



MINISTRY OF WATER AND ENVIRONMENT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

**INVESTING IN FORESTS AND PROTECTED AREAS FOR
CLIMATE-SMART DEVELOPMENT PROJECT
ADDITIONAL FINANCING (IFPA-CD)**

JUNE 2025

EXECUTIVE SUMMARY

Project Background: The Government of Uganda (GoU) developed the Uganda Investing in Forests and Protected Areas for Climate Smart Development (IFPA-CD) to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. The project that is being financed by the World Bank (WB) and GoU and contributes to the World Bank Group's twin goals of ending extreme poverty and building shared prosperity in a sustainable manner.

The project is being implemented by the Ministry of Water and Environment (MWE), Ministry of Tourism, Wildlife and Antiquities (MTWA), Uganda Wildlife Authority (UWA), National Forestry Authority (NFA), targeted District Local Governments (DLG), and contracted Technical Service Providers (TSPs). Under Additional Financing, some activities related to development of wood value chains will be implemented by the Uganda Timber Growers Association (UTGA).

The project focuses on improving the management of forests and increasing revenues for sustaining forests and supporting resilient livelihoods. The Project concept is aligned to support raising incomes in rural areas and seeks to strengthen natural resources management and build resilience, with particular attention to growing incomes of women.

Methodology: The Stakeholder Engagement Plan (SEP) was developed for IFPA-CD during project preparation in 2019-2020 in a process that included stakeholder consultations and full disclosure. In view of the proposed AF, the SEP has been updated. The update has been informed by the findings from relevant document reviews such as Reports of World Bank's implementation support missions such as Aide Memoires, Environmental and Social Management Framework (ESMF), The Process Framework, The Vulnerable and Marginalised Group Framework, The Vulnerable and Marginalised Group Plans, Implementation Status Reports (ISRs), Progress reports from the Government of Uganda implementing agencies, Findings of stakeholder consultations, The Grievance Redress Framework, District Development Plans, Management Plans for Central Forest Reserves, Management Plans for National Parks and Wildlife Reserves. The SEP was also updated in July 2024 to include provisions related to enhanced inclusion and non-discrimination.

Where information in the original SEP for IFPA-CD remains relevant, it has been maintained.

Location of the Project Area: The Project's geographical focus is on selected priority areas in western and north-western Uganda, which includes the Albert Water Management Zone (AWMZ) and West Nile part of Upper Nile Water Management Zone, plus Lamwo district. Component 3 focuses on the 19 refugee hosting districts of Hoima, Kagadi, Kakumiro, Kamwenge, Kibaale, Kikuube, Kiryandongo, Kyegegwa, Adjumani, Arua, Terego, Koboko, Lamwo, Madi Okollo, Moyo, Obongi, Yumbe and Amuru district.

Project Components: The Project focuses on four main components, namely: 1) Improved management of protected areas 2) Increased revenues and jobs from forests and wildlife protected areas 3) Improved landscape management 4) Project management and monitoring

Stakeholder Engagement Plan

During the preparation of the IFPA-CD project, a Stakeholder Engagement Framework was designed (in 2020) followed by a detailed Stakeholder Engagement Plan (SEP) which was prepared at the start of project implementation to guide stakeholder engagement. The SEP defines programs for stakeholder engagement, describes commitments and process for stakeholder engagement and outlines ways in which IFPA-CD project implementation team communicates with stakeholders. It includes mechanisms by which people can raise concerns or make complaints and receive feedback on issues of IFPA-CD project implementation.

As part of preparation of the AF, the SEP is being updated to meet the World Bank's ESS10 requirements and is being disclosed as part of the AF appraisal process. The main purpose of stakeholder

engagement is to ensure that stakeholders are effectively engaged in project actions with the view to understand and own the IFPA-CD project.

Stakeholder Engagement Interventions: The project has had extensive stakeholder engagement from early stages of the project identification, preparation and implementation with project affected parties and other interested parties. The engagements were under the REDD+ readiness processes, IFPA-CD and during preparation of IFPA-CD-AF. The main stakeholders consulted included the Marginalized and Vulnerable Groups (the Batwa), the beneficiary populations and communities, district technical officers and politicians from lower-level local councils (LCs) to Constituency (LC1), religious leaders, officials at the Water Management Zone level, stakeholders from key sectoral ministries at the central level, and Members of Parliament (MPs).

Stakeholder Identification and Analysis Criteria: Stakeholder engagement process for the IFPA-CD starts with identification, mapping and analysis of project stakeholders and this plan serves to clarify the stakeholder identification procedure at national and project area level during project implementation. This guides MWE and Implementing Agencies, Local Governments and TSPs to comply with national and World Bank requirements for effective stakeholder engagements.

Mapping Stakeholders: Broadly, IFPA-CD Project stakeholders are ‘people or institutions who have a role in the Project or could be positively or negatively affected by the Project, or who are interested in the Project. IFPA-CD Project stakeholders are grouped into primary, secondary and tertiary stakeholders.

Vulnerable Groups (VG): Under the IFPA-CD project, vulnerable groups include the rural women, child-headed households, youths, and orphans, persons with disabilities, the elderly, and hard to reach community members and the sick. Their concerns, contributions and priorities inform project design.

Vulnerable and Marginalised Groups (VMGs): This term applies to groups meeting the definitions in ESS7, such as the Batwa ethnic group who are present in the project area i.e. around Echuya CFR, Mgahinga Gorilla, Bwindi Impenetrable and Semuliki National Parks. They represent a specific sub-category within the broader vulnerable groups due to their unique identities and aspirations that are distinct from the mainstream vulnerable groups. The Vulnerable and Marginalized Groups Framework (VMGF) and site-specific Vulnerable and Marginalized Groups Plans (VMGPs) have been developed. They highlight priorities for IFPA-CD support regarding the Batwa, including budget and modalities for implementation of project activities.

Strategy for Consultations: The project applies various methods of engagements that meets international standards for stakeholder consultations which emphasizes the need for consultations to be free and prior informed.

Strategy for incorporating and providing feedback to stakeholders: Views, suggestions and recommendations received from stakeholders are responded to during the public consultative meetings or through administrative correspondences or through follow up field visits and discussions. Feedback on policy issues that require attention by the Project Steering Committee (PSC) is provided soon after the next PSC meeting.

Strategy for information disclosure: Project information such as the PAD, ESMF, ESCP, SEP, VMGPs, etc. are disclosed to stakeholders and public accompanied by registers of comments and suggestions from the public that are subsequently documented by MWE, UWA, NFA and Technical Service Providers (TSP) in a formal manner. The Grievance Redress Mechanism (GRM) ensures that there is an adequate mechanism for stakeholders airing their views and receiving prompt feedback.

Management functions and responsibilities: The overall responsibility for implementing this SEP is with the MWE (PCU) through the National Project Coordinator (NPC). Within the PCU, the Environmental and Social team supports, monitors and reports on the over-all performance of the SEP and works closely with UWA and NFA to ensure a coordinated approach.

Grievance Redress Mechanism (GRM): In line with ESS10, IFPA-CD GRM was established purposely to facilitate communication between conflicting parties, promoting dialogue, and facilitating

a reasonable agreement between the parties to a grievance. It provides credible and accessible means for Project Affected Persons (PAPs) and other stakeholders to pursue grievances, allowing the project to address genuine issues in a timely manner and to minimise chances of distractions to project implementation. For UWA, Grievance Redress Committees (GRCs) were formed at Conservation Area and Protected Area levels, and the roll out to lower levels is on-going. For NFA, GRCs have been formed at Range level, and roll out to lower levels is on-going. In refugee hosting districts, GRCs run from lower levels up to the national level. Different levels of GRCs have different roles and responsibilities. The GRC processes involves Receiving, Acknowledging and Recording Grievances, Sorting and categorization, Verification and resolution, Giving feedback, Safe handling of grievance records, Anonymous grievances and Right to Appeal.

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ABBREVIATIONS

BINP	Bwindi Impenetrable National Park
CFR	Central Forest Reserve
CSO	Civil Society Organization
DEA	Directorate of Environment Affairs
DFID	Department for International Development (UK)
DLG	District Local Government
DESSS	Directorate of Environmental Sector Support Services
BMCA	Bwindi and Mgahinga Conservation Area
BMCT	Bwindi and Mgahinga Conservation Trust
ECO	Ecological Conservation Organization
ECOTRUST	Environmental Conservation Trust of Uganda
ED	Executive Director
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FFI	Fauna and Flora International
FGRM	Feedback and Grievances Redress Mechanisms
FSSD	Forestry Sector Support Department
GAP	Gender Action Plan
GBVAP	Gender Based Violence Action Plan
GCF	Global Climate Funds
GIZ	German Development Agency
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IFPA-CD	Investing in Forest and Protected Areas for Climate Smart Development Project
IGCP	International Gorilla Conservation Programme
IUCN	International Union for Conservation of Nature and Natural Resources
JGI	Jane Goodall institute
LMP	Labour Management Procedure
MFNP	Murchison Falls National Park
MoFPED	Ministry of Finance, Planning and Economic Development
MoGLSD	Ministry of Gender, Labour and Social Development
MTWA	Ministry of Tourism, Wildlife and Antiquities
MWE	Ministry of Water and Environment
NEMA	National Environment Management Authority
NFA	National Forestry Authority
NGO	Non-Government Organization
NP	National Park
NPA	National Planning Authority
NTC	National Technical Committee
NU	Nature Uganda
OPM	Office of the Prime Minister
PA	Protected Area
PAD	Project Appraisal Document (of IFPA-CD)
PAP	Project Affected People
PCU	Project Coordination Unit
PS	Permanent Secretary
PSC	Project Steering Committee
QENP	Queen Elizabeth National Park
SEP	Stakeholder Engagement Plan
SESA	Strategic Environmental and Social Assessment
SLM	Sustainable Land Management
SNP	Semuliki National Park

SOP	Standard Operating Procedures (for COVID-19)
TSP	Technical Support Services
UN	United Nations
UNHCR	United National High Commission for Refugees
UTA	Uganda Tourism Association
UTGA	Uganda Timber Growers Association
UWA	Uganda Wildlife Authority
VMGF	Vulnerable and Marginalized Groups Framework
VMGP	Vulnerable and Marginalized Groups Plan
VSLA	Village Savings and Loans Associations
WB	World Bank
WCS	Wildlife Conservation Society
WESWG	Water and Environment Sector Working Group
WR	Wildlife Reserve
WWF	Worldwide Fund for Nature

1. INTRODUCTION/PROJECT DESCRIPTION

1.1 Project Design

As part of efforts to conserve and sustain forest cover, the Government of Uganda (GoU) developed the Uganda Investing in Forests and Protected Areas for Climate Smart Development (IFPA-CD) Project that is being financed by the World Bank (WB) and GoU. The Project contributes to the World Bank Group's twin goals of ending extreme poverty and building shared prosperity in a sustainable manner. The Project is also closely aligned with the Uganda Country Partnership Framework (FY16-21) (CPF)¹ and Uganda Vision 2040. The project aims to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. This will be achieved by undertaking integrated interventions by the Ministry of Water and Environment (MWE), Ministry of Tourism, Wildlife and Antiquities (MTWA), Uganda Wildlife Authority (UWA), National Forestry Authority (NFA), targeted District Local Governments (DLG), and contracted Technical Service Providers (TSPs).

The project takes a landscape approach to improve management and economic productivity of forest ecosystems in the targeted landscapes. The project combines investments in forest management in state- and community-managed lands and focuses on improving the management of forests and increasing revenues for sustaining forests and supporting resilient livelihoods.

The Project area targets some of the poorest districts in Uganda, which are also some of those most affected by the refugee influx. Specifically, the Project concept is aligned to support raising incomes in rural areas and seeks to strengthen natural resources management and build resilience, with particular attention to growing incomes of women.

Outcomes: The expected project outcomes are:

- a. Increased provision of ecosystem goods and services through more sustainably managed forests and protected areas and enhancement of forest stocks.
- b. Increased revenue generation and other benefits from forests and protected areas for communities, government agencies and private sector in the Albertine Rift and West Nile Region.

The project is structured in four main components and eight subcomponents, see Table 1 below.

Table 1. Project Components and Subcomponents

Component	Sub-component
Component 1. Improved management of forest protected areas	1.1. Improvement of infrastructure and equipment for the management of forest protected areas
	1.2. Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas
	1.3. Restoration of degraded natural forests and habitats in Wildlife and Forest Protected Areas
	1.4. Increased forest protection in CFRs and WRs in close proximity to refugee settlements
Component 2. Increased Revenues and Jobs from Forests and Wildlife Protected Areas	2.1. Investments in tourism
	2.2. Investments in productive forestry

¹ World Bank (2016). *Country Partnership Framework for the Republic of Uganda for the Period FY16-2, extended*.

Component 3. Improved landscape management	3.1. Increased trees cover on community and private land
	3.2. Supporting farm forestry for refugee fuel supply
Component 4. Project management and monitoring	

1.2 Description of Additional Financing

AF is under Uganda Multi Donor Trust Fund (MDTF) in the amount of approximately US\$27 million.

1.3 Proposed Changes

The proposed changes with the AF entail scaling up of activities and expanding the coverage of interventions within the original project landscape. Proposed activities under the AF are well aligned with the original Project Development Objective (PDO), therefore the PDO will remain unchanged.

The content of the components (Section 2.4) of the parent project are adjusted to reflect the expanded scope and new activities proposed under the AF. The proposed changes are to increase the overall cost of the Project to US\$203.9 million (consisting of US\$178.2 million (US\$148.2 million from the World Bank and US\$30 million from the Government of Uganda) in the parent project plus US\$27 million AF).

In addition to AF, the project has restructured and included new wildlife and forest protected areas as well as 9 plantation CFRs. These include Karuma Wildlife Reserve, 9 Plantation Central Forest Reserves under NFA have been added to the target for plantation establishment (Nyakunyu, Kagorra, Oruha, Kikumiro, Kyehara, Lendu, Mafuga, Okarevu and Usi forest reserves. Natural forests (5) added include: Ozubu 681 ha, Kijuna 1225 Ha, Kanaga 650 ha, Nyabiku 355 ha, Ruzaire 1,160 ha

1.4 Proposed AF activities by components

Sub-component 1.1: Improvement of infrastructure and equipment for the management of forest protected areas.

The AF will expand support for enhanced biodiversity monitoring. This includes expansion of Uganda's National Forest Monitoring System (NFMS) to include biodiversity inventories in key landscapes (e.g., QENP, Budongo CFR), rollout of the Earth Ranger² system in select PAs (Toro-Semliki WR, Kibale NP, Katonga WR, Bwindi Impenetrable NP, and Mgahinga Gorilla NP), and procurement of monitoring tools, vehicles, and IT infrastructure. The project will support comprehensive biodiversity stocktaking in key PAs: UWA will undertake a full biodiversity inventory in the QENP landscape (including assessment of opportunities and threats to biodiversity in PAs) covering QE NP, Kyambura WR, Kasyoha-Kitoma CFR, Kalinzu CFR, Kigezi WR, South Maramagambo CFR, and North Maramagambo CFR, and NFA will undertake full biodiversity updates (and regular monitoring in years 2 and 3) in Budongo, Wambabya, Kitechura, Ibambaro, Muhangi, Kagombe, Itwara, Kibego, and

² <https://www.earthranger.com/>.

Echuya CFRs. Coordination with partners such as Makerere University, IUCN, and the Wildlife Conservation Society will ensure data integration and sustainability.

1. *The AF will also finance construction* (as well as design, supervision of works, and environmental and social [E&S] due diligence) of offices and housing infrastructure for NFA staff in select CFRs (Budongo [2 units], Kalinzu [1 unit], Lendu [1 unit], Mafuga [1 unit], Oruha [1 unit]); the provision of mobility (vehicles); and construction of additional junior staff housing for UWA staff in MGNP (Garamba outpost) and Toro Semliki WR (5 units), as well as flush toilets at selected sites. The offices will use climate-smart/climate-adjusted designs, with water harvesting facilities and with solar panels as the main power source.

Subcomponent 1.2: Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas

With the AF, activities will be expanded to deepen engagement with CFM and CRM groups. Planned activities include roll-out of updated CFM guidelines, new community awareness campaigns, and additional support to income-generating activities such as soap making, briquetting, and beekeeping. VMGPs will be updated and implemented in Echuya CFR, Bwindi NP, MGNP, and Semuliki NP.

Sub-component 1.3: Restoration of degraded natural forests and habitats in forest reserves

Additions to the removal of invasives will be primarily financed under the AF. The subcomponent also finances the removal of invasive vegetation over 10,200 ha—3,000 ha in CFRs (Budongo, Matiri, Kalinzu, and North and South Maramagambo) and 7,200 ha in NPs and WRs (Bwindi Impenetrable NP, Kibale NP, Murchison Falls NP, MGNP, Semuliki NP, Queen Elizabeth NP, and Toro Semliki WR).

Subcomponent 2.1: Investments in tourism

The AF will support the following activities:

- (a) *Under NFA*: construction of tourism infrastructure (including a visitor information center [including equipment] and other related site infrastructure, as designed, as well as basic internet connectivity and materials and equipment for the center) in Echuya CFR. The AF will also support upgrade of the existing community ecotourism site, development of a picnic site, a craft shop for the community group, and improvements to their office. The AF will also support a capacity assessment for NFA tourism staff and training on tourism development.
- (b) *Under UWA*, the AF will support development of a ‘Strategic Sustainable Nature-Based Tourism (NBT) Development Plan’, guiding long-term product development, governance, and destination competitiveness aligned with biodiversity conservation. This plan will build upon Uganda’s new Tourism Policy and target niche biodiversity tourism markets. Additional support includes furnishing and equipping five new visitor information centers (originally planned to be financed under IDA) and the procurement of a grader and safari vehicle to improve road accessibility and tourism experience in QENP.

Subcomponent 2.2: Investments in productive forestry

The AF will support the following activities:

- (a) *Capacity building support to the Uganda Timber Growers Association (UTGA)*. UTGA is an independent private sector, member-driven association of commercial tree growers,

including associated tree nursery operators and forestry contractors. Delivered via NFA, funding support will include investments in governance, marketing, business planning, and industry development as outlined in UTGA's Business Plan (2022–2027). Specific investments will include technical assistance, provision of equipment and temporary staff for the UTGA timber yard, exposure visits for UTGA members, and support to cluster engagements with the members. The AF will also support Forest Stewardship Council certification expansion and chain of custody systems, including audit-related activities.

- (b) *Support to NFA for establishment of timber plantations* within Kagorra, Oruha, Kikumiro, Kyehara, Mafuga, Lendu, Nyakunyu, Okavureru, and Usi CFRs with a total target area of 2,000 ha; maintenance support will be also provided to 3,500 ha of existing NFA plantations.
- (c) *Matching industry grants for processing and value chain activities.* The recipients of the grants will be determined through call for proposals, with an intention to provide approximately 12 matching grants. These will be competitively awarded based on criteria such as innovation, employment creation, and climate benefits. Eligible investments may include sawmill upgrades, drying kilns, engineered wood technologies, or efficient residue utilization. A TSP will manage the grant facility, while MWE will oversee disbursements. This activity will have a broader geographic scope, also encompassing additional districts or other administrative areas where specifically stated: Buikwe, Ibanda, Isingiro, Jinja district and Jinja Municipality (including Jinja City), Kalungu, Kampala City, Kasanda, Kayunga, Kazo, Kiboga, Kiruhura, Kyankwanzi, Luwero, Masaka, Mayuge, Mbarara, Mityana, Mpigi, Mubende, Mukono, Nakaseke, Nakasongola, Ntungamo, Rwampara, Sheema, and Wakiso.
- (d) *Support to Nyabyeya Forestry College* to strengthen vocational and technical training in commercial forestry and wood processing, through investments in processing equipment that can be used for practical training that meets the industry standards and related training. The beneficiaries of this training will include contractors and the workforce in the industry. The outcome expected from this investment is a more knowledgeable and skilled workforce capable of delivering high-quality products that meet the demands of clients.

2. THE STAKEHOLDER ENGAGEMENT PLAN

During the preparation of the IFPA-CD project, a Stakeholder Engagement Framework was designed as one of the instruments to guide stakeholder identification, analysis and engagement. It was duly disclosed in 2020. A more detailed Stakeholder Engagement Plan (SEP) was prepared at the start of project implementation to guide stakeholder engagement; it was disclosed as a draft.

As part of preparation of the AF, the SEP is being updated to meet the World Bank's ESS10 requirements and is being disclosed as part of the AF appraisal process. The SEP describes the commitments and process for stakeholder engagement during the remaining period of IFPA-CD implementation (2024-2028). It describes the stakeholder identification and prioritization, engagement approaches and strategies for the national, regional and local stakeholders during the entire project cycle. This SEP is, therefore, an instrument for mapping and prioritizing stakeholders across levels and regions; for guiding planned consultations and disclosure of relevant project information to/with identified stakeholders.

Planned consultations are useful in creating awareness of the project's potential impacts and mitigation measures; enabling the stakeholders to be consulted from an informed position about the project; and providing a mechanism for receiving feedback and its consideration in relevant project designs, plans and activities, including options and alternatives.

Following the GoU and World Bank focus on enhancement of inclusion and non-discrimination measures in all projects in 2023, the preparation of this document and its annexes include specific measures to mitigate the social risks associated with discrimination against or exclusion of any affected individuals and groups from accessing project benefits and opportunities in World Bank—financed projects and program in Uganda. These measures are described in various sections of this document including Annexes 3, 4 and 5.

2.1. Purpose of Stakeholder Engagement

The purpose of stakeholder engagement is to ensure that stakeholders are effectively engaged in project actions with the view to understand and own the IFPA-CD project. Overall, stakeholder engagement is intended to be all-inclusive devoid of manipulation, interference, coercion, and intimidation, discrimination, and conducted on the basis of timely, relevant, understandable and accessible information. It involves providing information and opportunity to contribute towards decisions that influence the implementation of IFPA-CD project interventions as well as to provide opportunities for all stakeholders to raise their concerns and opinions as appropriate.

2.2. Objectives of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for an inclusive stakeholder engagement, including public information disclosure and consultation, throughout the entire project implementation cycle. The SEP outlines the ways in which IFPA-CD project implementation teams communicate with stakeholders and includes a mechanism by which people can raise concerns or make complaints about IFPA-CD project and any activities related to the project and receive feedback on issues raised. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between staff of the implementing agencies and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

The specific objectives of the SEP are to:

- a. Provide guidance for stakeholder engagement such that the project meets the standards of International Best Practice.
- b. Identify key stakeholders that are affected, interested and/or able to influence the Project and its activities.
- c. Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation.

- d. Provide an inclusive stakeholders' engagement process that provides stakeholders with an opportunity to influence project planning and implementation.
- e. Establish formal inclusive and non-discriminatory grievance/resolution mechanisms ensuring access to vulnerable or marginalized individuals and groups.
- f. Define roles and responsibilities for the implementation of the SEP.
- g. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

2.3. General Principles of Stakeholder Engagement Under the Project

- The project utilizes various methods of engagement as part of its continuous interaction with the stakeholders aiming at ensuring an effective and meaningful engagement.
- Some of the methods are tailored to the targeted stakeholders. For example, techniques used for consulting with statutory officials are different from those of liaising with the local communities with a lesser emphasis on technical aspects. Application of tailored techniques, which ensures maximum participation of the vulnerable or marginalized individuals and groups in project consultations.
- The technique of every consultative activity strives to meet general requirements on accessibility, i.e. conducting consultations at venues or e-platforms that are easily reachable and do not impose restrictions of access or cultural inappropriateness (i.e. with due respect to the local customs and norms) and exclusions.

Ensure provision of logistical assistance to stakeholders to enable them to participate in project activities and consultative meetings, most especially the vulnerable or marginalised stakeholders.

Since the status of vulnerable or marginalized individuals and groups may lead to people's diffidence and reluctance or physical incapacity to participate in large-scale community meetings, holding separate/dedicated small group discussions with them at an easily accessible venue is one of the ways for the project to reach out to the such groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings.

3. LOCATION OF THE PROJECT AREA

The Project's geographical focus is on selected priority areas in western and north-western Uganda. The Project area includes the Albert Water Management Zone (AWMZ) and West Nile part (plus Lamwo district) of Upper Nile Water Management Zone.

The Albert Nile WMZ is largely comprised of the Lake Albert catchment area, which is shared between Uganda and the DRC, is located at the northern tip of the western rift valley. On the Ugandan side, it is stretching from the slopes of the Rwenzori Mountains in the Southwest, through the escarpment of Albertine Rift Valley down to the Victoria Nile delta in the North-eastern end of the lake. The spatial extent of this catchment is a total area of 18,037 km². Lake Albert covers an area of 5,270 km² of which 2,850 km² (54%) is on the Ugandan side. At an altitude of 615 m, it lies between two parallel escarpments, that on the western side rising abruptly to nearly 2,000 m above the water surface. Like most large rift valley lakes, the lake is ribbon shaped lying in the northeast southwest direction and runs approximately 160km in length and is 35km at its widest point. The lake is relatively shallow with an average depth of 25m and maximum depth of 58m and has a total volume of about 280 km³. The implementation of the Project within this WMZ targets the Districts of Hoima, Kamwenge, Kibaale, Kiryandongo, Kikuube, Kakumiro, Kagadi Kyegegwa which form part of the Albert Water Management Zone (AWMZ) and target Protected Areas and Central Forest Reserves.

The upper Nile region surrounding Lake Victoria is one of the most densely populated of Africa with up to 1200 persons' km. Population growth rates are among the highest in the world. In 1985, 32% of the Ugandan portion of the catchment was occupied by agriculture and, with population having doubled in the interim, deforestation and excessive cultivation with little input use have been the predominant land use trends. In West Nile, which is part of the Upper Nile WMZ, the Project will be implemented in the Districts of Adjumani, Madi Okollo, Terego, Obongi, Arua, Amuru, Koboko Moyo, Yumbe, Lamwo and Nwoya. The Project also targets Wildlife Protected Areas, plantation, Central Forests and Central Forest Reserves as listed in Table 2 and Table 3 below.

Refugee hosting districts supported through the project have been selected, because they are situated within project target landscapes of Albertine and West Nile regions, they host refugee communities or are within a 5 km radius of the refugee settlements. In order to ensure appropriate coverage and landscape contiguity, the project is working in clusters of districts based on the boundaries set as of July 1, 2010. This allows the project benefit from the technical capacity of local government staff in the original districts, while securing continuity in cases of creation of new districts.

Table 2. Wildlife Protected Areas under the Project

S/No	Name of Park/Wildlife Reserve	Size (Ha)
1	Bwindi Impenetrable National Park	32,100
2	Mgahinga Gorilla National Park	3,370
3	Kibale National Park	79,500
4	Semuliki National Park	22,000

5	Queen Elizabeth National Park	197,800
6	Murchison Falls National Park	384,000
7	Rwenzori Mountains National Park	99,600
8	Toro-Semliki Wildlife Reserve	54,300
9	Kabwoya Wildlife Reserve	22,532
10	Katonga Wildlife Reserve	21,000
11	Karuma Wildlife Reserve	67,500

Table 3. Central Forest Reserves under the Project

	Name of CFR (Managed by NFA)	
1.	Budongo	New: Kagorra
2.	Bugoma (in refugee hosting areas)	New: Kikumiro
3.	Buhungiro	New: Kyebara
4.	Echuya	New: Lendu
5.	Era (in refugee hosting areas)	New: Mafuga
6.	Ibambaro	New: Nyakunyu
7.	Ihimbo	New: Okavureru
8.	Itwara	New: Oruha
9.	Kagombe (in refugee hosting areas)	New: Usi
10.	Kakasi	New: Kanaga (in refugee hosting areas)
11.	Kalinzu	New: Kijuna (in refugee hosting areas)
12.	Kasokwa	New: Nyabiku (in refugee hosting areas)
13.	Kasyoha-Kitomi	New: Ozubu (in refugee hosting areas)
14.	Kibego	New: Ruzaire (in refugee hosting areas)
15.	Kitechura	
16.	Matiri	
17.	Mt Kei (in refugee hosting areas)	
18.	Muhangi	
19.	Nkera	
20.	North Maramagambo	
21.	South Maramagambo	

22.	Nyakarongo (in refugee hosting areas)	
23.	Otzi (East) (in refugee hosting areas)	
24.	Otzi (West) (in refugee hosting areas)	
25.	Rwensambya (in refugee hosting areas)	
26.	Wambabya (in refugee hosting areas)	
27.	Wati (in refugee hosting areas)	

Table 4. Project Districts with Activities outside Protected Areas (under Component 3)

Districts as of July 1, 2010	Districts as of September 1, 2023
<i>Albert Water Management Zone</i>	
1. Hoima	1. Hoima
	2. Kikuube
2. Kamwenge	3. Kamwenge
	4. Kitagwenda
3. Kibaale	5. Kakumiro
	6. Kagadi
	7. Kibaale
4. Kiryandongo	8. Kiryandongo
5. Kyegegwa	9. Kyegegwa
<i>West Nile / Upper Nile Water Management Zone</i>	
6. Adjumani	10. Adjumani
7. Amuru	11. Amuru
8. Arua	12. Madi Okollo
	13. Terego
9. Koboko	14. Koboko
10. Lamwo	15. Lamwo
11. Moyo	16. Moyo
	17. Obongi
12. Yumbe	18. Yumbe
13. Nwoya	19. Nwoya

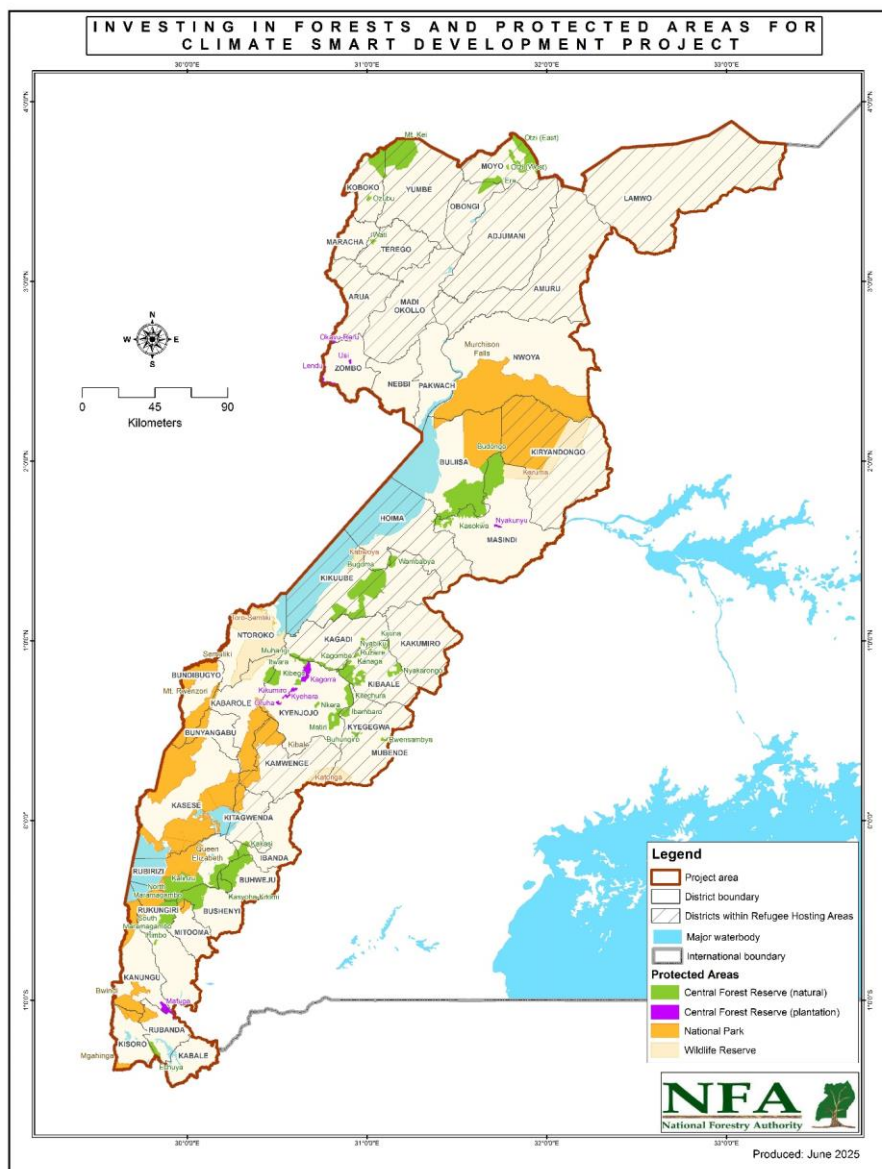


Figure 1: Project Location Map

Table 5. Project Districts Adjacent to Wildlife Protected Areas Supported Under the Project

S/No	Protected Area	Adjacent Districts
1.	Toro-Semliki Wildlife Reserve	Ntoroko
		Kabarole
2.	QENP	Rubirizi
		Mitooma
		Rukungiri
		Ibanda
		Kanungu
		Kasese
		Kamwenge
		Kitagwenda
3.	Semuliki NP	Bundibugyo
		Ntoroko
4.	Kibale NP	Kyenjojo
		Bunyangabu
		Kamwenge
		Kasese
		Kabarole
5.	Mgahinga Gorilla National Park	Kisoro
6.	Katonga Wildlife Reserve	Kyegegwa
		Kamwenge
		Kazo
7.	Murchison Falls National Park	Buliisa
		Masindi
		Pakwach
		Nwoya
		Oyam
		Kiryadongo
		Hoima
		Kikuube
		Obongi
		Adjumani
		Moyo
8.	Rwenzori Mountains National Park	Bundibugyo
		Kasese
		Ntoroko
		Bunyangabu
9.	Kabwoya Wildlife Reserve	Hoima
		Kibuube
10.	Bwindi Impenetrable National Park	Kanungu
		Rubanda

Table 6. Project Districts Adjacent to Central Forest Reserves Supported with Core Interventions under the Project

S/No	Management Area	Central Forest Reserve	Surrounding Districts
1	Budongo System	Budongo CFR	Buliisa
			Hoima
			Masindi

		Kagombe CFR	Hoima
			Kikuube
			Kagadi
			Kibaale
		Kasokwa CFR	Kyenjojo
			Masindi
			Kibaale
			Masindi
2	Mafuga Plantations	Echuya CFR	Hoima
			Kikuube
3	Muzizi River	Buhungiro CFR	Kisoro
			Rubanda
		Ibambaro CFR	Kyegegwa
			Kyegegwa
		Itwara CFR	Kyenjojo
			Kabarole
		Kibego CFR	Kyenjojo
			Kyenjojo
		Kitechura CFR	Kyegegwa
			Kyenjojo
		Matiri CFR	Kyenjojo
			Kyenjojo
4	Southwestern	Muhangi CFR	Kirongo
		Nkera CFR	Kyenjojo
			Kyegegwa
		Rwensambya CFR	Rukungiri
			Kitagwenda
		Kakasi CFR	Bushenyi
			Rubirizi
		Kalinzu CFR	Mitooma
			Buhweju
			Rubirizi
			Bushenyi
		Ibanda	Kitagwenda
			Bushenyi
		Mitooma	Rubirizi
			Mitooma
		Rukungiri	Bushenyi
			Mitooma
5	West Nile	Era CFR	Moyo
			Koboko
		Mt. Kei CFR	Yumbe
		Otzi (East) CFR	Moyo
		Wati CFR	Arua

4. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement activities started as part of the REDD+ Readiness activities and the preparation of the Forest Investment Plan, which laid the foundation for the IFPA-CD project. The following consultations were carried out:

Table 7. Consultations under REDD+ Process

S/No	Dates	Stakeholders Met	Purpose of Consultations
1	February 2017	Implementing Partners and local communities	To agree on FIP Priorities and Projects
2	14 th February 2017	Forest dependent communities - the Basua and Bambuti Communities	To provide updates and seek their views for project design
3	16 th February 2017	Forest dependent communities- the Batwa communities around Bwindi, Mgahinga National parks and Echuya Forest Reserve	To provide updates and seek their views for the design of REDD+ project
4	14 th -16 th February 2017	Project stakeholders from Masindi, Hoima, Kibaale, Buliisa, Kabarole, Kyenjojo, Kamwenge, Kyegegwa, Kasese, Bundibugyo, Ntoroko, Mubende	To provide updates and seek their views for project design
5	14 th March 2017	National representatives from the Albertine Region	To provide updates and seek their views on FGRM
6	10 th April 2017	National representatives from the Albertine Region	To deliberate on the Smart Energy Solutions for Africa (Strategic Environmental and Social Assessment)
7	17 th – 18 th May 2017	52 Participants from Government MDAs, CSOs MPs, LG Officials.	Second Consultative Workshop on the REDD+ Strategy for Uganda
8	2013-2018	Consultations/engagement at national, district and community levels, including engagements with the Forest dependent (VMGs) the Batwa community in the Albertine Rift.	REDD+ Stakeholder engagement processes that led to the preparation of Uganda's REDD+ Strategy and Action Plan (2017) and Forest Investment Plan (2017).
9	1 st March 2018	Water and Environment Sector working Group (WESWG)	The meeting of WESWG endorsed the original concept note and recommended its approval by Ministry of Finance, Planning and Economic Development (MoFPED) and onward submission to Green Climate Fund (GCF) and World Bank for funding consideration
10	March and May 2018	Local Government officials. Field Staff of NFA, UWA, DWRM. CSO/NGOs, Media and Private Sector representatives	To discuss project implementation challenges of REDD+ project and devise solutions
11	30 th August 2018	Joint meeting of the Water and Environment Working Group and Tourism Working Group	To harmonize the priorities for the IFPA-CD Project and recommended further IFPA-CD project development as a joint IFPA-CD

			project for MWE and Ministry of Tourism, Wildlife and Antiquities (MTWA).
12	2 -17 th February 2019	project stakeholders from Bushenyi , Ibanda, Mbarara, Ntungamo, Lyantonde, Kiruhura, Isingiro, Buhweju, Rubirizi, Ruhinda, Sheema, Kabale, Kisoro, Kanungu, Rukungiri	To provide updates and seek their views for project design
13	2 nd March 2019	Leaders of all Batwa communities	Consultations on REDD+ Strategy options held on at Nkuringo Cultural Centre, Kisoro
14	July 2019	The REDD+ Secretariat, in Southwestern Uganda (In Rubanda and Kisoro District), Bundibugyo, Kween and Moroto District.	Landscape consultation and participation platforms. Community consultative meetings for Implementing Partners to discuss strategies to enhance participation of Vulnerable and Marginalised Groups (VMG)
15	2 nd December 2019.	Members of Parliament of Uganda	Consultations meeting on REDD+ with Members of Parliament of Uganda
16	June 2019- January 2020	Stakeholders at national levels, selected districts and communities	IFPA-CD project formulation Missions

Building on the above engagements, IFPA-CD project was designed, and the following engagements were conducted to inform actual project identification and preparation. Consultations with the Vulnerable and Marginalised Groups (VMGs) (the Batwa) were carried out under the guidance of the Vulnerable and Marginalised Group Framework (VMGF) and subsequently four Vulnerable and Marginalised Group Plans (VMGPs) were developed.

Table 8. Consultations for the Design of IFPA-CD Project

S/No	Dates	Stakeholders Met	Purpose of Consultations
1	30 th August 2018	Water and Environment Sector Working Group and Tourism Sector Working Group.	Joint Sector Working Group meeting held
2		Joint Water and Environment Sector Technical Team meeting	Successive Joint Water and Environment Sector Technical Reviews and Joint Water and Environment Sector Review meetings during 2018 and 2019.
3	2 March 2019	Communities of Nyabaremure and Batwa	To agree on plans to enhance participation of Marginalised groups
4	June 2019	Engagements in the project landscape during Project Formulation Mission	To get inputs and views of stakeholders for in cooperation in the project design
5	12-17 June 2019	Local Government Officials, UWA, NFA, WMZO Officials and Refugee Camps Commandants	To provide updates and seek their views for project design
6	September 2019	Stakeholder engagements during Project Formulation Mission	To get inputs and views of stakeholders for in cooperation in the project design

7	January 2020	Stakeholder engagements during Project Formulation Mission	To get inputs and views of stakeholders for in cooperation in the project design
8	March 2020	Consultations with UNHCR and Office of the Prime Minister	To get views from refugees' agencies for the design of IFPA-CD activities in the refugee hosting districts
9	March 2020	Members of Parliament	Members of Parliament Visit to Project area in early
10	March 2020	Members of Parliament	Stakeholder engagement during Project negotiations
11	June 2021	The Bwindi Batwa Development Association (BBDA) and community members	To seek their views in the design of the VGMP for Bwindi
12	June 2022	The Batwa community living in the Southern sector of Bwindi Impenetrable Forest National Park ³	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa.
13	June 2022	The Batwa community living adjacent to the Northern Sector of Bwindi Impenetrable National Park	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa.
14	June 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Southern and Northern sector of Bwindi Impenetrable Forest National Park ⁴	To seek their views regarding key issues to be considered in project design to address the concerns of the Batwa community
15	September 2022	Special consultation with the Batwa around Echuya CFM was carried out	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa community in Echuya CFR
16	September 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Echuya CFR	To seek their views regarding key issues to be considered in project design to address the concerns of the Batwa community within Echuya CFR
17	September 2022	Special consultation with the Batwa around Mgahinga Gorilla National Park (MGNP) was carried out	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and

³ A total of 3 meetings with the Batwa were organized in the Southern Sector of Bwindi alone.

⁴ A total of 3 meetings were organized in the Southern Sector of Bwindi alone.

			minimize any unfavourable outcomes for the Batwa community in Mgahinga Gorilla National Park (MGNP)
18	September 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Mgahinga Gorilla National Park (MGNP)	To seek their views regarding key issues to be considered in project design to address the concerns of the Batwa community within Mgahinga Gorilla National Park (MGNP)
19	October 2022	Special consultation with the Batwa around SNP was carried out	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa community in Semuliki National Park
20	October 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Semuliki National Park	To seek their views in regard to key issues to be considered in project design to address the concerns of the Batwa community within Semuliki National Park

During the above engagements, the focus was on the following aspects:

Information Category	Mode of disclosure	Reference
Project rationale, intervention logic, project investment and budgets, project area/sites, implementation arrangements, fiducial arrangement, procurement plan and procedures, monitoring and evaluation mechanisms, safeguards	<ul style="list-style-type: none"> Meetings and Focused Group discussions Publication and dissemination of project brochure and briefs Electronic PDF documents on MWE websites Field consultations with stakeholders and Vulnerable and Marginalized groups (Batwa) Print and audio media 	<ul style="list-style-type: none"> Project Appraisal Document Project Procurement Strategy for Development Project Implementation Manual
Environmental and Social Risks Safeguards	<ul style="list-style-type: none"> Meetings and Focused Group Discussions Electronic PDF documents on MWE websites Consultations with Vulnerable and Marginalized Group 	<ul style="list-style-type: none"> Environmental and Social Management Framework (ESMF) Environmental and Social Commitment Plan (ESCP) Gender Action Plan (GAP) Labour Management Plan (LMP) Grievances Redress Mechanism (GRM) Vulnerable and Marginalized Groups Framework (VMGF), Vulnerable and Marginalized Group Plans (VMGPs).
Stakeholder Engagement Framework	<ul style="list-style-type: none"> Meetings and Focused Group Discussions Electronic PDF documents on MWE websites 	<ul style="list-style-type: none"> SEP

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Stakeholder analysis criteria

Stakeholder engagement process for the IFPA-CD starts with identification, mapping and analysis of project stakeholders and this plan serves to clarify the stakeholder identification procedure at national and project area level during project implementation. This guides MWE and Implementing Agencies, Local Governments and TSPs to comply with national and World Bank requirements for effective stakeholder engagements.

The following criteria are used to identify stakeholders under IFPA-CD project:

- **Liability:** being community or social group, especially, those with acknowledged interaction with the targeted PAs to whom project implementation or whose livelihoods and socio-economic aspirations are likely to be negatively affected by project investments directly or indirectly (e.g., Vulnerable and Marginalized Groups (Batwa) and communities adjacent to targeted protected areas).
- **Influence:** being institutions or community or other social and economic groups that may be able to substantially influence project implementation and operations. This covers institutions with mandates over project supported components (forestry, wildlife, environment, wetlands, water, agriculture, land, biomass energy, tourism, climate, refugees, training in wood value chains, etc.), District Local Governments and institutions who take decisions on project financing (MoFPED, National Planning Authority (NPA), Parliament).
- **Partnership:** being opportunities for building partnership relations between the project implementers (MWE NFA, UWA, and Local Governments) and a given institution, community group or individual households in the framework of the project implementation operations. This covers institutions with interest to complement project activities for impact creation or to advance their investments and benefits through partnerships or collaboration with project (e.g., private sector players in nature based tourism, forestry/wood value chains, commercial forestry; NGOs/CSOs active in environment/natural resources/wildlife conservation and management, land use/land management, agriculture, commercial private tree farming and conservation financing institutions), among others.
- **Dependency:** being social or community groups, businesses or individuals whose economic or livelihoods interests will be dependent on the project operations (e.g. project contractors/employees and their dependents, Local suppliers).
- **Representation and inclusion:** being individuals or institutions with legitimate right to represent Vulnerable and Marginalized Groups (VMGs) (the Batwa) or other vulnerable groups (e.g., Women, Youth/Elderly/Disabled, etc.).
- **Expressed interest:** being institutions or social group or individuals not necessarily directly affected by the planned or current activities but have expressed interest to the project (e.g., Media, Civic institutions, etc.).

5.2 Mapping Stakeholders

Broadly, IFPA-CD Project stakeholders are ‘people or institutions who have a role in the Project or could be positively or negatively affected by the Project, or who are interested in the Project’. Engagements with all identified stakeholders ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and enables the project to draw on their local knowledge and experience, pre-existing expertise, mandates, ongoing programmes and initiatives, political and social leverage, networks and agendas. IFPA-CD Project stakeholders are grouped into:

Primary stakeholders are individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly, including those who are directly affected or are disadvantaged or vulnerable. These include the CFM /CRM /ecotourism groups, Batwa community,

Refugees, communities, bordering the targeted PAs and landowners in the project area. Amongst these stakeholders may include the vulnerable or marginalized individuals and groups, which may be based on age, gender, status, education level, sex, culture, literacy, sickness, physical or mental disability, etc, who in further assessment may be identified, consultations conducted, risks assessed, and mitigation measure proposed. The identified likely impacts and commitment to address these impacts have been incorporated in the Environmental and Social Commitment Plan (ESCP).

Table 9. Consultations with Primary Stakeholders

Institution	Interest/T argeted inputs	Target	Location	Venue	Timing
Communities around PAs where Electric Fencing are being installed + vulnerable groups in communities around the targeted protected areas affected by Problem Animals	Access to resources within PA	Local Communities around QENP and MFNP	QENP - UWA, District	Kyambura	ongoing
	Safety of people and livestock		MFNP - UWA District	Purongo	ongoing
Special interest Groups (Forest resource use Groups)	Access to resources within PA	Collaborative Forest Management/Collaborative Resources Management Groups	CFM - Echuya (NFA, NU)	Echuya NFA Grounds	ongoing
			CRM - Kasyoha Kitomi (NFA, NU)	NFA Offices	ongoing
			CRM - Budongo (NFA)	NFA Offices	ongoing
			CRM Kibale	Mainaro	ongoing
	Ecotourism	Community Ecotourism Groups (Forest)	BINP	Buhoma	ongoing
		Community Ecotourism Groups (Forests)	SNP	Ntandi	ongoing
		Community Ecotourism Groups (Savannah)	MFNP /QENP	Ranger Posts	ongoing

Secondary stakeholders may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them or influence project decisions and operations. These include government institutions with mandate over environment management, social development, tourism, labour, agriculture, etc, non-government agencies and organizations, Conservation Trust Funds, UN Humanitarian agencies, Private sector in wood value chains and tourism (beyond direct project beneficiaries), project contractors and employees, NGOs/CSOs active in the project area, Public and Civic institutions (schools, churches, Universities, etc.), and Cultural institutions among others.

- a. For each location and activity, the specific interested parties are identified and engaged as appropriate.
- a. Civil society groups and NGOs at national and local levels that pursue environmental and socio-economic interests and may become partners of the project are likely to be located outside the project's direct area of influence.
- b. Business owners and providers of services, goods and materials within the project area are involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future.
- c. Government entities – government officials, permitting and regulatory agencies at the national and local levels, including environmental, technical, social protection and labour authorities.
- d. Mass media and associated interest groups, including local and national printed and broadcasting media, digital/web-based entities, and their associations.
- e. Project employees.

Note:

- ✓ The project verifies stakeholder representatives to confirm that they are legitimate and genuine.
- ✓ For each IFPA-CD Project site and activity, stakeholders are further analysed using the criteria to specify those stakeholders falling under each category and devising appropriate mechanism for their engagement. However, for the Vulnerable and Marginalized Group (Batwa), additional measures have been described in the VMGF and VMGPs.

Vulnerable Individuals and Groups. By the virtue of the location of the project, there is potential of affecting the VMGs (the Batwa as mentioned above). However, in addition to the VMGs, there is potential exclusion from and discrimination against other categories of vulnerable or marginalized individuals and groups from project benefits and opportunities. The vulnerable status may stem from an individual's or group's national, ethnic or social origin, colour, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, dependence on unique natural resources, etc. Under the IFPA-CD project, vulnerable groups include the rural women, child-headed households, youths, and orphans, persons with disabilities, the elderly, and hard to reach community members, the sick. Further identification of potential vulnerable or marginalized individuals or groups may be done during project implementation.

Project design and all interventions are tailored to meet their interests and efforts are being made to ensure that they participate in all project related activities, without exclusion and discrimination. Their concerns and priorities inform project design. Their contributions as stakeholders enables the project to draw on their local knowledge and experience, pre-existing expertise, mandates, ongoing programmes and initiatives, political and social leverage, networks and agendas for successful project implementation.

5.3. Engagement with Vulnerable and Marginalised Groups

In Uganda (and in the context of the IPFA-CD Project) the Vulnerable and Marginalised Group (VMG) is the term applied to groups meeting the requirement of ESS7, which is the Batwa ethnic group present in the project area, because they represent a specific sub-category within the broader vulnerable group category. They are a distinct social and cultural group, have identities and aspirations that are distinct from mainstream vulnerable groups within the project location, often disadvantaged and are the most economically marginalized and vulnerable segments of the vulnerable population adjacent to the target protected areas of Echuya CFR, Mgahinga, Bwindi Impenetrable and Semuliki National Parks. For this reason, several NGOs and other non-state institutions have focused on uplifting the quality of life/livelihoods of the Batwa, and IFPA-CD Project intends to build on the above efforts to engage the Batwa community in the design, planning and implementation of the project to enhance project benefits to them. The project recognizes that previous or ongoing Batwa engagements in these programmes have faced challenges of:

- a. Social discrimination of Batwa by hosting communities;

- b. Language barriers and low levels of literacy that hinders their participation in development and planning processes.
- c. Cultural attachment to the forests and deep-rooted cultural values and practices that undermine their adoption of new technologies and livelihood options; and
- d. None or low representation in political or natural resources governance processes.

Despite the above, the project design/formulation process engaged Batwa in the design of the Environment and Social Management Framework (ESMF), development of the Process Framework (PF) and the development of the Vulnerable and Marginalised Group Framework (VMGF) and subsequent Plans (VGMPs). Prior to the IFPA-CD design, Batwa were engaged through an elaborate consultations process on REDD+ Strategy priorities, Strategic Environmental and Social Assessment (SESA) for REDD+, Feedback and Grievances Redress Mechanism (FGRM) and Benefit Sharing Arrangements for REDD+. During 2018/2019, the Batwa were targeted for capacity building preparing them for their engagement under REDD+, and presently, the IFPA-CD project. An assessment of the needs of the Batwa to effectively participate in project reveals additional challenges in form of communication and access to information.

A summary of the VMGF was prepared as part of project preparation and translated in four local languages used by the Batwa: Kufumbira, Kiswahili, Lwamba, and Runyankole.

Table 10. Batwa Communication and Information Access Needs

Group Location	Key characteristics	Language needs	Preferred notification means	Specific needs (accessibility, large print, time to engage, etc.)
Echuya CFR	<ul style="list-style-type: none"> Small family groups living is clustered settlements Migratory families to other /from other communities around Echuya, Bwindi and Mgahinga 	Translation into Kifumbira/ Kinyarwanda /Rukiga	Oral Posters Translator (trusted /familiar people)	Meeting = morning hours Dedicated Batwa forum/meeting (with no participation of non-Batwa) Focused Group Discussion Meals/refreshments
Mgahinga NP	<ul style="list-style-type: none"> Small families living in clustered community settlements Households settled on land donated by NGOs Migratory families to other /from other communities around Echuya, Bwindi and Mgahinga 	Kifumbira/ Kinyarwanda		
Bwindi NP	<ul style="list-style-type: none"> Small families living in clustered community settlements Households settled on land donated by NGOs Migratory families to other /from other communities around Echuya, Bwindi and Mgahinga 	Kifumbira/ Kinyarwanda/ Rukiga/Swahili		
Semliki NP	<ul style="list-style-type: none"> Small families living in clustered community settlements 	Rwamba/Swahili		

	<ul style="list-style-type: none"> • Have “cultural head”- King of Batwa • Migratory families to other /from other communities around Semliki NP and Democratic Republic of Congo 			
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The Project ensures meaningful consultations with the Batwa following a consultation plan designed for the Batwa.

Table 11. Consultations Plan for the Batwa

Institution	Interest/Targeted groups	Target	Modality	Venue	Date
Vulnerable and Marginalized Groups (Batwa)	Access and use of forest resources within Semliki, Mgahinga and Bwindi NP; Echuya CFR	Batwa Communities	• Meeting with CFM Groups - Echuya (NFA and Nature Uganda)	Echuya NFA Grounds	ongoing
			• Meeting with CFM Groups + Batwa Trail - Mgahinga (MGNP, BMCT and OUBDU)	Mgahinga	ongoing
			• Meeting CFM/CRM BINP - Mpungu or Buhoma or Rushaga (BINP + BMCT)	Mpungu/Buhoma	ongoing
			• Meeting Batwa SNP - Ntandi/Sempaya -(SNP, Flora and Fauna International (FFI)	Ntandi	ongoing

Development of the Vulnerable and Marginalized Groups Plans (VMGP)

A Vulnerable and Marginalized Groups Plan (VMGP) for each location where the Batwa are present and have cultural attachment was prepared and disclosed under the parent project. These took into consideration the unique issues in regard to the Batwa community who are present and have collective attachment in some of the proposed project areas, highlighted specific constraints faced by the Batwa community and defined priorities for IFPA-CD project support to Batwa, budget and modalities for implementation of these activities. The four VMGPs is now being updated and to be finalized 60 days after project effectiveness.

Additionally, the arrangements for engaging the Batwa in implementing the project GRM, CRM and CFM as indicated in the ESCP, are being followed. During implementation of the SEP, reference is made to the GRM framework for further guidance. Table 12 presents additional measures for engaging the Batwa group in project decision-making processes during project implementation phase.

Table 12. Arrangement for Engaging Batwa in Decision-Making Processes

Affected People	Decision making process	Arrangements/modality	Responsibility
	Project reviews	Informants during supervisory missions, midterm review, end of project evaluation	UWA, NFA, PCU
	CFM	Representation of community including the Batwa group interests	PCU, UWA, NFA
	CRM	Representation of community including the Batwa group interests	PCU, UWA, NFA
	GRC	Resolving grievances and ensuring good working environment for both the community, the Batwa and project implementers	PCU, UWA, NFA
	Activity Planning	Annual activity planning basing on the VMGP	PCU, UWA, NFA
	Information management	Translation of project information into vernaculars/local dialects	PCU, TSU, UWA, NFA
		Disseminating project information to Batwa	PCU, TSU, UWA, NFA

6. STRATEGY FOR STAKEHOLDER ENGAGEMENT

This section presents information on planned stakeholder engagement actions, methods and processes during the implementation of IFPA-CD project July 2021 – June 2028. Information provided highlights the principles and considerations during consultations and engagement with targeted stakeholders, processes/ approaches and modalities for the engagement.

6.1 Strategy for Consultations

Various methods of engagement are being used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultations, decision-making and the development of impact management solutions.

The IFPA-CD AF Project applies international standards for stakeholder consultations which emphasize the importance of a consultation being 'free, prior and informed', which requires accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. To fulfil this requirement, the project applies a range of consultation methods that specifically focus on fulfilling the requirements of this approach. In this regard **Project information** is communicated in advance of public consultations. This includes an announcement for the consultation meeting through a medium that reaches the targeted stakeholders (e.g., radio announcement), distribution of invitations and full details of the forthcoming consultations meeting well in advance, including the agenda. The Project ensures that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the target community/stakeholders. Specifically, the project endeavour to:

- a. **Make advance public notification of an upcoming consultation meeting** via publicly accessible locations and channels. The project keeps proof of the announcement/publication (e.g. a copy of the newspaper/radio announcement or notice for meeting) for accountability and reporting purposes. Existing notice boards and such other public avenues in the communities or offices of local CSOs/NGOs, offices or widely visited public premises (e.g., government offices, churches, schools, health facilities, etc.) are used for distributing the announcements as appropriate.
- b. **Maintain list of invitees** to the meeting and their contacts. Wherever possible, attendees' signatures or other formats for confirming attendance are obtained as a proof of their participation.
- c. **Select most accessible or appropriate methods of communication** that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the project. In this regards, Oral communication in vernacular is preferred as an option that enables the information to be readily conveyed to such persons during consultation meetings or via radio and mobile phone messages.
- d. **Keep record of all participants** for purposes of accountability and guiding targeted follow up actions with respective stakeholders.
- e. **Keep record of meetings deliberations** for the purposes of transparency and the accuracy of capturing public comments. Meeting records are made via a combination of taking written minutes of the meeting, audio recording (e.g. by means of voice recorders) and photographing.
- f. **Conduct separate meetings and Focus Group Discussions** for the vulnerable or marginalized individuals and groups to enable them to express themselves without barriers often associated with inferiority, cultural or other factors.
- g. **Manage meeting size** by making necessary arrangements to ensure audibility and visibility of the presentation and any demonstrations involved. This may include provisions for use of microphones, proper illuminations, projectors, etc. Meeting size are taken into account SOPs and other requirements for preventing transmission of COVID-19 or other diseases.
- h. **Evaluate the meetings** in order to capture levels of participant's satisfaction or reservations about the meeting, issues discussed, feedback provided, conclusions or recommendation made, etc.

- i. **Provide consultations or meeting Agenda** in a clear and itemized outline of the meeting's structure, sequence, chairperson, a range of issues that are discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the exchange of ideas). This is intended to give prospective participants an opportunity to prepare their questions and comments in advance.
- j. **Allocate sufficient amount of time for a concluding Q&A session** at the end of any public meeting or a hearing thereby providing the audience opportunity to convey their comments and suggestions that can subsequently be incorporated into the implementation or decisions of the project.
- k. **Keeping a record of all public comments received and responses provided** during the consultations meetings in order to enhance project accountability for stakeholder's views and inputs. The recorded comments and how they have been addressed by the project are included in the project regular reporting to the stakeholders.
- l. **Disclose project information** in the public domain accompanied by a register for comments and suggestions that can be used by any member of the affected community and general public/stakeholder to provide their written feedback on the contents of the presented information during the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed agents are made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.

The following engagement methods and techniques are applied by project to ensure “free, prior and informed” consultations with Stakeholders.

6.2. Strategies for Meaningful Stakeholder Engagement

Table 13 summarizes methods and approaches identified for project use to ensure meaningful stakeholder engagements are free and informed by prior information. In all the approaches, the project will be informed by the EISM guidelines in ensuring inclusion and non-discrimination of any potential vulnerable or marginalized individuals and groups, which may be adversely affected by the project.

Table 13. Methods and Approaches for Ensuring Free and Prior Informed Engagements

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
Distribution of printed public materials: leaflets, brochures, fact sheets, posters, etc.	Used to convey information on the Project and regular updates on its progress to local and national stakeholders.	Printed materials present illustrative and written information on Project activities, progress as well as impact mitigation measures. Aim at concise contents and adapted to a layperson reader. Use Graphics and pictorials to describe technical aspects. Use language understood by targeted audience	Distribute materials as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as household visits in remote areas. Place materials at the offices of local administrations and NGOs and other venues commonly accesses by public.	Households/communities, local authorities in the Project Area.
Distribution of printed public	A quarterly newsletter or an	Important highlights of Project achievements,	Quarterly circulation of the	Households /communities in the Project Area

materials: newsletters/ updates	update circular sent out to Project stakeholders on a regular basis to maintain awareness of the status of the Project	announcements of planned activities, changes, challenges, and overall progress.	newsletter or update sheet in the Project Area and other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – emailing and physical delivery	Public offices at local and national levels, Protected Areas, public institutions such as schools, Tourism offices, etc.
Print Media	Newspaper inserts, announcements, press releases, short articles or feature stories in the printed media	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the community/stakeholders. Commemoration of national/international events e.g., World Wildlife/ Forests/Water/ Environment/biodiversity days, Refugees, etc.	Placement of paid information in local and national printed media, including those intended for general reader and specialised audience	Residents in project area, national level audiences
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Project, Project development updates, solutions for impact mitigation. Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the project area and can reach local audiences. Collaboration with media producers that operate at national level	Residents in project area National levels stakeholders /audiences
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project and related solutions/impact management measures. Updates on Project implementation.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	Affected communities in in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. Authorities and other governmental bodies.
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Place printed announcements and notifications in visible and easily accessible places frequented by the local public	Directly affected communities in the project area
Information Feedback				
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials, ESMF documentation, environmental and social action plans.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Stakeholders are also given free	Directly affected communities in the project area

			access to a register of comments and suggestions.	
Dedicated telephone line (hotline)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's Safeguards and Communications staff are being shared with the public	Any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff shall be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration	Local communities within the Project Area. Any other stakeholders and interested parties in general.
Internet/Digital Media	Project website to promote various information and updates on the overall Project, including, impact assessment and impact management process, procurements, employment opportunities, as well as on Project's engagement activities with the public. Website has a built-in feature that allows viewers to leave comments or ask questions about the Project.	Information about Project implementers, TSPs and collaborating partners Project implementation updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.	A link to the Project website should be specified on the printed materials distributed to stakeholders. Other on-line based platforms such as web-conferencing, webinar presentations, web-based meetings, Internet surveys, etc. are being used.	Affected and beneficiary communities, Project stakeholders and other interested parties that have access to the internet resources.
Surveys, Interviews and Questionnaires	Use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project activity and related solutions/impact management measures. Questions targeting stakeholder perception of the Project activity, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	Directly affected households/community in the Project Area.
Feedback & Suggestion Box	Suggestion boxes will be used to encourage residents in the affected communities to leave written feedback and comments about the project activity. Contents of the	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box shall be selected in a safe public place at the construction sites to make it readily accessible for the community.	Directly affected households and communities in the Project Area.

	suggestion box shall be checked by designated project staff on a regular basis to ensure timely collection of input and response/action, as necessary. Use of Feedback & Suggestion Box will be applied to construction works. (This will be given priority in the subsequent implementation period)		Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	
Consultation & Participation				
Public hearings	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project, and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local and national mass media. Send out targeted invitations to stakeholders. Public disclosure of activity information and associated impact assessment documentation in directly affected communities in the Project Area. Give viewers/readers of the activity information are free access to a register of comments and suggestions that is made available during the disclosure period.	Directly affected communities in the Project Area.
Household visits	Household-level visits are being conducted to supplement the statutory process of public hearings, particularly to solicit feedback from community members and vulnerable persons who may be unable to attend the formal hearing events.	Description of the Project and activity related solutions/impact management measures. Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.	Visits shall be conducted by Project's designated staff with a specified periodicity.	Directly affected in the Project Area.

Focus Group Discussions and Workshops	Are being used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders.	Announcements of the forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	Directly affected households/community in the Project Area including, youth, elderly, women, and other vulnerable groups.
Information centres and field offices (TSPs)	TSPs field offices, once TSPs have been contracted, will be meant to serve as depository of Project-related information with TSP staff available to respond to queries or provide clarifications.	Project-related materials and information. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the field office with open hours for the public, together with contact details, will be provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	Directly affected communities in the Project Area and any other stakeholders and interested parties.
Project Site Visits	Visits to Project activity sites are organised for local communities. Targeted invitations are distributed to selected audience offering local communities, elected officials, local authorities and the media to demonstrate Project activities and solution. Visitors are accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour.	Demonstration of specific examples of Project's solutions and approaches to managing impacts.	Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the Project Site. Possible safety restrictions on the site access during active construction works is foreseen.	Local communities elected officials, media groups. NGOs, etc.

6.3 IFPA-CD Stakeholder Engagement Interventions to-date

Based on the above consultation strategy, the following main interventions have been conducted since the launch of IFPA-CD in March 2022.

Table 14. Key Stakeholder Engagement Interventions

Dates	Consultations /Trainings	Stakeholders Met	Purpose	Issues Raised	Responses
2023, 2024	Formation and capacity building of GRC members at range 5,	Officials from the districts surrounding the	Establish and train Protected Area	Revenue sharing	UWA has a mechanism to share revenues with districts and sub counties

and 2025	conservation 11, sub county 189 and 5 districts	protected areas, range and conservation area staff	(PA) GRCs on their roles and responsibilities and orienting the GRCs in the functionality of the GRM.	GRC guidelines from MLGSD	Need to customize the structure and have one committee
				How to make the GRCs known to the local communities?	Trainings, Preparation of the IECs materials and Radio talk shows
				Need to show how conflicts will be mitigated.	During screening and implementation of safeguard measures
				At what stage should the grievances go either to the RDC or judiciary?	If the GRC formed has failed
				Facilitation of GRCs	It's a voluntary assignment
May 2025	Engagements with UNHCR	UNHCR Staff in charge FRRM, OPM	To streamline IFPA-CD grievance redress mechanisms (GRMs) with the Inter-Agency Feedback, Referral, and Resolution Mechanism (FRRM) system	Need for an MoU between MWE and UNHCR	OPM to share with UNHCR the MoU between MWE and OPM for UNHCR to understand how to relate MWE to share Frequently Asked Questions (FAQs) with UNHCR
2024	Stakeholder consultations in the refugee hosting districts (19 consultations made)	District and Sub county officials	To get their views in the proposed plan to implement fuelwood, agroforestry and woodlots	Which kind of tree seedlings will be planted?	Species will be preferred in-line with the agroforestry model agreed. For woodlots the commercially viable species will be preferred
				What are the specific district activities?	Agroforestry, woodlot establishment, commercial plantations, procurement and distribution of fuel wood specifically eucalyptus to persons with specific needs in refugee settlements
				Why consult towards the end of the project	The project implementation has been going on by NFA and UWA. It is only the refugee component which delayed to start due to challenges in the procurement of the service providers.
				Eucalyptus doesn't do well in some parts of North and West Nile districts hence people won't be able to benefit from Agroforestry,	The Technical Service Provider will carry out a Needs Assessment/ site species matching prior to provision of tree seedlings for planting and growing.

				Woodlots and plantation subsidy.	
				Most service providers from Kampala don't work well with district leaders and they spend just two to three days in the field.	MWE will coordinate their work with the districts
				How are these service providers selected?	The advertised through the national media and others on international media. Local providers may be sub contracted
	Inclusion and Nondiscrimination training completed (472 stakeholders from 33 districts)	Technical staff from UWA, NFA and MWE Service Providers and contractors and districts (CAOs, LCVs, DFOs, DEOs, DCDOs and sub county officials)	To build capacity on additional safeguards measures on inclusion and nondiscrimination	Need for resources to conduct community sensitization on IND issues for the whole district	Districts are already receiving funds under IFPA-CD project every quarter
				Why have you come towards the project end	The project has requested for additional financing and an extension
				Why did the World Bank stop funding projects in Uganda	Upon passing of the Anti-Homosexuality Act in 2023, the World Bank was so concerned that the act would escalate discrimination of potential project beneficiaries
				The Anti-Homosexuality Act was passed to stop the bad practice in Uganda, why are you again talking about Homosexuality and yet this is bad practice	We have not come to promote homosexuality but to learn how to work with people of different backgrounds and sexual orientation
				We need joint review meetings with contractors	The review meetings will be organized
2025	Field visit and engagements at Nyabyeya Forestry College (NFC)	Technical staff of the college	To assess the investment needs for support that will scale-up NFC to become an educational facility of significance in wood processing and value addition.	Need to support the upgrade of the college	A proposal to support an upgraded wood processing facility was reviewed New equipment will be acquired Capacity of the staff will be built
2025	Engagement with Uganda Timber Grower's Association (UTGA)	representatives from Uganda Timber Grower's Association (UTGA)	assessing their capacity to implement activities involving wood processing. The key action	Need to support the upgrade of the UTGA	Provide capacity building for UTGA Support the enhancement of an existing model nursery development

			points from this engagement are		Acquire vehicles and office equipment.
2025	Field visit and engagements with the Batwa CSOs and Batwa Community	MWE, Bank team, NFA, UWA and the three Batwa-led organizations and the Batwa community	To agree on the need to review and validation of VMGPs,	Need to have more holistic approach to Batwa engagements with the project	UWA and NFA to streamline the management and benefit-sharing mechanisms Explore establishment of a Batwa Cultural Centre, Establishment of Batwa-only CFM and CRM groups
Other Consultations Conducted					
2024	Stakeholder meetings were held for boundary re-opening in various CFRs and boundary elements aimed at preventing human wildlife conflict (electric fence and elephant trench)				
2024	Consultation of the Kwonga clan on the proposed support (One consultation meeting with the clan members, other stakeholders and district officials held)				
2024	Appointment of IFPA-CD district Focal persons (Focal persons have been appointed by the districts)				
2025	Follow-up meeting with Batwa NGOs (Meeting with the Batwa NGOs held and concerns raised are discussed)				
2023	Conduct trainings/sensitizations on ESIRT, the Project Labour Management Procedures (including the ESHS Code of Conduct) and reporting templates etc				

6.4. Strategy for Providing Feedback

Incorporating and providing feedback to Vulnerable Groups (VG) and Vulnerable and Marginalised Groups (VMG)

Views, suggestions and recommendations received from these groups i.e. VGs and VMGs are responded to during the public consultative meetings or through administrative correspondences or through follow up field visits and discussions with households/community. A Grievance Redress Mechanism (GRM) provides reference for the actions and procedures that will be applied to receive and respond to the views from these groups.

Issues that require urgent remedial action are processed through administrative and decision-making steps and feedback provided to the affected people/community within a reasonable period (not exceeding 1 month). Feedback on policy issues that require attention by the Project Steering Committee (PSC) is provided soon after the next PSC meeting. PSC meets at least twice a year. Issues that qualify to be incorporated in subsequent project implementation activities and processes are handled during annual work planning processes or post mid-term review planning processes.

In addition to the above consultations, Consultations were done in March 2023 to January 2024, with civil society organizations, donors, and other interested parties regarding the exclusions and discrimination risks and impacts, which apply to IFPA-CD and other World Bank funded project. The engagement was led by the World Bank, and included meetings with Government of Uganda representation, other Development partners and NGOs/CSOs. The identified risks and concerns included:

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

Incorporating views and providing feedback from primary and secondary stakeholders

Views, suggestions and recommendations received from Stakeholders are responded to during the public consultative meetings or through administrative correspondences or through follow up meetings with concerned stakeholder (s).

Issues that require urgent remedial action are processed through administrative and decision-making steps and feedback provided to the affected stakeholder within reasonable period (not exceeding 1 month). Feedback on issues that require attention by the Steering Committee are provided soon after the next Steering committee meeting.

Issues that qualify to be incorporated in subsequent project implementation activities and processes are handled during annual work planning processes or post mid-term review planning processes

6.5. Strategy for Future Consultations (Future Phases)

Recommendations for future phases will be formally discussed during the mid-term review planned for March 2024. The mid-term review process will be participatory thereby giving early opportunity to stakeholders to become part of the project review/assessment and identification of need for the future phases. The mid-term review report will be adopted by the Project Steering Committee. Recommendations for future phases will be communicated to the stakeholders via disclosure of the mid-term review report or MWE correspondences to targeted stakeholders.

The process of formulating the “future phases” shall apply the similar stakeholder consultations and engagement process as was applied during the formulation of the project, subject to any modifications to accommodate emerging issues or local circumstances. Depending on the circumstances then, a modification of this Stakeholder Engagement Plan (SEP) will guide engagements in formulating the future phases.

Decisions on scope of future phases will be processed in accordance with GoU procedures that emphasise stakeholder engagement and ownership at local and sectoral levels.

In addition, the future planned modifications of SEP will be enhanced to strengthen mitigation of potential social risks associated with exclusion and discrimination of vulnerable or marginalized

individuals and groups, which may be adversely affected by the project. World Bank hired an independent consultant to support the implementation of EISM with roles and responsibilities defined in Annex 4 and 5.

6.6. Strategy for information disclosure

IFPA-CD project information namely project brief, PAD, ESMF, ESCP, SEP, VMGF, VMGPs, etc. are disclosed to stakeholders and general public. These are disclosed on the MWE website <https://www.mwe.go.ug/library/investing-forests-and-protected-areas-climate-smart-development-ifpa-cd-project-0>, NFA website <https://www.nfa.go.ug/index.php/resources/projects>, and UWA website <https://ugandawildlife.org/uwa-projects/investing-in-forest-and-protected-areas-for-climate-smart-development-project/>.

Disclosure to affected people and other stakeholders in the project area are accompanied by registers of comments and suggestions from the public that are subsequently documented by MWE, UWA, NFA and TSPs in a formal manner. Feedback on comments and or suggestions made during public meetings are provided during such meeting or within 2 weeks after the meeting.

The IFPA-CD implementing agencies continues applying a similar approach to disclose any additional Environmental and Social assessment information that may be prepared as part of the project implementation. Efforts are made to translate key messages into vernacular for purposes of ensuring that local stakeholders and affected people can comprehend the information.

The Environmental and Social Management Framework (ESMF) (disclosed on March 18, 2020), the Process Framework (disclosed on January 21, 2020), the Stakeholder Engagement Framework (disclosed on January 27, 2020), and Labor Management Procedures (disclosed on January 21, 2020) were disclosed before project appraisal. A Vulnerable and Marginalized Groups Framework was disclosed on March 18, 2020. the related four VMGPs were disclosed on April 27, 2023. Key commitments related to environmental and social risks are recorded in the Environmental and Social Commitment Plan (disclosed on March 23, 2020 and re-disclosed after an amendment on June 16, 2021).

In addition, the IFPA-CD project aims to ensure that project information is accessed by stakeholders through consultations, dissemination of published information, meetings and workshops. The project operationalizes the GRM to ensure that there is an adequate mechanism for stakeholders airing their views and receiving feedback.

The SEP has remained in the public domain for the entire period of project implementation and is often updated on a regular basis as the project progresses, to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement are also revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

The outline summarizes the main types of information that are shared with stakeholder groups, sources, language and format of presentation as well as time frame for receipt of comments or suggestions from stakeholders.

Table 15. Type of Information Disclosed

Information category	Location/access source	Language	Format	Time frame for comments/feedback
Project documents (PAD)	MWE, UWA, NFA, MTWA	English	Electronic PDF Document	n/a

			Printed Hard Copies	
Project Implementation Manual	MWE	English	Electronic PDF Document Printed Hard Copies	3 months
Safeguards	MWE, UWA, NFA	English	Electronic PDF Document	continuous
	UWA, NFA, Districts	VMGF (Rufumbira/Rukiga/Bamba/Swahili)	Printed hard copy	1 month
Procurement contracts	MWE, UWA, NFA	English	Electronic PDF Document	10 days

With regards to disclosing project progress and implementation issues, the following strategies are being applied

Table 16. Communication and Feedback Mechanisms

Stakeholder	Communication channels	Feedback Loop
GoU /mandated institutions and agencies	<ul style="list-style-type: none"> • Project progress reports (Quarterly/semi-annual/annual) • Project work plans and budgets • Technical reports, Publications and briefs • Reports from Supervisory Missions, Annual Review, mid-term Review, End of project Evaluation • Deliberations/records of meeting of Steering Committee, NTC 	<ul style="list-style-type: none"> • Participation during/input into: <ul style="list-style-type: none"> ✓ <i>Annual work planning and reviews sessions</i> ✓ <i>Agenda and deliberations of NTC, PSC</i> ✓ <i>Experience sharing and lessons learning processes</i> • Written responses/correspondences • Meetings • Supervisory Missions/field visits
Partners and collaborating stakeholders	<ul style="list-style-type: none"> • Project progress Reports (Quarterly/semi-annual/annual) • Technical reports, publications and briefs 	<ul style="list-style-type: none"> • Annual work planning and reviews • Experience sharing and lessons learning processes
Project targeted people/community/beneficiary	<ul style="list-style-type: none"> • Project progress Reports (Quarterly/semi-annual/annual) • Technical reports, publications and briefs 	<ul style="list-style-type: none"> • Experience sharing and lessons learning processes

7. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

7.1. Resources

Financial resources for implementing the SEP are integrated in work plans and activity budget of PCU, MWE user Departments, UWA, NFA, TSPs or Contractor/Consultant. The NPC confirms these provisions prior to the approval of annual work plans and activity budgets.

Contacts for the Safeguards Focal Points/Desks at MWE/PCU, UWA, NFA, TSPs, and Contractor/consultants are provided to stakeholders at the time of disseminating the SEP or in case of TSPs and Contractors/Consultants, after signing service contract. Updates on the contact names and addresses are provided to stakeholders as soon as changes happen.

Stakeholder database: The Safeguards Focal Points in MWE User departments, UWA, NFA, TSP, Contractor/Consultant has established and maintained a database of all stakeholders engaged, track and document stakeholder participation in consultations, meetings or other platforms convened for purposes of soliciting stakeholder inputs or for providing feedback to stakeholders, track and document views or concerns and feedback provided to stakeholders by their respective institutions or by MWE.

7.2 Management functions and responsibilities

Management: The over-all responsibility for implementing this SEP is the MWE (PCU). The National Project Coordinator (NPC) is responsible for ensuring that the SEP is satisfactorily implemented by MWE user departments, UWA, NFA and TSPs. The NPC ensures that stakeholder engagement have been adequately planned for and budgets for these actions included in annual budgets of MWE user departments, UWA, NFA, TSPs and Contractors/Consultants. The NPC is being assisted by the Technical Project Coordinator, Environmental Risks and Social Risks Management Specialists/desks. The Institutional Focal Points for UWA and NFA is responsible for ensuring that the applicable provisions of SEP have been satisfactory implemented by UWA and NFA, respectively. The Institutional Focal Points ensures that stakeholder engagement have been adequately planned for and budgets for these actions included in annual budgets of their respective institutions. The Contract Managers for TSPs and Consultants are responsible for ensuring that the applicable provisions of SEP have been satisfactory implemented by TSPs and Contractors/Consultants, respectively.

Responsibilities: Within the PCU, the Environmental and Social team supports, monitors and reports on the over-all performance of the SEP and work closely with UWA and NFA to ensure a coordinated approach. The E&S team at the PCU supports and monitors implementation of applicable provisions of this SEP by the Technical Service Providers and Contractors/Consultants. The Technical Service Providers and Contractors/Consultants report on their performance in stakeholder engagement and issues that require attention by MWE/PCU, UWA and NFA.

Within MWE User Departments, UWA and NFA, the designated E&S Focal Points support, will monitor and report on performance of the SEP on behalf of their implementing entities as well as liaising with ES team at PCU for back up support where needed.

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

Specific measures will include: (i) assisting project teams to enhance existing project-level grievance mechanisms and develop and operate the independent mechanism (the EISM) that would identify,

manage, and monitor cases of discrimination; (ii) where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the World Bank (in accordance to ESS10, regarding GRM), propose appropriate remediation, and follow up on agreed actions to resolve the case; (iii) support the WB to monitor the efficacy of the agreed measures to mitigate the impacts under the project; and (iv) carry out stakeholder consultation and community outreach that will ensure that the World Bank is aware of any breaches of preventative measures with regard to discrimination against vulnerable or marginalized individuals or groups.

8. THE IFPA-CD PROJECT GRM

The IFPA-CD Environmental and Social Management Framework (ESMF) and the Vulnerable and Marginalised Groups' Framework (VMGF) outline key principles for establishment of the project Grievance Redress Mechanism (GRM). The frameworks provided an outline for developing a GRM and establishing Grievance Redress Committees (GRC) at various levels as appropriate.

8.1 Definition of a Grievance under IFPA-CD project

A Grievance refers to a complaint, a feeling of dissatisfaction, an injustice, a wrongdoing, an accusation, or criticism. It may include queries, suggestions and comments. A grievance should not be mistaken to be "a case", because the two concepts are different. A case is a question contested before Courts of justice or an equivalent legal process. Examples of likely grievances are disagreement on boundary between a Protected Area (PA) and private land or damage to crops during construction of an electric fence around a PA. It is therefore important to establish a robust Grievance Redress Mechanism (GRM) for better management of project related grievances as well as serving as a channel for registering positive feedback on project implementation.

8.2 Justification for a robust GRM under IFPA-CD Project

The GRM is an inclusive and participatory entity that is aimed at facilitating communication between conflicting parties, promoting dialogue, and facilitating a reasonable agreement between the parties to a grievance. The GRM is expected to objectively determine facts and draw conclusions from them to provide the basis for action. The GRM is designed to contribute to conflict detection, prevention and resolution, as well as the transformation of the grievance into peaceful co-existence and community cohesion. It will help to channel grievances into an acceptable, institutionalized system for resolving conflicts that are likely to occur during project implementation. It focuses on dialogue and problem solving as an intermediate way for stakeholders to discuss and resolve grievances.

The implementation of GRMs is known to be influential in enhancing resilience and identifying and mitigating project risks and impacts from early in the project cycle. GRMs provide predictable grievances resolution processes that are regarded as effective and fair. The implementation of good practices coupled with a grievance management framework helps project implementers identify the key environmental and social management actions, community benefit provisions, and comprehensive decision-making processes that are required to avoid disruptions during project implementation.

It is also important to note that the Environmental and Social Standard ten (ESS 10) on stakeholder engagement and information disclosure under the World Bank's Environmental and Social Framework (ESF) requires that an inclusive and responsive grievance mechanism accessible to all project affected parties and proportionate to project risks and impacts be established.

The IFPA-CD Project GRM aims to provide a fair, legitimate, reliable, and cost-effective redress procedure to enable PAPs and other interested parties to present their grievances and find satisfactory resolutions. It is also a critical tool for promoting transparency and accountability in accordance with the ministry guidelines as well as for World Bank funded projects. It is therefore important to have a GRM to properly handle project related grievances.

Therefore, the IFPA-CD GRM is designed to act as recourse for situations in which, despite proactive stakeholder engagement, some stakeholders may have a concern about the project's potential impacts on them. Ultimately the purpose of the GRM is to find a win-win solution and in case the GRM fails, the parties to a grievance may resort to the formal courts at any stage of the grievance resolution process. It is intended to complement, not replace, formal legal channels for managing grievances (e.g. the court system, organizational audit mechanisms, etc.).

8.3 The Objective of GRM for IFPA-CD

- a. To receive and resolve project related grievances in a timely, appropriate and efficient manner;
- b. To build trust among project staff and communities;
- c. To promote community empowerment and participation in project decisions that affect them; and
- d. To provide feedback mechanisms to project affected persons on resolution of their complaints.
- e. To enhance information sharing about the project;
- a. To provide cost effective method for channelling complaints/ grievances;
- b. To provide an avenue for resolving grievances and disputes at the lowest project level;
- c. To provide opportunity for the community to be able to report their grievances with dignity and also receive a fair hearing;
- d. To facilitate speedy resolution of conflicts before they escalate;
- e. To facilitate access to information;
- f. To help project implementers win the trust and confidence of the community;
- g. To prevent adverse impacts to the community
- h. Help to avoid project delays and cost overlaps thus improving quality of work.

8.4 Implications for not having a GRM

The consequences are numerous and adverse including inability to register and build on positive feedback, Project Affected Persons may seek redress/ resolution from judicial or administrative systems which are cumbersome or inappropriate to addressing project triggered grievances because they tend to be hostile or foment violent behaviour towards the project or waste time and resources, derail benefits and possibly cause high cost overruns, deprive people's right to be heard in a just and fair manner, or cause adverse impacts on people and the environment which could lead to a risk of possible suspension or cancellation of the project.

8.5 Principles of GRM

The GRM has been designed according to the following eight internationally accepted principles for the design of GRM:

1. **Accessibility** – provides adequate assistance to those who wish to access it, including specific groups such as children, women and the disabled accessibility needs to take into consideration language, literacy, awareness, finance, distance or fear of reprisal.
2. **Predictability** – offers a clear and known procedure, with timeframes for each stage, clarity on the types of processes and outcomes it can and cannot offer and means of monitoring the implementation of any outcome.
3. **Fairness** – all decisions should be perceived as fair and objective especially in terms of access to information and opportunities for meaningful participation in the final decision
4. **Rights compatibility** – it is with applicable national and international standards; should not restrict access to other redress mechanisms
5. **Transparency** – procedures and outcomes or decisions should be made public and in a transparent manner
6. **Capability** – should have required technical, human and financial resources to deal with issues at stake
7. **Feedback** – Should serve to channel citizen feedback to improve project outcomes for the people

8. **Legitimate:** has clear, transparent, and sufficiently independent governance structure to ensure that there is no bias or interference and the process can be conducted fairly with respect to all parties
9. **Inclusive and non-discriminative** of the potential vulnerable or marginalized individuals and groups who may be adversely affected.

In addition to the above principles, the following are also considered:

- The grievance redress procedure to be followed should consider existing and effective community and traditional dispute settlement systems.
- The GRM and its application widely disseminated to all stakeholders, through Local Council structures, CFM, CRM, NFA/UWA field offices, GRM structures, NGOs/CBOs;
- Grievance review is done independently and impartially to foster the trust and confidence of all stakeholders.
- All methods and results of consulting the public including the management of grievances is documented/recorded and disclosed to the affected persons as appropriate.
- The principle of confidentiality of the issues/information and anonymity of the complainant applies to GRM processes as appropriate.

8.6 GRM Structures

Introduction

The GRM is grounded on existing local dispute management models/mechanisms that involves the local leaders and technical staff in providing a forum for listening to and resolving grievances. The GRM is spearheaded by Grievances Redress Committees (GRC) established at appropriate levels.

The Composition of the GRC takes into consideration the technical competencies of the GRC members at all levels to receive and resolve grievances. The members are formally assigned responsibility to work with the respective committees. In choosing the members, consideration is given to the diverse stakeholder interest groups in the participating project areas and the need for balancing geographical and gender distribution. The GRCs can co-opt members to the respective committees such as the CRM/CFM as and when the need arises given their cooperative advantage, Grievances received are resolved at the lowest level of Local Council one with its committees (village level) to the extent possible. However, there is provision for referrals in the case of grievances escalating to the next level.

The GRM Structures

Given the complex nature of the IFPA-CD Project in terms of the geographical coverage within the refugee hosting districts, protected and conservation areas, it has been difficult to adopt “a one size fits all” GRM structure for all the project area of operations because some forest reserves and conservation areas are located within just one district while others are surrounded by more than one district.

Project implementation arrangements for the refugee hosting districts are different from that of the Central Forest Reserves and National Parks. For management purposes, the National Forestry Authority (NFA) has grouped the Central Forest Reserves into ranges while the Uganda Wildlife Authority (UWA) grouped the National Parks into conservation areas.

While the four-level structure was adopted for refugee hosting districts, the range and conservation areas adopted different GRM structures suitable for their geographical coverage in terms of the number of districts covered by the range and or conservation area. Hence, the composition of the GRCs is not the same for the refugee hosting districts, range and conservation areas as shown below.

GRM Structures in the Districts in Refugee-Hosting Areas

District-level Grievance Redress Committees (GRCs) have been constituted in 19 districts (Hoima, Kikuube, Kamwenge, Kakumiro, Kagadi, Kibaale, Kiryandongo, Kyegegwa, Adjumani, Amuru, Arua, Madi Okollo, Terego, Koboko, Lamwo, Moyo, Obongi and Yumbe).

At the lower levels in the refugee hosting districts i.e., District, Sub-County level, Parish and Village Level, the GRM used by DRDIP have been adopted by IFPA-CD to resolve grievances. The GRCs formed by DRDIP have been trained by the project and they are able to receive and resolve grievances related to IFPA-CD.

Within the refugee settlements, the Inter-Agency Feedback Referral and Resolution Mechanism (FRRM) set up by UNHCR will be being used to receive grievances/complaints once the project activity taking place inside the settlements (fuelwood distribution) starts implementation. Grievances not resolved at the district level will be handled by the National Level GRC housed at MWE which compose of members from MTWA, UWA, NFA and OPM.

Supplementary Channels to Facilitate Grievance Reporting

Because the project stakeholders require various avenues to report grievances, alongside the above structures, a simplified and cost-effective structure was reviewed at MTR to include the Local Council one as the first level GRC. GRC Information, Education and Communication (IEC) material was developed as described below.

GRM IEC material

The poster contains a summarized description of the different channels through which the project related grievances may be reported including use of the dedicated toll-free lines, emails and use of social media (WhatsApp) numbers. So far, the posters have been printed in English and widely circulated to local leaders and communities in the project districts purposely to create awareness among the stakeholders especially at the LC1 level for prompt reporting and handling of project related grievances. The posters are to be translated and printed in the different languages spoken in the project areas including the refugee hosting districts (Lugbara and Madi language for West Nile region, Acholi and Langi languages for Northern region and Runyoro- Rutooro and Runyakore-Rukiiga for western region)

Toll Free Lines

The toll-free lines - UWA - 0800245245, NFA- 0800264036 and MWE-0800203655, WhatsApp Numbers – UWA- 0740560236, NFA – 0707608920, MWE – 0772841843 and Email Address ifpacd@mwe.go.ug are all active and are meant for receiving grievances directly from complainants.

Suggestion Boxes

Suggestion boxes are to be put in strategic locations e.g. trading centres for the stakeholders to drop in their complaints or grievances. The boxes will be opened and actions taken on the grievances reported.

Personnel

Two personnel from each implementation agency UWA, NFA and MWE have been assigned and trained to receive, register grievances in the log book and forward IFPA-CD related grievances to the social safeguards focal persons of the respective implementing agencies and to the PIU social team respectively for follow up with the field team for resolution.

Table 17. GRM Structures in the Districts in Refugee-Hosting Areas

S/No	Albert Water Management Zone	S/No	West Nile/Upper Nile Water Management Zone
1	Hoima	10	Adjumani
2	Kikuube	11	Amuru
3	Kamwenge	12	Arua
4	Kitagwenda	13	Madi Okollo
5	Kakumiro	14	Terego
6	Kagadi	15	Koboko
7	Kibaale	16	Lamwo
8	Kiryandongo	17	Moyo
9	Kyegegwa	18	Obongi
		19	Yumbe

GRM STRUCTURES AT NATIONAL PARKS AND SURROUNDING DISTRICTS

Project Districts Surrounding the National Parks adopted Conservation level, District, Sub-County level, Parish and Village Level GRC structures. Details of the GRC structures including names of sub counties, parishes and villages are in annex 2.

Table 18. Estimates of GRM Structures at Wildlife Protected Areas under the Project and Surrounding Districts

S/No	Conservation Area	Surrounding Districts	No of S/Counties	No of Parishes	No of Villages
1	Kigezi (Ishasha) Southern Sector of QEPA	Kanungu	2	4	7
		Rukungiri	1	2	9
		Mitooma	1	3	11
2	Toro-Semliki Wildlife Reserves	Ntoroko	8	11	29
3	QENP	Rubirizi	6	17	36
		Mitooma	3	11	22
		Rukungiri	2	5	19
		Ibanda	1	1	3
		Kanungu	2	4	21
		Kasese	7	25	57
		Kamwenge	1	1	4
4	Semiliki NP	Kitagwenda	4	10	28
		Bundibugyo	5	6	16
		Ntoroko	8	11	29
5	Kibale NP	Kyenjojo, Bunyangabu, Kasese, Kabarole – information forthcoming			
		Kamwenge	7	9	17
6	Mgahinga Gorilla National Park	Kisoro	2	3	12
7	Katonga Wildlife Reserve	Kyegegwa	2	2	5
		Kamwenge and Kazo – information forthcoming			
8	Murchison Falls National Park	Buliisa, Masindi, Pakwach, Nwoya, Oyam, Kiryadongo, Hoima, Kikuube, Obongi, Adjumani, Moyo – information forthcoming			
9	Rwenzori Mountains National Park	Bundibugyo, Kasese, Ntoroko, Bunyangabu – information forthcoming			
10	Kabwoya Wildlife Reserve	Hoima	3	3	4
		Kibuube	2	3	4

11	Bwindi Impenetrable National Park	Kanungu and Rubanda – information forthcoming
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GRM AT THE CENTRAL FOREST RESERVES AND SURROUNDING DISTRICTS

Project Districts Surrounding the Central Forest Reserves adopted Range level, District, Sub-County level, Parish and Village Level GRC structures. Details of the GRC structures including names of subcounties, parishes and villages are in annex 1.

Table 19. Estimates of GRM Structures for the Central Forest Reserves and Surrounding Districts

S/No	Management Area	Central Forest Reserve	Surrounding Districts	No of S/Counties	No of Parishes	No of Villages
1	Budongo System	Budongo	Buliisa	1	2	11
			Hoima	2	6	30
			Masindi	1	3	12
			Hoima		1	1
			Kikuube	1	7	15
		Kagombe	Kagadi	4	13	27
			Kibaale	1	2	15
			Kyenjojo		1	8
		Kasokwa	Masindi	1	1	1
		Nyakarongo	Kibaale			
		Rwensama	Masindi	1	1	2
2	Mafuga Plantations	Echuya	Kisoro			
			Rubanda	2	6	16
3	Muzizi River	Buhungiro	Kyegegwa			
		Ibambaro	Kyegegwa			
			Kyenjojo	1	4	7
		Itwara	Kabarole	1	3	9
			Kyenjojo	2	4	10
		Kibego	Kyenjojo	1	1	7
		Kitechura	Kyenjojo	1	5	11
			Kyegegwa			
		Matiri	Kyenjojo	1	3	3
		Muhangi	Kyenjojo	2	2	4
		Nkera	Kirongo	1	1	2
			Kyenjojo	1	2	5
		Rwensambya	Kyegegwa			
4	Southwestern	Ihimbo	Rukungiri	2	2	8
		Kakasi	Kitagwenda	1	2	5
		Kalinzu	Bushenyi	2	4	11
			Rubirizi	1	4	6
			Mitooma	1	2	5
			Buhweju	2	6	15
		Kasyoha-kitomi	Rubirizi	2	10	29
			Bushenyi	1	3	7
			Ibanda	1	3	7
			Kitagwenda	2	3	4
			Bushenyi			
		North Maramagambo	Mitooma	1	1	2

			Rubirizi			
			Mitooma	2	4	12
			Rukungiri	2	5	9
			Bushenyi			
			Mitooma			
5	West Nile	Era	Moyo	2	8	33
			Koboko	1	1	1
		Mt. Kei	Yumbe	1	3	14
		Otzi (east)	Moyo	1	3	4
		Wati	Arua	2	4	4

Establishing the GRCs in these locations has been done formally with a letter of assignment by the appointing authorities at the various levels. Terms of Reference shall be shared with them as well as the various tools including complaints registers, Complaints log and reporting templates.

Inducting of GRC members has been undertaken to ensure awareness on GRM and knowledge of appropriate procedures and steps for managing grievances. The Directorate of Environmental Sector Support Services (DESSS) takes lead in training National and District level GRCs. The District GRCs trains the Subcounty GRCs with supervision from the National GRC. The Subcounty CDO takes lead in forming and training the village level GRCs with support from the Subcounty GRC members. The hand-outs on GRM have been developed from time to time and distributed among the various categories of project stakeholders and in the communities in the project area.

COMPOSITION OF GRIEVANCE COMMITTEES AT DIFFERENT LEVELS

Level 1: Village level Grievance Redress Committee (VGRC). Local Council One

This is the lowest unit upon which all grievances are channelled and handled before escalating unresolved grievances to higher levels. The motivation to seek for redress is critical, it is therefore important that the mechanism originates from the benefiting community members.

The committee comprises of 7 members and chaired by the Chairperson LC 1 and the 5 members are elected in the village. One of the members should be elected as secretary. The one third gender rule is applied to ensure representation of women, youths and ethnic balance.

Level 2: The Subcounty level Grievance Redress Committee

This is established to deal with grievances unsettled at the village level. It comprises of 7 members including: the LC 111 Chairperson (The chair, GRC), the Subcounty chief, Subcounty Community Development Officer (Secretary), Councillor in charge of Production, opinion/ religious leader, NGO/CBO representative and a representative of vulnerable groups (women etc.) as member

Level 3: District level Grievance Redress Committee

This is established to deal with any grievances unsettled at the subcounty levels. The GRC at the district is comprised of 7 members: the Chief Administrative Officer (the Chairman), the District Community Development Officer (DCDO), District Forest Officer (DFO), District Lands Officer (DLO), District Agriculture Officer (DAO), District Environment Officer (DEO) and representative of NGO forum. The DCDO shall be the secretary to the District GRC.

Level 4: Range/Conservation level Grievance Redress Committee

This is established to deal with any grievances unsettled at the district levels. The GRC at the conservation area and Range levels are comprised of 7 members including some of the Range or Conservation workers, community representatives, district representatives etc

Level 5: National level

The National Level GRC is chaired by the Commissioner, Department of Environment Sector Support Services (DESSS) and the secretary is the Social Risk Management Specialist. Other members include: the Environment Risk Management Specialist and nominated officers from MTWA, UWA, NFA and OPM. The National Level GRC handles all appeals not resolved at district level.

8.7 Roles and Responsibilities of Grievance Redress Committees

The roles and responsibilities of the GRC are presented in Table 20 below.

Table 20. Roles And Responsibilities of GRCs

GRC	Roles and Responsibilities
Village level GRC (Local Council One)	<ul style="list-style-type: none"> Point of contact for beneficiaries and community to file or follow up on grievances Sensitize community on rights and responsibilities and channels for registering complaints Follow up on complaints registered in the complaint's boxes directing as appropriate Log complaints received appropriately Compile all complaints registered and forward to the Subcounty level for review and solving for those that might have not been resolved at community level.
Subcounty level GRC	<ul style="list-style-type: none"> Sensitize Parish level GRCs and community members on rights and responsibilities and channels for registering complaints Follow up on complaints directed to the Subcounty level and see that they are resolved Ensure complaints registered are properly logged and received appropriately Ensure documentation specifically the logbook, registers, forms etc. are properly filed and stored Forward unresolved complaints which may require district level solving
District Level GRC	<ul style="list-style-type: none"> Sensitize Subcounty GRC on rights and responsibilities and channels for registering a complaint Follow up on complaints that have been directed to the district level and see that they are resolved Conduct quarterly review meetings on Subcounty GRC report Forward unresolved complaints which may require higher level solving to national level GRC
Range/Conservation Area Level GRC	<ul style="list-style-type: none"> Sensitize the district GRC on rights and responsibilities and channels for registering a complaint Follow up on complaints that have been directed to the range/conservation level and see that they are resolved Conduct quarterly review meetings on district GRC report Forward unresolved complaints which may require higher level solving to national level GRC
National Level GRC	<ul style="list-style-type: none"> Ensure grievance redress processes are developed and functional Sensitize GRCs at all levels on their roles and responsibilities Ensure complaints registers are up to date Follow up on complaints that have been directed to the national level Monitor implementation of resolutions made by GRCs at all levels

	<ul style="list-style-type: none"> • Share best practices and general guidance to the IFPA-CD project • Conduct sensitization and awareness outreach to relevant stakeholders • Maintain all records of grievances and redress • Analyze common grievances, lessons learning to inform effective program implementation and mitigation measures in future
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Based on the above structures, the following intervention have so far been carried out with a view to establish and building capacity of GRCs at the range and Conservation Area levels:

Table 21. GRM Establish and Capacity Building Interventions to Date

S/No	Interventions
1	Grievance Redress Committees (GRCs) have been formed for all the Conservation Area levels under UWA
2	Grievance Redress Committees (GRCs) have been formed for all the Ranges under NFA.
3	Capacity building of all the conservation level GRCs have been undertaken (Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, Katonga Wildlife Reserve, Kibale National Park, Toro-Semliki Wildlife Reserve, Queen Elizabeth National Park, Murchison Falls National Park, Rwenzori Mountains National Park, Kabwoya Wildlife Reserve and Semuliki NP)
4	Capacity building of all the range level GRCs is ongoing (West Nile, Southwestern, Muzizi River, Mafuga Plantations and Budongo System range)

Commented [LV1]: Removed Ajai. No longer part of project scope

8.8 The GRM Process

The GRM is designed with the objective of solving grievances at the earliest possible time in the interest of all parties concerned. The mechanism should aim at being inclusive and non-discriminatory towards all adversely affected potential beneficiaries and interested parties who may be identified as vulnerable or marginalized individuals and groups. Therefore, the internal complaint resolutions systems (GRCs) of the IFPA-CD Project GRM have been strengthened to minimize potential escalation of complaints to the national level or courts of law. Further strengthening of GRMs across the project through EISM (as detailed under Annex 4 and 5).

Those seeking redress and wishing to state grievances do so by notifying any member of the GRC or the GRC contacts provided and publicized in the project areas. Should some PAPs register their complaints with project staffs, they should have them registered with the GRC. Complaints related to security personnel should be registered as is required for any other complaint, and worker and community concerns related to security personnel should be addressed promptly. If the complainant's claim is unresolved, under the village GRC, the matter is brought before the parish GRC.

The GRM process involves the following steps: receiving, acknowledging and recording grievances; sorting and categorization; and giving feedback.

• Receiving, Acknowledging and Recording Grievances

All grievances are received, acknowledged and recorded at village level. The secretary of the GRC is in charge of receiving the grievance and recording in the Grievance Registration form. Acknowledgement is done within 24 hours and this include outlining the grievance process; providing contact details of the contact person that is responsible for giving feedback about the grievance; giving an indication of how long it is likely to take to resolve the grievance. Complainants are periodically updated on the status of their grievances.

- **Sorting and categorization**

Acknowledgement of grievances received is followed by sorting and categorizing it for appropriate action. The analysis and categorization are based on the following criteria:

- a) Is the grievance within the scope of the project, i.e., is it attributable to project activities or staff?

A GRC has no role in addressing a grievance that is outside the scope of the project but gives feedback on the same to the complainant, and where possible forward it to relevant offices.

- a) Is it a sensitive or non-sensitive grievance?

Non-sensitive grievances are those that relate directly to the projects interventions and have a potential of being verified and resolved within the GRM structures according to the procedures laid out in these guidelines. Such include grievances related to the project activities, project funding, discrimination and communications.

Sensitive grievances are those that relate to the project but may require a more complex investigation and resolution processes. Such include misuse of funds, corruption or fraud, conflict of interest, political interference, contravention of signed agreements, as well as gender and sexual based harassment or exploitation.

Further analysis of grievances is undertaken to identify the specific nature of the grievances as per the following criteria:

Potential Type of Grievances			
i.	Non-inclusive	x.	Bribery
ii.	Quantity of services	xi.	Embezzlement
iii.	Quality of services	xii.	Fraud
iv.	Timeliness of services	xiii.	Data or information provision
v.	Conflict of interest	xiv.	Environmental degradation
vi.	Behavior of staff	xv.	Environmental pollution
vii.	Recruitment	xvi.	Timeliness of services
viii.	Procurement of commodities or services	xvii.	Access to sub project resources
ix.	Political interference	xviii.	Resource based conflicts
		xix.	Gender based violence
		xx.	Child abuse

- **Verification and resolution**

Verification of the grievances logged at village level is done by the GRC to establish whether it is genuine or not and to ascertain its authenticity. The merit of grievances is judged objectively against GRM principles.

Grievances that are straightforward (such as queries and suggestions) are resolved on the spot or immediately by contacting the complainant. Whenever possible, GRC and project affected persons are encouraged to resolve grievances at the village/community level. However, even if a grievance is resolved locally, it must be recorded for knowledge management. If a grievance cannot be resolved immediately the complainant receives a response within seven (7) working days

Grievances not resolved at village level are escalated to the Parish, Sub-County or District level for further verification and investigation (ref. below for details). In cases where complaints cannot be resolved at the district level, the Conservation or Range GRCs will be involved. GRCs at all levels ensure neutrality in the process and outcome of the investigation. If after exhausting the project institutional structures, beneficiaries are still dissatisfied with explanations and solutions offered, they have the option of seeking justice through courts of law.

- **Giving feedback**

Feedback refers to the process of informing the complainant, all GRM users and the public at large about the result of the grievances investigated and resolved as well as the actions taken. Once a grievance has been resolved, the GRC provides feedback to the complainant. The feedback has clarity in conveying the decision reached to allow the complainant whether to appeal or not. GRC provides feedback to the complainant directly through verbal communication (if his or her identity is known) and/or by posting the results of cases in high profile locations, disclosure in public meetings or publish and circulating the resolutions or closure report. Both the date and the resolution are recorded in the grievance log register.

Safe handling of grievance records

The grievance forms and the grievance log register are kept in a safe place that is only accessible by the secretary to the GRC. The grievance records are archived at the end of the project and be subjected to the government data disposal guidelines.

Anonymous grievances

A grievance received anonymously needs to be assessed to identify whether it is substantial or not and if found substantial, actions are taken to resolve it. This may involve holding meetings with community members to disclose the resolution of the GRC. Despite lack of an avenue to acknowledge and respond directly to the complainant, such a grievance is considered as a warning signal to the project or an indication of underlying discontent. Such grievances including those found to be malicious are documented and taken into account during the general risk analysis of the project.

Right to Appeal

A complainant who is not satisfied with the response received from the conservation and or range GRC despite having had the opportunity to request for further clarification or feedback, has the right to make formal communication to the Social Risk Management Specialist. This happens within one month of receipt of the response and the case reviewed by the Specialist. The complainant is informed about the appeal process and notified that response to the appeal is final; however, the complainant is at liberty to pursue the matter legally if s/he is still unsatisfied with the decision.

Referral System

The Ugandan laws allow any aggrieved person the right to access justice through systematic administrative and judicial system. If the complainant remains dissatisfied with any of the structured levels of the grievance mechanism, he or she has a right of appeal to any legal authority.

In case of any referrals, the committee receives complaints, record it and provide written referrals within fourteen (14) days to the next level of structure. Copies of these referrals are kept in record file. Efforts are made to follow-up on how the resolution of the project related complaints referred are being handled.

Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Sexual Violence Against Children (SVAC) Complaints

Gender based violence is a very sensitive aspect of conflicts in communities and families; and where it occurs, it leads to stigma to the affected persons/victims and families. This requires ethical and confidentiality to effectively support victims and affected families. It is therefore important that people both inside and outside the project operations have appropriate channels through which they can report GBV/ SEA, including options to report anonymously. GBV issues integrated into this GRM require specialized approach considering needed ethics, sensitivity, and confidentiality. Consequently, this GRM requires specified persons within the GRCs to create confidentiality and ease stigma when dealing with GBV issues. For this purpose, each GRC selects from the very start two people (female and male representative) among them to form a GBV complaints team that attend to the project related GBV/SEA/SH/SVAC issues. In addition, Contractors are required to sign a document (Code of Conduct) that clearly states the rules as regards to the vulnerable groups in the area. Further guidance

on dealing with GBV grievances is also be provided by the Ministry of Gender, Labor and Social Development (MoGLSD) and/or the Departments of District Community Based Services of the respective District Local Governments.

a) GBV Referral Paths

Depending on the kind of abuse the following are the complaint referral paths:

- i) For all cases relating to physical assault without significant injuries, verbal/emotional abuse; it is reported to Village GRCs to initiate mediation. Failure to agree or the perpetrator is a repeat offender, a written referral is made to police.
- ii) Report to Police - All capital offences including deaths, rape and defilement
- iii) Report to Medical/Health Practitioners for victims/survivors in critical conditions before reporting to police or GBV service provider.
- iv) Report to Psycho - Social Service Providers (District Community Development Office, Legal Aid Clinics, and relevant CSOs/CBOs). Victims also have an option of reporting directly to these community institutions.
- v) Report to the Magistrates Court - In adverse/extreme circumstances, even after having taken the above paths, the victim can report the matter to the magistrate's courts.

The training of GRCs considered the need for a GBV/SEA specialist among the facilitators to ensure the delegated members (female and male representatives) on the committees responsible for dealing with GBV victims/survivors in any complaint are equipped with the necessary skills for purposes of sensitivity, confidentiality and ethics required in these cases. The IFPA-CD Project's GRM incorporates clear information on how feedback, concerns and grievances can be submitted by any Project Affected Person (PAP)/stakeholder, as well as highlighting the varied ways of submitting a complaint. It also provides information on the way the GRM committees work, both in terms of process and deadlines.

b) Handling GBV/SEA Complaints

Each GRC has two people nominated to handle and refer complaints related to GBV/SEA. The role of the GBV complaints team, among other duties as GRC members, is to receive GBV complaints, handle them with the sensitivity and confidentiality they deserve; and refer them to appropriate referral paths such as Service Providers and/or Police as the case may be. Possible channels that function as part of the two grievance mechanisms could include:

- For workers: independent helplines, an email address or whistleblowing line, health and safety committees. It is important that these channels provide anonymity for the aggrieved persons.
- For service users or community members: feedback boxes, telephone numbers, a designated community organization, or local women's organization. Reporting channels need to include anonymous options.

The GRM aims to support GBV/ SEA victims by referring them to GBV/ SEA Services Provider (which can be a local/national NGO already working with GBV/ SEA) for support immediately after the GBV complaints team has received a complaint from a victim. Support options include:

- i) Protective homes for GBV victims/survivors,
- ii) Medical support for incidents involving sexual violence, which may include treatments that need to be administered within 72 hours of the incident to be effective, such as:
 - Emergency contraception to prevent unwanted pregnancy
 - Post-exposure prophylaxis treatment to reduce the chances of HIV infection.
- iii) Psychological support for victims and witnesses, which may need to include trauma counselling for victims of sexual violence or harassment,
- iv) Legal advice for victims, whistle blowers, witnesses, and alleged perpetrators,
- v) Measures that support reintegration into the workforce (e.g., counselling), and
- vi) Child-protection support services and/or expertise for reports involving children.

There are three key elements involved in handling GBV/ SEA complaints: (i) a separate GRM channel, (ii) GBV/ SEA Services Provider, and (iii) representative of NFA/UWA or MoWE. While the process

for grievance resolution and people involved may vary, the key guiding principle for resolution should be to ensure complete confidentiality of the victim, a victim centered approach and speedy resolution. The process for addressing complaints entails:

- The GBV complaints team keeps GBV/ SEA allegation reports confidential and, unless the complaint was received through the GBV/ SEA Services Provider or other identified reporting channels, refer the victim immediately to the GBV Service Provider.
- If a case is first received by the GBV/ SEA Services Provider or through other identified reporting channels, the report is sent to the GBV/ SEA Complaints team to ensure it is recorded in the system.
- The GBV/ SEA Services Provider provides the necessary support to the victim until it is no longer needed.

c) Resolving and closing a GBV/SEA case

There are two elements related to resolving and closing a GBV/ SEA case:

- The internal project system, in which the case is referred to the GBV/ SEA Services Provider for victim support, and through the established GBV/ SEA resolution mechanism appropriate actions are taken against perpetrators, and
- The support that the victim receives from the GBV/ SEA Services Provider.

When a complaint is received, it should be registered in the project GRM and referred to the GBV Complaints Team with the consent of the complainant. The GBV/ SEA Complaints Team initiates accountability proceeding (with the victim's consent), as follows:

- If the victim does not wish to place an official complaint with the project, the complaint is closed.
- When the victim proceeds with the complaint, the case is reviewed through the established GBV/ SEA resolution mechanism and a course of action is agreed upon.

A process to resolve GBV/ SEA complaints is shown in the figure below.

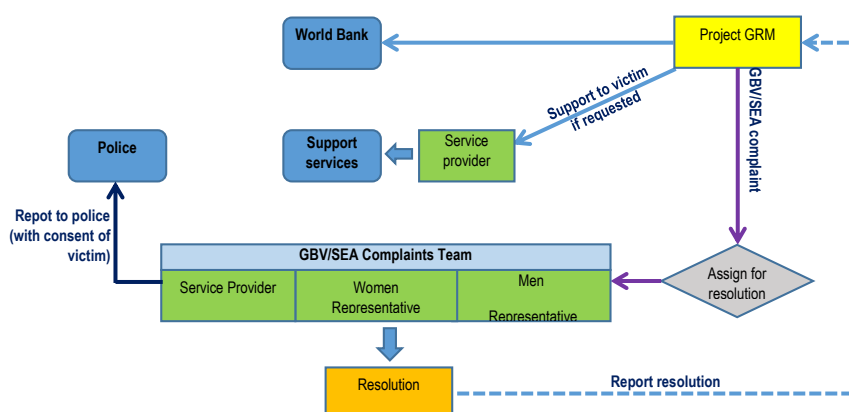


Figure 2: Process of resolving GBV/ SEA complaints.

Implementation and Awareness Creation

Awareness creation is a critical part of implementation of the GRM under the IFPA-CD project. Stakeholders need to be informed about the existence of the GRM, its structures and how it operates including mechanisms for channelling grievances. Information, Education and Communication (IEC) materials has been developed to disseminate information to various stakeholders so that they are provided with information they require on GRC mandate, objectives and operational principles for effective delivery of their functions.

EISM GRM

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

- Enhance existing project-level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to discrimination on World Bank/IFC financed operations and refer them to an appropriate grievance handling mechanism.
- Design and operate a mechanism for receiving grievances related to discrimination on World Bank-financed operations (including from project-level grievance mechanisms noted above).
- Establish a hotline or an alternative complaint mechanism, for individuals to lodge complaints of discrimination on World Bank-financed projects or voice their concerns without fear of reprisal. As indicated earlier, a hotline (0800 333125) hosted and operated by a local NGO on behalf of the EISM firm has been established for vulnerable or marginalized individuals or groups to lodge their complaints of discrimination.
- The guidelines on how the hotline will be used and cases managed are outlined in Annexes 4 & 5. This will also be integrated in the Project Implementation Manual (PIM).

8.9. Disclosure of the GRM Information

Information on GRM for the IFPA-CD project has been disclosed in the project area as well as the MWE's website and on the World Bank website. Information leaflets and brochures about the GRM structure shall be presented during project related meetings and public consultations. Training of GRCs has been undertaken as well as awareness raising within the project area. During these gatherings, it is emphasized that the GRM is aimed at quick and amicable resolution of complaints and does not substitute the legal process established under national legislation.

Various avenues (including radio talk shows and awareness campaigns are being used to ensure people are made aware of the availability of the GRM, steps of grievance resolution as well as contacts and locations of focal persons to be approached in case of any grievance.

Various stakeholders including civil society, NGOs are considered as key actors of the GRM and play a crucial role in disseminating the information on GRM and facilitating quick and amicable resolution of complaints. The GRC District Focal Person coordinates information dissemination activities in collaboration with the Social Safeguards Specialist of the Project Coordination Unit as well as Safeguards Focal Points in UWA and NFA on GRM and ensures that the posters providing details on GRM and contacts of grievance focal points are posted in a publicly accessible and visible place such as trading centres, markets, places of worship and health centres and in every affected community.

8.10 Grievance prevention

Grievance prevention is key and forms part of the GRM implementation. The following measures have been put in place to prevent grievances from occurring:

- a. Identify risk areas that are likely to cause grievances and possible mitigation measures.
- b. Provide sufficient and timely information to the community and other stakeholders. Many complaints arise because of lack of information or insufficient information. Therefore, providing accurate and adequate information about the project and its activities and implementation schedule is done regularly. Avenues for information dissemination is in form of radio talk shows, Information and Education Materials, and trainings.
- c. Conduct meaningful community and stakeholder engagements. Throughout the project implementation, the project continues sharing information, progress reports, providing

opportunity to community members to raise their concerns, responding to their issues in a timely manner, as well as receiving feedback on interventions.

- d. Build capacity for the project staff. The project staff are equipped with information about the project such as project design, project activity implementation schedules, and institutional arrangements. They also have basic skills like effective communication, community dynamics, negotiation and conflict resolution. Building trust and maintaining good rapport by providing information on the project and responding to community needs helps solve issues before they become grievances.

8.11 The World Bank's Grievance Redress Service (GRS)

GRS Definition and Purpose

The GRS is the World Bank's easy way to provide PAPs and communities an avenue to bring their complaints directly to the attention of Bank Management. The Project-level GRM remains the primary tool to raise and address grievances in Bank-supported operations except issues that cannot be resolved at the Project level. The GRS facilitates corporate review and resolution of grievances by screening and registering complaints and referring them to the responsible Task Teams/Managers. The GRS undertakes the following functions within defined time frame:

- a) Receives complaints from stakeholders;
- c) Evaluates and determines their eligibility and category;
- d) Refers complaints to appropriate Task Teams/Managers;
- e) Follows up with Task Teams to ensure complaints are resolved;
- f) Refers PAPs to the Borrower or other parties where appropriate.

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

Submitting a Complaint to GRS

Complaints may be submitted by one or more individuals, or their representatives, who believe they are adversely affected directly by an active (i.e. not closed) Bank-supported operation (IDA). A complaint may be submitted in the English or local language. Processing complaints not submitted in English may require additional processing time due to the need for translation. A complaint can be submitted to the Bank GRS through the following channels:

By email: grievances@worldbank.org;

By fax: +12026147313

By mail: The World Bank, Grievance Redress Service,
MSN MC 10-1018, 1818 H St NW, Washington, DC
20433, USA and/or

Through the World Bank Uganda Country Office in Kampala – Rwenzori House, 1 Lumumba Avenue, P.O. Box 4463, Kampala (U); Tel: +256 414 3022 00.

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank supported operation. This is supported by available documentation and correspondence where possible and appropriate. The complainant may also indicate the desired outcome of the complaint, i.e., how it may be resolved. The complaint should have the identity of complainants or assigned representative/s, and address contact details.

9.0 MONITORING AND REPORTING

The MWE has the overall responsibility for coordinating monitoring and reporting and ensuring that data and information are produced on time and to the necessary quality. Project performance and results, including progress on stakeholder engagement, are reported on a semi-annual basis to the World Bank.

Inclusive and non-discriminatory citizen engagement indicator measures civic engagement in management of forests under the CFM and CRM arrangements and in community forests. The end of project target is based on an average of 50 persons, both men and women, consulted in each community (without discrimination) under CFM and CRM arrangements and an additional 100 persons around central forest reserves with boundary demarcation activities. This is based on Information compiled from project records for consultations conducted during forest management plan preparation and consultations for the formation of CRM and CFM groups. CFM and CRM groups established with project support should aim to be inclusive and non-discriminative and have at least one woman in the executive committee. UWA and NFA focal points responsible for community engagement will collate the above information based on the documentation.

To strengthen and facilitate systematic documentation of stakeholder engagement sessions, the project has developed and distributed a standardized stakeholder engagement template which provides a simplified reporting format. It covers location, date, venue, number of participants, key issues discussed and if relevant, decisions taken. Pictures should also be taken as appropriate. The template was prepared by MWE in close collaboration with UWA and NFA.

Grievance management: Grievances are captured for monitoring and reporting using the Grievance Registration Form, logbooks and reporting templates as detailed in the GRM framework. The Grievance Registration Form is filled out for each grievance (relevant to the project) by GRM parties at Conservation/Range, District, Sub-County, Parish and village level where the grievance is logged.

The District Focal Persons coordinates GRM activities with members of GRC at District, Sub-County, Parish and Village levels on a weekly basis to update the GRC's database. Training of GRCs at different levels is currently ongoing to strengthen the grievance management and conflict resolution skills of the members. Ongoing efforts include capacity building for CRM and CFM groups, which is critical as all parties are familiar with these entities, and since they will last beyond the life of the project, this initiative may also contribute to longer term improvement in the management of natural resources. The District Focal Persons and the GRC members at the different levels, will receive training on the application of EISM to strengthen the mitigation of the risks associated with exclusion and discrimination of vulnerable or marginalized individuals and groups in accordance with guidance given under Annex 4 and 5.

The District Focal Persons (DFPs) coordinate the monitoring process and provide monthly reports on the status of handling and management of grievances within their respective districts. The respective reports reflect a consolidated picture of the status of grievance handling at the district level.

The above approach facilitates the documentation of the number of consultations with local stakeholders, groups/categories of stakeholders involved, engagement methods used, geographical coverage of engagement activities, number of participants, including women and topics covered.

Involvement of stakeholders in monitoring activities: Monitoring and reporting of the stakeholder engagement process are considered critical to enable the implementing agencies (IAs) to respond appropriately to local issues and concerns. It is likewise important for the IAs to report back to the affected stakeholders to ensure two-way communication, transparency, and the building of trust between UWA/NFA and the affected PA-adjacent communities. UWA and NFA will report back to community beneficiaries on the main findings from the monitoring exercise and on the resolutions of project-related grievances as well as any other matters of relevance to affected community members.

Stakeholders will therefore be kept informed about project implementation including progress with regard to the SEP and the grievance management process.

Systematic monitoring and reporting of stakeholder engagement and the reporting back to stakeholder groups allow the process to be evaluated reflecting the objectives of the SEP as well as progress on agreed actions. This will also facilitate adjustments or improvements during implementation and review of outputs at the end of project implementation to evaluate the effectiveness of the SEP as implemented.

In addition to the above and in response to mitigating potential risks and impacts associated with social exclusion and discrimination, the World Bank will ensure effective monitoring of these risks aimed at project beneficiaries or workers, with special support provided through Enhanced Support, Implementation and Monitoring (EISM) mechanism, as may be needed, for individuals or groups who may be identified as vulnerable or marginalized. Furthermore, training will be offered to all concerned parties (including the PCU and the respective participating MDAs and Local Governments as well as CFMs /CRMs) to promote sensitization against non-discrimination and exclusion. Details of EISM is found under Annex 4 and 5.

ANNEX 1 DETAILS OF GRCS FOR CENTRAL FOREST RESERVES AND SURROUNDING DISTRICTS

Name of Range	CFR	District	Surrounding Subcounty GRC	Parish GRC	Village GRCs
Budongo System Range	Budongo	Masindi	Karuju	Kibwona	Bubwe
					Busingiro
					Kalengeija a
					Kalengeija b
					Kampala b
					Sitini b
					Udukuru
					Akimi a
					Akimi b
					Garasoya a
					Garasoya b
					Kibuye
					Siba
					Hanga
					Kyabisagazi ii
					Kapeka ii
					Kapeka iii
					Ewafala
					Busaju
					Kibale
					Kyesiko
					Onini
					Simba
					Kanyege
					Kyempunu
					Maramu
					Nyabyeya i
					Nyabyeya ii
					Nyakafunjo
					Kababito
					Katanga
					Katugo i
					Katugo ii
					Nyantanzi
					Rwangara
					Rwentale i
					Siiba
					Bulyango i
					Bulyango ii

				Kisita	Kirima
				Labongo	Kyarugangara
					Hanga
					Kasenyi-bwore
					Kigaragara
					Kihaguzi
					Kituuka i
					Kituuka ii
					Nakyanika i
					Nakyanika ii
	Hoima		Kabale		Nyakasenene
					Kahuniro
					Kamata b
		Kiryanga	Pachwa		Nyampindu
		Rugashari	Burora		Kihuumuro
					Nyabugando b
					Nyakabingo
					Iruhura
					Izahura
					Namirembe
					Namugongo
					Rutooma
	Kibaale		Rugashari		Yorodani
			Bubogo		Kikonda ii
					Kisindi
					Kisonsomya
					Nyakabale
		Kabwoya			Bujongoro
			Igwanjura		Kisaaru tea
					Nyaigugu
					Nyangabi
			Kaseeta		Kyenjojo
					Nyayirongo
			Kidoma		Nyamigogo
					Rusaka
			Butoole		Butoole
			Kasonga		Refuge settlement
					Refuge settlement
		Kikuube	Kyangwali		
Budongo System Range			Kisuura		Humura
	Kagombe				Muzizi
			Nyakarongo		Bwema
	Kagadi	Bwikara			Katalemwa a

					Kyabeiru
					Nyamirembe
					Kamukole
					Ngoma
					Nyamalembo
					Busirabo
					Busirabo b
					Rwamabare
					Kanyangoma b
					Kisara
					Muhangi
					Nsugasugi a
					Nsugasugi b
					Kahunde
					Kinywataba
					Katerera
					Lyanda
					Muruha
					Nyamachumu
					Kambogo
					Kyakajwi
					Kyesamire
					Nyambeho
					Karalike
					Kyakazana
					Nyabigata
					Bukonda
					Bujogoro
					Bukonda
					Nyamugusa
					Rwamagando
					Kitembe
					Ngerebwe
					Rubona
					Rwamagando
					Kituuma
					Kyakanyonyi
					Bujogoro
					Nyamarunda
					Buronzi
					Kabaale
					Kanaba
					Kiguuza
					Kitooga
					Kyehengo
					Nyamarunda
					Kibaale
					Nyakarongo
					Kibaale
					"
					"
					Igomero
					Kigomoka
					Kahunge
					Kasambya
					Kyebando
					Ntubagi
					Rwamalenge
					Kisengwe
					Nguse

West Nile Range	Mt. Kei	Wambabya	Hoima	Buseruka	Kyebando	Kajuma	Kijuma			
						Kisojo	Katwetwe			
						Kabale	Kayanja			
							Kiganda			
							Katooke			
							Kayera			
							Kigaga			
						Katanga	Kijumba			
							Katanwa			
							Kyambara			
							Nyamaroby			
							Rwamutongo			
						Kiziranfumbi	Rwengabi			
							Rwenkobe			
							Butimba			
							Rwamusaga			
							Murugarama			
						Echuya	Rubanda	Muko	Kashasha	Rutegyengyer e
		Kirimbi								
		Kitooma								
		Murago								
		Murandamu								
		Murole	Mushanje							
			Mushongati							
			Nyakabungo							
			Ryakashara							
		Kishanje	Rushayu							
		Ikamiro	Rwaburindi							
		Ikamiro	Rwamahano							
		Karengyere	Kagano							
		Era	Moyo	Dufile	Laropi					Gbalala
					Aluru					Pamoju
					Pamoti					
					Vura	Eria				
			Obongi	Itula	Legu	Ukuni				
					Palorinya	Anora				
					Palorinya					
				Obongi	Legu	Legu				
			Koboko	Ludara	Chakulya	Chakulya				
			Yumbe		Palaja	Ambala				
					Dukulia					
					Mengo					

				Menjere
				Osukia
				Rodo
			Kerwa	Bombo
				Rodo
				Warakalya
				Osukia
			Wandi	Osukia south
				Nyanza
				Mengo
				Nyalaka
		Dufile	Laropi	Adhi
				Edre
			Orra	Pajakiri
				Ramogi north
				Ramogi south
			Panyanga	Pakaa
				Pakonira
				Abeso
				Agugwe
				Aringa
				Aringa west
			Pajakiri	Ijujo
				Izzi
				Meria
				Pabolo
				Paecoa logo
				Pagunaki
				paleure
				Palaure
				pamulu
				Pamoyi
				Pamulu
			Pameri	Gwere luzira
				Gwere mundi
				Erepi east
			Pamujo	Kweyo
				Lyua
				Pagabo
				panyindra
				Pamenyu a
			Pameri	Erepi
				Minya
			Pamoyi	Alu
				Gwayi

				Liri
				Ori
Wati	Arua	Aii-vu	Ayuri	Aliwaku
			EREA	Akua
			ONAI	Kumuyo
Zoka	Adjumani	Omugo	Omugo	Ezaveku
		Ciforo	Maaji	Boroli
		Ofua	Zoka	Adjugop
				East moy
Rwensama	Masindi	Budongo	Nyabyeya	Ozugo/gbayi
				Karongo
				Kyakuhihwa
Ibambaro	Kyenjojo		Kijaguzo	Munyambogo
				Nyamicui
				Kyarwehuta
Itwara	Kabarole	Kabarole	Kabende	Munsambya
				Kalibwoya
				Kikuba
				Kyabagasha
				Burungu
				Kasokero
				Kyangabukama
				a
				Musongora
				Rwesenene
Kibego	Kyenjojo	Bugaaki	Kibasi	Hakibaale
			Kijura	Kyamuhorro
				Kataraka
			Kyabaranga	Kihora
				Busasa
			Nyamabuga	Isunga tengo
				Masese
			Katambale	Rwera
				Kibale
			Kigoyera	Kijumbe
Kajuma				
Muzizi River Range	Kyenjojo	Katooke	Nyakisi	Buhurra
				Kafunda
				Kisojo a
			Rubango	Kagorra a
			Kyarusozi	Binunda
Nsinde a				
Nsinde b				
Kyamugenyi			Kyabaganda	
			Ncumbi	

South Wester n Range	Kitechura	Kyenjojo	Bufunjo	Kitenga	Nyabwenga
					Businda
					Kaamukube
					Kijengi
					Kisengye
					Kitega
					Kyamugarra
					Nyamicui
	Matiri	Kyenjojo	Kihuura	Kigunda	Mahasa
				Kyankaramata	Busese
					Kiryandongo
					Kyamunwa
					Nyabusozi
				Matiri	Ganyinayo
				Matiri	Matiri
				Rwibaale	Butubiri
	Mukonomura				
	Rwenyunyuzi				
	Rwibaale				
	Muhangi	Kyenjojo	Kyarusozi	Kasaba	Nyaruzigati
				Katambale	Igoma a
				Kigoyera	Mwoya
	Nkera	Kirongo	Kyenjojo t/c	Kirongo	Kidomi cell
				Rwendera cell	
		Kyenjojo	Katooke	Myeri	Kadiki
				Kihuura	Nkeera
	Rwensama	Masindi	Masindi	Kihuura	Bisa
				Buramba	
				Masindi	Maramu
				Nyabigoma	
		Kyenjojo	Kyegegwa	Kabwesa	Buteera
				Kabwesa	
				Muhangi	
				Kibuye	Kibuye a
Ihimbo	Rukungiri	Rukungiri		Kibuye b	
			Rukungiri	Rwemirongo	
			Kakindo	Burambira	
			Kyabureere	Kibeizi	
			Kyabureere		
			Bikurungu	Nyakatunguru	
			Kikongi	Kikongi	
			Nyakarama		
			Nyakatunguru		

Kakasi	Kitagwenda	Kicheche	Kakasi	Rushararazi
				Kakasi
				Kasyoha
				Kakasi
			Ruhunga	Kasyoha fr
			Nyabikamba	
			Rubuzagye	
			Ryampanga	
Kalinzu	Bushenyi	Kyamuhunga	Mashonga	Kayanga
			Ryamurunga	
			Tea estate	
			Katima	
			Swazi	Ryanyamihondo
			Swazi i	
			Swazi iii	
			Nyakahandagazi	
		Nyabubare	Nyarugoote	Nyarugoote
			Mitooma	Kibare ii
			Nyakashojwa	Nyakahanga
			Rugarama	
Kalinzu	Mitooma	Mitooma		Rutookye iii
				Sherere ii
				Bihehe
				Butezi
	Rubirizi	Ryeru	Mushumba	Kyanika i
			Ndangaro	Nkombe i
			Nyabubare	Kyanika
			Nyakiyanja	Kabukwiri
	Masindi	Karujubu	Kibwona	Kibwona
			Kisita	Karujubu
			Kiryanga	Kijweka
				Nyabisense
Kasokwa	Buhweju	Nyangahya	Kajumbura	Kajumbura ii
			Kiruruma	
			Kyahenda	
			Nyamihira	
Kasyoha-Kitomi		Bihanga	Karembe	Runengo
			Nyakaziba	Kayenje
				Ntungamo
			Rukiri	Kako
		Burere	Rubengye	Kengeya
				Kayonza
				Rubengye

Bushenyi	Kyabugimbi	Rwajere	Kihane		
			Kyambura		
			Nyakisyama		
			Ruhita		
		Buhumuro	Kasa ii		
		Bitooma	Kyaasha		
			Kayanga		
			Kibingo		
			Kikumbagazo		
		Mashonga	Nyakatembe		
Nyakazinga					
Irimya	Karuhisi				
	Kanywambog o		Kabuhweju		
		Kibingo			
		Kisabo ii			
Ibanda		Ibanda	Kicuzi	Ryabatenga	
	Kicuzi				
	Kakasi		Mahuha		
			Kakasi		
	Ruhunga		Kakasi		
			Kasyoha		
	Mahyoro		Nyabikamba		
			Kitonzi	Kakiindi i	
	Rubirizi		Mahyoro	Kakaari	Mugombwa
					Ngoro ii
Katanda		Katanda ii			
		Nyangorogoro			
Kyabakara		Kagarama			
		Rugarama			
Mugyera		Kisharu			
Munyonyi		Munyonyi i			
		Munyonyi ii			
		Munyonyi v			
	Nyandongo i				
Katerera	Ryeru		Butoha i		
		Kanyara			
		Butoha	Nyangorogoro i		
			Kabirizi i		
		Buzenga	Kamacumu ii		
			Kyeibumba i		
			Kyeibumba ii		
		Ndangaro	Kanyambiriri i		
			Kanyambiriri ii		
			Kashenvi		

				Kinoko
				Nkombe i
				Nyabwiina
				Rwemitago
				Rwenkobe
			Ndekye	Nyamishekye
			Nyabubare	Kyamabare
				Rurama
North Maramagam bo	Mitooma	Kiyanga	Rwoburunga	Nyakashebeya
				Sherere
		Kanyabwanga	Kanyabwanga	Kigyende i b
				Koburunga
		Mitooma		Rugazi
South Maramagam bo		Kiyanga	Kashongorero	Karokarungi a
				Kashongorero
			Iramira	Bukungu
				Kaburara
				Kateija
			Kiyanga	Bukiriro i
				Bukiriro ii
				Kakimba
				Kamabaare
		Bwambara	Nyabubaare	Kakoni
				Nyakarambi
		Rukungiri		Nyakibingo
				Nyarwimuka
				Rugyera
				Rutooma
				Rushaya
		Ruhinda	Nyarwimuka	Ruyayo

ANNEX 2. DETAILS OF GRCs FOR WILDLIFE PROTECTED AREAS AND SURROUNDING DISTRICTS

Name of Conservation Area	Surrounding Districts	Surrounding Sub counties	Parishes GRC	Village GRC
Kigezi (Ishasha) Southern Sector of QEPA	Kanungu	Kihhihi	Kibimbiri	Kameme
				Kyenyabutongo
				Rwererer C
			Rushoroza	Cumbugu
				Kazinga Upper
		Nyanga	Bukorwe	Bukorwe
			Nyanga	Mushunga
	Rukungiri	Bwambara	Kikarara	Garuka
				Nyakatembe
				Nyabugando
				Nyakabungo
				Kafunjo
				Kahimbi
				Rwesigiro
			Bwambara	Rushaya A
				Rushaya B
	Mitooma	Kiyanga	Kiyanga	Kashasha
				Kamabale
				Nkongi
				Kihungye
			Bukiro, Nyanga	Nyanga
				Rutoobo
				Kakimba
				Bukiro 2,
			Kaburara	Kaburara
				Bikungu
				Nyakagera

Name of Conservation Area	Surrounding Districts	Surrounding Sub counties	Parish GRC	Village GRC
Toro-Semliki WLR	Ntoroko	Kanara subcounty	Kimara	Kimara south
				Kangonzibwoha A
				Kangonzibwoha B
		Kanara town Council	Kanara Ward	Kanara A Kanara B Rwenyange A Rwenyange B
			Twenzane Ward	1.Ntoroko middle west 2.Ntoroko South A 3.Ntoroko South B
			Kisenyi Ward	Ntoroko East B Ntoroko central B
			Ntoroko Ward	KisenyiA Kisenyi B Ntoroko North

		Karugutu subcounty	Kicwamba Ward	Kakooga Kyabandara 1
		Karugutu town Council	Itojo	Kakindo
		Nombe	Kyabandara parish	Kyabandara 3 Munyege Mulambe2
		Bweramule	Bugando	Mujune Bugando
		Butungamo	Kasungu	Kimala 2 Kyenyange Kajura
		Rwebisengo	Makondo	Makondo Kibira Kasongora

Name of Conservation Area	Surrounding Districts	Surrounding Sub counties	Parish GRC	Village GRC
QENP	RUBIRIZI			
		Katerera S/C	Katerera	Nyakahita,Rukoma, Katonya
		Kyabakara S/C	Kyabakara.	Kagando, Katabago1
			Kakari	Nyakanengo,Nyaru hanga,Nyakarabi B
			Rugarama	Rugarama 1&2, Rusoro,Karembo
			Nyabubare	Rutondo
		Kicwamba S/C	Kyambura	Kibodi,Kyambura 1
			Kicwamba	Kicwamba Upper,
			Katara	Katara
			Rumuri	Buhingo1, Kyankwali, Buhingo3
		Katunguru S/C	Katunguru	Kyanga Bukama
			Kazinga	Kanombe,Kagera
			Kisenyi	Nsegia 1&2
			Kashaka	Nsengira1,2,3&4
		Ryeru S/C	Ndangara	Ndangara
			Mushumba	Mushumba
		Kirugu S/C	Kirugu	Kirugu, Kafuro1&2
			Kyezanza	Kyezanza
	Mitooma			
		Kiyanga S/C	Kiyanga	Kamabale,Kacwamba,Rutobo&Nyanga
			Kaburara	Kaburara,Katinza,B ikungu
			bukiriro	Bukiriro1&2
			kashasha	Ngonge , Kihungye

		Rwoburunga S/C	Ndoromu	Ndoromu
			Rwaburunga	Muzinga,Ruzonga, Rubaya,Karokarungi
			Kiribwa	kafunzo
			Kagati	Nyabubare,Nyakas hebere,Kemengo,S herere,Kafunzo.
		Kigyende S/C	Kanyashongorero	
			Kanyabwanga	
	Ibanda	Kicuzi	Irimya	Karuhizi, Kagezi, Buhidaji
	Rukungiri			
		Bwambara	Rweshama	Chwera,Rwabinyonyi,Rweshama
			Nyabubare	Nyabubare.
			Kikarara	Nyakabungo A&B,Kafunzo,Nyabugando,Kahindi,Rwesingiro,Nyakatembe A&B,Guruka
			Bwambara	Bwambara,Rushaya A&B,Kakoni,Guruka
		Ruhinda	Nyamwinuka	Nyamwinuka
	Kanungu			
		Kihihi	Kibimbiri	Kameme,Kinyabutongo,Rwerere,Mwerigizo
			Rushoroza	KimbuguNyarurambi,Kazinga Lower&Upper,Kororo
		Nyanga	Nyanga	Ishasha,Musanga,Busanza,Burambi
			Bukorwe	Burambi,Karambi,Bukorwe,Kazinga
	Kamwenge	Kamwenge	Nkongoro	Nkongoro, Mwetororo, Kasoga1&2
	Kasese			
		Nyakiyumbu	Kayanza	Kayanza,Kataturwa
			Katholhu	Rwehingo,Bwengo
			Bukangara	Kikumbi
		Isango	KamuKumbi	Kamukumbi 1&2, Kanyatsi
			Harukungu	Central cell,Harungongu B,Kitatutwara

		Kabafu	Kabafu 1&2, Isango 1&2
		Kyempara	Kyempara 1&2
	Nyakatonzi	Muruti	Kakonge 1&2, Muruti
		Kisasa	Muhumule, Kyesan da, Bukangara, Rwe hingo
		Kamuruli	Kamuruli Lower, Bwanika, Ka gongo, Rwemburara
		Nyamugasani	Nyamugasani, Rwet uha, Isanzi
	Muhokya	Muhokya	Rutoke, Muhokya A
		Kahendero	Kahendero 1&2, Bwenanule, Lyemu buza
	Lake Katwe	Kasenyi	Kigabo, Kikonzo
		Hamukungu	Hamukungu A & B
		Katanguru	Kibati, Kasubi
		Mweya	Mweya Upper & lowe
		Kabirizi	Kabirizi, Rwetutu
		Busunga	Rwamate, Busunga
	Kahokya	Kahokya	Kahokya, Nyaruziga ti
	Katwe- Kabatooro TC	Kyarukara	Kyarukara A & B
		Kyakitale	Kyakitale Lower and upper
		Rwenjuba	Rwenjuba lower & upper
		Tophill	Kakone, Tophill,
		Kiganda	Town center, Mwaru (landing site)
Kasese Municipality	Central Division	Railway Ward	Kikonzo, Kidodo, R ailway
		Kirembe	Kahokya, Nyamiran gala, Kirembe
			Kangangya, Main, Saluti A & B
		Scheme ward	Scheme
	Karusndara	Karusandara	Kabaka, Kabuga, Ka bokero, East and West, Sebwe, Kivegengen yi. Karusadara

			Kanamba	Mubuku2, Tukundane, Kanamba, Ngando, Kabarati
			Kyalanga	Kyalanga, Kikonzo, Rwebigongo
	Kitagwenda			
		Kanara	Kanara	Kanara
			Rweshama	Rweshama
			Kekubo	Kekubo
		Ntara	Nyakachamba	Karubugoma 2
		Bukurungu TC	Nyakera Ward	Nyakera A&B
			Bukurungu Ward	Nyamizo 1&2, Kabale 1&2
			Buhumiro Ward	Kabale 3&4/Kaband a
		Mahyaro TC	Mahyoro Ward	Bubale, Kyamubing a, Kaduku, Nkurung o, Kedata, Rugando, Nyakasura 2
			Kanyabikere Ward	Kanyibikere, Katan ga, Kihango, Zambia , Rwetuma
			Kyendangara	Kyendangara, Omukalere, Buhindaji, Kitomi

Name of Conservation Area	Surrounding Districts	Surrounding Sub counties	Parish GRC	Village GRC
Semiliki National Park	Bundibugyo	Burondo	Burondo	Burondo III
				Burondo Central
		Ntandi T/Council	Ntandi Ward	Ntandi EAST
				Ntandi West
			Bundimasoli Ward	Bundimasoli
			Mpulya Ward	Mpulya III
		Ntotoro S/County		Bundimwali
			Ntotoro	Bubulongu 1
				Mantoroba
		Tokwe S/County	Bundinyama	Bundirume C
				Bundirume I
				Bundinyama I
				Bundibukusu
				Bundimugayo II
				Bundinyama II

				Bundirume II

	Ntoroko Bunyangabu			
Kabwoya Wildlife Reserve	Hoima Kibuube			
Bwindi Impenetrable National Park	Kanungu Rubanda			

Annex 3: Actions Taken by Gou to Ensure Inclusion and Non-Discrimination

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

Since 2023, the Government has continued to ensure inclusion and non-discrimination in all its projects and consistent with this, the Government has taken the following measures:

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

Of particular importance is the Letter of Assurance of September 21, 2023, from the Permanent Secretary/Secretary to the Treasury on Uganda's Social Safeguard Policies following excerpts:

“Following the World Bank Group’s concern with the Act in 2023 and as communicated in the budget Execution Circular 2023 of FY 2023/2024 on 18th July 2023, we guide:

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

The following transcripts of relevant Guidelines and Circulars issued by the GOU are included in this annex: Letter of Assurance; Circular on provision of health services; Circular on provision of education services; Circular issued by the Director of Public Prosecutions, and relevant excerpts from the Circular on Budget Execution.

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This subject please quote No. ALD 141/259/01 TC



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

21st September 2023

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



UGANDA'S SOCIAL SAFEGUARD POLICIES

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

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

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

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

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

Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance Planning and Economic Development

Mission

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

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

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

ALD 141/259/01 TC

21st September 2023

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



UGANDA'S SOCIAL SAFEGUARD POLICIES

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

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

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

Mission

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

Specific Measures for High Risk Sectors

Health

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

Education

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



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports
Hon. Minister of Health
Hon. Minister of Gender, Labour and Social Development
Hon. Minister of Energy and Mineral Development
The Principal Private Secretary to H.E. the President
The Solicitor General, Ministry of Justice and Constitutional Affairs
The Permanent Secretary, Ministry of Health
The Permanent Secretary, Ministry of Education and Sports
The Permanent Secretary, Ministry of Gender, Labour and Social Development
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BPD 86/179/01



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

10th July, 2023

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

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

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

A. INTRODUCTION

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

Minister

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

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

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

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



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

Policy Directives

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

Non-Discrimination

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

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

Advertising by Ministries, Agencies and Local Governments

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

Contracting in Ugandan Shillings versus Foreign Currencies

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



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Ministry of Health
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KAMPALA
UGANDA

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

THE REPUBLIC OF UGANDA

5th June 2023

Circular

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

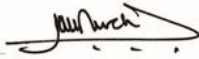
PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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

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

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

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



Dr. Henry G. Mwebesa
DIRECTOR GENERAL HEALTH SERVICES

cc. Hon. Minister of Health
Hon. Minister of State for Health (GD)
Hon. Minister of State for Health (PHC)
Permanent Secretary, Ministry of Health
All UN Agencies
PEPFAR Coordinator
Head Country Team Global Fund, Geneva
Country Manager, World Bank
Country Director – CDC, USAID, DOD
Director General, Uganda AIDS Commission
Directors, Ministry of Health
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Ministry of Education and Sports
Embassy House
P.O. Box 7063
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Website: www.education.go.ug
Kampala, Uganda

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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

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

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

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

A handwritten signature in blue ink, appearing to read "Ketty Lamaro".

Ketty Lamaro
PERMANENT SECRETARY

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

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Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

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

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

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

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

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

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

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

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

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

Annex 4: Enhanced Implementation Support and Monitoring on Non-Discrimination

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

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

The objectives of the Enhanced Implementation Support and Monitoring include:

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

Table 11 illustrates the enhanced implementation support and monitoring steps. Figure 8 contains the Enhanced Implementation Support and Monitoring process. Figure 9 contains Complaint Management for vulnerable or marginalized individuals or groups.

1. SCOPE OF WORK AND ACTIVITIES

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

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

To do so the EISM will:

- **Enhance existing project-level grievance redress mechanisms** to safely, ethically, and coincidentally receive cases related to discrimination on World Bank/IFC financed operations and refer them to an appropriate grievance handling mechanism.
- **Design and operate a mechanism for receiving grievances** related to discrimination on WB/IFC financed operations (including from project level grievance mechanisms noted above).
- **Establish a hotline or an alternative complaint mechanism**, for individuals to lodge complaints of discrimination on WB/IFC financed projects or voice their concerns without fear of reprisal. The EISM is an alternative to lodging complaints through a GOU-led project-level GRMs

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

Table 12: Enhanced Implementation Support and Monitoring Steps	
Act as a key first step in the referral process from project-level GRMs	Designed specifically to handle complaints restricted to WB/IFC projects
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities.
Step 2	Develops specific security protocols to ensure that communications are safe, ethical, and confidential.
Step 3	Establishes a data management system on an international server guaranteed by the provider as safe and secure encryption and privacy.
Step 4	Implements a data privacy and protection policy to include confidentiality clauses to be signed by all personnel entrusted with managing referrals or referral-related information.
Step 5	Handles complaints in a confidential, anonymous, and non-judgmental manner which is sensitive to local context and in local languages.
Step 6	Provides detailed monthly reports of complaints received to the WB/IFC
Step 7	Provides ad hoc incident reports of all allegations to WB/IFC within 48 hours of receipt.
Step 8	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.
Step 9	Maps available services for vulnerable or marginalized individuals or groups including counselling, legal services, protection, and other services.
Step 10	Refers individuals to the appropriate local services or organizations as needed.
Step 11	Regularly evaluates the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning.
Step 12	Recommends and supports the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

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

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

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

1.3 Capacity strengthening and technical support

Activities related to capacity strengthening and technical support include:

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

1.4 Monitoring and Evaluation

Activities related to monitoring and evaluation include:

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

2. SCOPE OF WORK AND ACTIVITIES

The GOU and its PIUs remain responsible for the implementation of all project activities including supporting the WB/IFC to ensure the agreed measures on non-discrimination in the portfolio are implemented fully, ethically, safely, and to an appropriate standard of quality; and to support the WB/IFC to enhance our awareness of cases of discrimination across the WB/IFC portfolio.

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

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

Description of Enhanced Implementation Support and Monitoring (EISM) Process

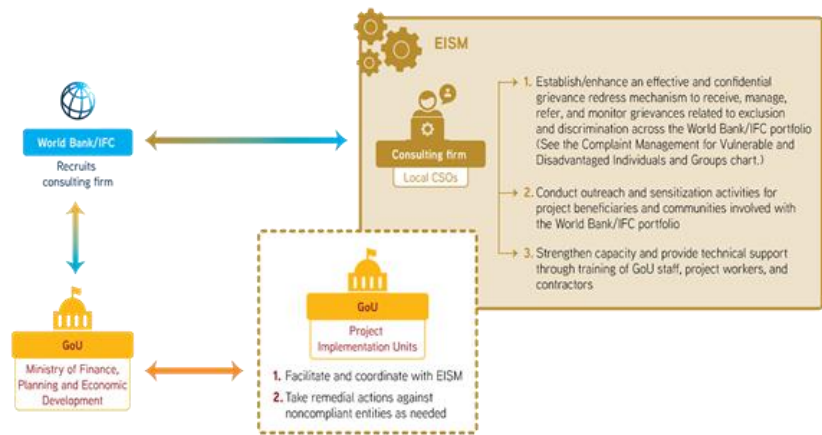
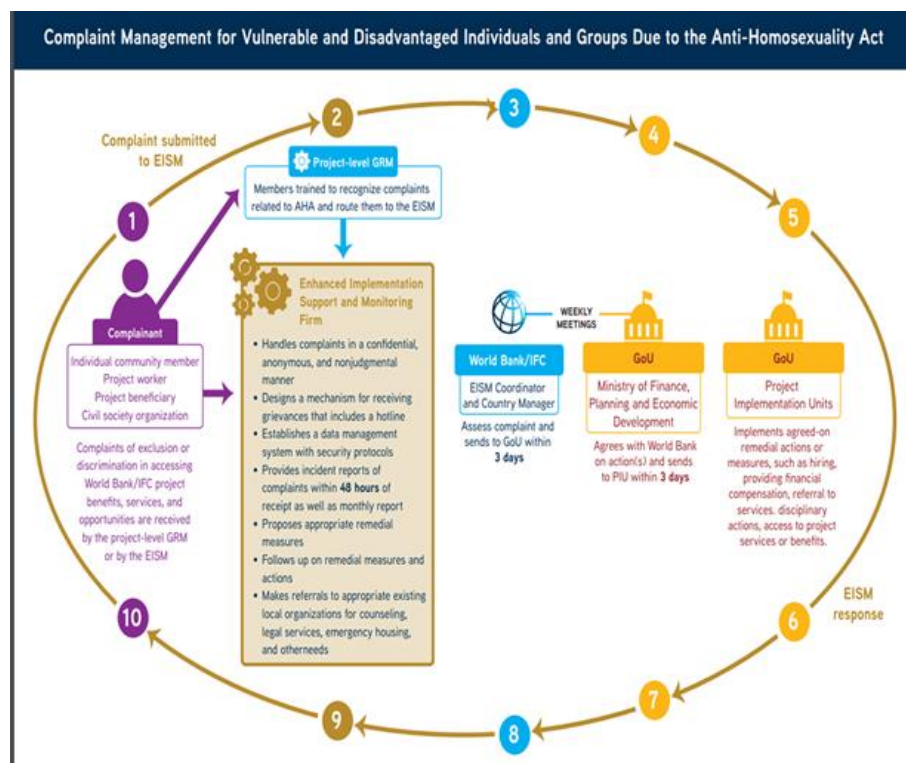


Figure 10: Complaint Management for Vulnerable or Disadvantaged Individuals or Groups



ANNEX 5: Guidelines For Implementing Mitigation Measures to Address Exclusion and Discrimination -Related Risk

In July 2024, the Environmental and Social documentation and its annexes including ESMF, VLD guideline, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. The ESMF and SEP for IFPA_CD includes such mitigation measures in various sections as appropriate.

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

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

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

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

Steps for Implementing Mitigation Measures

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

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

1. Assess the Status of the Project

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

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since June 2023 or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed. The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.
- **Pipeline projects.** A project that has not yet begun implementation provides the opportunity to integrate exclusion and discrimination related risk mitigation measures and monitoring into its design.

IFPA-CD as a pipeline project has presented such an opportunity to integrate these mitigation measures and monitoring into its design.

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

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

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

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

Hotline on Discrimination and Exclusion

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

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

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

3. Conduct Outreach and Sensitization Activities

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

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

4. Strengthen Capacity and Deliver Technical Support

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

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

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

5. Conduct Monitoring and Evaluation

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

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

6. Take Remedial Action

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

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

Roles and responsibilities for the Implementation of Mitigation Measures

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

This section also provides more specific information on roles and responsibilities to implement the mitigation measures of the EISM firm RSEO and the PIUs/PIST. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/PIST with the support of the EISM firm RSEO hired by the World Bank with NGO/CSOs and country-based development partners in implementing these mitigation measures. SREO's specific responsibilities include:

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

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

- Developing training, sensitization, information, educational, and communication materials on the principle of non-discrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on non-discrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on non-discrimination and codes of conduct on non-discrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.

- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

Box 1: Roles and Responsibilities for the Implementation of Mitigation Measures

Government of Uganda

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

Project Implementation Units/Project Implementation Support Teams

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

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

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

Civil Society Organizations

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

SREO Consulting, Ltd.

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

Annex 4: IFPA-CD UPDATED GRM SYESTEM

The toll-free lines have been established for both UWA (0800100960 and WhatsApp number 0740560236) and NFA (0800264036 and WhatsApp number 0707608920) and are functional. MWE toll-free (800203655) line to receive project related grievances on activities in the refugee hosting areas and it will also be the second level for grievance escalation from both UWA and NFA.

Each implementing institution (MWE, UWA & NFA) shall always have in place two officers responsible for receiving calls from the provided project numbers, recording all received grievances in the complaint's logbook, channelling grievances received to responsible officers and following up to ensure that it is resolved and then closed off.

The responsible officer is the social safeguards focal person for the project at UWA and NFA. The project Social Risk Management Specialist is responsible for resolution of grievances at MWE and overall project grievances and ensuring its well documented, followed up on, resolved and closed off. A complaint is only closed off once the complainant confirms satisfaction with the resolution process and outcome provided and if despite solutions and feedback provided and all possible options explored and still unresolved then complaint may take this case to the next level for resolution.

A centralized email for reporting of grievances and any project related issues is open and managed by MWE ifpacd@mwe.go.ug where project beneficiaries and all other stakeholders' grievances can be sent.

Suggestion boxes will be placed in project community areas where project activities are ongoing closer to communities likely to be affected to create multiple uptake channels for grievances. Each protected area will nominate an officer in charge of collecting grievances from the suggestion boxes working with the Local Council 1 chairperson who is responsible for suggestion boxes in their area of operation.

Develop and print IEC material with key information about the project and most importantly, the toll-free numbers, emails, WhatsApp numbers and other available channels for grievance reporting. In addition to the English version the IEC material shall be translated into relevant local languages in the project area and displayed in the respected locations.

NFA AND UWA GRIEVANCE REPORTING IEC WITH TOLL FREE LINES



FLOW CHART FOR GRIEVANCE REPORTING TOLL FREE LINE

When a call is received from the toll free numbers(call centre), the call Center personnel records the grievance in the log book and immediately refers it to the social Safeguards Officer for the agency (UWA & NFA) for an immediate follow up and resolution and if it needs the field office involvement, it is then forwarded to the field office (Chief Warden – UWA & Range Manager - NFA). This should all be done within one day of receiving the grievance. A follow up is made by the field officer to the field and feedback provided to the complainant within two working days of receiving the grievance. Once the complaint is resolved the case is closed. And if not resolved the complaint is escalated to the next level in this case MWE. If not resolved by MWE, the complainant can use other mechanism which involves Court or report to WB GRS.

NFA AND UWA TOLL FREE LINE RESPONSE FLOW CHART



FRRM IN REFUGEE SETTLEMENT

The IFPA-CD project through MWE will work together with UNHCR and use its inter-agency common service plat form for Feedback, Referral and Resolution Mechanism (FRRM) to receive complaints and feedback related to the project. Any issues received through its call centre will be forwarded to the Project Social Risk Management Specialist who will register the grievance or feedback in a logbook, follow up on it and ensure it's resolved while keeping the aggrieved person informed and periodically as agreed updating the FRRM system with the status of the grievance received until closure. A detailed technical working mechanism will be agreed upon with UNHCR prior to operationalisation of this.