

P171607
UGANDA: INVESTMENT FOR INDUSTRIAL TRANSFORMATION AND EMPLOYMENT
PROJECT (INVITE)

STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF)

DRAFT

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ACRONYMS/ABBREVIATIONS:

BoU	Bank of Uganda
CEDP	Competitive and Enterprise Development Project
CGF	Credit Guarantee Facility
CGS	Credit guarantee schemes
COVID19	Coronavirus disease 2019
CPF	Country Partnership Framework
CSOs	Civil Society Organizations
DBFOT	Design Build Finance Operate and Transfer
DBOT	Design Build Operate and Transfer
E&S	Environmental and social
ESA	Environmental and Social Assessment
ESAP	Environmental, Social Action Plan
ESHS	Environmental, social, health, and safety
ESIA	Environmental social impact assessment
ESMS	Environmental and social management system
ESRM	Environmental and Social Risk Management
ESS	Environmental and Social Safeguards
FCI	Finance, Competitiveness, and Innovation
FM	Financial Management
FY	Fiscal year
GDP	Gross domestic product
GoU	Government of Uganda
GRM	Grievance Redress Mechanism
HRC	Host and Refugee Communities
IBRD	International Bank for Reconstruction and Development
ICT	Information & communication technology
IDA	International Development Agency
IFL	IBRD Flexible Loan
IFR	Interim Financial Report
INVITE	Investment for Industrial Transformation and Employment

IPF	Investment Project Financing
LIC	Lead Investor Competition
M&E	Monitoring and Evaluation
MDTF	Multi donor trust fund
MFI	Micro Finance Institution
MoFPED	Ministry of Finance Planning and Economic Development
MoGLSD	Ministry of Gender Labor and Social Development
MSME	Micro, Small, and Medium Enterprise
NDP	National Development Plan
NEMA	National Environmental Management Authority
NPL	Non-performing loan
NPP	National Procurement Procedures
PBC	Performance Based Conditions
PMT	Project Management Team
PFI	Participating financial institution
PIU	Project Implementation Unit
PPSD	Project Procurement Strategy for Development
PSFU	Private Sector Foundation Uganda
RFQ	Request for quotations
RHDs	Refugee Hosting Districts
SEF	Stakeholders Engagement Plan
SMEs	Small to Medium Size Enterprises
STEP	Systematic Tracking of Exchanges in Procurement
TA	Technical Assistance
UBOS	Uganda Bureau of Statistics
UNBS	Uganda National Bureau of Standards
URA	Uganda Revenue Authority
WB	World Bank

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1. INTRODUCTION/PROJECT DESCRIPTION

1.1 Background

The STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF) has been prepared to guide stakeholder engagement and feedback and will be implemented as a risk management tool for the Investment for Industrial Transformation and Employment Project (INVITE), referred to hereinafter as “the Project” for which the Ministry of Finance, Planning and Economic Development (MoFPED) has entered into an exclusive agreement with World Bank to develop the Project. The Bank will fund the Project which will be implemented by the Private Sector Foundation Uganda (PSFU) and Bank of Uganda (BOU). The entities will be responsible for ensuring compliance with environmental and social safeguards guidelines.

The World Bank (WB) Environmental and Social Framework (ESF) provides guidelines for the borrower to develop and implement projects that are *environmentally and socially* sustainable and requires assessment and management of all of environmental and social risks¹ and impacts² of the project. The INVITE project will be implemented under the Environmental and Social Framework under which the bank has defined specific Environmental and Social Standards (ESSs), which are designed to avoid, minimize, reduce or mitigate the adverse environmental and social risks and impacts of projects.

Therefore, this SEF is developed in line with the Stakeholder Engagement and Information Disclosure (ESS10) WB/IFC standard which provides guidance on the STAKEHOLDER ENGAGEMENT FRAMEWORK and implementation process by all the entities. All other standards triggered by the project are also taken into consideration particularly, ESS1. Assessment and management of Environmental and Social Risks and Impacts, Labor and Working Conditions (ESS2), Resource Efficiency and pollution prevention and Management (ESS3), Community Health and Safety (ESS4), Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5); Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6), Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7), Cultural Heritage (ESS8), Financial Intermediaries (ESS9). The SEF covers all the five (4) components of INVITE.

¹ Environmental and social risk is a combination of the probability of certain hazard occurrences and the severity of impacts resulting from such an occurrence.

² Environmental and social impacts refer to any change, potential or actual to; (i) the physical, natural, or cultural environment, and (ii) impacts on surrounding community and workers, resulting from the project activity to be supported.

1.2 Project Description

The Government of Uganda now faces a dual challenge of addressing the impact of COVID 19 and setting or maintaining the course for increased employment in lagging regions particularly in refugees and host communities. Due to the COVID 19 response measures the Government is experiencing a shortfall in revenues and households a shortfall in incomes as markets have closed and economic activity reduced and restricted. Emerging sectors with significant economic potential, horticulture, tourism, dairy, etc. have experienced a complete slump in demand, resulting immediately in liquidity constraints and increasing risks of insolvency to firms. The proposed project will improve access to financial services in the short-term and provide financial solutions over the medium term. While in parallel a complementary Multi Donor Development Fund will provide technical assistance to enhance public services and the capability of firms.

The proposed project will immediately address liquidity constraints faced by firms, particularly MSMEs, in manufacturing, exports, and strategic sectors. A Liquidity Facility will enable PFIs (Participating Financial Institutions) extend the amortization period of existing loans to eligible MSMEs. This facility will also be extended Micro Finance Deposit Taking Institution to create access to liquidity to over 200 000 active Micro Finance borrowers. The facility will offer access to liquidity based on receivables (i.e. the contracted cash flow) to access liquidity immediately on delivery of their products and services. The component will also include a window for Government delinquency on payments to MSMEs.

In the medium-term facility will evolve providing liquidity to financial intermediaries to lend on a longer-term basis for productive investments, without running the maturity mismatch risks associated with using short-term funds. This component will also offer a long-term convertible subordinated loan with a grant element for sectors severally exposed to COVID19 or of strategic interests. In the aftermath of the crisis the partial credit guarantee will encourage financial intermediaries to support expansion of lending in designated new markets segments.

In March 2024, following the enactment of the Anti-Homosexuality Act, 2023, by the Government of Uganda, the SEF and other safeguards instruments 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.

The specific measures to ensure such individuals or groups are not disadvantaged in sharing any development benefits resulting from the projects or programs financed by the World Bank are found in the risk and mitigation measures and Annex 10 and 11 of the INVITE ESMF. This SEF was modified to ensure such vulnerable or marginalized individuals or groups are consulted appropriately.

1.3 Project Development Objective (PDO)

To mitigate the effect of COVID-19 on private sector investment and employment and to support new economic opportunities including in refugee and hosting communities.

1.4 Project Components

1.4.1 Component 1: Mitigating the impact of COVID-19.

The objective of this component is to ease liquidity constraints on MSMEs. For the reasons discussed above, the component will seek to prioritize the manufacturing and exporting sectors driving economic transformation. The component will operate three different windows targeting different types of firms within the supply chain.

Window 1 will support the extension of the loan period for well performing firms by financing the cost of providing a grace period. The window will support registered MSMEs that qualify, with an extension of the loan terms – with no incremental cost or debt servicing liability for them for a grace period. This will enable firms to tide over the near term liquidity crunch, while it enables PFIs to continue to receive – via the window – some compensation covering their cost for such an extension (thereby incentivizing this) while also participating in burden sharing through lower margins than usual.³ The window will focus on firms in the manufacturing and exports sectors. The window can also be used by MFIs or SACCOs, if they are clients of PFIs and have taken out loans from PFIs to fund their operations. The rebate will also contribute towards lessening any liquidity issues that may arise from the foregone interest income resulting from the impact of COVID-19 in this market segment. A strong leverage (10x or more) of project resources is expected in terms of the volumes of loans impacted through the support of this window.

Window 2 (supporting micro firms) will target micro firms to enable them to restart or continue their operations as critical units in funding the link say between producers with aggregators, processors, and distributors, also in Refugee and Hosting Community Districts. The window will provide a line of credit to those Micro Finance Deposit-taking institutions (MFDs), Micro Finance Institutions (MFIs) and Savings and Credit Cooperative Societies (SACCOs) regulated by the Bank of Uganda and the Uganda Micro Finance Regulatory Authority (UMRA), thus enabling MFDs, MFIs and SACCOs to offer a “Restart Discount Loan” to those of their clients who have been negatively

³ The cost of the grace period to the PFI will be estimated based on the weighted average cost of interest-bearing liabilities plus the administrative costs associated with loan generation across the banking sector. In making this calculation it is expected that PFIs will waive the any costs associated with the loan restructuring process. With the funding support provided under this component PFIs will be able to extend a grace period to eligible MSME clients at no expense to the borrowers (i.e. no additional payment of interest or capital).

impacted by COVID-19. Those institutions drawing on the credit line provided by this Window are expected to offer a 50 percent reduction in the annualized interest rate to their borrowers when offering COVID-19 Restart loans. Participating MFDs, MFIs and SACCOs will be eligible for the line of credit upon satisfactorily undergoing due diligence under the project. The line of credit provided will be for 18 months priced at the Central Bank lending rate plus an administration fee. Participating intermediaries will benefit from the relatively cheap cost of funding, a benefit they will be obliged to share with the end borrowers, providing them with a 50 percent reduction in annualized interest payment, thereby helping to rebuild their client base. The project will work with UMRA so as to cater specifically for smaller rural savings groups, particularly those operating in RHDs. In these locations it is envisaged that more hand-holding will be required to be provided through technical assistance programs funded by the collaborating development partners.

Window 3 (receivables financing, including government arrears) will provide finance to MSMEs based on security in the form of their receivables. Buyers, which are usually larger formal enterprises, normally pay their invoices with a delay of up to three months, thereby negatively affecting the liquidity of often small, informal enterprise suppliers. The window will provide financing to MSMEs based on security in the form of invoices issued by large buyers, thereby building on the credit-standing of these large off-takers and introducing a product that offers lower risk while fostering liquidity in these difficult times. This window will allow MSMEs to receive payment for the goods or services they have delivered immediately. The cost of credit provided to MSMEs by the facility will be significantly lower than were they to avail themselves of invoice discounting provided currently by banks with pricing based on the much weaker creditworthiness of the MSMEs. MSMEs will also be able to discount receivables issued by the Government, thereby enabling a way to create mechanisms to mitigate the negative effects of government arrears being a hindrance for growth. In this case, should the Government agency be in payment arrears on a receivable, the MoFPED will pay the invoice on behalf of the delinquent agency or Ministry. The MoFPED will then deduct the amount of any overdue invoices plus a penalty from its next transfer to the Ministry or Government agency which did not honor its payment obligation in a timely manner.

1.4.2 Component 2: Creating New Productive and Transformative Assets.

This component will be focused on enabling new financing to restart and bolster economic growth. The component provides risk coverage for new lending to MSMEs, extends local currency liquidity on a

long-term basis to larger investment projects and de-risks or incentivizes private investment in RHDs through a competitive grant program. Component 2 seeks to mitigate the financial sector's risk aversion and thereby improve the availability of credit to MSMEs, and to provide longer-term finance to productive investments.

- *Window 1* will target MSMEs with a focus on manufacturing and export supply chains by setting up a *Credit Guarantee Facility (CGF)* to share the risks associated with new lending on a 50/50 basis with PFIs. The partial credit guarantees will be priced according to performance indicators for each PFI designed to reflect the PFI's track-record in monitoring and controlling the risks associated with its MSME portfolio, chiefly the level of NPLs and write-offs. A situation whereby well-performing PFIs are punished (by charging a fee that is too high) and under-performing banks are subsidized (by charging a fee that is too low) will thereby be avoided. Eventual proceeds from the process of recovery on non-performing loans will be shared *pari passu* between the PFI and the CGF. As the CGF reduces the banks' risk exposures, and thereby allows banks to reduce the amount of security they require in the form of collateral, the CGF may be of benefit to female borrowers, who are less likely to be registered owners of property or real estate.
- *Window 2* will provide long-term financing in the form of *subordinated/convertible long-term local currency loans* for up to 20 percent of the total project debt plus equity. The purpose of the subordinated debt instrument is to catalyze additional long-term private sector investment. By taking a subordinated position the funding provided by this window will encourage the mobilization of financing by the private sector that would otherwise not be available due to the risks associated with lending to investment projects. The presence of the subordinated debt reduces the probability of default to senior creditors, given that the subordinated creditor will only be able to collect interest and principal once senior creditors have received their amortization payments. Such structuring will also help leverage additional caPMTal and can contribute in the medium term towards IDA's Private CaPMTal Mobilized efforts. Were a borrower definitively unable to amortize the subordinated debt, the terms of the subordinated debt would allow the facility to convert its subordinated debt into equity. In a situation where a significant amount of time elapses without payments being made on the facility's subordinated debt – with no clear evidence of capacity for making future payments – the facility could exercise the option to convert any unpaid principal into

equity at a price set in the original loan agreement. The intention is to make this debt to equity swap available to strategic sectors exposed to COVID-19, and for strategic investments with significant [35%] economic and social returns, that have in the past been fully funded by the public sector, such as social and economic infrastructure.

- *Window 3 will facilitate Investment in Rural Supply Chains in Refugee and Host Districts.* The main objective of this component is to support investment in refugee and host districts by encouraging expansion of existing supply chains or establishment of new supply chains. The component will provide competitively selected lead investors in the refugee and host districts in Western/North/East Uganda with performance-based grants. The component will launch a competition for Lead Investors with well-developed business concepts, or expansion plans for existing or new supply chains. Business plan submissions will have to demonstrate sufficiently large network effects, in terms of the number of local suppliers engaged or the number of local workers employed. Submissions will be assessed using a standardized set of criteria to include level of inclusion of poor households, degree of innovativeness, projected growth and rate of return, job creation potential, feasibility and practicality given local contexts. Winners of the competition will be provided access to a performance-based grant, which will be made available to the investors over a specific time period and according to a defined investment plan. The competition as a whole is expected to support 12 supply chains to expand their value proposition, providing a performance grant of up to US\$1 million per project depending on specific business needs of the winning supply chain investors. Business and start-up training, including coaching of workers through WhatsApp, will be provided to ensure that communities benefit from the new investment. The design of this component is based on IFC and IBRD/IDA experiences in Haiti, Kenya, Nigeria and Rwanda.

1.4.3 Component 3: Multi Donor Funded Trust Fund (MDTF) for enhancing capabilities in Public Institutions and Private Firms

The MDTF aims to improve the performance and coordination of public institutions and private sector firms critical to job creation. This has posed a constraint to private sector development and if not addressed, will continue to hamper efforts to foster economic transformation. The program will provide technical assistance and hands on capacity building to a preliminary set of institutions i.e. Uganda National Bureau of Standards; the Uganda Bureau of Statistics; the Uganda Ware-House Receipts Authority; Uganda Export Promotion Board; Uganda Microfinance Regulatory Authority; and the Uganda Free Zone Authority, etc. The purpose of the program support provided will be to deliver

improved and more effective services to firms and policy makers, to enhance the enabling environment. For example, the MDTF will fund hands-on capacity building of the Uganda Bureau of Statistics through firm-level data collection to set the basis for strengthening evidence-based policymaking. In the case of the Uganda Ware-House Authority the MDTF will support the implementation of systems, performance management, regulation, monitoring, tracking, data collection, etc. and coordination with other institutions e.g. Uganda Bureau of Standards.

The MDTF will also focus on developing firm capacity and expanding access to market opportunities⁴ through different interventions targeting three distinct sub-groups of firms: (1) potential exporters; (2) potential suppliers to large companies and multinational corporations;⁵ and (3) domestic companies expanding their sales and growth through use of digital platforms.⁶ First, the MDTF will support exporters (and potential exporters) to identify export opportunities and meet consumer demand through specialized technical assistance and capacity-building activities using local and international consultants.⁷ Further, specialized international consultants will also be available should firms have need to gain knowledge about how import processes work in foreign markets. Additionally, firms which meet specific agreed-upon milestones will be eligible to receive vouchers: (i) to pay for certification to allow them to market their products on export markets, (ii) to fund participation in international fairs with a view to meeting buyers, and (iii) to cover shipping costs for a “first trial export lot”. Second, the MDTF will finance a supplier development program to build the capacity of local SMEs and enable them to supply large domestic or foreign companies with a focus on the emerging oil and gas industry. Firms participating in the supplier development program which successfully meet specific milestones will be eligible to receive vouchers allowing them to purchase certification services to demonstrate that they are able to meet buyers’ demand. Thirdly, the MDTF will provide MSME with access to digital platforms, including access to support networks, business development services, and grants to reduce the fixed costs of accessing digital platforms. The objective of this support will be to grow business sales, increase profitability and expand employment. This component will also specifically target female-owned enterprises and firms owned by or employing refugees.

1.4.4 Component 4: Implementation Support and Monitoring & Evaluation.

The objective of this component is to assist in the development and implementation of the different

⁴ Access to demand is an important binding constraint for firm growth, especially in the aftermath of COVID-19.

⁵ The first two groups of firms will typically be firms with a certain scale and initial capacity, firms with more than 10 employees and with capacity to serve large clients or customers abroad (i.e. more likely firms with on average 15-20 employees).

⁶ This group of firms will typically include micro firms with 2 employees or more, and small firms with up to 10-15 employees.

⁷ This component will be open to both manufacturing and services companies.

facilities, and to provide guidance and support in the setting up and operation of the Project Management Unit. M&E activities undertaken as part of this component will focus on developing an indicator framework with baseline measurements and annual targets, monitoring the economic impact of program activities through data collection and survey implementation, and evaluating the economic impact of the program through a structured impact evaluation at the conclusion of the project. The monitoring component of the M&E approach will require data collection across different dimensions of the Project: (1) Performance Tracking data (e.g. sales, employment, wages, transactions, etc); (2) Activity Tracking data reflecting the Theory of Change (e.g. as reflected by the number of loans serviced on the project's web platform, the number of receivables purchased on the factoring platform, the number of refugees receiving business training, etc.); (3) Key Results data (e.g. value of private investment in manufacturing firms, formal employment in manufacturing firms, etc); and (4) Key Risks tracking (e.g. project implementation performance, NPL ratio of banks and PAR of MFIs, etc). The evaluation component will build on the data collected under the monitoring component, but additionally focus on implementing a structured impact evaluation process to measure the impact and attribution of the program, identifying a benchmark case for comparison of performance, designing and piloting survey instruments, and conducting experimental or quasi-experimental testing on a treatment group

1.5 Project Beneficiaries

The project direct beneficiaries are owners of firms of all sizes involved in manufacturing and/or exporting supply chains. The program will also focus on economic opportunities for refugees and their host communities by seeking to catalyze investments that enhance economic activity as well as enhancing the capacity of public institutions, i.e. research and training facilities, standards, data gathering and management.

1.5.1 Project Location

Geographically, the project will be implemented countrywide and across multiple industry sectors with the exception of component 3 that is facilitating investment in rural supply chains in refugee and host communities in 3 to 4 geo-political zones cutting in Western Uganda highlighted in figure 1.1 below. However, for components 1 and 2 since the beneficiaries of the projects are likely to be spread countrywide, their locations cannot be readily mapped.

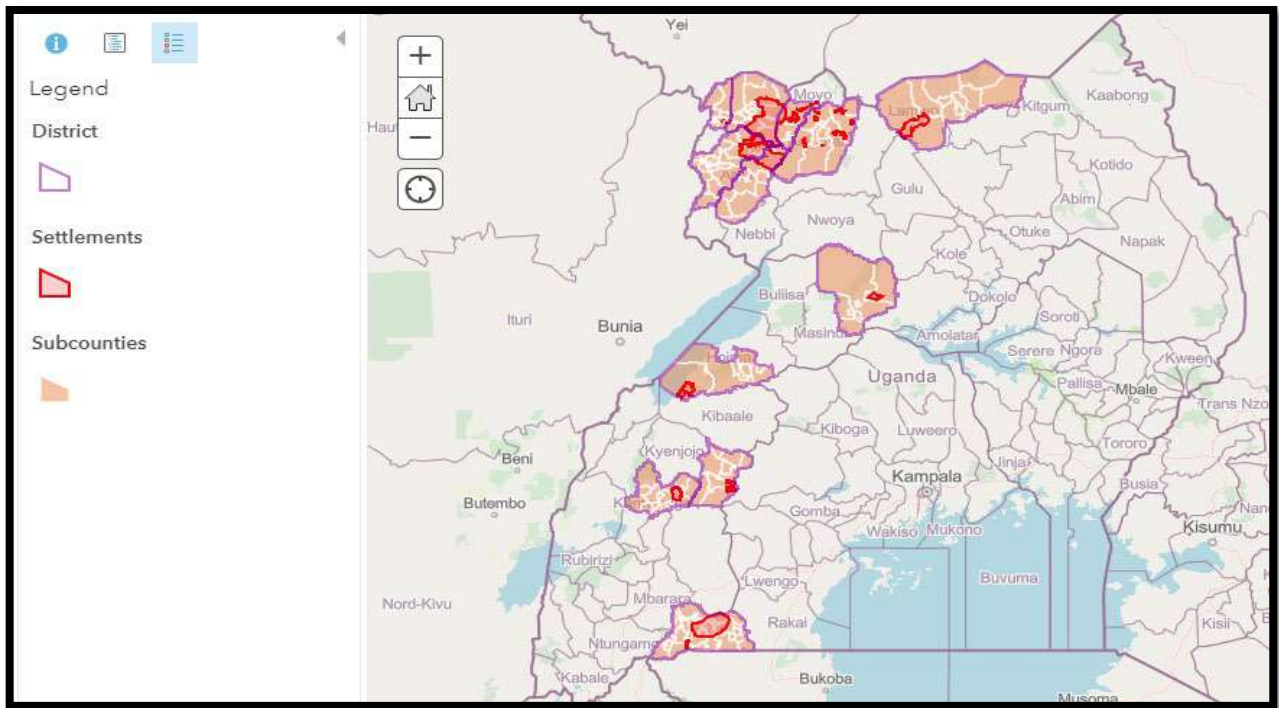


Figure 1.1 Map of Uganda showing Refugee Hosting Project Component 3 Target Districts: Sources: <https://data2.unhcr.org/en/dataviz/128?sv=0&geo=220>

1.6 Potential Social and Environmental Risks and Impacts of the Project

Preliminary screening undertaken by PSFU indicates that the different beneficiary project activities have potential E&S risk aspects that the project developer has to identify for management. Some of these risks are identified under 1.6.1 (environmental) and 1.6.2 (social).

1.6.1 Potential Environmental Risks

Potential environmental impact is expected under Components 1, 2, 3 and 4 of the project. Component 1 will provide financing to existing MSMEs. This comes with likelihood that the beneficiary MSMEs may have pre-existing / ongoing environment, health and safety (EHS) issues/risks. Under ESS2, ESS3 & ESS6, these risks may include use of solvents or toxic substances, industrial accidents with implications for labour and working conditions, efficient resource utilisation and loss of biodiversity. The extent of the risks posed by beneficiary MSMEs will depend on the sectors in which they operate and on the specific nature and scale of their operations, which is yet to be defined during project implementation.

Under Component 2, the project will finance new productive investment lines. This might involve activities such as construction of new factories/ facilities and other infrastructure that also has potential to impact on the environment in different ways that may include increased waste generation and air/noise pollution under ESS3, health and safety risks for workers and communities under ESS2. The potential

environmental impacts are expected to be site specific, local, reversible and temporary and can be mitigated through appropriate mitigation measures.

Similarly, activities under component 3 are likely to have moderate environmental impacts related to operations of the MSMEs in the rural supply chains that are to be supported and that will benefit from the grants. The types of E&S risks are associated with the range of different financial instruments and the range of MFIs/PFIs that will be involved but will be related to those in components 1 and 2. Activities under component 4 involving the provision of technical advice meant to address issues hindering accelerated private investment and linkages to lagging regions would not be expected to have significant direct environmental impacts.

1.6.2 Social risk

Social impacts are expected under Components 1, 2, and 3. It is envisaged that under component 1, social risks are likely to include inadequate stakeholder engagement (to inform MSMEs of the project and selection criteria for them to benefit from the credit facilities available) under ESS10, and inaccessible grievance redress mechanisms where these entities could report. Under ESS 2, ESS5, ESS7 and ESS10 in particular, the specific risks may include perceived lack of fairness or transparency of the process, exclusion vulnerable or disadvantaged individuals or groups, and/or any additional charges FI might subject them to in order to benefit from these interventions.

In addition to these risks, activities under component 2, which are meant to leverage private sector capacity and financing in large and critical assets that are publicly owned and activities that require large investments (waste treatment facilities, logistics/collection centers, housing facilities for workers, training centers, testing laboratories, research and development facilities, etc.) will likely have downstream potentials labour and working condition related risks under ESS2 arising from the eventuality of civil works that would (i) require land acquisition and cause physical and/or economic displacement under ESS5 (ii) include risks associated with the influx of workers into communities that might be hosting these facilities (Social conflict, GBV/SEA, etc.) under ESS4 as well as (iii) labor issues, including exclusion of vulnerable or disadvantaged individuals or groups from employment opportunities under ESS 2 and ESS7.

Finally those under component 3, which are meant to generate jobs or viable market for refugees and host communities by encouraging expansion of existing supply chains or establishment of new supply chains are also likely to carry E&S impacts that are unknown at this stage but may be akin to those in components

1 and 2. These risks will be addressed the implementation of BOU's ESMS and establishment of Environmental and Social Procedures for the implementing FIs. This will ensure that all relevant national regulations/guidelines provided respectively by the Bank of Uganda, NEMA and MoGLSD are applied throughout the project cycle.

Therefore to manage these E&S risks the INVITE will apply Financial Intermediaries (FIs) ESS9 requirements⁸ (i) negative screening / exclusion of transactions that would present either credit or reputational risk; (ii) requiring regulatory compliance as appropriate and viable given the size of the MSMEs, tenure and size of the transactions; and (iii) conducting positive screening and requiring MSMEs to adhere to certain key E&S performance indicators and/or action plans.

And where investments are expected to be long-term and larger in size, site-specific instruments, including ESIA's, ESMP's, RAP's, Environmental and Social Audits and other management plans, as appropriate will be developed and enforced as a credit facilitation condition. In addition, a local asset fund manager shall also be recruited and will be responsible for the first and second stages of E&S risk screenings for the submissions and in the absence, PSFU/BOU will be directly responsible for this process.

The project will deal with the above E&S risks, by promoting more sustainable solutions such as renewable energy supply, reuse of storm water, waste recycling programs, social inclusion, HIV/AIDS , GBV/SEA and COVID-19 risk management, community education programs and sound grievance redress management systems for workers, communities and VMGS shall also be encouraged in all the five components of the project. Effective mechanisms that deal with the risks of (in)voluntary displacements, sexual and gender-based exploitation and abuse, child labor, wage and contractual disputes will also need to be designed under E& S risk management tools and operationalized.

Exclusion risks related to discrimination of vulnerable or disadvantaged individuals or groups is a credit risk that has been identified. These include individuals and enterprises that may not have all the beneficiary requirements, those led by individuals who might not understand/know the facilities offered under the project, those who feel excluded because of their background, limited education achievements, age, gender, nationalities (refugee status), disability, and etc. To address these risks , several social opportunities such as engagement of local suppliers and inclusion of poor households have been identified and included as core selection criteria for credit line beneficiaries. Additionally, the selected

⁸ ESS9 requirements for FIs E&S risks and impact management are to (1) set out how the FI will assess and manage environmental and social risks and impacts associated with the subproject it finances; (2) promote good environmental and social management practices in the subprojects the FIs finances; and promote good environmental and sound human resources management with the FI.

beneficiaries would be required to adhere to E&S requirements as part of the grant agreement, including certain ESHS benchmarks and compliance with relevant laws in Uganda and World Bank Environmental and Social Standards.

2.BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

There have been consultations with some stakeholders at the inception and preliminary proposed project which are described as below.

To discuss INVITE, a team from the IDA has had multiple engagements with officials from the Ministry of Finance, Planning and Economic Development (MoFPED), Ministry of Trade, Industry and Cooperatives (MoTIC), Ministry of Gender, Labor and Social Development, Private Sector Foundation Uganda (PSFU), Bank of Uganda (BOU) as well as donor representatives of the Kingdom of Netherlands, Sweden, Belgium, the European Union and the United Kingdom (Department for International Development, DFID).

These engagements were carried out on a pre- appraisal mission virtual meeting held with the Bank team to Mobilize Private Investments for Jobs Project (MOPIJO) on May 20, 2020. Building on it, the Private Sector Foundation-Uganda, Ministry of Finance, Planning and Economic Development and the World Bank delegation held another engagement at the wrap-up meeting of June 1, 2020 chaired by the Permanent Secretary/Secretary to the Treasury.

A virtual consultative meeting on the Environmental and Social Commitment Plan (ESCP) was conducted by the Bank team with the stakeholders from BOU and PSFU on 13th August 2020 and a number of resolutions and action plans were developed for both PSFU and BOU as shown in the Table 2.1 below.

January 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 INVITE included:

- The need for capacity building to teach vulnerable or marginalized refugees how to access project benefits;
- The possibility that project’s GRMs are not safe and confidential;
- The need to ensure that all shared data is protected and safe;

The approach to managing these issues and other issues raised during the consultations are found in the INVITE ESMF. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on Non-discrimination and Inclusion. For additional information, see:

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

3. LEGAL POLICY FRAMEWORK FOR STAKEHOLDERS ENGAGEMENT

Uganda has several policies, laws and regulations relating to ESS assessments, and certain expectations in relation to stakeholder engagement and consultation during the assessment and implementation. Therefore, stakeholder engagement is implied in a number of these policy and legislative frameworks but specifically outlined in the Environmental Impact Assessment Regulations, 1998, Public Finance Management Act 2015 and other laws. There are also recognized international environmental and social safeguard standards (ESSs) in relation to stakeholder engagement and consultation. The legal and policy framework for stakeholder engagement that informs the SEF preparation and its implementation is indicated in Table 3.1 below.

Table 3.1: Legal and Policy Framework for Stakeholder Engagement

Law/Policy	Jurisdiction/Mandate	Relevance
National Legal and Policy Framework for Stakeholder Engagement		
The Constitution of the Republic of Uganda, 1995	This is the apex law of legislation in Uganda. It was enacted with widespread participation of the population, including people with disabilities, women and other minority groups. Each group ensured that their interests are represented. Secondly, it provides for statutory instruments that govern participation in policy and programs. It provides for participatory governance – Under the political objectives; -part (i) The State shall be based on democratic principles which empower and encourage the active participation of all citizens at all levels in their own governance; and	Identify and plan for consultation and active participation of community members, local leadership and other stakeholders along project areas in planning studies and implementation.

Law/Policy	Jurisdiction/Mandate	Relevance
	<p>-(iii), the State shall be guided by the principle of decentralization and devolution of government functions and powers to the people at appropriate levels where they can best manage and direct their own affairs.</p>	
	<p>The law provided for Women and Disabilities (Vulnerable groups) thus:</p> <ul style="list-style-type: none"> -Article 33 states that women shall be accorded full and equal dignity of the person with men and that women shall have the right to equal treatment with men and that right shall include equal opportunities in political, economic and social activities. -Article 34 states that persons with disabilities have a right to respect and human dignity and the State and society shall take appropriate measures to ensure that they realize their full mental and physical potential. Article 36 on minorities' states that minorities have a right to participate in decision making processes and their views and interests shall be taken into account in the making of national plans and programmes. 	<p>The identification of stakeholders for consultation and participation should give equal opportunity and include socially vulnerable groups including women, children persons with disabilities and other minorities such as refugees and noncitizens.</p>
	<p>The law provided for environmental protection and conservation, by offering 'every Ugandan... <i>a right to a clean and healthy environment</i>' (section 39) while at the same time expects citizens to play their part in creating a healthy environment - '<i>it is the duty of every citizen of</i></p>	<p>Stakeholder engagements should include consultation over potential social and environmental impacts and locally agreeable mitigation measures. The SEF should take into consideration likely</p>

Law/Policy	Jurisdiction/Mandate	Relevance
	<i>Uganda to create and protect a clean and healthy environment</i> (section 17).	vulnerabilities among stakeholders and how they are likely to compromise their full participation in planning consultations and mitigation implementation
The Public Finance Management Act 2015	The law provided for Budget Preparation, Approval and Management with consultation of relevant stakeholders during annual budget shall be preparation (Section 13 (2))	Stakeholder Consultations will be held with Central Government at the National Budget Workshop, in Sector Working Groups as well as with Local Governments in Regional workshops as well as with the private sector and Development Partners
The Environmental Impact Assessment Regulations, 1998	These specify the general requirements for good ESIA and RAP practice in Uganda. The Environmental Impact Assessment Regulations, 1998; Sub-regulation (1) of Regulation 12 that requires the developer to take all measures necessary to seek the views of the people in the communities that may be affected by the project. Regulations 19, 20, 21, 22 and 23 outline further requirements for public participation.	Require developers to ensure that the views of stakeholders in affected communities are sought and those potential impacts including benefits are identified and appropriately disclosed.
The Occupational Safety and Health Act, 2006	The OSH Act provides a number of requirements regarding workplace safety, provisions and health of employees / workers.	Require developers to ensure that the occupational safety and health of all the workers are observed at work place as required by act

Law/Policy	Jurisdiction/Mandate	Relevance
Refugee Act,2006	The Refugee Act empowers the refugees to move and work around the country as well as live in the community.	It is important to note that some refugee communities especially in Uganda have settled (in settlements) and some freely interact with the community. It is important therefore to consider such people for beneficiary/employment opportunities on the project and hence the need to be consulted
Bank of Uganda Financial Consumer Protection Guidelines, 2011	Bank of Uganda Financial Consumer Protection Guidelines, applies to: (a) all financial services providers regulated by Bank of Uganda in respect of business they transact in Uganda; and (b) the agents of all financial services providers regulated by Bank of Uganda in respect of business the agent transacts in Uganda.	These guidelines help FIs to - (a) promote <i>fair and equitable</i> financial services practices by setting minimum standards for financial services providers in dealing with consumers; (b) increase <i>transparency</i> in order to inform and empower consumers of financial services; (c) foster <i>confidence</i> in the financial services sector; and (d) provide <i>efficient and effective</i> mechanisms for handling consumer <i>complaints relating</i> to the provision of financial products and services.

Law/Policy	Jurisdiction/Mandate	Relevance
The Local Government Act (1997);	The Local Government Act (1997) provides for the system of local governments, which is based on local councils and the participation of the community members in which powers over development planning, budgeting, financial management, human resources and service provision function (including the emerging of safety and security service delivery needs) have been devolved to popularly elected Local Governments.	Identify and plan for meaningful engagement, consultation and involvement of relevant local government stakeholders, community leaders and members. Preceding the preparation of this SEF, was extensive mapping of stakeholders to ensure inclusive public involvement and participation. As the project further evolves, more stakeholders shall be identified and involved as per the prevailing needs and requirements of the project.
National Gender Policy 2007; and National Plan of Action for Women.	These are instruments aimed at narrowing the gender (inequality) gap and promoting equity in access to and control of resources or development outcomes by ensuring that gender concerns are routinely identified and addressed in the identification, design, appraisal, implementation, monitoring and evaluation of national, and local government policies, plans and programs.	These have implications for stakeholder engagement that includes the identification of and consultation with vulnerable social groups such as women, youth and disabled groups in respect to development processes and related impacts.
Land Act, 1998; and Land Acquisition Act, 1965.	The Land Act, 1998 addresses land holding, management control and dispute resolution and repeats (in Section 3) provisions of Article 237 of the Constitution which vests all land ownership in the citizens of Uganda, to be held under	These have implications for stakeholder engagement that includes the identification of and consultation with relevant land management structures at

Law/Policy	Jurisdiction/Mandate	Relevance
	<p>customary, freehold, mailo or leasehold tenure systems. Section 43 of the Act reaffirms the statutory power of compulsory acquisition conferred on the government and local authorities under articles 26 (2) and 237(2) (a) of the Constitution but subject to fair and prompt compensation and where necessary recourse to redress mechanism. This is re-echoed in Land Acquisition Act, 1965.</p>	<p>local government level, the land owners and users under different tenure including vulnerable social groups such as women, youth and children (refugees) that derive sustenance from land in respect to development impacts and mitigation measures.</p>
WB/IDA Policy Frameworks for Stakeholder Engagement		
<p>The World Bank Environmental and Social Standards (ESSs) in relation to stakeholder engagement and consultation</p>	<p>Stakeholder Engagement and Information Disclosure (ESS10): The Bank expects the project proponent to explicitly prepare a SEF that includes among others: Identification of all stakeholders interested in or likely to be impacted by the project, Develop and implement a stakeholder engagement and consultation plan, and Involve all stakeholders in ESA preparation and implementation through appropriate and timely sharing of relevant information and effective consultation and participation. Early stakeholder engagement is also cross referenced as an integral requirement for Environmental and Social Impact Assessment and Management (ESS1) ; ESS2 Labor and Working Conditions ESS\$ Community Health and Safety, ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement(ESS5), Indegenous</p>	<p>Identify and plan for early and appropriate engagement and consultation with all project stakeholders including vulnerable social groups and paying special attention to their needs and concerns.</p>

Law/Policy	Jurisdiction/Mandate	Relevance
	<p>Peoples / Subsaharan Afriacn Historically Underserves Traditional Local Communities (ESS7), the Cultural Heritage (ESS8)⁹ and Financial Intermediaries (FIs) (ESS9); FIs are required to develop and maintain in the form of an Environmental and Social Management System (ESMS), effective environmental and social systems, procedures and capacity for assessing, managing, and monitoring risks and impacts of FI subprojects¹⁰ as well as managing overall portfolio risk in responsible manner.</p>	

⁹ The requirement of the ESS8 applies to all projects that are likely to have risks or impacts on cultural heritage and include a project which: (a) Involves excavations, demolition, and movement of earth, flooding or other changes in the physical environment. As such, some of graves along the alignment are likely to be impacted.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

- (i) Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- (ii) May have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.
- (iii) Vulnerable (disadvantaged) populations or marginalized communities that might be affected by the project directly or indirectly

The approach used to identify stakeholders under each of these definitional classifications involved:

- 1) Review of project relevant documents including the Project Initiation Document and UNHCR annual refugee reports
- 2) Consultation with the project proponents and other project development partners such as the World Bank, BoU, UDB, MoGLSD and MoFPED
- 3) In-house brainstorming sessions with the help of expert judgement and knowledge of the refugee and VMG contexts in the country

4.1 Affected parties

The directly affected stakeholders are the owners of Micro, Small and Medium Enterprises (MSMEs) involved in manufacturing and/or exporting supply chains, Micro Finance Institutions (MFIs), their employees, customers, suppliers, contractors and sub-contractors, communities where they are located, members of Refugees and Refugees host communities firms/enterprises including the communities their suppliers and sub-contractors may be directly or indirectly affected by the project, positively or negatively.

4.2 Interested Parties

The major stakeholders under this category include:

- The World Bank (WB)
- Government Ministries Departments and Agencies (MDAs) such as MoFPED, MoGLSD,

NEMA, OPM, MoTID, Uganda National Bureau of Standards; the Uganda Bureau of Statistics; the Uganda Ware-House Receipts Authority; Export Promotion Agency; and the Uganda Free Zone Authority

- UNHCR and NGOs implementing projects in Refugee areas,
- Local Governments and lower local Governments,
- Religious groups, and
- the Media.

While these groups may not be directly affected by the project, they may have a role in the project preparation (for example, government permitting) or be in a community affected by the project and have a broader concern than their individual household.

Moreover, civil society and nongovernmental organizations may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities for the borrower to consider and address in the assessment process. Some groups may be interested in the project because of the sector it is in (for example, trade), and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open to anyone interested.

4.3 Vulnerable or Marginalized Individuals or Groups

Vulnerable groups in the context of this project in line with (ESS1) include those who feel excluded because of their:

- backgrounds
- limited education achievements
- age
- nationalities and refugee status
- disabilities
- Vulnerable and Marginalised groups such as the Batwa in the Western Uganda and the Ik/Tepeth in Karamoja region (ESS7)

These categories of potentially affected project populations might not understand/know the services offered under project or how they can or help others to benefit from it. To manage their risk of

marginalization and vulnerability in the project and engage with them, their locations, key characteristics, language needs, preferred notification means (e-mail, phone, radio, letter), preferred meeting hours, specific needs (accessibility, large print, child care, daytime meetings), barriers to their participation in engagements and what needs to be done to unlock these barriers, interest and what role they could play in the process will be mapped and rationalized.

4.4 Vulnerable or Marginalized Individuals or Groups:

Vulnerable or marginalized individuals or groups may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

4.5 Stakeholder Identification and Mapping

An initial list of INVITE stakeholders in Table 5.2 was developed as part of the stakeholder mapping exercise. The process involved identifying stakeholder groups that are likely to affect or to be affected or to be marginalized or left vulnerable to the impact of the project or to misout from the intervention packages if no mitigation plans are developed. At this point, this process is still preliminary and is expected to evolve as new stakeholders or new stakeholder roles in the program emerge. To enhance awareness of the project and solicit for their input into the design, implementation and risk management processes, stakeholders in Table 5.21 and those that will progressively be added into this living list shall be continuously engaged, without manipulation, interference, and intimidation using the preferred modes of engagement and communication identified for each respective party. This is crucial as a springboard for the development of strong, constructive and responsive relationships for effective management of the environmental and social risks that may accrue. As a living list, stakeholders are expected to expand during the scoping and baseline phases, program disclosure and the ongoing consultations during project implementatio

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Purpose and Objectives of STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF)

This SEF is an instrument for identifying, mapping and prioritizing stakeholders across all levels in the regions and country at large for guiding or managing the planned information disclosure or communication and consultation processes with identified stakeholders as they exist through the different project phases. This SEF as a tool allows for stakeholder consultation in a two-way process of communication including managing the feedback process¹¹. Stakeholder engagement and information disclosure will be conducted at all stages of the project lifecycle including during the course of the implementation (subproject activity screening, scoping studies, ESIA, disclosure of the project related information such as ESIA, project briefs, ESMP, GRM procedures, project operationalization and decommissioning). The key objectives of stakeholder engagement include the following:

- ✓ To design stakeholder engagement framework and requirements of the project;
- ✓ Describe the legal requirements for consultation and disclosure;
- ✓ Provide an inventory of key stakeholders who are likely to be affected by the project directly or indirectly;
- ✓ Provide summary of all public consultation and information disclosure activities to date annex 1 and 2;
- ✓ Propose an effective approach and strategy for meaningful and maximized disclosure of relevant project information annex 3;
- ✓ Indicate related resources required for project implementation and management.
- ✓ Ensuring that stakeholders understand project and operational aims and requirements, with respect to INVITE, and have confidence in PSFU/BOU's ability to manage environmental/social risks in a responsible and transparent manner

5.2 Principles of Stakeholder Engagement

The project assessment and implementation procedures should promote and allow for meaningful and

¹¹ Meaningful consultation is understood as a two-way process, where stakeholder engagement should meet the following criteria: (i) Begins early in the project planning process to gather initial views on the project proposal and inform project design; (ii) Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts; (iii) Continues on an on-going basis, as risks and impacts arise; (iv) Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format and relevant local language(s) which is understandable to stakeholders; (v) Considers and responds to feedback; (vi) Supports active and inclusive engagement with project-affected parties; (vii) and is free of external manipulation, interference, coercion, discrimination, and intimidation; and (viii) Is documented and disclosed by the Borrower.

culturally appropriate consultation and participation, including that of host communities at the different levels; including the right to public information and disclosure. In order to realize this, the SEF has taken into consideration the following principles including those based on ESS10 and International Best Practice (IBP):

- i. Early and effective dissemination of relevant project information to ensure informed decision making and runs through project cycle.
- ii. Interaction with stakeholders based on honesty and transparency
- iii. Commitment to meaningful and inclusive participation of all project stakeholders including vulnerable groups and the right to redress system in case of disputes.
- iv. Stakeholder engagements are culturally appropriate and conducted in ways that promote mutual respect; and recognises the rights, interests, cultural practices, language needs, values and beliefs of stakeholders. Inclusiveness is encouraged and promoted through appropriate and multiple stakeholder participation approaches to include highly visible stakeholders as well as those that are typically underrepresented, such as minority groups, women, youth, and vulnerable people.
- v. Stakeholder engagement will be continuous throughout the project life cycle and will follow an iterative process

5.3 Proposed strategy for information disclosure

The project will use various forms of engagement techniques to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders.

The techniques mostly proposed to be used in INVITE include one on one meetings, correpondences, formal meetings, public meetings, focus group discussions and the different IEC material platforms among others that are shown in Table 5.1.

Table 5.1 showing the proposed techniques

Technique for Engagement	Appropriate application of the technique
Correspondences (Phone, Emails, letters)	Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues

Technique for Engagement	Appropriate application of the technique
	Build personal relationships Record meetings
Formal meetings	Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Disseminate technical information Record discussions
Public meetings	Present Project information to a large group of stakeholders, especially communities, (Refugee and host communities, Business firms) Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, Power Point, posters etc. Record discussions, comments, questions.
Focus group meetings	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses
Project/Institutional websites	Present project information and progress updates Disclose ESIA, ESMP and other relevant project documentation
Direct communication with affected asset owners	Share information on timing of specific project activities Agree options for removing assets e.g. crops and relocation of fences.
Project signs posts	Share information on project activities Reminders of potential impacts

Technique for Engagement	Appropriate application of the technique
Project leaflet	Brief project information to provide regular update Site specific project information.
Electronic Media such as Radios/TVs/print media	Brief project information to provide regular update Site specific project information.
Public address system	Drive through announcements, Church and Mosque announcements, Music, DJ mentions etc.
Information centers and exhibitions or other visual displays	Project information will be displayed at prominent center/boards used by LGs, NGOs, PMO, UNHCR, LCs/RWCs information centers (sites)

However, a precautionary approach will be taken to the consultation process to prevent infection, given the highly infectious nature of COVID-19. Safety shall be considered for this reason when choosing a particular technique in Table 5.1 for consultations at any one point in time. The following Coronavirus (COVID-19) Ministry of Health and Public Service Guideline of Uganda in Annex 7 shall be followed.

5.4 The Proposed STAKEHOLDER ENGAGEMENT FRAMEWORK

Table 5.2: Proposed STAKEHOLDER ENGAGEMENT FRAMEWORK

S/N	Target Stakeholder	Responsible Entity	Interest/Specific Needs of Stakeholder	Proposed Methods of engagement/How to address the needs	Time frame
PROJECT AFFECTED PARTIES (PAPs)					
01	Owners (Communities and individuals) in the area of the MSMEs, SMEs/firms subproject	PSFU, BOU, and FI	Public information about the subproject Resolving of project-related issues openly and in a mutually satisfactory manner.	Press conferences, community engagement and consultation meetings, mass/social media Communication, disclosure of written information in local languages - brochures, posters, flyers, information desks, at the Upper and lower Local Councils offices and project launches.	Immediately after approval of INVITE funding and throughout the period of project implementation
02	Vulnerable or Marginalized Individuals or Groups including persons with disabilities, ,rural poor women, men and youth, the elderly, Refugees, people living with HIV/AIDS, female headed households.	PSFU, BOU, and FI	To be determined at the commencement of the project disclosures at respective beneficiary areas	Community engagement and consultation meetings, focus group discussions and use of relevant NGOs with the vulnerable or marginalized individuals or groups ; administration of questionnaires, key informant interviews, information desks at the District Council offices, Refugee and Refugee Hosting Districts	Immediately after approval of the project and throughout the period of project implementation

S/N	Target Stakeholder	Responsible Entity	Interest/Specific Needs of Stakeholder	Proposed Methods of engagement/How to address the needs	Time frame
	Marginalised groups like the IK and Batwa will also be targeted ¹²				
OTHER INTERESTED PARTIES (OIPS)					
03	Project Coordination/Management Units	PSFU/BOU	Capacity building in the area of Environment and Social Risks Management	International and in-county training courses and workshops, tailor made in-house training courses and long term and short-term technical assistance	On need basis and as per training plan throughout project implementation
04	Government Agencies (MoFEPD, MoTID, NEMA, MoGLSD, OPM) including the Project Steering Committee	PSFU/BOU	Environmental and Social Risk Management (ESRM) awareness and updates on project progress	One-on-one meetings and workshops for the relevant government officials to present progress reports and discuss emerging strategic issues	SC meetings quarterly and one-on-one meetings on need basis
05	Project Technical Committee	PSFU/BOU	ESRM awareness	Tailor made orientation courses, conferences and workshops	Immediately after project launch and as needed

¹² Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so

S/N	Target Stakeholder	Responsible Entity	Interest/Specific Needs of Stakeholder	Proposed Methods of engagement/How to address the needs	Time frame
06	Banks and other FIs	PSFU/BOU	Training of the staff involved in ESRM issues and updates on project progress and provision of feedback and disclosure of documents	ES risk training sessions for selected PFI members of staff in the risk and compliance Divisions; meetings of all the PFIs to get updates on progress of the activities, share experiences/best practices among PFIs, receive reports on bottlenecks that cut across all the PFIs and provide on spot guidance on ways forward, and disclosure of project related documents of interest to the PFIs during the meetings and on PSFU/BOU Website	As per training plan and progress reporting biannually Disclosure of documents on RBM website is the entire duration of the project
07	Owners of MSMEs/SMEs	FI , BOU, and PSFU	Competitively priced financing for inputs and equipment and machinery, capacity building in business development basic financial management, leadership and governance, E&S issues, linkage to markets and disclosure	Mentoring support on identification of competitively priced financing; PFI supervision; support in procurement of inputs, equipment and machinery; training workshops in areas business development, basic financial management, leadership and governance, E&S issues; disclosure of written documents on RBM website,	Supervisory and monitoring visits – every quarter and as needed; training works- as per training plan; and Feedback on reports to be done quarterly and annually;

S/N	Target Stakeholder	Responsible Entity	Interest/Specific Needs of Stakeholder	Proposed Methods of engagement/How to address the needs	Time frame
				feedback on quarterly and annual reporting	
08	MSMEs owned by members of vulnerable and marginalized populations, including persons with disabilities, rural poor women, men and youth and the elderly.	PSFU, BOU, and FI	Such MSMEs will be identified and their needs be determined at the commencement of the project	Key informant Interviews including consultations, administration of questionnaires among owners of MSMEs from the vulnerable or marginalized individuals or groups; information desks at the District Council offices	At the beginning of the project with support provided to continue for the duration of the project
09	Business Development Service providers	PSFU/BOU	Orientation in ES issues	Orientation of Business Development Service providers on issues of Environmental and Social risks management	Immediately after Project launch
10	Development partners and international organizations of mutual interests (World Bank, Kingdom of Netherlands, Sweden, Belgium, the European Union and the United	PSFU/BOU	Sharing of experiences and complementing each other's interventions	Donor group meeting, Sector Working Groups meetings and MoFPED Website,	Project preparation and throughout project duration

S/N	Target Stakeholder	Responsible Entity	Interest/Specific Needs of Stakeholder	Proposed Methods of engagement/How to address the needs	Time frame
	Kingdom (Department for International Development, DFID).				
11	Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; District Councils, Farmer Organizations	PSFU, BOU, and FI	Project information, Business opportunities, Research, worker welfare	Press releases, Public meetings, Mass/Social Media Communication - disclosure of written information on PSFU/BOU Website Brochures, posters, flyers, public relations kits, project tours for media and local representatives and District Executive Committee entry and exit meetings	Immediately after project launch and on ongoing basis thereafter

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 The Roles and Responsibilities of PSFU

The management, coordination and implementation of the SEF and its integral tasks will be the responsibility of dedicated team members within BOU/PMT and the FIs. The roles and responsibilities of the organizations are presented below. PSFU/BOU is committed to comply with National, Regional and International Obligations¹³. This will be expressed through the vision, the mission statement and core values. Our commitments specific to the SEF are expressed in the following core values: The project team is committed to stand public scrutiny and take responsibility for decisions and actions it takes and be credible in the eyes of their stakeholders

The PSFU PMT PMT has an environmental and social performance team under the management of the Project Coordinator. The key tasks are *inter alia* to:

- Development and approval of the content of the draft SEF (and any further revisions);
- Approval prior to release of all materials used to provide information associated with the INVITE ESIA (such as introductory letters, question and answer sheets, PowerPoint materials, posters, leaflets and brochures explaining INVITE and ESIA process);
- Approval and facilitation of all stakeholder engagement events and disclosure of material to support stakeholder engagement events;
- Participation either themselves, or identification of a suitable PSFU/BOU staff representative, during all face-to-face stakeholder meetings;
- Reviewing and signing off minutes of all engagement events; and
- Maintaining the stakeholder database.
- Ensure all the implementing agencies staff/FIs comply with the ESHS code of conduct prepared and implement them so that the issues of sexual exploitation and abuse including gender based violence (Annex 9) are avoid during project implementation.
- Grievance redress role & responsibilities

¹³ The World Bank Environmental and Social Framework

6.2 The Roles and Responsibilities of FIs/MFIs

The Financial Intermediaries (FIs) are key partners in the implementation of this project. They play a key role as an intermediary to benefiting MSMEs/other individuals. They will be provided with access to concessional credit lines, in a limited volume and only over the COVID period so as not to distort the market for loan caPMTal. The subordinated loan facility will be capped at agreed percent of the total project size, include other private financial institutions, and repayment conditions will be structured in such a way that it ensure the financial health of the investment project, with repayments on the subordinated loan occurring only when there is sufficient revenue cash flow.

MFIs will also determine how to provide the COVID support to their clients so as not to disrupt their lending model. The receivables financing mitigates risk late and non-payment improving overall building credit relationships with large buyers in the economy.

- Create awareness on the INVITE project and disseminate information to their clients
- They will also be required to develop tools as part of the relevant safeguards instruments to be prepared prior to implementation of the project
- Furthermore, it will only engage with PFIs consistent with the Bank of Uganda prudential regulatory requirements.
- Finally the FIs will be required to put in place and maintain an ESMS to identify, assess, manage and monitor the environmental and social risks and impacts of FI subprojects on an ongoing basis.

The ESMS will be commensurate with the nature and magnitude of environmental and social risks and impacts of FI subprojects the types of financing and the overall risk aggregated at the portfolio level¹⁴.

6.3 Resources

PSFU Project Management Team shall be responsible for management of these resources and stakeholder engagement activities. The Project Coordinator, Sociologist, Environmental Health and Safeguards Specialist, M&E Specialist, and Engineer at PSFU Coordination Unit and BoU are devoted to managing and implementing the STAKEHOLDER ENGAGEMENT FRAMEWORK With the help of this team, this plan will be reviewed every six months to determine if any changes to stakeholder

¹⁴ For the purpose of assessing the adequacy of ESMS, the FI portfolio means the portfolio of current and/or proposed subprojects to which ESS applies.

classification or engagement are required. If so, the plan will be updated, and budget will be revised accordingly. The subsequent STAKEHOLDER ENGAGEMENT FRAMEWORK will provide specific measures for sensitisation and management of GBV risks and will provide a requisite budget for the activities.

The breakdown of the estimated budget is detailed below:

Activities	Frequency (Annual)	Unit Cost (USD)	Years	Total (USD)
Travel expenses of staff (cost per year) to project district to conduct compliance assessments	1	7000	5	35000
IECs and Communication	1	10000	5	50000
Media Briefs and Live talkshows	3	5000	5	75000
Stakeholder EHSS/stakeholder engagement capacity building	1	10000	5	50000
Community/VMG GRM Committee facilitation	1	10000	5	50000
Stakeholder Meetings/Workshops	1	10000	5	50000
Contingency	1	5000	5	25000
Total (USD)	9	57000	35	335000

7. GRIEVANCE MECHANISM

7.1 Overview and Grievance Mechanism

The World Bank ESS10 provides for the Borrower to ensure that a grievance mechanism for the project is in place, as early as possible in project development to address specific grievances-civil or criminal arising from the project traction. Such grievances may among others involve (in)voluntary displacements, sexual and gender-based exploitation and abuse, child labor, wage and contractual disputes, workers welfare or environmental and noise pollution. Where possible, such grievance mechanisms will utilize existing formal or informal grievance mechanisms suitable for project purposes, supplemented as needed with project-specific arrangements designed to resolve disputes in an impartial manner as shown in figure 7.1

Thematic grievance received by FIs: Its anticipated that most of the grievances received by FIs and project management units my relate to the table 7.1 shown below;

Table 7.1 Anticipated lists of grievances/complaints

S/N	Grievances/complaints	Responsible Stakeholders
01	Financial services poor customer care services, technology failure, lack of transparency and full disclosure of all financial risks as well as reward of their products, unfair contract terms and misrepresentation of financial services and deceptive advertising.	FIs
02	The potential grievances of much interest to this project are those related to the negative environmental and social impacts arising from the implementation of the subprojects and as observed earlier, among others involve e.g. selection of the sub project beneficiaries, application procedures, delays of payment, (in)voluntary displacements, sexual and gender based exploitation and abuse, child labor, wage and contractual disputes, workers welfare or environmental and noise pollution.	PMT

Note: There are various acts of parliament and regulations that provide remedies to grievances related to, employments, and safety of the workers, and communities, compensation and land disputes as well as

negative environmental and social impacts amongst others.

In addition, the project-level grievance redress mechanisms will include a pathway to safely, ethically, and confidentially receive cases related to exclusion or discrimination of individuals or groups that are vulnerable or marginalized. This referral pathway will be developed with the support of the World Bank provided implementation and monitoring support outlined in the INVITE ESMF.

7.2 INVITE Project General GRM

Grievance mechanism (Annex 8) must be present and made available to PAPs who have grievances or are not satisfied with project related activities can submit their complaints including GBV&SEA etc., level of consultation and information dissemination, exclusion and extortion, non-fulfilment of workers contracts, and timing of compensation, amongst others. Complaints and grievances also concern issues related to construction safety and nuisances caused by construction or failure to access project credit lines and corruption in the MFIs.

The goal of the Grievance Redress Mechanism (GRM) is to promote a mutually constructive relationship and enhance the achievement of project development objectives. The GRM is to ensure that complaints are directed and expeditiously addressed by the relevant agencies which are to enhance responsiveness and accountability

While a project-specific feedback and complaints mechanism is set up (Annex 8), the project will incorporate the existing grievance mechanism that has been used in the past experiences.

At project level, each project site/FIs is expected to operate its mechanisms of handling feedback and complaints on the project (See Annex 8). Such a mechanism will be checked in the annual audits to ascertain its effectiveness, accessible and transparent procedures to receive and resolve complaints and where need be and for purposes of delivering this project, it shall then be reviewed and modified accordingly. The project general GRM Feedback or complaints shall be encouraged among all workers and community members throughout the project and resolved without undue delay. This will also be closely monitored and reported. It is important that, concerns are raised on project level before they are brought to the PMT level.

Steps of Grievance Redress

A verbal, a text based or written complaint from aggrieved person will be received by the Project Manager/Project Coordinator or a person assigned in the project as the Grievance Officer (GO) and recorded in a grievance log (electronically if possible). Grievances can be lodged at any time, either directly to the FIs, Contractor, or to the Sub Project component/Developer.

- **Registration:** This should be the first step and will involve the social contact person/institution receiving the complaint from the complainant. The complainant is expected to fill out and return a “complainant form” or by use of toll free line, suggestion box and email to the PMT (E&S Contact person/institution) who in turn will acknowledge receipt of the complaint within 2 business working days and log the complaint in the Program GRM log managed by the PMT.
- **Verification:** The verification will determine among other things whether the matter has any relationship with the Project and whether the level at which it is presented can handle it. A preliminary assessment will be undertaken to ensure that the matter is indeed needs further investigation. Also rejection of claims should be validated by E&S staff of the PMT and referrals outside need to be done carefully if at all and in agreement with the complainant. This will mean a quick referral of the case either to the next level or survivors care centers or to law enforcement using the basic principles of survivor centric approaches and confidentiality. Part of investigation will also be assessing the cost of loss or risk involved in the grievance.
- **Processing:** The processing step is when options for the approach to resolving the case are weighed and determined. Parties involved in the case are brought together by the PMT for a first attempt at resolution with suggestion from the parties by the social contact personnel. The social personnel at a certain level then decide where the case should go to for hearing and resolution if complainant decides to pursue the matter further. This should happen within five days from investigation and if more information is require then it can be handled based on its circumstances
- **Implementation and case closing:** Generally the first level is local or involves the FIs, contractor or service provider, the second could be the PMT, the third the GRC. The composition and functioning of the GRC needs to be established as part of the GRM procedure and communicated to PAPs. The GRC should include community representation (men and women). An independent mediation step should be offered. Complainants should be advised that they have the option to use the judicial system (or the GRS/IP) at any time

In addition to this GRM, communities and individuals who believe that they are adversely affected by the WB supported project may submit complaints to the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel, which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought

directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org as indicated in the below Figure 7.1.

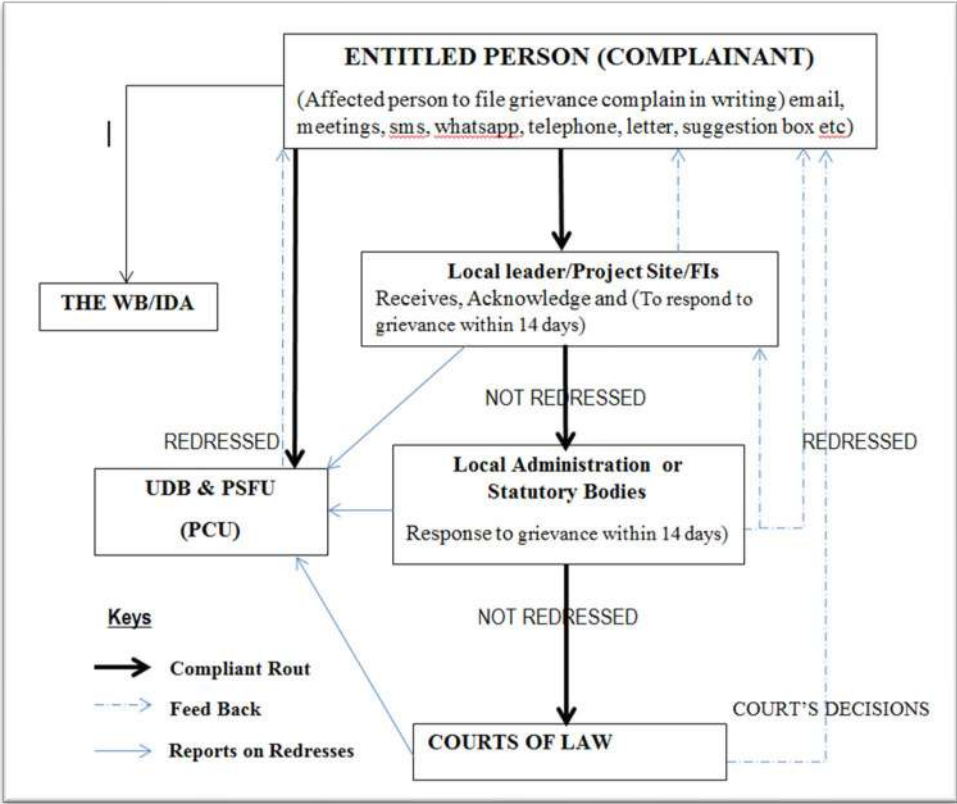


Figure 7.1 General Grievance Redress Mechanism

7.3 Grievance Mechanisms of FIs

In addition to section 7.2.3 Bank of Uganda Financial Consumer Protection Guidelines, 2011 shall also be applied to all FIs participating in the project. The Bank of Uganda Financial Consumer Protection 2011 guideline applies to:

- ✓ all financial services providers regulated by the Bank of Uganda in respect of business they transact in Uganda; and
- ✓ the agents of all financial services providers regulated by the Bank of Uganda in respect of business the agent transacts in Uganda.

The objectives of these guidelines are to:-

- 1) promote fair and equitable financial services practices by setting minimum standards for financial services providers in dealing with consumers;
- 2) increase transparency in order to inform and empower consumers of financial services;
- 3) foster confidence in the financial services sector; and
- 4) provide efficient and effective mechanisms for handling consumer complaints relating to the provision of financial products and services.

The process of the GRM should be followed by all categories of persons .i.e. project implementation teams and the stakeholders i.e.[Project affected Persons (PAPs)]¹⁵ with potential to register grievances including (i) business owners applying for the facilities provided under the project, (ii) Individuals/communities that might be affected by activities from the SMEs, (iii) Refugees and Members of host communities benefiting/being affected by the project, (iv) workers that might be employed by SMEs to expand using these funds and (v) Service providers including BDS; goods and other services with the help of a grievance registration form in annex 4. All resolved grievances must be closed out using a grievance resolution form. A grievance log for monitoring purposes shall be placed at all points for grievance registration. The direction of grievance reporting depends on whether is criminal or civil as highlighted in figure 7.2 with the waiting period in days for grievance resolution.

It is the duty of the relevant GRC to ensure that project affected persons are given the option of using the grievances redress mechanisms that are led by local authorities where project led negotiations have not been able to provide a satisfactory solution to the complaint. The project is duty bound to forward to the relevant local authority the complaints they receive that, in their view, can be better resolved by the local government led dispute resolution systems.

The FIs will be duty bound to use in-house intelligence mechanisms and routine supervisory visits to register grievances affecting the disadvantage and vulnerable groups.

The aspiration of the GRS is to have as many issues as possible administratively resolved outside court as means to avoid delays, backlogs and to make justice as accessible as possible especially, to persons that may be vulnerable and less able. The procedure shall include:

Step One-LC 3 Level GRC: All civil grievances shall be submitted in writing or verbally to the Sub-

¹⁵PAPs that might need to raise complaints: (i) business owners applying for the facilities provided under the project, (ii) Individuals/communities that might be affected by activities from the SMEs, (iii) Refugees and Members of host communities benefiting/being affected by the project, and (iv) workers that might be employed by SMEs to expand using these funds.

County/Division/Town Council Grievance Redress Committee (GRC) through the Community Development Office (CDO) who is the Secretary, community GRC that handles grievances and provides feedback in 14 days. The LC 3 level grievance committee shall consist of the the CDO, MFI's Grievance Officer (representative), the LC 3 Chairman and a traditional/religious/opinion leader at the LC 3 level. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the the district level GRC in writing through the district CDO that serves as the Secretary.

Step Two-District Level GRC: GRC that sits every week and will provide feedback in 14 days. The district level grievance committee shall consist of the the district CDO, MFI's Grievance Officer (representative), CAO, the LC 5 Chairman and a traditional/religious/opinion leader at the LC 5 level. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

Step Three-Project GRC: This will include Project Coordinator, Engineer, Workers Representative, INVITE Sociologist and EHS. This GRC will meet once monthly and respond to any issue within 14 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the Project Management Team GRC at PSFU.

Step Four: Project Management Team GRC. This will include at PSFU the Project Coordinator, Legal officer, Sociologist/EHS, M&E Specialist and Fiancial Expert . This GRC will meet once a month and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to the Project technical Steering Committee

Step Five: Project Technical Steering GRC. This will include at PSFU the Project Coordinator, Project Incharge at BoU and Represenative of MoFPED with capacity to handle any civil issue including those that are intricate and complex. This GRC will meet quarterly and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to court for adjudication.

GBV/SEA/SH GRM Measures

The project will carry out GBV risk specific stakeholder engagements and clearly outline referral pathways to facilitate survivor centered Mitigation measures under the SEF. Cases of GBV will be against GBV and SEA shall be addressed through the existing legal procedures and process in place including Police, Courts and Prosecution, Labor Officers and Probation Officers. The procedure shall include:

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

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

Do you have a Grievance?

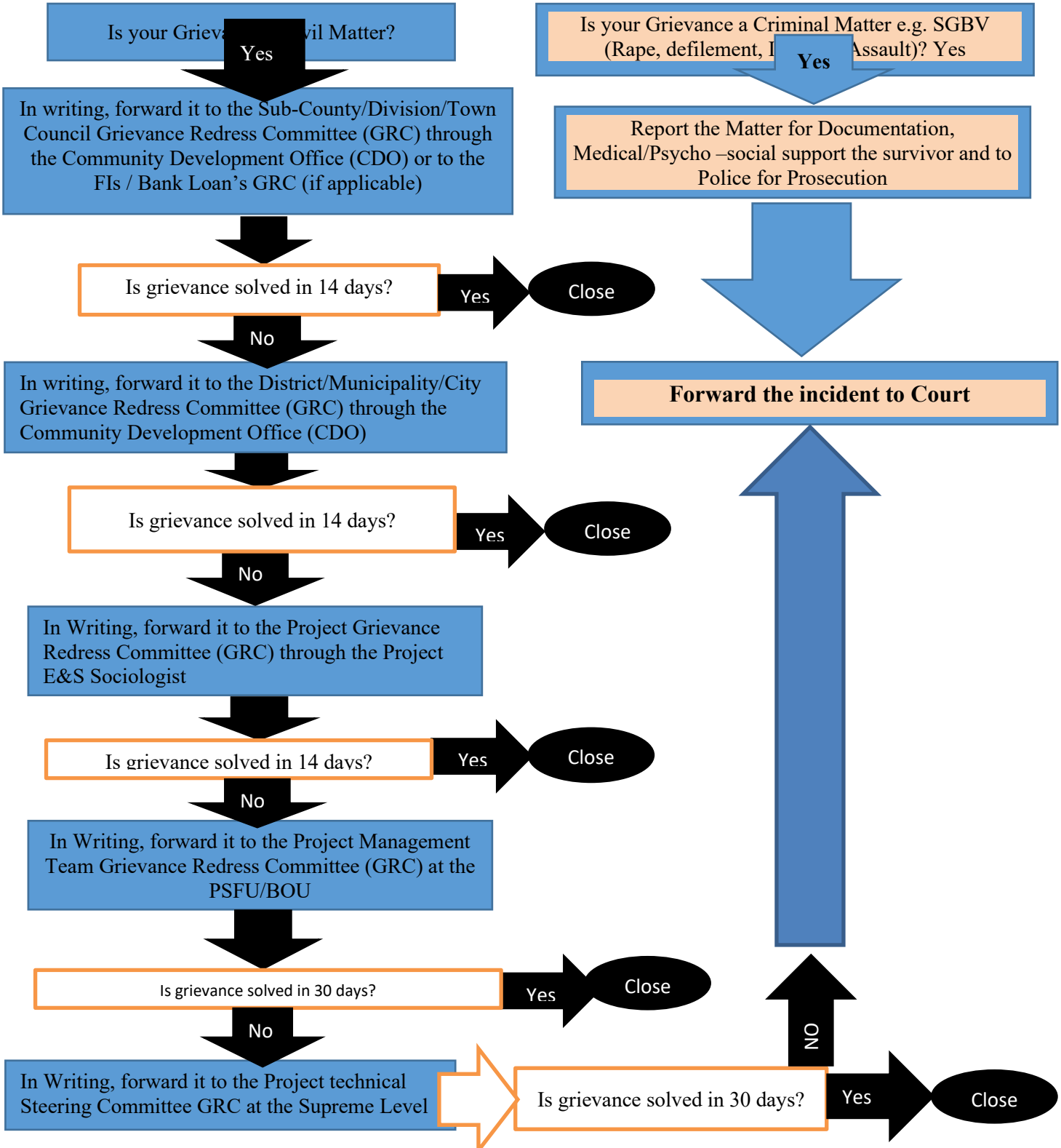


Figure 7.2 Community Grievance Redress Mechanism Flowchart

7.4 Workers Grievance Redress Mechanism

A grievance is a concern or complaint raised by an individual or group affected by the project. Concerns and complaints can result from either real or perceived impacts and maybe logged and handled in a similar manner. The objective of the project workers' GRM is to provide workers with a mechanism for submission and raising grievances and grievance resolution. This mechanism will ensure all grievances are handled in a fair and transparent manner, in line with INVITE's internal policies, the Ugandan legal framework and the requirements under ESS2.

INVITE's Sociologist shall work with workers and their leaders in the project sites to establish and operationalize workers grievance redress committees to address all grievances recorded. All measures shall be taken to settle all grievances amicably before resorting to courts of law.

Steps in the Workers Grievance Redress Mechanism

All workers related grievances of contractual nature including among others, non-fulfillment of contracts, levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation shall be addressed to the workers' grievance committee. The procedure shall include:

Step One: All civil grievances shall be submitted in writing to the Secretary, site specific workers GRC that sits weekly to handle grievances and provides feedback in 7 days. This committee shall consist of the site engineer, workers representative, INVITE Grievance Officer (representative) and the Contractor EHS and Sociologist. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the project implementation team GRC.

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

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

Step Two: Project GRC that sits every week and will provide feedback in 14 days. This committee shall consist of the INVITE Project Coordinator, , Engineer, Workers Representative, INVITE Sociologist and EHS t. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

Step Three: PSFUt GRC. This will include at PSFU the Project Coordinator, Legal officer, Sociologist/EHS, M&E Specialist and Fiancial Expert . This GRC will meet once a month and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to the Project technical Steering Committee .

Step Four: Project Technical Steering GRC. This will include at PSFU the Project Coordinator, Project Incharge at BoU and Reprsenative of MoFPED with capacity to handle any civil issue including those that are intricate and complex. This GRC will meet quarterly and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to court for adjudication.

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

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

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

Do you have a Grievance?

Dis itan SGBV grievanc?e Yes

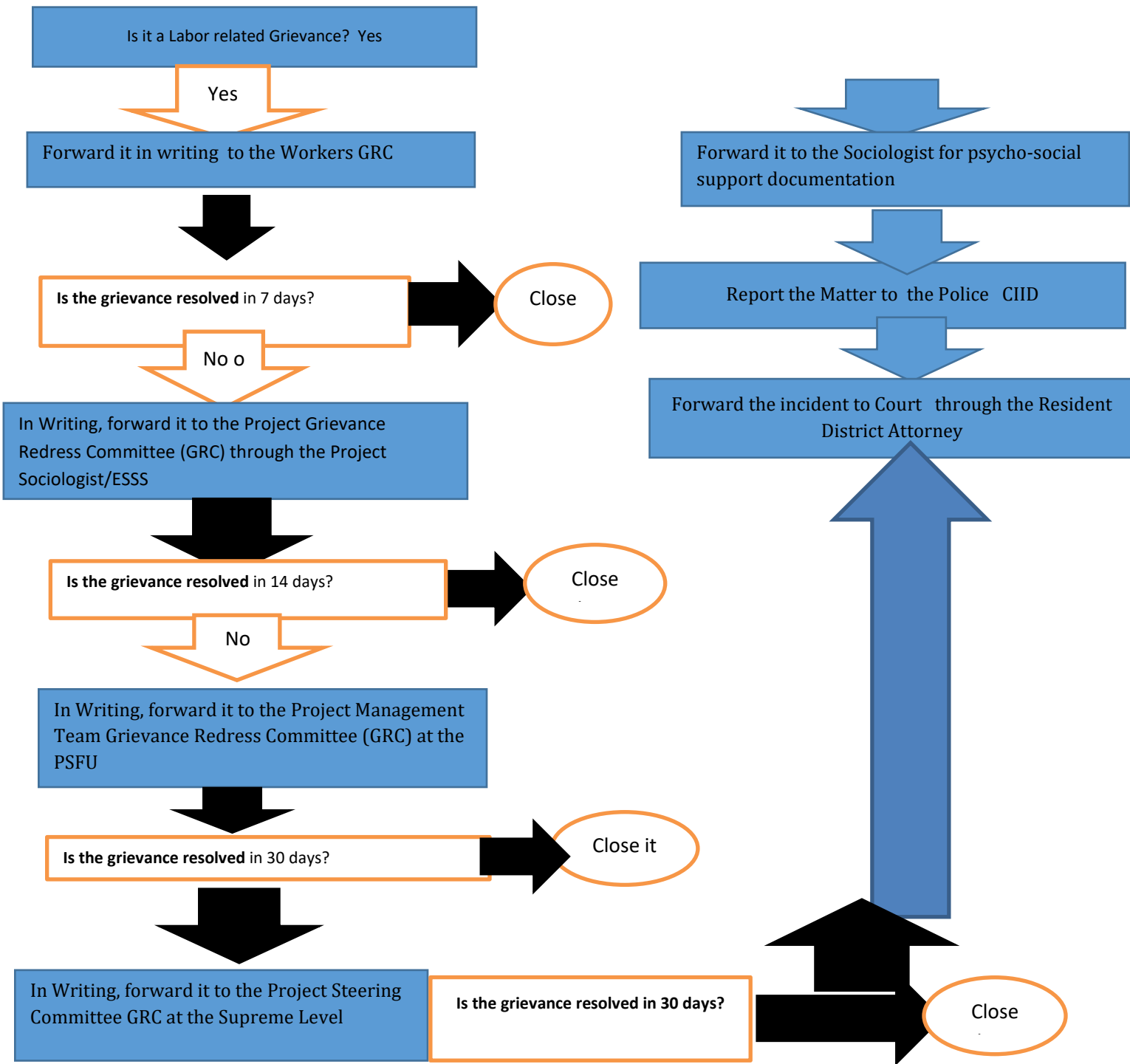


Figure 3: Workers Grievance Redress Mechanism Flowchart

7.5 Grievance Mechanisms for VMGs

ESS 10 and ESS 7 provides for a GRC for VMGs. In this project the VMGF will have also five steps.

Step One-Community Level GRC: All civil grievances shall be submitted in writing or verbally to the GRC through a recognized VMG traditional or opinion leader who is the Secretary, community GRC that

handles grievances and provides feedback in 14 days. The community level grievance committee shall consist of the the recognized traditional leader, opinion leaders, CDO and MFI's Grievance Officer (representative). If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the the district level GRC in writing through the district CDO that serves as the Secretary.

Step Two-District Level GRC: GRC that sits every week and will provide feedback in 14 days. The district level grievance committee shall consist of the the district CDO, MFI's Grievance Officer (representative), CAO, the LC 5 Chairman and a traditional/religious/opinion leader at the LC 5 level. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

Step Three-Project GRC: This will include Project Coordinator, Engineer, Workers Representative, INVITE Sociologist and EHS. This GRC will meet once monthly and respond to any issue within 14 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the Project Management Team GRC at PSFU.

Step Four: Project Management Team GRC. This will include at PSFU the Project Coordinator, Legal officer, Sociologist/EHS, M&E Specialist and Fiancial Expert . This GRC will meet once a month and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to the Project technical Steering Committee

Step Five: Project Technical Steering GRC. This will include at PSFU the Project Coordinator, Project Incharge at BoU and Represenative of MoFPED with capacity to handle any civil issue including those that are intricate and complex. This GRC will meet quarterly and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee, the matter shall be referred to court for adjudication.

The project will carry out GBV risk specific stakeholder engagements and clearly outline referral pathways to facilitate survivor centered Mitigation measures under the SEF. Cases of GBV will be against GBV and SEA shall be addressed through the existing legal procedures and process in place including Police, Courts and Prosecution, Labor Officers and Probation Officers. The procedure shall include:

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

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

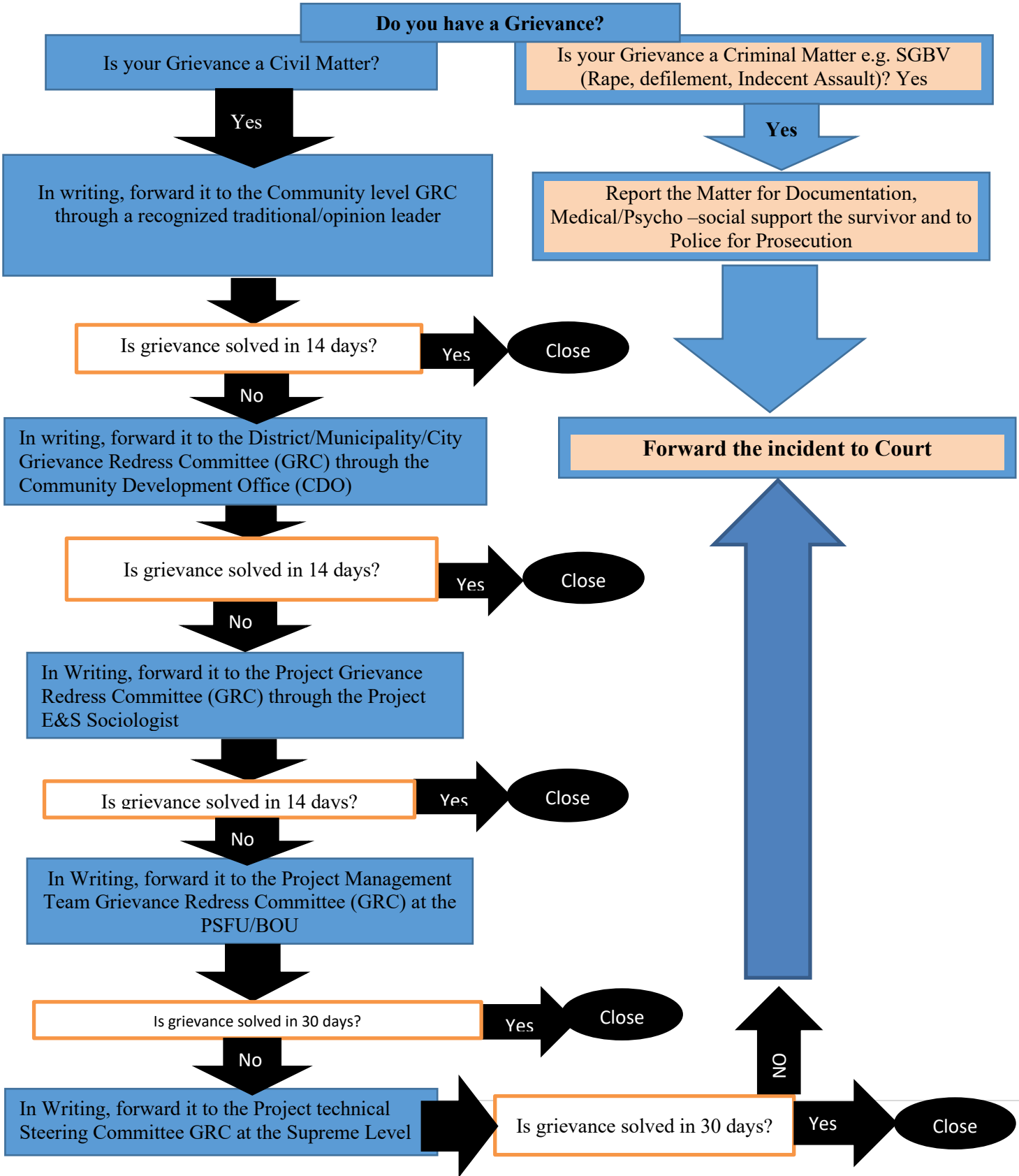


Figure 7.3 VMG Grievance Redress Mechanism Flowchart

7.6 Raising Awareness on the GRM

As a key risk management tool, awareness of the INVITE project GRM will be raised using a number of mechanisms. Key among them include:

- GRM IEC Materials: IECs materials particularly, a printout of the GRM flow chart will be printed on A3 or A2 and pinned on all notice boards at the PMT, BoU, Project site level and at the PFIs.
- In addition, an INVITE EHS risk management strategy induction session will be organized at the PMT, BOU and with the different project MFIs before project implementation and followed bi-annually. The package disseminated in these sessions will include a GRM will be part of the package.
- Further, the LMP and other EHS risk management documentations containing the GRM will be included in the bid documents shared with contractors for integration on their EHS risk management plans and capacity building.
- Lastly, EHS induction sessions will be conducted with each contractor (together with the associated sub-contractors) where again among other EHS considerations, the GRM will be presented including the roles and responsibilities of the different committees.

7.7 Procedure for Comment Response

The steps taken by PSFU/BOU for receiving and handling any comments pertaining to the Program are subsequently outlined.

STEP 1: Submitting a comment to PSFU/

A comment can be submitted using any of the following paths:

- a) During regular meetings held between communities and the program team
- b) Through the Local Consultative Forums established in the affected villages;
- c) During informal meetings
- d) Through communication directly with management – for example a letter addressed to site management, or other operational offices;
- e) Directly by letter to the Project Coordinator, INVITE

Plot 43 Nakasero Road Kampala
Box 7683 Uganda
or by Telephone: +256312263850 or Email: psfu@psfuganda.org.ug

- f) Placing a comment in the community suggestion boxes in each PAC
- g) Filling in a grievance record form and submitting it to selected offices.
- h) Through the social and environmental specialists

For comments that have been submitted informally, the Social and Environmental specialists as community liaisons officers will arrange for a meeting where the comment can be explained in full and written down on a grievance and comment logging form (Annex 1). For all Confidential comments the EHS Specialists will be the main point of contact, responsible for responding to the source.

In addition, the project-level grievance redress mechanisms will include a pathway to safely, ethically, and confidentially receive cases related to exclusion or discrimination of individuals or groups that are vulnerable or marginalized. This referral pathway will be developed with the support of the World Bank provided implementation and monitoring support outlined in the INVITE ESMF.

STEP 2: Logging the comment

Once a comment has been received it must first be logged in the comments and concerns register (clearly described in the ESMP Tracker under the Source) and the EHS Specialists will be informed.

STEP 3: Providing the initial response

The person/community/stakeholder that lodged the initial comment will be contacted within 5 working days to acknowledge that INVITE PMT has received the comment and provide feedback and the steps being taken in line with the communication.

7.8 Procedure for Grievances Resolution

STEP 1: Investigating the grievance

The grievance will be investigated utilizing a set up incident/ grievance investigation team to provide for root causes, mitigation measures and responsible parties for incident or grievance closure. INVITE will aim to complete investigation within two weeks of the grievance first being logged. INVITE will involve the aggrieved in this investigation, where possible, to ensure participation. INVITE through the EHS specialists will continually update the aggrieved on the progress of the investigation and the timeline for conclusion.

STEP 2: Concluding/resolving the grievance

The grievance should then be resolved. NITA-U will outline the steps taken to ensure that the grievance

does not re-occur. Consultation with aggrieved parties and views sought about company recommendations shall also be carried out. If complainant is satisfied, the EHS Specialists will seek their signoff from the Component Lead and Program Coordinator.

STEP 3: Taking further steps if the grievance remains open

However, if the grievance still stands the PMT, Social and Environmental Specialists will initiate further investigation and determine the steps for future action

7.9 Record Keeping

All comment responses and, grievances are to be logged using the Comment Response, and Grievance logging forms and registers. Closure of the same shall be signed off in the Grievance closure or resolution form (Annex 7). These registers include details of the comments/grievance, the commenter/aggrieved, and ultimately the steps taken to resolve the grievance. Any accompanying documentation e.g. written statements, photographic evidence, or investigation reports are to be filed along with the grievance log both in hard and soft copies. A master database will be maintained by the INVITE PMT to record and track management of all comments and grievances, and audited by the EHS Specialists. This will serve to help monitor and improve performance of the Comment Response and, Grievance Mechanism.

7.10 Comment Response and Grievance Mechanism Log

A sample format for logging summary details of each comment and grievance response is provided in the Annex 6. As noted above, hard and soft copies should be kept on file.

Note:

- a) If it is a comment, the commented will receive a copy if he/she requests one
- b) If it is a Grievance, the aggrieved shall always receive a copy once complete for their own records.

7.11 Monitoring and Review

It is vitally important to monitor the effectiveness of the comment response and, grievance mechanism. Appropriate measures/KPIs for this include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the PMT/EHS and reported to the Component Lead and Program Coordinator. As part of the annual review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism. Records of receipt grievances and status of resolution will be shared with the World Bank through the monthly Environmental and Social safeguards progress reports. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Comment Response and, Grievance Mechanism is designed to improve effectiveness and stakeholder buy-in.

8. MONITORING AND REPORTING

8.1 Introduction and Purpose

INVITE will maintain a database and activity file detailing all public consultations, disclosure of information and grievances collected throughout the project which will be available on request. Monitoring of the stakeholder engagement activities is important for several reasons such as:

- 1) Ascertaining whether planned stakeholder engagements and other related activities are progressing as planned
- 2) Whether intended outputs are being realized
- 3) For the effectiveness and efficiency of SEF to be evaluated, challenges to be identified and rectified in time.

8.2 Level of Monitoring and Evaluation

Two levels of monitoring are anticipated:

- 1) Process monitoring during the ESMP assessment phase engagement activities: short-term monitoring of stakeholder engagement activities to ascertain whether SEF is being followed and expected outcomes are being realized; necessary resources have been deployed and are being used efficiently; routine reporting is being undertaken and reports are being used to make improvements in the SEF and its implementation; and whether necessary support supervision for the stakeholder engagement team is being realized.
- 2) At the completion of all planned engagement activities after the ESMP implementation phase, a review of activities, outputs and outcomes to evaluate the efficiency and effectiveness of the SEF.

8.3 Monitoring and Evaluation

INVITE will keep record of the number and the type of complaints received and addressed, allowing for performance management of the GRM. The EHS Specialists will be responsible for producing regular reports (quarterly) for senior management which include:

- Number of complaints received;
- Compliance with standards & policies (addressing within a certain time etc.);
- The issues raised and trends in these issues over time;
- Causes of grievance/feedback
- Whether remedial actions were warranted;

- Redress actions actually provided;
- Recommendations to improve /prevent/limit recurrences

8.4 Monitoring and Reporting

The SEF implementation will be regularly monitored and reported on as part of overall ESMF monitoring by EHS and the PMT. Monitoring will assess documented evidence of SEF activities conducted and verify them on a spot-check basis and/or where concerns arise.

6.4 Monitoring and Evaluation Indicators

By identifying key performance indicators that reflect the objectives of the SEF and the specific engagement activities, it is possible to both monitor and evaluate the process undertaken. The suggested indicators for M&E include this highlighted in

10. ANNEXES

ANNEX I: MINUTES OF STAKEHOLDER CONSULTATIONS-INCEPTION PHASE

Date of the Meeting	
Place of meeting	
Meeting Proceedings Recorded by	
Subject of the Meeting	
Summary of Proceedings	
The agenda for the meeting	
Meeting proceedings	Action By

Signed Chairperson: _____

Secretary: _____

ANNEX 2: SAMPLE OF STAKEHOLDERS LOG

Date /place	Firm/Company/Organization Staff in Attendance	Contact Person	Meeting Summary Key Issues Raised	Follow up Action

ANNEX 4: GRIEVENCE REGISRATION FORM

GRIEVIENCE REGISRATION FORM																																	
INVITE	Serial No----- Ref No----- Date-----																																
Name of Complainant: Gender: Male <input type="checkbox"/> Female <input type="checkbox"/> Telephone Number: Age:..... ID Type and No: Description of Complaint; Name & Contact details of witness (If available):																																	
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; padding: 2px;">Location of Receipt of Grievance</th> <th style="text-align: left; padding: 2px;">Location of occurrence of Grievance</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px;">District:</td> <td style="padding: 2px;">District:</td> </tr> <tr> <td style="padding: 2px;">County:</td> <td style="padding: 2px;">County:</td> </tr> <tr> <td style="padding: 2px;">Sub county/Town council:</td> <td style="padding: 2px;">Sub county/Town council:</td> </tr> <tr> <td style="padding: 2px;">Village/Cell:</td> <td style="padding: 2px;">Village/Cell:</td> </tr> <tr> <td style="padding: 2px;">LC Chairperson's Name:</td> <td style="padding: 2px;">Line Number:</td> </tr> <tr> <td style="padding: 2px;">Grievance No in village:</td> <td style="padding: 2px;">Name of execution contractor:</td> </tr> <tr> <td style="padding: 2px;">Other (Specify)</td> <td style="padding: 2px;">Other (Specify)</td> </tr> </tbody> </table>	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)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; padding: 2px;">Location of Receipt of Grievance</th> <th style="text-align: left; padding: 2px;">Location of occurrence of Grievance</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px;">District:</td> <td style="padding: 2px;">District:</td> </tr> <tr> <td style="padding: 2px;">County:</td> <td style="padding: 2px;">County:</td> </tr> <tr> <td style="padding: 2px;">Sub county/Town council:</td> <td style="padding: 2px;">Sub county/Town council:</td> </tr> <tr> <td style="padding: 2px;">Village/Cell:</td> <td style="padding: 2px;">Village/Cell:</td> </tr> <tr> <td style="padding: 2px;">LC Chairperson's Name:</td> <td style="padding: 2px;">Line Number:</td> </tr> <tr> <td style="padding: 2px;">Grievance No in village:</td> <td style="padding: 2px;">Name of execution contractor:</td> </tr> <tr> <td style="padding: 2px;">Other (Specify)</td> <td style="padding: 2px;">Other (Specify)</td> </tr> </tbody> </table>	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)
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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)																																
<p>Description of Activity/Project/ line that Grievance is related to</p> Signature or thumbprint: <hr/> <p>FOR OFFICIAL USE ONLY: Received by:</p> Observation of receiving Officer: Issue <input type="checkbox"/> Grievance <input type="checkbox"/> Non Grievance <input type="checkbox"/> Method of receipt: Letter <input type="checkbox"/> Email <input type="checkbox"/> Face to face <input type="checkbox"/> Telephone call <input type="checkbox"/> WhatsApp <input type="checkbox"/> Etc...(Please specify) Support documents provided by Complainant (if any)																																	

ANNEX 5: GRIEVENCE RESOLUTION FORM

GRIEVENCE RESOLUTION FORM	
INVITE	<p>Closure Date: _____</p> <p>Ref No (Pick from Reg No) _____</p>
<p>Name of Complainant: Gender: Male <input type="checkbox"/> Female <input type="checkbox"/></p> <p>Telephone Number: Age:</p> <p>ID Type and No:</p> <p>Grievance registration Form Details:</p> <p>Serial No: System Ref No. Date of receipt</p> <p>Response to Complaint (detailed-Utilize overleaf/ additional paper if required)</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>Name & Contact details of witness (If available).....</p> <hr/> <p>Iacknowledge that I agree to the solution proposed in respect to the above grievance and that the solution has been implemented to my satisfaction.</p> <p>Complainant's Name & Signature:</p> <p>Witness' Name & Signature:</p> <p>Company representative Name & Signature:</p>	

ANNEX 6: GRM LOG

Location (District).....

Sub County.....

Village:.....

Ref No.	Date Received	Mode of Receipt	Name of Complainant	Contacts of Complainant	Description of Complaint	Action Taken

ANNEX 7. POST COVID LOCKDOWN STANDARD OPERATING PROCEDURES FOR OPERATION IN UGANDA

Minister : +256 414 250 557/8
Minister : +256 414 251003
Minister of State : +256 414 251004
Permanent Secretary : +256 414 251002
Email : ps@publicservice.go.ug
Website : www.publicservice.go.ug



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

In any correspondence on
this subject please quote no. **PMD 80/80/01 Vol: 7** THE REPUBLIC OF UGANDA

5th June 2020

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

CIRCULAR LETTER NO. 7 OF 2020

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

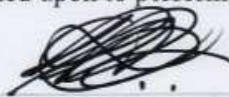
Following the directive of His Excellency the President of Uganda on partial lifting of the lockdown specifically permitting private vehicles and Public Transport services to operate at one half capacity, movement of Public Officers to and from their work premises has been eased and a number of them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

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

1. Staffing:

- a) Each Ministry, Department, Agency and Local Government should identify 30% of its total workforce to remain on duty to ensure that critical services are provided promptly.

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



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2. Decongesting office premises and limiting physical interaction:

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

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

3. Employee Health and safety:

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

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

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

4. Emergency response:

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

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



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

Catherine Bitarakwate Musingwiire (Mrs.)
PERMANENT SECRETARY

ANNEX 8. GRIEVANCE REDRESS MECHANISM ADMINISTRATIVE PROCEDURE CIVIL OFFENSES PATH

Tier One: Site specific GRC that sits weekly to handle grievances and provides feedback in 7 days. If the grievance is settled, the complaint is closed. If not, it goes to the next tier

Tier Two: Project Management Team GRC that sits every 2 weeks and provides feedback in 14 days. If the grievance is settled, the complaint is closed. If not, it goes to the next tier

Tier Three: Project Technical GR Committee that sits monthly to handle grievances and provides feedback in 30 days. If the grievance is settled, the complaint is closed. If not, it goes to the next tier

Tier Four: CEDP Steering GR Committee that sits Quarterly to handle grievances and provides feedback in 30 days. If the grievance is settled, the complaint is closed. If not, it goes to the next tier

Tier Five: Court adjudication.

Criminal/GBV/SEA Offenses Path

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

Tier Two: Handling of the incident by Police where form 3 will be completed. This tier includes medical examination of the incident by police surgeon and completion of the charge sheet

Tier Three: Forwarding of the incident to the resident state prosecutor

Tier Four: Criminal proceedings in court

ANNEX 9. ESHS CODES OF CONDUCT FOR INVITE

Gender-Based Violence and Child Protection Code of Conduct

The company is obliged to create and maintain an environment which prevents gender based violence (GBV) and child abuse/exploitation (CAE) issues, and where the unacceptability of GBV and actions against children are clearly communicated to all those engaged on the project. In order to prevent GBV and CAE, the following core principles and minimum standards of behavior will apply to all employees without exception:

1. GBV or CAE constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment. All forms of GBV and CAE including grooming are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit GBV or CAE will be pursued.
2. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
3. Do not use language or behavior towards women, children and men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Sexual activity with children under 18 - is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
5. Sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited.
6. Sexual interactions between contractor's and consultant's employees at any level and member of the communities surrounding the work place that are not agreed to with full consent by all parties

involved in the sexual act are prohibited (see definition of consent above). This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this Code.

7. All staff, volunteers, consultants and sub-contractors are highly encouraged to report suspected or actual GBV and/or CAE by a fellow worker, whether in the same contracting firm or not. Reports must be made in accordance with Standard Reporting Procedures.
8. All employees are required to attend an induction training course prior to commencing work on site to ensure they are familiar with the GBV and CAE Code of Conduct.
9. All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV and CAE Code of Conduct.
10. All employees will be required to sign an individual Code of Conduct confirming their agreement to support GBV and CAE activities.

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

FOR THE COMPANY

Signed by _____

Title: _____

Date: _____

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

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

Mobilization

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

corrective actions when GBV and/or CAE has occurred, shall constitute grounds for sanctions and penalties.

Training

1. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and CAE Codes of Conduct. This training will be SEFarate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the Action Plan for addressing GBV and CAE issues.
2. Provide time during work hours to ensure that direct reports attend the mandatory CEDP facilitated induction GBV and CAE training required of all employees prior to commencing work on site.
3. Ensure that direct reports attend the monthly mandatory refresher training course required of all employees to combat increased risk of GBV and CAE during civil works.
4. Managers are required to attend and assist with the CEDP facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations.
5. Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

Prevention

1. All managers and employees shall receive a clear written statement of the company's requirements with regards to preventing GBV and CAE in addition to the training.
2. Managers must verbally and in writing explain the company and individual codes of conduct to all direct reports.
3. All managers and employees must sign the individual 'Code of Conduct for GBV and CAE', including acknowledgment that they have read and agree with the code of conduct.
4. To ensure maximum effectiveness of the Codes of Conduct, managers are required to prominently display the Company and Individual Codes of Conduct in clear view in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.

5. All posted and distributed copies of the Company and Individual Codes of Conduct should be translated into the appropriate language of use in the work site areas (Local languages, Kiswahili, etc).
6. Managers will explain the GRM process to all employees and encourage them to report suspected or actual GBV and/or CAE.
7. Managers should also promote internal sensitization initiatives (e.g. workshops, campaigns, on-site demonstrations etc.) throughout the entire duration of their appointment in collaboration with the GCCT and in accordance to the Action Plan.
8. Managers must provide support and resources to the GCCT to create and disseminate the internal sensitization initiatives through the Awareness-raising strategy under the Action Plan.

Response

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

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

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

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

FOR THE EMPLOYER

Signed by _____

Title: _____

Date: _____

Individual Gender Based Violence and Child Protection Code of Conduct

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

- Consent to police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual activity with children—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defense.

- Not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.
- Not have sexual interactions with members of the communities surrounding the work place and worker’s camps that are not agreed to with full consent by all parties involved in the sexual act (see definition of consent above). This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Attend and actively partake in training courses related to HIV/AIDS, GBV and CAE as requested by my employer.
- Report through the GRM or to my manager suspected or actual GBV and/or CAE by a fellow worker, whether in my company or not, or any breaches of this code of conduct.

With regard to children under the age of 18:

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

Use of children’s images for work related purposes

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

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

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

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

Signed by _____

Title: _____

Date: _____