

STAKEHOLDER **ENGAGEMENT** PLAN (SEP).

for UGANDA DIGITAL ACCELERATION PROJECT – (UDAP)



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ACRONYMS AND ABBREVIATIONS

AHA	Anti-Homosexuality Act, 2023
CAA	Civil Aviation Authority
CDO	Community Development Officer
CERC	Contingency Emergency Response Component
CSOs	Civil Society Organisations
DHO	District Health Officer
DLG	District Local Government
EISM	Enhanced Implementation Support and Monitoring
eKYC	Electronic Know Your Customer
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
GBV	Gender Based Violence
GEMS	Geo Enabled Initiative for Monitoring and Supervision
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
IT	Information Technology
MDAs	Ministries, Departments and Agencies
MoFPED	Ministry of Finance, Planning and Economic Development
MoES	Ministry of Education and Sports
MoGLSD	Ministry of Gender, Labour and Social Development
MOH	Ministry of Health
MoICT&NG	Ministry of Information, Communications Technology and National Guidance
MoLG	Ministry of Local Government
MTN	Mobile Telecommunications Network
NBI	National Backbone Infrastructure
NDP	National Development Plan
NEMA	National Environment Management Authority
NITA-U	National Technology Information Authority
OPM	Office of the Prime Minister

PDPO	Personal Data Protection Office
PIU	Project Implementing Unit
PSFU	Private Sector Foundations Uganda
PWDs	Persons With Disabilities
RDC	Resident District Commissioner
RHDs	Refugee Host Districts
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
UCC	Uganda Communications Commission
UDAP	Uganda Digital Acceleration Project
UHRC	Uganda Human Rights Commission
UNRA	Uganda National Roads Authority
UTL	Uganda Telecommunications Limited
VMGs	Vulnerable and Marginalised Groups

DEFINITION OF KEY TERMS

Disclosure: Process of making facts or information known to the public.

Inclusivity: Practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalised i.e., those having physical or intellectual disabilities or belonging to other minority groups.

Marginalisation: The term "Marginalization" generally describes the overt actions or tendencies of human societies whereby those persons perceived as being without desirability or function are removed or excluded (i.e., are "marginalized") from the prevalent systems of protection and integration, so limiting their opportunities and means for survival.

Stakeholder Analysis: Process of identifying the interested parties or individuals before a project begins.

Stakeholder: A person or group or organisation with a vested interest, or stake in the decision-making and activities of a business, organisation or project.

Vulnerability refers to the conditions determined by physical, social, economic and environmental factors or processes, which increase the susceptibility of a community/individual to the impact of hazards.

1.0 GENERAL INTRODUCTION

1.1 Project Description

The Uganda Digital Acceleration Project (UDAP) is designed to accelerate additional digital transformation of Uganda to achieve the aspirations of the Digital Transformation for Africa initiative. The project will expand access to affordable high-speed internet through a combination of investments and reforms. It will also 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. In addition, it aims to ensure a digitally capable and inclusive Uganda, by enhancing ICT research and innovation, improving digital skills and promoting digital inclusion. This project will finance a coordinated effort to build up the core foundations of the digital economy.

It is also aligned with Uganda's current National Development Plan (NPD IV), which outlines objectives that can be promoted by the digital sector.

1.2 Project objectives

The Project Development Objectives (PDO) include the following;

- i) Expand access to high-speed internet in selected areas
- ii) Improve efficiency of digital service delivery in selected public sectors
- iii) Strengthen the digital inclusion of selected host communities and refugees.

1.3 Project components

The design of this project is echoed on five (5) components including; Expanding Digital Connectivity to unserved and underserved areas, Enabling Digital Transformation of the Government, Promoting Digital Inclusion of Refugees and Host Communities, Strategic Project Implementation Support, Contingency Emergency Response Component (CERC) and these are briefly explained below;

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. This will be achieved through a combination of infrastructure investments, policy reforms and in unison with the objectives of the Government's Digital Transformation Program under the National Development Plan (NDP III). In addition, this component will enhance Uganda's digital infrastructure by expanding the government's data centre hosting capacity, improving e-waste management and developing e-signature capability.

Component 2: Enabling Digital Transformation of the Government

This component is aimed 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. This component will help improve efficiency, effectiveness in service delivery as well as enhance the development of digital services in business and service delivery across Government under objective 2 of the NDP III.

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. The key activities under this component include; expanding the backbone and provision of last mile solutions, scaling up mobile access including campaigns on electronic Know Your Customer (eKYC) and counterfeit products.

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 (CERC)

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.



2.0 OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP)

According to the Environmental and Social Standard (ESS) 10 Stakeholders Engagement and Information Disclosure, it's a requirement that NITA-U as the implementing agency to provide stakeholders with timely, relevant, understandable and accessible information. In addition, the agency is obliged to consult with these stakeholders regularly and in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination as well as intimidation. Henceforth, the objectives of the ESS10 include the following;

- 1) To establish a systematic approach to stakeholder engagement that will nurture and maintain a constructive relationship with stakeholders, especially project affected parties;
- 2) To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design so as to improve the environmental and social sustainability of the project;
- 3) To provide means for effective and inclusive engagement with project-affected parties and other interested parties throughout the project life cycle on issues that could potentially affect them;
- 4) To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format;
- 5) To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow NITA-U to respond to and manage such grievances

Following the enactment of the Anti-Homosexuality Act, 2023, this SEP now includes specific measures to mitigate the risk of discrimination against or exclusion of any affected vulnerable or marginalized individuals or groups in providing or receiving benefits in World Bank financed projects and programs in Uganda. These mitigation measures are described in Appendices 6 and 7 of this SEP. In addition, this SEP ensures that such vulnerable or marginalized individuals or groups are consulted appropriately.

2.1 Responsibilities of the Borrower and Client

For effective implementation of projects, the World Bank sets out various environmental and social standards as a requirement to all her supported projects. These are intended to; support Borrowers in achieving good international practice relating to environmental and social sustainability, assist borrowers in fulfilling their national and international environmental and social obligations, enhance non-discrimination, transparency, participation, accountability and governance; and enhance the sustainable development outcomes of projects through ongoing stakeholder engagements. Therefore, the key requirements under the ESS10 include the following;



- NITA-U will engage with stakeholders throughout the project life cycle i.e. the nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- In addition, the implementing agency will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve; stakeholder identification and analysis, (planning how the engagement will take place) disclosure of information, consultation with stakeholders, addressing and responding to grievances as well as reporting to stakeholders.
- NITA-U will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account or the reason why it was not
- The implementing agency will identify the different stakeholders, both project-affected parties and other interested parties i.e., individuals or groups that are affected or likely to be affected by the project
- Depending on the potential significance of environmental and social risks and impacts, NITA-U may be required to retain independent third-party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process.
- The need to develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. This plan will describe the timing & methods of engagement, communication & information needs, interests & interests of stakeholders etc.
- The implementing agency will seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures in the Environment and Social Commitment Plan (ESCP).
- NITA-U will respond to concerns and grievances of project-affected parties and to this develop and implement a grievance redress mechanism to receive and facilitate resolutions.
- Lastly, NITA-U will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS10.

2.2 Communication with stakeholders

The SEP outlines the ways in which the project team and or contractors will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about UDAP project and any activities related to the project. The key important message that the project

implementation team intend to communicate to stakeholders include the following;

- Project background
- Project description
- Project activities
- Potential project benefits and impacts
- The processes that should be used in the engagement process
- The grievance mechanism for the project
- The methods and frequency of stakeholders' participation in the project.

Broadly, stakeholder engagement for the project is categorized into preparation and operation engagement processes. Under UDAP, stakeholder engagements will be structured and offered regularly with flexibility of responding to key issues as they emerge. Various communication methods will be used to engage with stakeholders reflecting their level of authority, socio-economic context, cultural sensitivity and the level of education among various stakeholders. The various communication channels will include; face to face or physical meetings with communities, government workers or civil servants, political leaders, private sector, NGOs. Online or virtual meetings and workshops among others.



Table 1: Various communication and engagement needs of the stakeholders

Classification	Target group	Engagement to be methods	Frequency of engagement
MDAs at central level	Ministries and authorities e.g NEMA, UCC, MoICT&NG, MoFPED, NWSC, NITA-U, UHRC, MAAIF, MOH, MOES, MoLG, OPM, MEMD etc.	- Virtual meetings - Physical workshops	Quarterly
CSOs	Chapter 4, Joy for the Children,	Physical meetings Virtual meetings	Monthly
Intergovernmental Agencies or Development Partners	World Bank	Virtual meetings Physical meetings	- Weekly - Monthly - Quarterly
District Local Council Executives	DCDOs, CDOs, DEOs, LCVs, CAOs, RDCs, IT Officers etc.	Physical meetings Virtual meetings	Monthly
Vulnerable Groups	Women, children, elderly, PWDs and the poor	Community sensitization meetings	Monthly
Vulnerable & Marginalised Groups (VMGs)	Batwa, Benet, Tepeth and Ik communities	Community sensitization meetings	Monthly
Project Affected Parties			
Media	Nation Media Group, New vision Group, Weekly Observer newspaper, Red Pepper, The East African, NBS TV, TV West, NITA-U Social Media handles;	Physical meetings Virtual meetings	Quarterly
Private sector	MTN, Airtel, East African Coast Limited etc	Physical meetings Virtual meetings	Monthly
Traditional leaders	-Kingdoms of; Buganda, Bunyoro, Busoga, Tooro.	Physical meetings	Quarterly

	-Chiefdoms of; Kooki, Teso, Adhola etc.		
Land users & or Property Owners	Residents of Iganga Market Road side sellers, Igara. Lwengo and Rakai Districts	Physical meetings	Quarterly Monthly

3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

A stakeholder analysis identifies stakeholders before the project begins; grouping them according to their levels of participation, interest, and influence in the project; and determining how best to involve and communicate each of these stakeholder groups throughout. The purpose of stakeholder analysis include;

- To seek help and support from the key project players
- To gain early alignment among all stakeholders on goals and plans
- To help address conflicts or concerns early on

Table 2: Interest and Influence of Stakeholders

Classification	Target Stakeholders	Responsibilities/ Role to the project	Interest	Influence
Project Affected Communities	Project Affected Parties	Provision of labour mainly with semi and unskilled skills	High	Moderate
Vulnerable Groups	Women, children, elderly, PWDs and the poor	Mobilisations of fellow community members. Provision of labour (semi and unskilled)	Moderate	Low
Vulnerable & Marginalised Groups (VMGs)	Batwa, Benet, Tepeth and Ik communities	Provide guidance and information to project staff how their cultures can be respected and preserved. -Provision of labour	Moderate	Low
District Local Council Executives	CDOs, DEOs, LCVs, CAOs, RDCs, IT Officers, Sector Institutional Heads, DHOs	Provision of information to project implementers -Partner with NITA-U in offering	High	High

Classification	Target Stakeholders	Responsibilities/ Role to the project	Interest	Influence
		monitoring service to ensure contactors comply with the environment and social safeguards standards.		
MDAs at Central Government	MoGLSD, Ministry of Tourism, Ministry of Water & Environment, NEMA, UTL, UCC, MoICT&NG, MoFPED, NWSC, NITA-U, UHRC, MAAIF, MOH, MOES, MoLG, OPM, Ministry of Trade & Industry, MEMD, Ministry of Works & Transport	Willingness to provide all the necessary support UDAP being a government project including; technical. Supervisory and monitoring skills. Provision of project related information in their related sectors to help in risk assessment.	High	High
Intergovernmental Agencies or Development Partners	World Bank	-Monitoring compliance that are required for the successful implementation of World Bank Projects. -Provision of necessary funding to execute project implementation	High	High

Classification	Target Stakeholders	Responsibilities/ Role to the project	Interest	Influence
CSOs	Chapter 4, Joy for the Children, NAPE, UAIA, Action Aid, Human Rights Watch, Entities presented by the Collaboration on International ICT Policy for East & South Africa (CIPESA), other CSOs advocating for digital ICT governance.	-Offering of outreach services i.e. community sensitization & mobilisation	High	High
Private sector	MTN, Airtel, East African Coast Limited, WACS, WIOCC, I-Way Africa, Gilat, Simbanet/ Wannachi Group, Liquid Telecom, Google/C-Squared Uganda Roke, American Tower Company, Eaton Towers, Vodafone, Orange. UTL, Ericsson, ZTE, Huawei, Nokia,	-Leasing of their infrastructures at a cost. -Provide information of on optical fibre communication technology to help in risk assessment	High	High

Classification	Target Stakeholders	Responsibilities/ Role to the project	Interest	Influence
	Siemen, Africel.			
Traditional leaders	-Kingdoms of; Buganda, Bunyoro, Busoga, Tooro. -Chiefdoms of; Kooki, Teso, Adhola, etc.	Readiness to support project implementation -Mobilisation of communities for project activities -Provision of Information on preservation of culture.	Moderate	Moderate
Media	Nation Media Group, New vision Group, Weekly Observer newspaper, Red Pepper, The East African, Independent newspaper, NBS TV, TV West, NITA-U Social Media handles; web page, Facebook, twitter, You Tube.	-Dissemination of information regarding project operations.	High	High
Land users & Property Owners	Residents, land owners, market Road side sellers etc of the targeted districts.	-Willingness to participate in project works such as sensitisation meetings.	High	High
Vulnerable or Marginalised	Vulnerable or marginalised	-Willingness to participate in	High	Moderate

Classification	Target Stakeholders	Responsibilities/ Role to the project	Interest	Influence
Individuals or Groups	individuals or groups	project activities such as sensitisation meetings, provision of services.		

4.0 PRINCIPLES OF STAKEHOLDER ENGAGEMENT

In order to meet the best approach, UDAP will apply the following principles and approaches during stakeholder identification and analysis;

4.1 Inclusivity and sensitivity

Under UDAP, inclusive stakeholder engagement will specifically target and consider the opinions of individuals and groups at risk of being excluded or under-served especially the vulnerable and marginalised groups and especially those that may not be able to make it to the meeting point (through one-on-one meeting) in particular the chronically sick, elderly, disabled. Special meetings will be arranged to cater for these categories. This can lead to higher public acceptance of a project and informs the project to maximise social benefits. The requirements and claims of those interested and influenced by the project are identified. The parties affected by the project are projected to have a possible response that may support or hinder the project.

4.2 Openness and lifecycle approach

All consultations will be public to all stakeholders throughout the life of the project and carried out in a free and open environment where all views of participants will be respected.

4.3 Flexibility

This will be adopted to urge stakeholders to provide continuous feedback, fostering a collaborative environment and enabling the team to adjust requirements based on stakeholder input.

4.4 Informed Participation and feedback mechanisms

All stakeholders shall consent and freely participate in project implementation to find solutions to complex issues and this will help to build trust and confidence. Stakeholder feedback enhances informed decision-making by incorporating diverse perspectives. There will be transparency where tools including suggestion boxes fixed to different places or online to foster genuine engagement by valuing stakeholders' input and building trust.

5.0 CLASSIFICATION OF STAKEHOLDERS

To effectively prepare this SEP, it was imperative to find out or map out the project's stakeholders including the following;

5.1 Project Affected Parties (PAPs)

Persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures; the parties includes stakeholders who are directly or indirectly in project implementation like; NITA-U, MoICT &NG, MoFPED, MoGLSD, MOH, OPM, DLGs and the local community

5.2 Other Interested Parties (OIPs):

Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.

Such parties may include; the existing ICT service providers in Uganda in a particular the telecommunication companies (MTN, Airtel). For example; these companies may provide support and an enabling environment in regard to cost sharing or use of the already existing networks that UDAP can incorporate under its operation.

5.3 Vulnerable and Marginalised Groups (VMGs)

These are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. The Constitution of the Republic of Uganda 1995, recognizes the vulnerable and marginalised groups in Uganda to include; Batwa, also known as Twa or Pigmies who live primarily in south-western Uganda and the Ik who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong district, Karamoja. Other vulnerable groups include; the elderly, disabled people, HIV/AIDS infected and affected individuals and households, women, and orphans and vulnerable children (girl child, street children, children from extremely poor households, HIV/AIDS infected and affected children, children with disabilities, children living with elderly or disabled parents, and children in paid employment). This category of VMGs (the Batwa and Ik) falls under the ESS7 and hence special consideration, participation and engagement of these categories of persons will be guided by the project's Vulnerable and Marginalised Groups' Framework is in place (VMGF) and in addition to the World Bank guidelines on management of vulnerable and marginalized groups.

5.4 Vulnerable or Marginalized Individuals or Groups.



This category includes vulnerable or marginalized individuals or groups who may be discriminated against or excluded from providing or receiving benefits in World Bank financed projects and programs in Uganda, and these will need to be targeted using unique approaches. Reaching them may require engaging their leadership first. With the support of their leaders, it may be easier to meet them through organized meetings. The venues for and timing of the meetings shall be arranged to be accessible, convenient and appropriate for both men and women, the youth and other significant categories of the community.

6.0 STAKEHOLDER ENGAGEMENT PROCESS

Introduction

In order to ensure inclusivity, NITA-U conducted preliminary stakeholder engagements from June 2019 to June 2022 at both national and local levels. Regional, district and local levels. This was intended to ensure that the stakeholders' views, interests and concerns are taken into account to help in the assessment of the project's potential impacts and their proposed mitigation measures. However, there are continuous stakeholder engagements that have been conducted from January 2024 to date (2025) and details of these engagements are shown below;

Table 3: Multi-Stakeholder Engagement views and concerns

Multi Stakeholder Engagement 15th -17th July 2024 (Serena Hotel, Kigo):
Participants: Board Members, MoICT&NG, NITA-U Top management, PIU Team, UCC, PPDA, OPM

The key concerns during this engagement included the following;

- Ensure the project is accorded the urgency it deserves
- Conduct due diligence on the contractors and consultants for efficiency and effectiveness
- Assurance from stakeholders to accord full support towards the project team for successful implementation
- Need for continuous stakeholder engagements on project progress.
- PIU urged to include both environment and social safeguards.
- Call to optimise the time taken for the lengthy procurement process
- Draft environment & social activity plans, frame work contracts & TORs
- Undertake physical field visits to ascertain the land acquisition requirements, socio economic baseline information, mapping of the vulnerable and Marginalised groups.
- Engage with stakeholders including NEMA, CAA, UNRA, Uganda Railways Corporation to ascertain the clearances and or certifications.
- NEMA Approvals: Meet key stakeholders to advise and or fast track on ESAs e.g., NBI
- Consider partnerships with the existing projects and partners implementing similar
- Training needs of refugees (PWDs) should be given priority

• GEMS should be customised to country's local needs & contexts. • Avail information on the actual project site location (Tele centres, masts, fibers) • Land ownership: In western & South western Uganda land that hosts refugees is fully owned & managed by OPM. However, in West Nile land is communally/customarily owned hence need to seek stakeholder engagements & consent independently from the leadership. • Emphasized the need to collaborate with UNHCR & other stakeholders.		
Multi stakeholder engagement November 18th 2024 (Speke Resort Hotel, Munyonyo):		
Designation	Key Comments/Concerns	Response/Addressing Concerns
Commissioner, Ministry of Education and Sports	Need to envisage & forecast infrastructural limitation e.g., availability of energy/grid/electricity to enable computer usage in the various proposed institutions like schools. Highlighted of the 200 computers distributed 5 years ago in one school but are still in their packages, not in use due to energy challenges. -Consider duo-power i.e generator & solar to address battery charging issues -Human Resources needs to maintain the digital devices	-Ministry of Energy and Mineral Development and UECCC provided guidance on how to access credit on power or electricity related developments to communities and households. This is a government initiative to benefit the citizens. NITA-U: This advice and option is beneficial for the project and appreciated Consultant: The study recommended capacity building through training of the users on basic ICT usage.
Board Member Dr Theodore	Sustainability of telecentres; Which models are considered feasible from the consultant's findings?	Eight Consult: Combination of 3 models were identified and the government will choose the best option.

Mr Collins Babirukamu Director E- Governance NITA- U	If the 130 masts are constructed, shall we have covered the digital infrastructure challenge?	Japotech Consult: The answer is no but the ongoing study will help inform the percentage at which it may have contributed.
Project Coordinator UDAP	Proposed Design of Tele centers; is there a way the artistic impression can be improved to include masts for example for power connection?	Eight Consult: The final design it will be integrated by the engineers before final submission
Participant	WIFI Connectivity: How can the power costs be addressed especially if government buildings are not used?	There is need to engage both government and private players to address this need.
MNOs MNOs	OPEX (operation expenses) and CAPEX (Capital investment) of both government & MNOs need to be clearly aligned towards this infrastructure -Infrastructure like roads need to be availed by government to reduce on the costs incurred by the MNOs	Ministry of Works & Transport: There is need for the MNOs to identify such needs or services and formally inform the ministry. The government is willing to avail social services to her citizens. The concern is noted.

CEO Blue Crane Communications	-What is the government's contribution to MNOs in the execution of this project?	Consultant: The study recommended trainings to empower the communities having identified high illiteracy rates.
National Director PDPO	Addressing demand needs: Project being capital intensive how have you planned to ascertain the demand side especially in areas where MNOs may not be interested in? Can this technology create a virtually demand driven need?	Consultant: This has been and still a pertinent issue and the study has provided the proposed business models that can stimulate the demand needs for the project. MNOs: -Government should avail necessary infrastructures i.e roads, electricity especially to the hard-to-reach areas. This will reduce on the operation costs. -Land acquisition in protected areas like game & national parks, wetlands, the grand lease rates are so high compared to other areas. NITA-U & government should provide support to address this challenge.
Participant	Have you considered the security concerns of the proposed areas of the tele centers?	NITA-U: Given the recommendations from the study together with local leadership, security

		is key and will be given attention during the project cycle. Local leadership and security apparatus are heavily involved and most of the earmarked sites are within or close to other government installations
Board Member	Need for localized contents for the usage of digital services and or even translated in local languages	NITA-U: It's imperative that this advice fully utilized the fact that, the project intends to reach the last service user or consumer
Participant	Have you considered the security concerns of the proposed areas of the tele centers?	NITA-U: Given the recommendations from the study together with local leadership, security is key and will be given attention during the project cycle. Local leadership and security apparatus are heavily involved and most of the earmarked sites are within or close to other government installations

Board Member	Land acquisition: How will land be acquired for the proposed Telecentres?	Eight Consult: The proposed land has been earmarked and the details pertaining ownership and acquisition will be handled by the client. The client will be using existing government land
Participant from Ministry of Education & Sports	What did you base on the location of the WIFI spots?	Consultant: The study proposed user friendly gadgets/devices for this category although it is deemed expensive not only to procure but also to maintain them. However, for inclusiveness then, this would be the best option.
JAPOTECH and OMNI Solutions	There is urgent need to get information from the MNOs to for the newly and ongoing studies especially Last Mile Connectivity and Mobile Broad Band Studies	MNOs Utel, TowerCo, ATC (U) among others pledged to avail the necessary information required by the consultants.
Participant	How come the refugees are getting most of the services and developments as compared to the citizens?	NITA-U: Given the recommendations from the study together with local leadership, security is key and will be given attention during the

		project cycle. Local leadership and security apparatus are heavily involved and most of the earmarked sites are within or close to other government installations
Danson-PIU	Considering the resource envelope and looking at the schematic and artistic impression of the proposed Telecentres; do we really need all the 24 Telecentres; how will these be sustained in the long run? Did the consultant for Access Enabler consider other options like merging those that may be located close to each into one? Is it one design fits all sites or we have 2 or 3 designs and the projected cost	Consultant: Access Enabler consultant; we followed TOR and we are supposed to produce 24 designs and their respective BOQs
Participant UCC	How does NITA-U intend to handle the proposed establishment of 130 masts; have you considered the Capex and Opex; how they will be owned considering that the Towerco can't	NITA-U: this is the reason we are here to find a way forward on how this will be done; At the end of the day, our interest is to have tangible output and improve on the service

	establish any mast until they an order from MNOs	delivery. We need to come in and help bridge the existing gap within the unserved and underserved due to their location challenges
--	---	---

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 Appendices 6 and 7.

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 Appendix 5). 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 describe 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.

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 Appendices 5, 6 and 7 of this SEP. 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>.

7.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

7.1 Resources

NITA-U will oversee stakeholder engagement activities and provide necessary financial and human resources to undertake stakeholder engagement. Close coordination with Ministry of ICT & National Guidance, UNHCR, Office of the Prime Minister (OPM,), Ministry of Energy and Mineral Development, Ministry of Local Government, Ministry of Education and Sports, Uganda Communication Commission (UCC), Ministry of Health, National Environment Management Authority (NEMA), Ministry of Gender, Labour & Social Development will be promoted to ensure strong UDAP monitoring and response across refugees and host communities and across the country.

7.2 SEP Budget

Stakeholder engagement cuts across all the components, however, the Project Management component will coordinate the implementation of the SEP. The Project Implementation Unit (PIU) will integrate SEP activities into Project Implementation Plan. Below is an indicative budget for SEP implementation,

Table 4 showing Budget for Implementing the SEP

Engagement Activity	Target Stakeholder	Mandate /Interest	Frequency	Budget (USD)
Training, tooling and facilitation of the GRCs to popularization of the GRM	Local Grievance Management Committees	Ensure harmony on the project; Sort and coordinate all project-related grievances, investigate the issues, facilitate and mediate resolution of grievances and referring those that cannot be solved at community level	Annually	100,000
Regular Community Sensitization Meetings on cross-cutting	Project Affected people, landowners and or land users,	Sustainability of their livelihoods and identity; fair compensation; access to	Quarterly	50,000

issues in regard to the project	are property owners and users, business owners, transport and other services providers and community leaders	natural resources and social services; loss of social ties/support networks		
Engagement with various Refugees and refugee leaders, Refugee institution. Organizations during project implementation.	Refugees and refugee leaders, and refugee institution/ organizations Refugee Welfare	Sustainability of livelihoods and social identity, loss of land and cultural/religious sites, loss/restricted access to land and ICT materials and traditional cultural sites, loss of power over	Bi annual	52,907
Consultancy services for support in the development of a Grievance Redress Mechanism (GRM) manual handbook critical during training of Grievance Redress Committees (GRCs)	Individual consultancy	GRM Manual for project use	Once for the project life time	94,000
Total				296,907

7.3 Management Functions and Responsibilities

Responsibilities

NITA-U staff with support from PIU will be responsible for the overall implementation of this SEP and ensuring that it streamlined into different subprojects. In addition, the overall supervision of the project is led by the Director Technical Services and the Project Coordinator who will closely supervise the entire project implementation cycle. The specific roles of various stakeholders are shown below;

Table 5: Roles of the NITA-U and other Stakeholders

Stakeholder	Roles and responsibilities	Specific Tasks
NITA-U		
UDAP-PIU and user directorate of Technical Services	The PIU is responsible for project management and overall project implementation and coordination.	The PIU will be responsible for the day today running and management of the project. DTS will directly interface with both OPM and UNHCR (due to a component on inclusion of host communities and refugees within RHDs)
MoICT &NG	It provides strategic and technical leadership, overall coordination, support and advocacy on all matters of policy, law, regulation and strategy for the ICT sector. This ministry is mandated to; develop digital services frameworks, policies, laws and regulations, promotion of e-service and emerging technologies across government, supervise agencies i.e., NITA-U, promotion of interoperability and integrations of systems, institutionalization of ICT functions in MDAs and local governments.	The ministry will supervise the overall implementation of the UDAP project.
Ministry of Local Government	The proposed project is within a number of jurisdictions of different Districts headed by a Local Council 5 (LC5) Chairman and Chief	Local governments have administrative authority over projects implemented in respective areas of their jurisdiction and are

	Administration Officer (CAO) who are the political and technical heads respectively. Various district offices whose functions would be relevant to the project include offices of Natural Resources/Environment, District Health Officer, District health inspector/educator, District Planner, Community Development Officer, Wetlands Officer, Land Office, District Water Officer, Town Council and District Engineer. Equally important are village-level local council administration (LC I and LC III). Leaders at these levels of local administration are closer to residents and therefore important in effective community mobilization, sensitization and dispute resolution. The District and Local/Health Unit Health Teams will also be involved in project implementation.	expected to participate in supervision and monitoring project implementation and operation.
Ministry Lands Housing and Urban Development	The Ministry of Lands, Housing, and Urban Development (MoLHUD) is the Government lead sector on matters of land administration. It has the mandate over survey and valuation of affected land and properties in development projects. This gives guidelines on the methodology, documentation, and access to private or public land/property. The Valuation division within this ministry is responsible for approving the compensation awards.	Chief Government Valuer (CGV) in the Valuation Division in the Ministry of Lands, Housing and Urban Development (MLHUD) is responsible for approving the property valuation report developed as part of land acquisition. In addition, applying to the district land board for land to be acquired, the land on behalf of the central government/developer, ascertaining the value of the land to be acquired (in conjunction with the government valuer) and

		ensuring prompt, fair and adequate compensation
NEMA	The National Environment Management Authority will have regulatory, supervisory, and monitoring roles and the overall environmental management in Uganda. Different ESIA's, Project Briefs and full ESIA shall be submitted to NEMA for consideration before any project civil works is undertaken.	The Authority shall review and take final decision on the ESIA for the project and shall be involved in monitoring compliance with environmental requirements. In addition, any auxiliary facilities or sites serving the project shall require approvals from the Authority in accordance with the National Environment Act No.5 of 2019
MoGLSD	The MoGLSD sets policy direction and monitoring functions related to labor, gender and general social development. The OHS unit in the ministry is responsible for inspection and mentoring of occupational safety in workplaces and this could be during project construction and operation of the healthcare facilities.	Department of Occupational Safety and health (DOSH) in Ministry of Gender, Labor and Social Development is mandated to supervise all workplaces for safety of workers both during construction and operation. The ministry is also responsible for issuing workplace registration certificates
OPM	The office of the prime minister has the overall mandate to coordinate the implementation of government policies, programmes and projects under the national institutional framework. It specifically coordinates the development of capacities for prevention, preparedness and response to national and human induced disasters and refugee protection.	It is responsible for all administrative matters concerning refugees in Uganda and to coordinate inter-ministerial and non-governmental activities and programmes relating to refugees. Under UDAP, the OPM will lead the implementation of component 3; Strengthen the digital inclusion of host and selected communities and refugees.
Development Partners	UNHCR will play important collaborative roles in Project implementation especially in relation to Refugee welfare	In close collaboration with the OPM, UNHCR will implement project activities

		directly linked to refugees as a whole.
Other MDAs like Health and Education Ministries	These MDAs especially MOH and MoES will be instrument in implementation of UDAP in relation to having schools and health centres connected to NBI	These will play supervisory roles and providing technical advice in health and education.
Enhanced Implementation Support and Monitoring Entity	The EISM will primarily focus on supporting project teams to implement mitigation measures to address grievances and concerns from vulnerable or marginalized individuals or groups or workers relating to discrimination from project benefits	The EISM shall establish a dedicated hotline and assist PIUs/PCUs in improving existing GRMs; conduct outreach and sensitization activities; provide capacity-strengthening and technical support to PIUs/PCUs and; monitor & evaluate discrimination complaints.

8.0 GRIEVANCE REDRESS MECHANISM

In project implementation, "grievances" refer to formal or informal complaints, concerns, or issues raised by individuals or groups affected by the project's activities. These grievances can stem from real or perceived impacts and require a structured process for addressing and resolving them. Grievances and concerns are bound to occur from the earliest or inception phase, throughout the life of the project. The activities and operations of the consultant at planning phase; and those of the contractor at implementation phase can result into undesirable social-economic and environmental impacts and risks, which may annoy, irritate or cause feelings of discomfort and unfairness among different stakeholders which may affect the license to operate, the progress of the works and the ability of affected persons to enjoy the benefits of the project. Henceforth, this section describes the Grievance Redress Mechanism (GRM) of the Project.

A GRM shall be established, Grievance Redress Committees (GRCs) trained and operated by the project in line with the guidance provided in the ESMF. This will ensure transparency and accountability. In order to ensure the accessibility and effectiveness, the GRM shall have a clear set of goals and objectives and a well-defined scope for its interventions, especially geographical area coverage. The GRM shall include a set of procedures for receiving, recording, and handling complaints. It has been learned from many years of experience that open dialogue and collaborative grievance resolution simply represent good business practice both in managing social and environmental risks and impacts and in furthering Project and community development objectives. In voicing their concerns, they also expect to be heard and taken seriously.

The Project GRM will be augmented by the World Bank's Grievance Redress Service (GRS), which provides an easy way for Project-affected communities and individuals to bring their grievances directly to the attention of project management. The GRS will ensure that complaints are directed promptly to relevant GRCs and/or Managers for review and action, as appropriate. It is expected that the GRC members should be qualified, experienced, and competent personnel who can win the respect and confidence of the communities who will likely to be affected.

The objective of the GRM is to provide stakeholders with processes for submission and raising grievances and grievance resolution and provide an avenue to influence project design and ownership. This mechanism takes various forms including; verbal, written, telephone calls, anonymous and text messages. As per the ESS7, the GRM will be culturally appropriate to ensure that it is admissible to the various social and cultural norms of the various stakeholders.

In line with the ESS10, the Community GRM ensures that all grievances are handled with fairness and transparency and in unison with national legal framework as well as the NITA-U internal policies. The Environmental and Social



Standard 10 (ESS10), Stakeholder Engagement and Information Disclosure, requires the Borrower to “respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.” To that end, the borrower must “propose a clear Grievance Redress Service (GRS) for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The objectives of the GRM include;

- To address grievances promptly and effectively, in a transparent manner resulting in the outcomes that are seen as fair, effective and lasting
- To implement grievance management procedures that are culturally appropriate, accessible and readily available to all PAPs.
- To instill and build trust as an integral component of the project community relations activities;
- To provide effective monitoring and reporting of grievances

8.1 Composition of GRCs

NITA's Social Development Specialist shall work with community leaders in the project sites and communities to establish and operationalize community Grievance Redress Committees where community grievances are received and addressed. However, the presence of a GRM shall not reduce the right to seek legal redress. Nevertheless, all attempts shall be made to settle all grievances amicably before resort to courts of law. The various GRCs will include the following;

- **NITA-U GRC** composed of Executive Director (**Chairperson**), Project Coordinator, Director Legal services, Director Technical Services, Manager Portfolio & Investment, Social Development Specialist (**Secretary**), Environment Safeguards Specialist, Grievance Redress Member.
- **District level:** DCDO Team Leader-Secretary, CAOs Office Representative-Chairperson, Police-CFPU, Legal Officer, District Health Officer, District Environment Officer, Land Officer and Settlement Commandant
- **Subcounty level:** Senior Assistant Secretary (SAS)-Chairperson, Health In-Charge, Police In Charge, Community Development Officer (CDO)-Secretary, Implementing Partner Representative/Contractor, Area CSO-Representative and Community Representative/LCIII
- **Parish/community level:** Parish Chief-Secretary, Health In Charge, Para social worker, Community facilitator, Implementing Partner Representative/Contractor and Community Representative/LCI
- **Refugee settlement:** Assistant Commandant-Chairperson, Community Services Officer-Secretary, Refugee Welfare Committee (RWCIII) Chairperson, Police In Charge, Health In Charge, NGO/CSO Representative and Implementing Partner/Contractor Representative.

It is important to note that, there will be a workers' GRC at the contractors' side and its details are aligned and provided for in the project's Labour Management Plan (LMP)

8.2 Monitoring and Evaluation of GRM

The project will assess the overall effectiveness and the impact of the mechanism annually and the results will contribute to the improvement on the performance of the GRM as well as provide valuable feedback to the stakeholders. The key questions that can be addressed under this evaluation include the following;

- What type of complaints have been raised?
- How many complaints have been raised? How many were raised by women and men? What ages are most pronounced?
- What is the status of the complaints (rejected or not eligible, under assessment, action agrees on or not? resolved or not?
- How long did it take to solve the grievances?
- How many aggrieved parties have used the grievance redress procure?
- Where the outcomes agreeable to the complainants?
- How many grievances were referred to courts of law i.e., police or court.

8.2.1 Gender Based Violence (GBV) And Sexual Exploitation and Abuse (SEA) Complaints

Sexual and Gender-Based Violence (SGBV) 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. The protocol will outline professional standards and work ethics for the protection of women and children, including confidentiality, consent, safety and also outlines the roles and responsibilities of the key actors, that is, the project's supervising consultant or nominated service provider, contractor and other government line ministries and NGOs. Any person who receives information on alleged incidence of GBV/SEA/SH must report within 12 hours of the receipt. UNRA is to adopt referral pathways established by MGLSD. In case of occurrence of GBV/SEA/SH, the following reporting channels will be adopted;

- Trained GRCs and trained Community Focal points whose role is to receive and refer cases
- appropriately;
- The Nominated Service Provider (an NGO to be hired and entrusted with the responsibility of receiving cases, providing psychosocial support and ensuring follow-ups.
- At the PIU, UDAP has a Social Development Specialist specialized in GBV who will be responsible for the management of all social risks on the project, including SEA/SH. This will
- be the focal point/entry point for SEA/SH reporting and will work closely and coordinate with service providers (Community/Council, Police,

Health, Psychosocial Service Provider, Traditional/religious/community leaders, Magistrate Court) to ensure survivors access services including the project GRM according to the needs and wishes of the survivor.

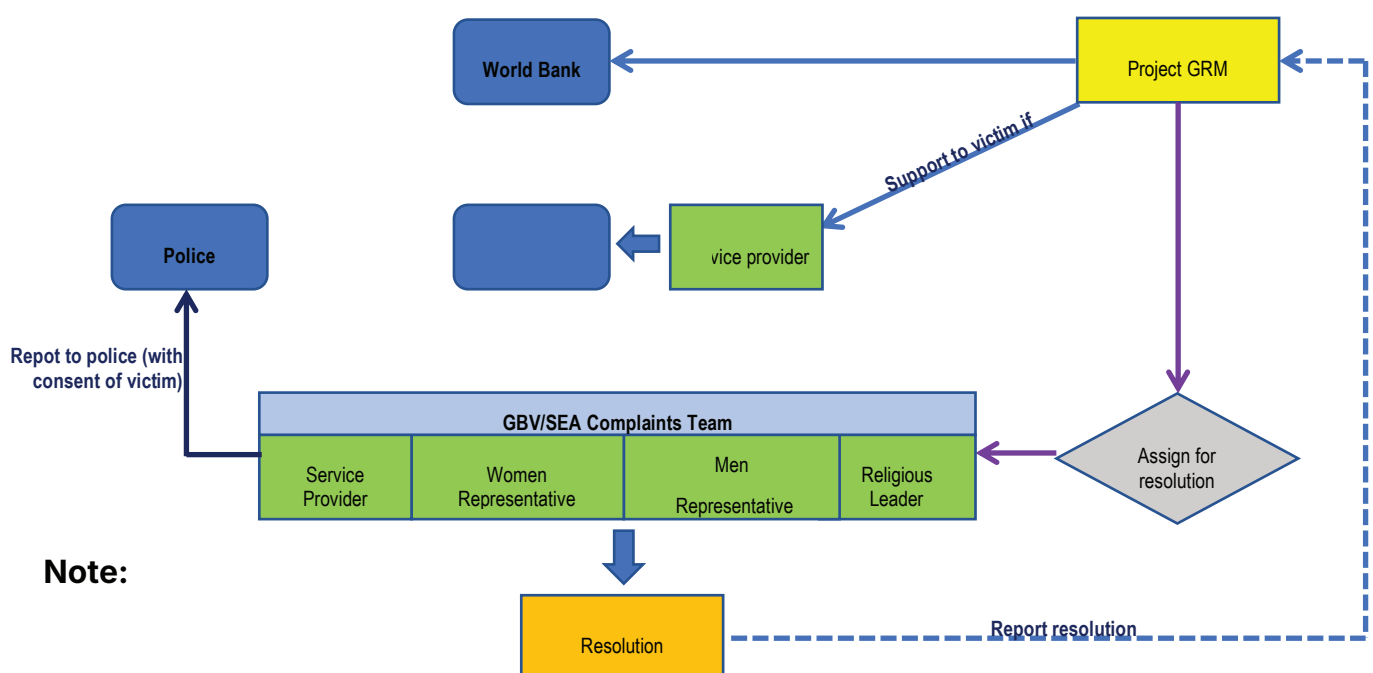
Contractors are required to sign a code of conduct that clearly prohibits GBV/SEA in line with the ESMF and awareness sessions/training will be conducted on GBV/SEA with workers.

- All project staff/workers will have signed Codes of Conduct as per ESMF/LMP and will be trained to refer GBV/SEA cases to a focal point (GBV/SEA Service Provider who must immediately and confidentially report cases to NITA-U and through NITA-U to WB while safeguarding confidentiality);
- Survivors must be offered referral to support services; and
- Sanctions against perpetrators must proceed at the personal or institutional level with consent of the victim, or where consent is not given, anonymously where possible.

Resolving and closing a GBV/SEA case

When a complaint is received, it should be registered in the project GRM register and referred to the GBV Complaints Team with the consent of the complainant. The GBV/ SEA Complaints Team will initiate accountability proceeding (with the victim's consent). If the victim does not wish to place an official complaint with the project, the complaint is closed. When the victim proceeds with the complaint, the case is reviewed through the established GBV/ SEA resolution mechanism and a course of action is agreed upon.

Figure 1: Process to resolve GBV/ SEA complaints.



The complaints or grievances will be submitted to the project social team in various forms including; face to face person, email, letters, cell phone and anonymous ways with use of designated suggestion boxes. The grievance registration and resolution closure forms are herewith appended.

Furthermore, the World Bank-hired EISM firm will provide advice and recommendations to enhance existing project level GRMs to safely, ethically, and confidentially receive cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups following enactment of the AHA 2023. In response to these recommendations, UDAP PIU will be responsible for strengthening the capacity of the existing project GRM as required to increase its awareness and ability to refer exclusion or discrimination cases under the Project to the EISM firm. The firm has established a nationwide GRM hotline – 0800 333125, hosted and operated by a local NGO, to receive grievances related to discrimination and exclusion under the Project. The guidelines for implementing mitigation measures to address AHA-Related risk including the use of GRM hotline are described in Appendix 7.

Further to the enhanced project-level GRM and the dedicated hotline, the World Bank has also developed a specific window under its existing Grievance Redress Service (GRS) to help manage complaints related to any World Bank supported project globally. A protocol has been developed to process all complaints related to exclusion or discrimination against vulnerable or marginalized individuals or groups in the Uganda portfolio.



9.0 MONITORING AND REPORTING

9.1 Monitoring

Monitoring involves the collection of routine data and or information that measure progress toward achieving project objectives. It enables you to identify, assess, and manage the project risks in real time. With this knowledge, one can develop mitigation strategies to minimize the impact of potential issues and ensure project continuity. Projects are monitored to; assess the stakeholders' understanding of the project, minimise the risk of project failure, promote systematic and professional management and assess progress in implementation.

Monitoring stakeholders' engagement is vital to ensure that consultations, disclosure and grievance redress mechanisms are effective and that stakeholders have been consulted throughout the project cycle. The project will monitor stakeholder engagement activities with specific attention to the following;

- To implement the Stakeholder Engagement Plan
- Ensure all grievances received are resolved in line with the GRM
- Consultations and disclosure activities conducted with stakeholders
- The efficiency and effectiveness of the engagement process in managing impacts and expectations by tracking responses received from engagement activities.

9.2 Reporting

Monthly reports will be used to develop quarterly reports (as per Environmental and Social Commitment Plan on reporting modalities) reviewed by Project Coordinator before submission to the World Bank.

9.2.1 Monthly Reports

The safeguards team will prepare these monthly reports on stakeholder engagement activities and the key areas for inclusion and reporting will include the following;

- ❖ Number and type of grievance, nature and timing of their resolution
- ❖ Level of understanding of the project by the stakeholders
- ❖ Level of involvement of the project affected persons in the communities.
- ❖ Place and time of formal engagements and level of participation by specific stakeholder categories and groups with consideration of gender representativeness
- ❖ Number and type of masts erected or optical fibres connected in kilometers
- ❖ Number of comments by topic or issue and the type of stakeholders as well as details of feedback.
- ❖ Community attitudes and perceptions towards the project based on feedback mechanisms developed
- ❖ Project activities conducted during each month

- ❖ Public outreach activities in particular key issues raised during meetings held with stakeholders.
- ❖ Findings to the visitations of information centers and E -waste management centers.
- ❖ Progress on current and new partnerships with the service providers
- ❖ Proposed plans for the next upcoming months.

These monthly reports will be helpful in the development of quarterly reports and they will be reviewed by the UDAP Project Coordinator for clearance and approval before submitting to the Bank as per our ESCP.

9.2.2 Quarterly Reports

An analysis and assessment of the above monthly reports will be used to prepare the quarterly SEP reports by the same project staff identified above. The quarterly report will summarize; public consultations issues, grievance and resolutions and concerns from community meetings among others. These reports will be submitted and reviewed to the Project Coordinator and Director Technical Services and on approval, they will then be submitted to the World Bank.

The World Bank is promoting a real-time based digital engagement monitoring tool called Geo-Enabled initiative for Monitoring and Supervision (GEMS) which enhances participatory monitoring processes. The Bank and the NITA-U/UDAP will train monitors in the field of digital engagement to promote knowledge sharing and information disclosure using this program. The development of ICT components to support the project where stakeholder engagement can improve results will follow an incremental and iterative approach, prioritizing the use of GEMS to promote the scalability and cost-effectiveness of digital engagement processes. ICT can be used to support stakeholder engagement processes if it is designed to leverage the identified engagement approach. Technology can play a variety of roles, such as facilitating transparency, mobilization, feedback, or responsiveness/closing the feedback loop. To identify at which stage what type of technology can be applied in the specific context of a given engagement initiative. ICT is most likely to produce its expected benefits when articulated with existing institutions, processes, and systems.

- The project will keep track of the many commitments made to various stakeholder groups at various times, and communicating progress made against these commitments on a regular basis. This will require the PIU to: Determine what information needs to be reported to which stakeholders, by what method and how frequently. Regularly update project commitments register within the PIU and disclose progress to affected and interested parties during engagements or other information sharing channels. Publicizing any material changes to commitments or implementation actions that vary from publicly disclosed documents.
- Make monitoring reports publicly available, especially reports of any external monitors.
- Regularly report on the process of stakeholder engagement, both to those stakeholders who are directly engaged, and to other interested parties.



- Translate information reported to stakeholders into local languages and in easily understandable formats.

The stakeholder engagements will be periodically revised and updated as necessary during project implementation in order to ensure that information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective. Any changes in project activities or schedules will be duly amended in the SEP.

Monthly summaries and internal reports on stakeholder grievances, feedback or inquiries, together with the status of implementation of associated corrective/preventative actions will be collated and documented by NITA-U-UDAP staff and other Agency involved in the project implementation.

Any comments or questions about the program or the consultation process; management

can be addressed to:

The UDAP Program Coordinator,

The National Information Technology Authority, Uganda (NITA-U)

Palm Courts; Plot 7A Rotary Avenue (Former Lugogo Bypass).

P.O. Box 33151, Kampala- Uganda

Phone number: Tel: +256-417-801041/2

Fax: +256-417-801050

E-mail address: info@nita.go.ug

APPENDICES



Appendix 1: Complaints' Identity & Contact Details Form

Demographics	Complainant	Witness/Representative
Title: Dr/Ms/Rev/Mrs/Mr		
Name		
Marital status		
Education		
Age		
Organisation		
Address		
District		
Country		
Email		
Telephone		
Language		
Should the communications be sent to you or your witness/representative?		

1. Should the requested information be kept confidential?

Yes ☐

No ☐

2. Do you suspect any fear of retaliation or victimisation?

Yes ☐

☐

No

3. If yes from above, from which source do you suspect the retaliation? Tick appropriate

Source	Tick appropriately
Officers	
Stakeholder/institution	
Political/local leaders	
Others (Specify)	

4. Please briefly explain the nature of fear or retaliation that from any of the above ticked options

.....

.....

.....

5. Have these identified fears been reported to the relevant courts of like police?

Yes ☐

No ☐

6. Kindly summarise the identified fears and complaints and attach all the relevant supporting documents for example; what happened? Who inflicted pain or torture? How? When? And where etc

Appendix 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)

Appendix 3 Grievance Resolution Form

GRIEVANCE RESOLUTION FORM



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:

Appendix 4: Grievance Reporting Template

District: _____ Subcounty: _____ Parish: _____
 Village: _____ Date: _____

S/N	Indicators	Calendar Months											
		January	February	March	April	May	June	July	August	Septemb	October	Novembe	Decembe
1	No of grievances related to project activities logged per months												
2	Number of grievances that received timely response (within 7 days)												
3	Number of grievances received and addressed at												

	parish level												
	Number of recurrent complaints received (Over a period of 15 days)												
4	Number of recurrent complaints received (over a period of 15 days)												
5	Number of meetings held												
6	Number of unresolved grievances												
7	Number of grievances												

	referred from parish to subcounty level for addressing												
8	Number of grievances referred to other legal institutions e.g LCs, police & courts of law												

Kindly provide details on recurrent complaints raised (attach evidence where need be)

.....
.....
.....
.....



Appendix 5: Actions Taken by GOU to Ensure Non-Discrimination

Appendix 5 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 appendix: Letter of Assurance; Circular on provision of health services; Circular on provision of education services; Circular issued by the Director of Public Prosecutions, and relevant excerpts from the Circular on Budget Execution.

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

ALD 141/259/01 TC

21st September 2023

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



UGANDA'S SOCIAL SAFEGUARD POLICIES

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

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

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

Mission

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

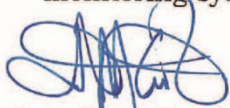
Specific Measures for High Risk Sectors

Health

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

Education

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



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

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

The Director of Public Prosecutions

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This subject please quote No.

BPD 86/179/01



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

10th July, 2023

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

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

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

A. INTRODUCTION

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

Affirmation

"To formulate sound economic policies, maximize revenue mobilization, ensure effective 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.



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IN ANY CORRESPONDENCE ON



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

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

THE REPUBLIC OF UGANDA

5th June 2023

Circular

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

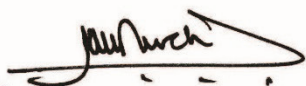
PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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

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

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

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



Dr. Henry G. Mwebesa

DIRECTOR GENERAL HEALTH SERVICES

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

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



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

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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

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

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

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

Ketty Lamaro
PERMANENT SECRETARY

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

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Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

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

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

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

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

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

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

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

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

Appendix 6: 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 6 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 6: 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

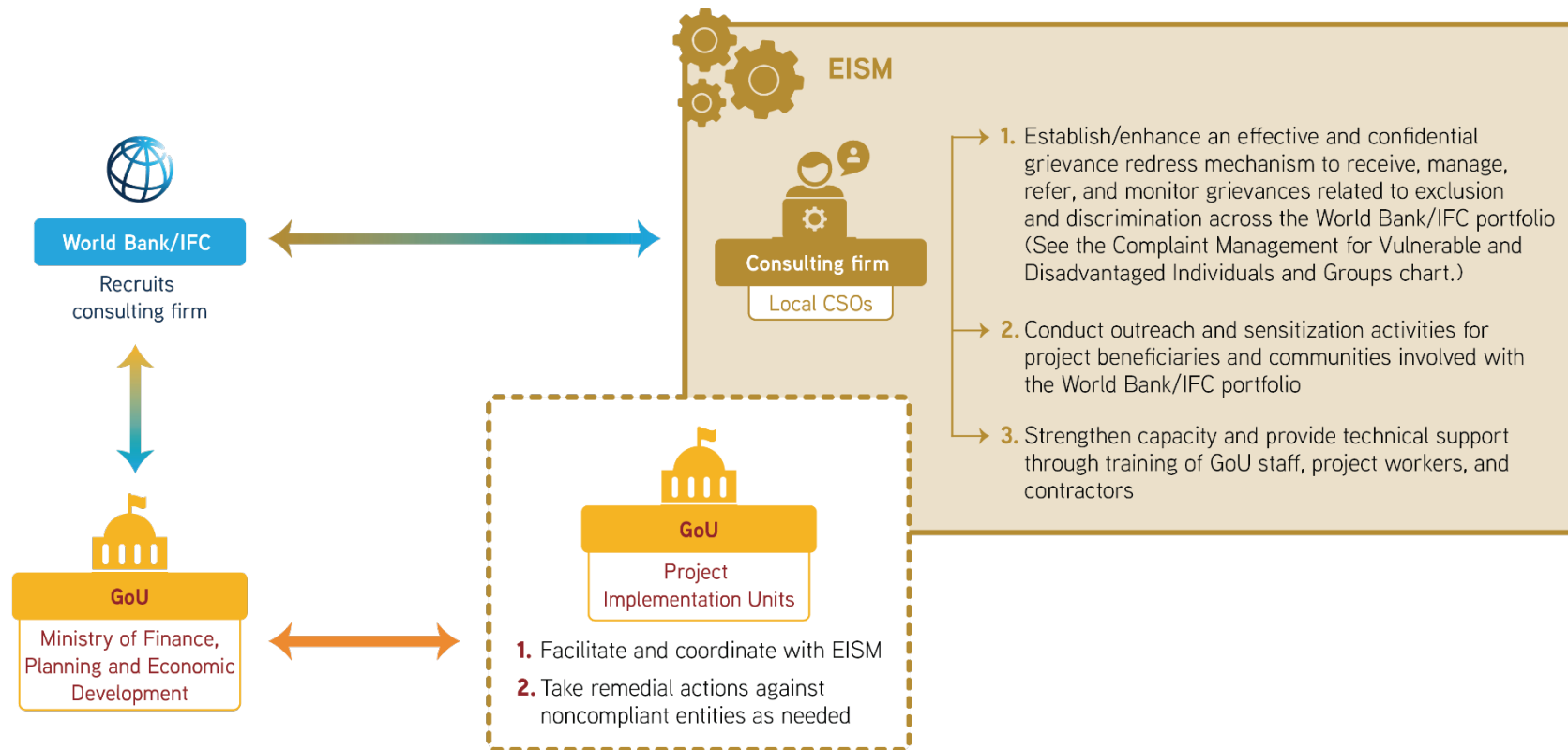
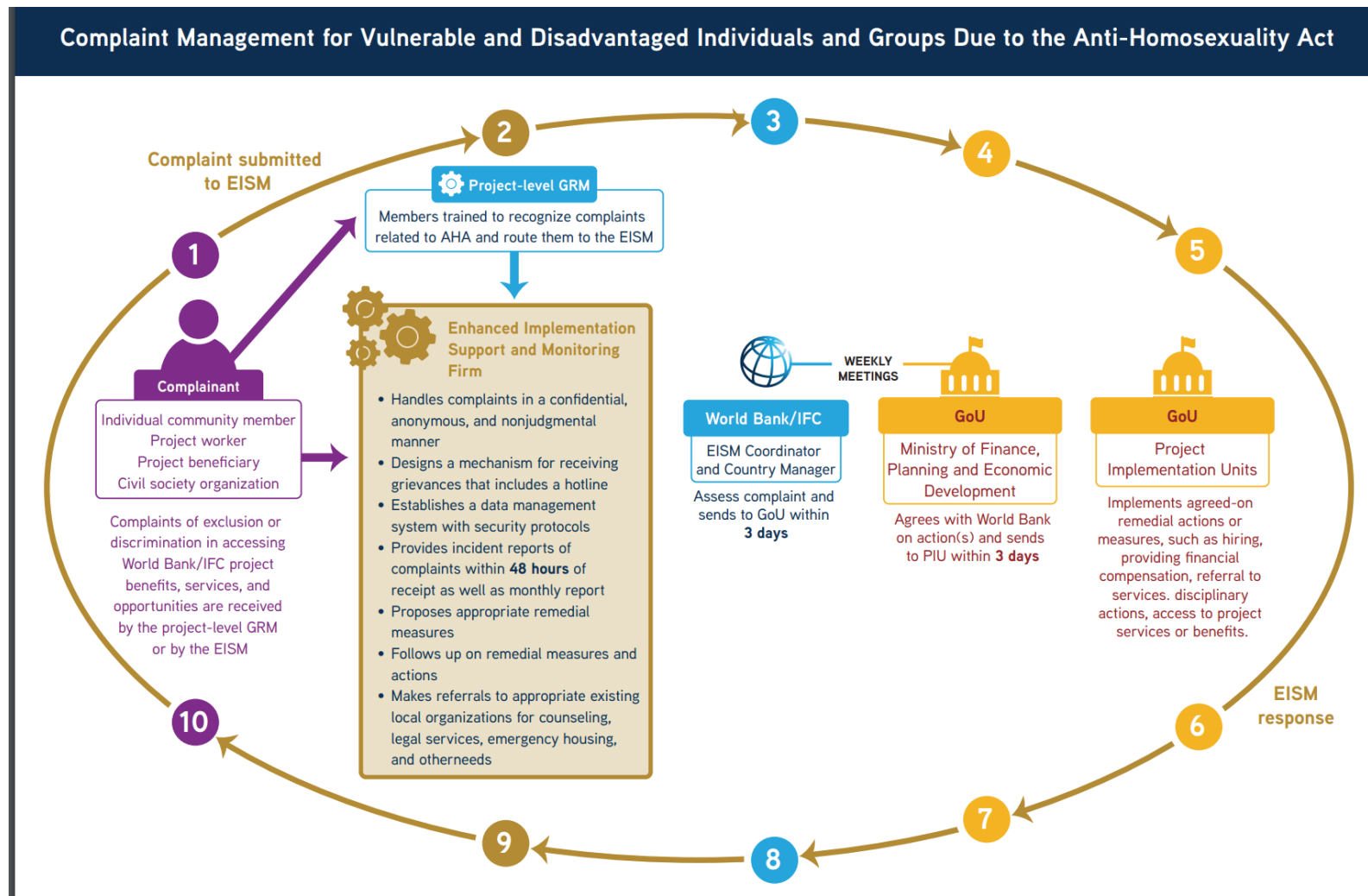


Figure 3: Complaint Management for Vulnerable or Marginalized Individuals or Groups due to AHA



Appendix 7: 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, LMPs, 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 SEP 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 appendix presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/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 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.

Appendix 8: Meeting Attendance List to Fast Track the Access Enabler Study



ATTENDANCE FOR THE MEETING 31st July 2024 TO AGREE ON WAY FORWARD FOR FAST TRACKING THE ACCESS ENabler STUDY UNDER COMP3

	Name	Organization	Designation	Email/phone number
1.	Charles Bafwa	OPM	ACR	charlesbafwa@gmail.com
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4.	Diane Mwendwa	8 Tech	Senior Consultant	diane@8tech.com 0778844343
5.	Josephine Mulimira	PNO-NITA	NITA-U	joephine.mulimira@nita.go.ug 0775211816
6.	Roselyn Vuma	WB	Consultant	dvuma@worldbank.org
7.	Charles DATA ALUMI	UNHCR	Economist	alumi@unhcr.org
8.	Peter Sembabwe	8 Tech	Architect	semper22@gmail.com
9.	Jude T. Lubaga	8 Tech	CEO	julubaga@gmail.com
10.	CPA Baker Ssekubo	8 Tech	COO	Ssekubobaker@gmail.com
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