation, Best industry practice and in compliance to the labor management procedures. The contractor is obliged to provide all copies of contracts or agreements from all employees and subcontractors or any other contract entered into as part of the project delivery to NITA-U.

8.0 REPORTING ON LABOUR PERFORMANCE AND WELLBEING

Monthly and quarterly Environment, Health, Safety and Social (EHSS) monitoring reports shall be provided by NITA-U to illustrate project performance in line with set EHSS indicators of the project including but not limited to those outlined in the Table below.

Table 3: EHSS Indicators to Illustrate Project Performance

Indicators		
Man-Hours	Fatalities (FTL)	Pre-Task Meetings
Personnel On Board (POB)	Immediate Incident Reports	EHS Inductions
Local Content	Incident/Accident Reports	Worksite Training Classes Held
National Content	Number of Days Since Last worked LTI	Total Training Hours
Female Content	Number of Days Since Last Recordable Incident	Drills (Fire, Stretcher, Man-Down)
Sound EHSS performance rewards	Number of Days Since Last Hurt	Motor Vehicle Inspections
Environmental Incidents (ENV)	Number of Days Since Last HIPO	Lifting Equipments Inspections (Self Loading Trucks)
First Aid Treatment (FAT)	Stand-Down Safety Briefs $\geq$ 15Mins	PPE Inspections
Medical Treatment Only (MTO)	World Bank Visits	Weekly Camp Inspections and spot checks
Restricted Work Cases (RWC)	Audits	Government/ lead agency visits (including Local government)
Cumulative Restricted Duty Days	Gov. licenses/ permits	Other External Audits
Lost Time Incidents (LTI)	JSAs Completed and Reviewed	Mileage (Km)-Contractor
Cumulative Lost Workdays From LTI	Permit To Work (PTW)	Mileage (Km)- UDAP
Other EHSS Meetings	Pre-Task Meetings	Kms excavated (trenched)
Grievances Recorded	Grievances Recorded	Kms backfilled

All the above elements provide guidance on how labor is performing and how safe the project stands during its implementation. Action points from these reports shall be tracked with action parties assigned to them to ensure completion.

To enhance and strengthen World Bank financed project activities in the Uganda Portfolio, monitoring of inclusion and non-discrimination of vulnerable or

marginalized individuals or groups following the enactment of AHA in all projects will have Third Party Monitoring. Third-Party Monitoring will be overseen by the EISM firm in collaboration with NGOs/CSOs. Third-Party Monitoring will monitor whether the mitigation measures for workers who may be vulnerable or marginalized are being adequately implemented; propose corrective actions and measures when required; undertake community stakeholders' outreach and sensitization and provide referral to counseling services when needed.

As part of the Third-Party Monitoring a Hot line has been established for the Project, as stated earlier. Several Development Partners and CSOs have expressed interest in expanding their Hotlines to cover vulnerable or marginalized individuals or groups issues. TORs will be prepared and will be shared with these Hotlines and other interested Development Partners.

8.1 Hiring

All work shall be carried out by personnel considered eligible to provide labour by law (above 18 years of age) upon presentation of a valid National Identification Card and recommendation letter from the resident Local Council chairpersons. For avoidance of doubt, this shall be under the guidance of the Ministry of Gender, Labour and Social Development. The minimum acceptable age of minors employed on the project will be sixteen (16) upon approval by the district labour officer and consideration will be given to young family heads. They shall be engaged in non-hazardous⁴⁴ that is not labour intensive for instance housekeeping and stock-taking.

All works shall be shared through a 40/60 ratio with the local community benefiting 60% of the employment. The project will engage community labour/workers to enhance and foster community driven development and provide community benefits. Community workers will be recruited under the direct supervision of contractors/ sub-contractors. The Contractors/ sub-contractors must ensure that all project workers sign employment contracts and Code of Conduct agreements with provisions on inclusion and non-discrimination. Equitable employment aspects of the project shall be streamlined throughout the project cycle with deliberate effort to cater for Vulnerable groups under ESS7.

This ESS applies to distinct social and cultural groups. such as "Sub-Saharan African historically underserved traditional local communities," "indigenous ethnic minorities," "vulnerable and marginalized groups,". In Ugandan context, such groups include the Vulnerable and Marginalised Groups (VMGs) include the Batwa and Ik. The project has a well aligned Vulnerable and Marginalised Framework (VMGF) that will guide the implementation of activities in areas occupied by VMGs and, in compliance with ESS2. Aspects of salaries and wages shall be in line with:

⁴⁴ ESS2 specifies work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include: (a) work with exposure to physical, psychological or sexual abuse (b) working at heights or in confined spaces (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, temperatures, noise or vibration damaging to health etc.

- a) Number of hours worked
- b) Distances excavated or covered during pole erection
- c) Grading as follows:
 - i. Casual Labor
 - ii. Supervisors
 - iii. Managers
 - iv. NITA-U staff
 - v. NITA- U Consultants

Deliberate efforts shall be directed to providing gender balance with specific attention to women in the project's areas of operation. In all available job offers, females shall be encouraged to apply and some jobs specifically earmarked for female employees. These shall include but not be limited to flag personnel, stores management, and field supervision among others.

All workers including casual laborers employed by the project shall be documented and have written contracts stipulating all the above and other aspects as per the laws governing Uganda and materially consistent with objectives of ESS2 and in compliance of this LMP. All workers will be issued a code of conduct stipulating the acceptable work behavior and punitive measures provided to mitigate against exclusion, discrimination, SEA and GB.

8.2 Staff Welfare

Accommodation: Given the linear nature of the project, **pre-facility** visits shall be carried out for selected accommodation units and an agreement reached between the contractor and landlords. All staff shall be expected to have and utilize personal beddings and the contractor shall be responsible for hauling these to the selected accommodation facilities. For avoidance of doubt the project shall only utilize existing facilities in project districts as a way of supporting local businesses and reducing on project environmental footprint. All facilities shall be inspected prior to occupation to ensure fit for purpose including adherence to any Standard Operating Procedures (SOPs) that shall be issued by the Ministry of Health in relation to any disease of public health emergencies of international concern that may be declared by World Health Organization. All residential facilities shall have clean running water and shall ensure that care is taken on:

- Malaria management
- Hygiene related aspects of the project including provision of hand washing soap and sanitizer where available and bathing facilities
- Proper human waste management including provision of adequate number of toilet facilities
- Appropriate lighting and ventilation
- Provision of proper muster points and
- Medical emergency points and readily accessible first aid kits maintained by health and safety representatives
- Gender considerations especially for separate accommodation and sanitation facilities

- Avoidance of locations that are hot spots for prostitution
- Social distancing and other SOPs when/where relevant

Insurance: All project staff shall have insurance including but not limited to workman's compensation as stipulated in the employment contracts and provided by NITA-U. Best practice also calls for medical insurance or MOUs with credible medical service providers in the operation area to cater for illnesses during project implementation

Food and Water: All project personnel shall be provided with meals in the following categories by their respective employers:

- Breakfast, lunch and dinner- teams staying in designated accommodation area
- Lunch- teams commuting from host communities
- Enough safe drinking water (≥ 3 litres of portable drinking water) - for all staff throughout the project cycle.

Security: All personnel shall be provided with appropriate security during project implementation, and this shall be in collaboration with state security agencies like Uganda Police, the Uganda Peoples Defense Forces, the Uganda Wildlife Authority (if in Protected Areas) and private security firms where applicable. All these shall be sensitized on NITA-U's awareness on Voluntary Principles on Human Rights and Security and encouraged to showcase these values while executing their state duties.

8.3 Timing of Labor Requirements

Following the labor laws requirements, all workers shall be expected to work for 8 hours; additional of which shall be regarded and paid as extra work with special rates. Night time is not anticipated, however, should it be required, then a special permit shall be required and specific safeguards requirements put in place including but not limited to flood lights. Such night workers cannot be in residential areas or national parks. This shall enable proper hazard identification and provision of mitigation measures. This caters mainly for works in busy town setting where day-time works have a potential to distract routine activities in the area. Teams working at night will have rested during day time.

In scenarios where workers have to travel a distance longer than 1 km, transportation shall be provided from accommodation to site/sites and time utilized for movements to and from the site shall form part of the working hours in the day. A journey Management risk assessment template utilized for field activities is provided in Annex 1 Man-hours attributed to the project have already been considered an integral part in the reporting of activities.

8.4 Incident Management and Investigation

To reduce the risk of incidents and accidents project teams shall be provided with awareness sessions on incident reporting, management and preventive actions. Emphasis shall be on emergencies like injury, accidents with a lot of



emphasis on near misses and Lost Time Incidents among others as per incident management plan.

8.5 Incident and Accident reporting

NITA-U shall notify the World Bank within 24 hours of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including fatalities or impact on physical and cultural resources. Whereas the contractors or suppliers shall be required to report to NITA-U on the same with immediate effect and not more than 12hours. Upon this notification, the next steps shall be prepared in relation to the Environmental and Social Incident Response Toolkit (ESIRT)



9.0 GRIEVANCE REDRESS MECHANISM

NITA-U has GRM guidelines that shall be utilized throughout the project lifespan. These support all processes that are aimed at preventing, timely identification and resolving of project related grievances. The intention is to address workers' concerns, community concerns, reduce risks, and assist other processes to create sustainable positive impact through various tiers. The GRM is further discussed in section 6.1 and Annex 3 of the ESMF.

9.1 Workers Grievance Redress

A grievance is a concern or complaint raised by an individual or group affected by the project. The objective of the project GRM is to provide workers with processes for submission and raising grievances and grievance resolution. This mechanism will ensure that all workers' grievances are handled in a fair and transparent manner, in line with NITA-U internal policies, the Ugandan legal framework and the requirements under ESS2.

NITA's Safeguards Team shall work and supervise all contractors and subcontractors within the project sites to establish and operationalize workers' Grievance Redress Committees.

All workers related grievances of contractual nature including among others, non-fulfillment of contracts, low levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation, delayed payment, non-provision of meals, poor accommodation, absence of enough workers' rest, failure to provide adequate and safe drinking water, unfair pay, cases of discrimination, sexual exploitation and abuse, intimidation, torture of any form, deduction of their wages to cover the cost of PPE, retaliated against for reporting aggrievance shall be addressed to the workers' grievance committees. The procedure shall include:

Step One: All civil grievances shall be submitted in writing to the Secretary, site specific workers GRC that sits weekly to handle grievances and provides feedback in 7 days. This committee shall consist of the contractor's representative/site Engineer, Workers Representative, NITA-U Grievance Officer (representative), Contractor EHS/Sociologist and the LC 1 Chairman (Traditional/Religious/Opinion leader). If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the project implementation team GRC.

At all times, the GRCs shall be gender responsive with deliberate efforts to have women represented so as to cater for specific needs and grievances of women. In scenarios where the grievance or complaint is on one of the main committee members, these shall step aside to allow fair investigation and replacements made.

For avoidance of doubt, suggestion boxes shall be utilized for scenarios where the complainant(s) prefer to stay anonymous.

Step Two: Project Implementation Team (PIT) GRC that sits every week and will provide feedback in 14 days. This committee shall consist of the Project Manager, Contractor Project Manager, NITA-U Grievance Officer (representative), Contractor Engineer, Workers Representative, NITA-U Social Scientist and EHS and Contractor EHS/Sociologist. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

Step Three: NITA GRC. This will include a Grievance Officer, Legal officer and the Executive Committee members of NITA-U with capacity to handle any civil issue including those that are intricate and complex. This GRC will meet once a month and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to court for adjudication.

Mitigation measures against GBV and SEA shall be addressed through the existing legal procedures and processes in place including Police, Courts and Prosecution, Labor Officers and Probation Officers. The procedure shall include:

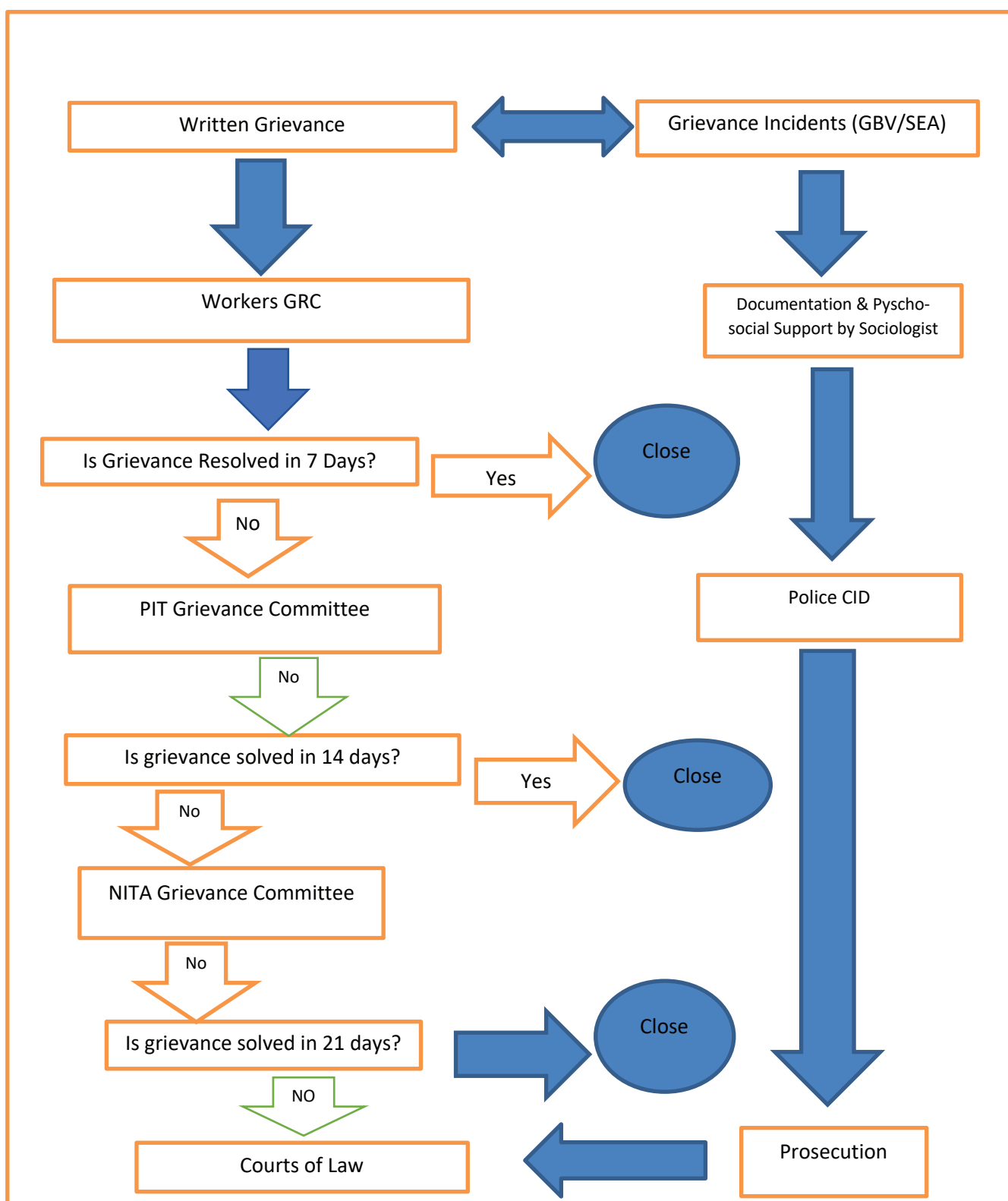
Step One: Documentation of the incident and provision of psychosocial support to the victim by the Sociologist/GBV incident or service providers

Step Two: Handling of the incident by Police and other criminal justice system authorities for redress

9.2 Grievance Redress Mechanism Guidelines

In addition to the grievance registration and closure forms in appendices 2 and 3, an extract from the GRM guidelines is subsequently presented in Figure 1 below. For the management of complaints pertaining to vulnerable or marginalized workers who may suffer discrimination, refer to Figure 3 under Annex 8.

Figure 1: Grievances Flow and Referral Diagram for the Project.



10.0 ANNEXURES

Annex 1: Journey Management Plan Risk Assessment

NITA-U JOURNEY MANAGEMENT PLAN RISK ASSESSMENT				
SECTION 1: TRAVEL DETAILS				
Driver's Name: Signature:	Purpose for the Journey:		Departure Date & Time:	
Vehicle Registration No:	Driver's Permit No:		Date & Time of Arrival:	
Passengers on the Vehicle:	Journey Description (From/To, Via):		Is the driver trained in defensive driving? Yes/No Has the driver rested for the past 11 hours? Yes/No	
SECTION 2: RISK ASSESSMENT (Strike Out Controls Which Are Not Applicable / Tick To Confirm Risk Rating, Or Amend As Appropriate)				
Hazard	Causes	Impact	Controls	Risk Rating
Loss of control of vehicle	Driver error Interaction with fauna Extreme weather conditions Variable standard of road surfaces Horseplay	Personal injury and/or damage to vehicle resulting from Collision with another vehicle, livestock or wildlife	Driver is licensed for the class of vehicle being driven and trained in defensive driving. Vehicle equipped with first aid kit Driver is well rested and free from the influence of alcohol and drugs (including prescription medication with drowsiness warnings). Driver modifies speed to cater for factors such as weather, traffic, fauna, and road conditions. Journey is scheduled conclude within 14 hours of start of work day.	

		Single vehicle collision	A pre-start inspection of the vehicle is carried out and all safety concerns addressed prior to departure. Vehicle equipped with trauma/first aid kit. Travel commences after dawn and concludes before dusk. Other:				
Hazard	Causes	Impact	Controls	Risk Rating			
Vehicle stranded	Mechanical failure Collision, Boda bodas and pedestrians criss-crossing in the road Lack of fuel	Personal illness Personal harm	All controls as stated above (per "Loss of control of vehicle") Minimum 1 litre of water for every 1 hour of journey per person on board. Fleet Care (roadside assist) contact details recorded in the vehicle. Mobile telephone on board (in case mobile reception available). All personnel remain with vehicle. Driver and/or passengers' familiar with route, or maps on board. Other:				
Inaccessible roads	Bushfires, floods, motor vehicle incident, pot holes etc...	Modified route required Delayed arrival	Driver modifies speed to cater for factors such as weather, traffic, fauna, and road conditions. Driver follows the direction of emergency services personnel as applicable, tunes in to radio for emergency updates Deviations from planned route (as above) reported to Contact at destination however possible. Shared driving where driver reports experiencing signs of fatigue. Other:				
SECTION 3: TRAVEL APPROVAL							

Approved by; Name and Position:	Signature:	Approved Date:	Approved Time:
---------------------------------	------------	----------------	----------------



Risk Matrix

		CONSEQUENCE				
		INSIGNIFICANT	LOW	MODERATE	HIGH	CATASTROPHIC
Life/Health		First Aid Treatment	Medical treatment or occupational illness (recoverable).	Lost time injury or occupational injury (recoverable); Restricted Work Injury	Fatality or disabling injury or occupational illness (non-recoverable)	Multiple fatalities or disabling permanent injuries
LIKELIHOOD	Almost Certain	Moderate	High	High	Extreme	Extreme
	Likely	Moderate	Moderate	High	High	Extreme
	Possible	Low	Moderate	High	High	High
	Unlikely	Low	Low	Moderate	Moderate	High
	Rare	Low	Low	Moderate	Moderate	High

RISK TOLERANCE LEVELS

GREEN LOW	Driver may approve and move unit to designated Journey manager for signature. Driver must review the JMP and verify that identified controls can be fully implemented, and that all personnel fully understand the task and their role. The journey may proceed with caution, but be prepared to reassess the risk.
YELLOW MODERATE	Supervisor input required. Supervisor must review the JMP, and discuss potential additional controls with the Driver. If controls cannot be implemented to reduce the risk rating to green, the Supervisor must sign the JMP as 'Approver'.
ORANGE HIGH	Project Manager input required. Project Manager must review the JMP, and discuss potential additional controls with the driver or their supervisor. If controls cannot be implemented to reduce the risk rating to yellow or green, the Project Manager must sign the JMP as 'Approver'.
RED EXTREME	Journey must not proceed. Input must be sought from the appropriate Manager for further advice. If controls cannot be implemented to reduce the risk rating to orange, yellow or green, the task must be reconsidered, alternative travel methods employed, or a full Risk Assessment conducted to establish suitable controls

Annex 2: Grievance Registration Form

GRIEVANCE REGISTRATION FORM	
	Serial No: 1001 Ref No: Date: .../.../.....
Name of Complainant: Gender: Male ☐ Female ☐	
Telephone Number: Age:	
ID Type and No:	
Description of Complaint;	
Name & Contact details of witness (If available):	
Location of Receipt of Grievance	Location of occurrence of Grievance
District:	District:
County:	County:
Sub county/Town council:	Sub county/Town council:
Village/Cell:	Village/Cell:
LC Chairperson's Name:	Line Number:
Grievance No in village:	Name of execution contractor:
Other (Specify)	Other (Specify)
Description of Activity/Project/ line that Grievance is related to	
Signature or thumbprint:	
FOR OFFICIAL USE ONLY: Received by:	
Observation of receiving Officer: Issue ☐ Grievance ☐ Non Grievance ☐	
Method of receipt: Letter ☐ Email ☐ Face to face ☐ Telephone call ☐	
WhatsApp ☐ Etc...(Please specify)	
Support documents provided by Complainant (if any)	

Annex 3: Grievance Resolution Form



NITA
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Closure Date: .../.../.....
Ref No (Should be in line
with registration form
number):
Receipt Date: .../.../.....

Name of Complainant:Gender: Male ☐ Female ☐

Telephone Number:Age:

ID Type and No:

Grievance registration Form Details:

Serial No:System Ref No.Date of receipt

Response to Complaint (detailed-Utilize overleaf/ additional paper if required)

.....

.....

.....

.....

.....

Name & Contact details of witness (If available).....

Iacknowledge that I agree to the
solution proposed in respect to the above grievance and that the solution has been implemented
to my satisfaction.

Complainant's Name & Signature:

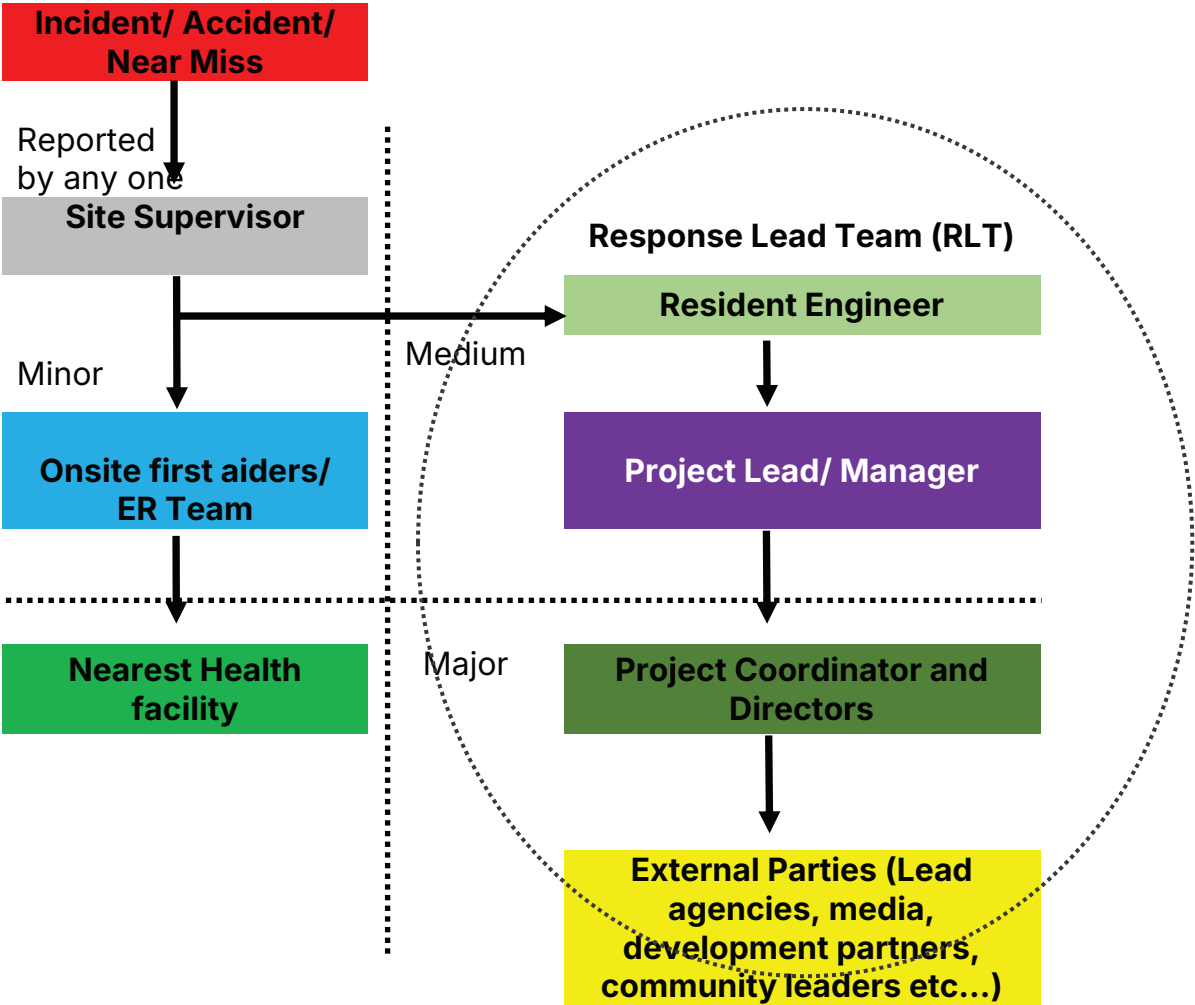
Witness' Name & Signature:

Company representative Name & Signature:

Annex 4: Incident Management and Investigation



INCIDENT RESPONSE SYSTEM



Annex 5: CODE OF CONDUCT FOR NITA-U STAFF

Policy brief & purpose

Our **Employee Code of Conduct policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. We however, expect all employees and (sub) contractors to follow our code of conduct as their everyday work place policy. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Scope

This policy applies to all our employees and (sub)contractors regardless of employment agreement or rank.

Policy elements

Compliance with law

All employees must protect our company's legality. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

All employees and (sub)-contractors must comply with all the environmental health, social and security safeguards in the Missing Links Project ESMP, Project Site Rules, NEMA conditions of approval for ESIA and site/district-specific permits/approvals to work conditions

All employees and (sub)-contractors shall follow, respect and comply with the project grievance redress procedure

Respect in the workplace

All employees and (sub)-contractors should respect their colleagues. Any kind of discriminatory behavior, harassment (sexual, gender, vulnerability, etc.) or victimization is prohibited and punishable. Employees and (sub)-contractors

should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Protection of Project Property

All employees and (sub)-contractors should treat our project property, whether material or intangible, with respect and care.

Employees and (sub)-contractors:

- Shouldn't misuse **Project equipment** or use it frivolously.
 - Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.)
- Employees should use project property only to complete their job duties.

Employees should protect Project facilities and other material property (e.g. PPE, Computers, Transmitters, FOC, etc.) from damage and vandalism, whenever possible.

Professionalism

All employees and (sub)-contractors must show integrity and professionalism in the workplace:

(a) Personal appearance

All employees and (sub)-contractors must follow our personal appearance and dress code guidelines.

(b) Corruption

We discourage employees and (sub)-contractors from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

(c) Job duties and authority

All employees and (sub)-contractors should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. Delegation of duties to team members must take into account their competences and workload. Likewise, team members should follow team leaders' instructions and complete assignments with skill and in a timely manner. We encourage mentoring throughout our company.

(d) Absenteeism and tardiness

Employees and (sub)-contractors should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. Employees and (sub)-contractors will be punctual when coming to and leaving from work.

(e) Conflict of interest

Avoid personal, financial or other interests that might hinder your capability or willingness to perform your job duties.

(f) Collaboration

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

(g) Communication

Be open to communication with colleagues, supervisors or team members

(h) Benefits

Do not abuse your employment benefits including time off, insurance, workman's comp facilities, subscriptions or other benefits our Project offers.

Policies

All employees and (sub)-contractors should read and follow our Project policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

Disciplinary actions

Management may have to take disciplinary action against employees and (sub)-contractors who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension after at least two warnings for minor offenses and termination after three warnings where more serious offenses are involved
- Detraction of benefits for a definite or indefinite time

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

Declaration

I, the undersigned, do declare that:

(1) I have been satisfactory inducted on the project code of conduct policy

(2) I have read and understood the entire code of conduct policy

(3) I agree to abide by all its conditions

No	Name	Designation		Signature	Date	Witness Signature	Date

Annex 6: CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

1. We are the Contractor, *[enter name of Contractor]*. We have signed a contract with *[enter name of Employer]* for *[enter description of the Works]*. These Works will be carried out at *[enter the Site and other locations where the Works will be carried out]*. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of social exclusion and discrimination.
2. This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all staff, labourers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as **"Contractor's Personnel"** and are subject to this Code of Conduct.
3. In May 2024, following the enactment of the Anti-Homosexuality Act (AHA, 2023) the environment and social documents of the World Bank-financed projects in Uganda were updated and re- disclosed to include specific measures to mitigate the risk of discrimination against or exclusion of vulnerable and marginalised groups in providing or receiving benefits. The Code of Conduct is part of the mitigation measures to ensure no person will be discriminated against or excluded and the principles of non-discrimination will be adhered to.
4. This Code of Conduct identifies the behaviour that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive, discriminatory, or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. Carry out his/her duties competently and diligently;
2. Comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;

Non-discrimination and Exclusion

3. Create and maintain a safe environment that prevents all forms of discrimination and exclusion and promote the implementation of this Code of Conduct;
4. Adherence to ethical standards in the provision of services to all people without any form of discrimination or exclusion;

5. Conduct themselves- including in-person and on digital platforms - in ways that do not discriminate or exclude anyone;
6. Not discriminate or exclude in hiring and employment practices;
7. Contractors, sub-contractors, and other workers shall not act (or fail to take action) in a manner that discriminates against or excludes anyone;
8. Prohibit harassment in the workplace and discrimination or exclusion against any person;
9. Prohibit termination of work contracts based on social discrimination;
10. Offer sensitization events on non-discrimination and exclusion, and the Code of Conduct for all the technical and support staff;
11. Ensure that all staff, contractors, sub-contractors and other workers append their signature the Code of Conduct as a commitment to comply with it;
12. Health care services, including HIV and Tuberculosis treatment, and safety measures should be provided to all workers in the project area without any form of discrimination or exclusion;
13. Patient rights and ethical values, safety, privacy, and confidentiality as stipulated in the Ministry of Health's 2019 Patient's Charter should be upheld each time a patient seeks health care services at a facility;

Training and Reporting

14. All personnel must complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on non-discrimination and exclusion.
15. There will be no retaliation against any person who reports violations of this Code of Conduct, whether to contractor or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS AND COMPLAINTS

16. If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly and report violations of this Code of Conduct. This can be done in either of the following ways:
 - Contact [*enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [] or by telephone at [] or in person at []; or

- Call [] to reach the Contractor's hotline (*if any*) and leave a message.
- For social exclusion and non-discrimination, complaints should be sent out to the Grievance Redress Service (GRS) at grievances@worldbank.org or specific hotline established to handle complaints on exclusion and discrimination which is run by the World Bank (0800 333 125).

17. The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

18. There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

19. I understand that if I breach this Code of Conduct, my employer shall take disciplinary actions against me that could include:

- Informal warning.
- Formal warning.
- Additional Training.
- Loss of up to one week's salary.
- Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of 6 months.
- Termination of employment.

20. I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor's contact person with relevant experience*] requesting an explanation.

Name of Contractor's Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the Contractor:

Annex 7: Actions Taken by GOU to Ensure Non-Discrimination

Annex 7 highlights recent actions taken by the GOU to ensure non-discrimination. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU.

The Anti-Homosexuality Act was passed on May 26, 2023. The GOU has continued to ensure non-discrimination in all its projects and consistent with this, the GOU 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 against 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 25, 2023) stating that prosecutors should seek guidance from ODPP before a decision is made to charge persons.

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 Agreement*
- *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 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.

Telephone: 256 414707000/232095
Fax : 256 41 4233524
Email : finance@finance.go.ug
treasury@finance.go.ug
Website : www.finance.go.ug
Plot No. 2-8 Apollo Kaggwa Road
In any correspondence on
This subject please quote No.



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

ALD 141/259/01 TC

21st September 2023

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



UGANDA'S SOCIAL SAFEGUARD POLICIES

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

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

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

Mission

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

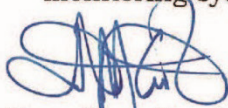
Specific Measures for High Risk Sectors

Health

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

Education

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



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

The Permanent Secretary, Ministry of Gender, Labour and Social Development

The Director of Public Prosecutions

Telephone: 256 414707000/222095
Fax : 256 41 4233524
Email : finance@uganda.gov.ug
treasury@uganda.gov.ug
Website : www.uganda.gov.ug
Plot No. 2-8 Apollo Kaggwa Road
In any correspondence on
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

Affirmation

"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"

- 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.



Telephone: General Lines: 256 - 417-712260
Permanent Secretary's Office: 256 -417- 712221
Toll Free 0800100066

E-mail : ps@health.go.ug
Website: www.health.go.ug

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

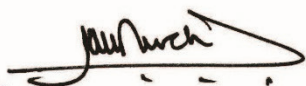
PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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

Telegram: "EDUCATION"
Telephone: +256-41-7893602
Fax: +56-41-4230437

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

Tel: Director +256-0414-332504.

General +256-414-332500
+256-414-332501

Toll Free: 0800112300



THE REPUBLIC OF UGANDA

Office of The Director of Public Prosecutions,
Workers House, 12th & 11th Floor
Plot 1, Pilkington Road,
P.O. Box 1550,
Kampala (Uganda)
admin@dpp.go.ug
www.dpp.go.ug

Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

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

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

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

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

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

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

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

A handwritten signature in black ink, appearing to read 'JFABODO'.

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

Annex 8: Enhanced Implementation Support and Monitoring of Non-Discrimination

1. Background and Objectives

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

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

The objectives of the Enhanced Implementation Support and Monitoring include:

- Assisting project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assisting the WB in strengthening the capacity of 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/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

Table 4 illustrates the enhanced implementation support and monitoring steps. Figure 2 contains enhanced implementation support and monitoring process. Figure 3 contains Complaint Management for Vulnerable and Marginalized Individuals and Groups. Figure 4 presents the roles and responsibilities for implementing mitigation measures.

2. Scope of Work and Activities

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

2.1 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 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 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.

Table 4: Enhanced Implementation Support and Monitoring Steps

Enhanced Implementation Support and Monitoring Steps	
<i>Act as a key first step in the referral process from project-level GRMs</i>	<i>Designed specifically to handle complaints restricted to WB/IFC projects</i>
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities,
Step 2	Develop 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	Maps available services for vulnerable or marginalized individuals and groups including counselling, legal services, protection, and other services,
Step 9	Refers individuals to the appropriate local services or organizations as needed
Step 10	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.

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.

2.2 Outreach and sensitization to project beneficiaries and communities involved with the World 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.

2.3 Capacity strengthening and technical support

Activities related to capacity strengthening and technical support include:

- **Support to the WB/IFC on training** 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 Non-discrimination of Workers.

2.4 Monitoring and Evaluation

Activities related to monitoring and evaluation include:

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

- **Recommending and supporting the implementation of adjustments to mitigation measures** based on regular evaluations and their impact.

3. Roles and Responsibilities

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

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

The GOU will facilitate the work of the entity and collaborate as needed on all activities requiring 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 2: Description of Enhanced Implementation Support and Monitoring (EISM) Process

Description of Enhanced Implementation Support and Monitoring (EISM) Process

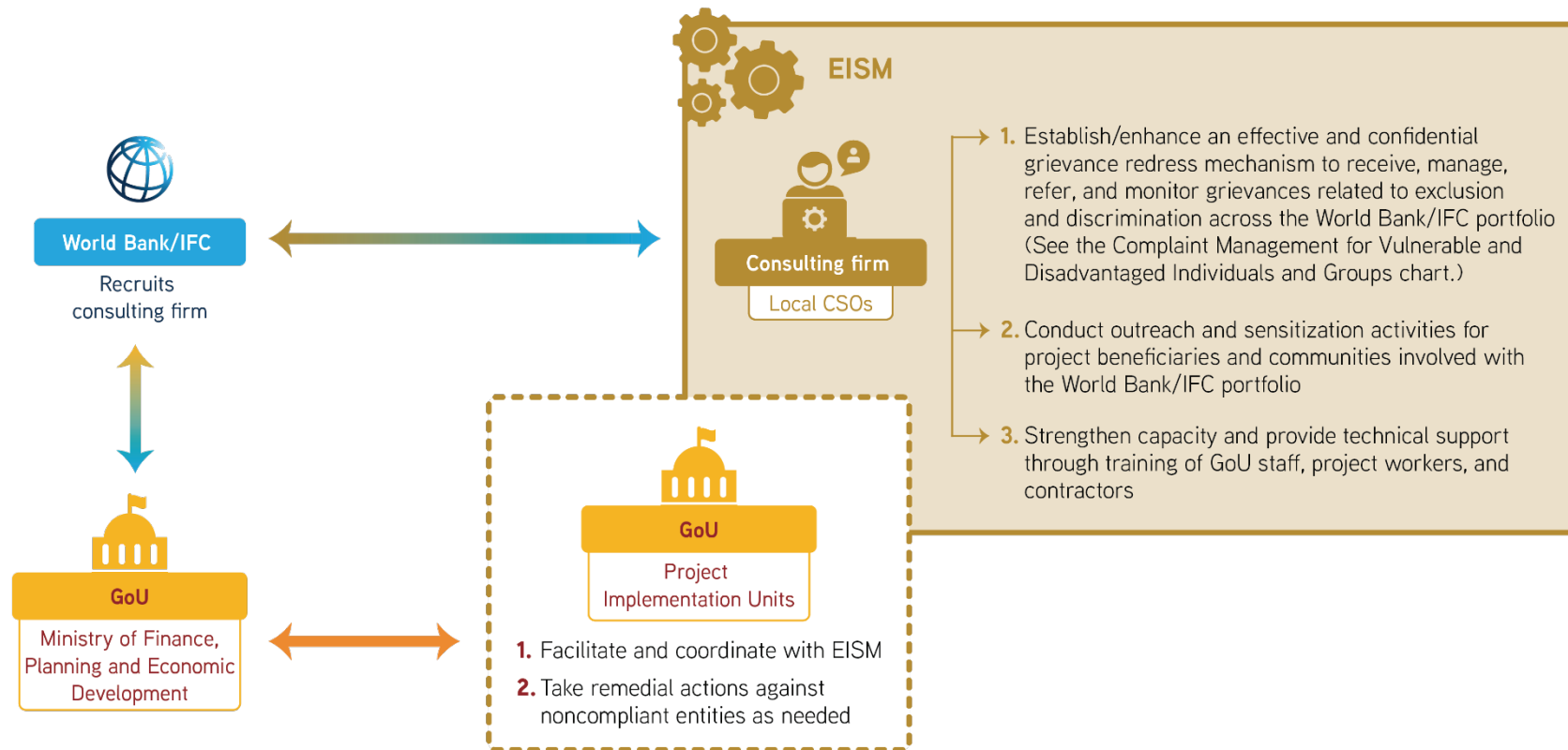
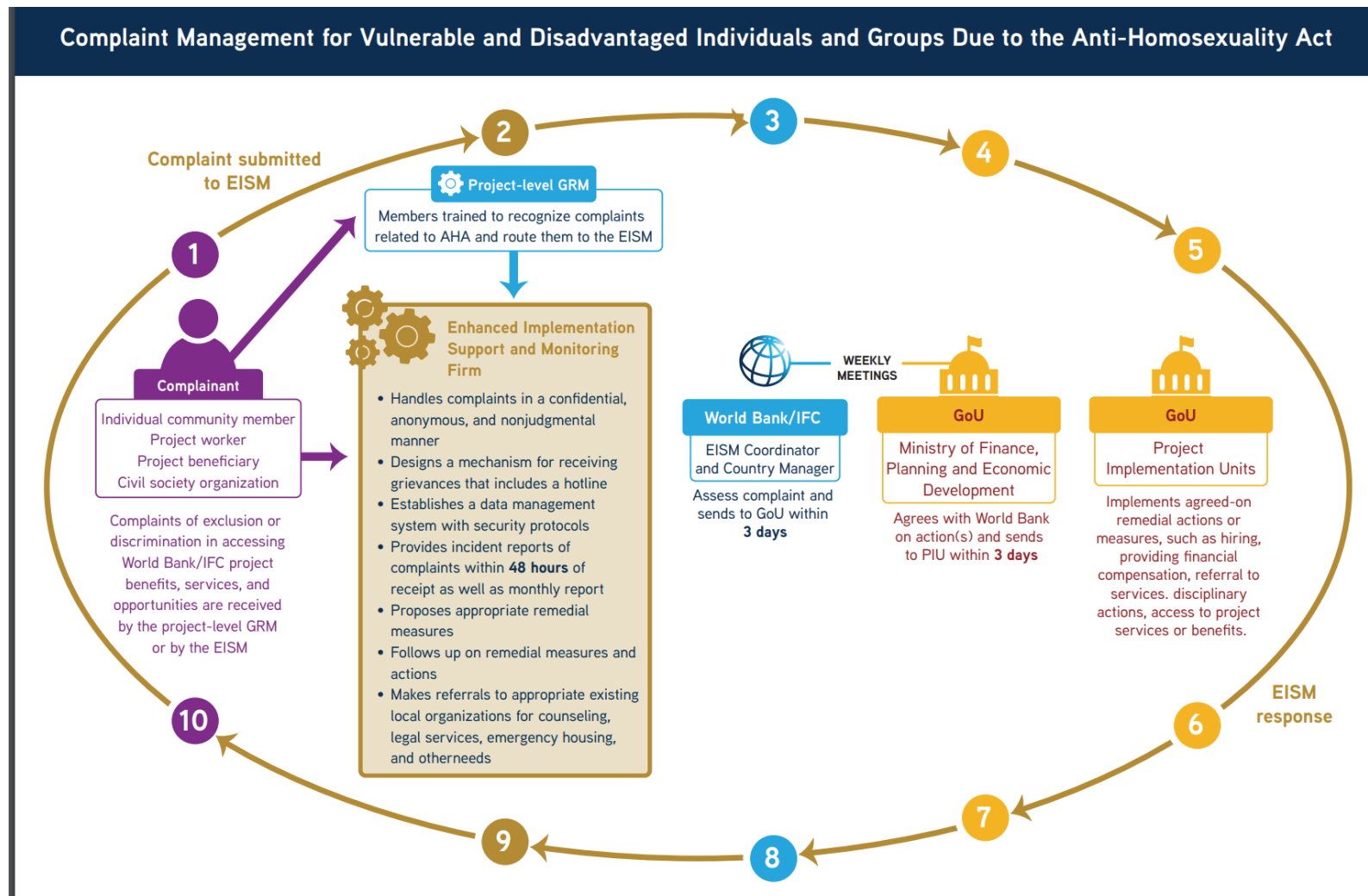


Figure 3: Complaint Management for Vulnerable or Marginalized Individuals or Groups due to AHA



Annex 9: Guidelines for Implementing Mitigation Measures to Address Discrimination

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, RPF, SEPs, POMs etc. for all ongoing projects in the Ugandan portfolio 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 LMP for UDAP includes such mitigation measures in various sections as appropriate.

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

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

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs including for UDAP, 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/PCUs, 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/PCU 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 a high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since the enactment of the AHA or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.

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

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

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

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

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

SREO will provide training to GRM staff so they can recognize AHA-related complaints and route them to the EISM. The enhanced process will enable the PIU/PCU 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/PCUs, 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/PCUs, and service providers should contact SREO to assist with:

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

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

5. Conduct Monitoring and Evaluation

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

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

6. Take Remedial Action

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

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

Roles and responsibilities for the Implementation of Mitigation Measures

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

This section also provides more specific information on roles and responsibilities in implementing the mitigation measures of the EISM firm SREO and the PIUs/PCU. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/PCU with the support of the EISM firm SREO 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 secure personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs/PCUs, 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/PCUs 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.

Figure 4: Roles & 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/PCUs.
- 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/PCUs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/PCUs.
- Monitors and evaluates discrimination complaints.



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