



THE REPUBLIC OF UGANDA

MINISTRY OF GENDER, LABOUR AND SOCIAL DEVELOPMENT

VULNERABLE AND MARGINALIZED GROUP FRAMEWORK (VMGF)

**ENHANCING GROWTH OPPORTUNITIES AND PRODUCTIVITY FOR
WOMEN ENTERPRISES (GROW) PROJECT - P176747**

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ACRONYMS

BMCT	Bwindi Mugahinga Conservation Trust
CGV	Chief Government Valuer
CPF	Country Partnership Framework
(D)CDO	(District) Community Development Officer
DLG	District Local Government
DMM	Department of Museums and Monuments
ESA	Environmental and Social Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMMP	Environmental and Social Management and Monitoring Plan
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GIZ	The Deutsche Gesellschaft für Internationale Zusammenarbeit
GoU	Government of Uganda
GROW	Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Services of the World Bank
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome
HSE	Health Safety and Environment
ICRW	International Centre for Research on Women
IDA	International Development Association of the World Bank
IWGIA	International Work Group for Indigenous Affairs
JLOS	Justice, Law and Order Sector

LC	Local Council
MDAs	Ministries, Departments and Agencies
MGLSD	Ministry of Gender, Labour and Social Development
MoFPED	Ministry of Finance, Planning and Economic Development
MoLG	Ministry of Local Government
MLHUD	Ministry of Lands, Housing and Urban Development
MTWC	Ministry of Tourism, Wildlife and Cooperatives
MoWT	Ministry of Works and Transport
MEBIO	Mount Elgon Benet Indigenous Ogiek Group
NDP	National Development Plan
NEMA	National Environment Management Authority
NFA	National Forest Authority
NFA	National Forest Authority
OPM	Office of the Prime Minister
OSH	Occupational Safety and Health
PAPs	Project Affected Persons
PIU	Project Implementation Unit
PWDs	People With Disabilities
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SIA	Social Impact Assessment
(S)GBV	(Sexual and) Gender Based Violence
(S)VAC	Sexual Violence Against Children
PSFU	Private Sector Foundation Uganda
UBOS	Uganda Bureau of Statistics

UNHCR	United Nations High Commission for Refugees
UOBDU	United Organisation for Batwa Development in Uganda
UPF	Uganda Police Force
UWA	Uganda Wildlife Authority
VESC	Valued Environmental and Social Component
VMGF	Vulnerable and Marginalized Groups Framework
VMGs	Vulnerable and Marginalized Groups
VMGP	Vulnerable and Marginalized Groups Plan
WB	World Bank

EXECUTIVE SUMMARY

The Government of Uganda plans to implement the Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project whose aim is to support the country's efforts to provide increased access to finance for women's enterprises; build business and digital skills; enhance women's social networking, provide opportunities for relevant exposure and mentorship. Furthermore, the project will address social norms and negative cultural practices that constrain women's economic empowerment. This is in line with Uganda's Vision 2040; "a transformed Ugandan society from a peasant to a modern and prosperous Country". The project will build on earlier World Bank interventions in the social sector and it is estimated to run for a period of five (5) years.

The Vulnerable and Marginalized Group's Framework (VMGF) has been developed in tandem with a Resettlement Policy Framework (RPF), Environment and Social Management Framework (ESMF) and Stakeholder Engagement Framework (SEF), as per Government of Uganda's and the World Bank's Environmental and Social Risk Management requirements.

The proposed GROW will contribute to Uganda's Vision 2040's and the NDP-III goal of increased household income. Similarly, the project will contribute to the MGLSD vision of a better standard of living, equity and social cohesion. The GROW project is to be implemented mainly by the Ministry of Gender, Labour and Social Development (MGLSD) and Private Sector Foundation, Uganda (PSFU).

The GROW project components and sub-components are anticipated to have an overall positive impact on a large portion of the Ugandan population, and potentially on members of vulnerable and marginalized groups. The Ministry of Gender, Labour and Social Development has prepared a Vulnerable and Marginalized Groups Framework (VMGF) to present (i) potential project benefits, (ii) anticipated socio-economic risks on these groups, and (iii) proposed measures to ensure they benefit from the project. The process of the preparation of the VMGF involved consultations with key stakeholders that included representatives from selected VMGs, CSOs/NGOs dealing with Vulnerable and Marginalized Groups issues, relevant government Ministries, Departments and Agencies (MDAs) and the private sector. Scheduled meetings (virtual in some cases) and feedback sessions were conducted mainly to seek their views on the anticipated project. Stakeholders were generally supportive and eager to have the project because of potential benefits towards the socio-economic transformation of the country. Further consultations/engagements with VMGs will be carried out as part of the implementation of this framework and the Stakeholder Engagement Framework (SEF). These will be carried out in a culturally appropriate manner and through communities' representatives and /or interpreters, when necessary, to ensure that feedback is adequately captured.

The VMGF will potentially be applicable to all project components thus project will make deliberate efforts to ensure that members of the VMGs benefit equitably from the project interventions. The Framework has identified some potential risks that could impact these communities as part of the implementation of activities under the project sub projects, they include those linked to gender-based violence and sexual exploitation and abuse, abuse of labour from members of these communities, child labour, increased vulnerability, social conflict, etc. They include destruction of crops, vegetation and vulnerable and marginalized trees and other natural resources among others. The framework proposes activities to mitigate the risks and impact that will be further elaborated in the Vulnerable and Marginalized Groups Plan (VMGP). The Proposed activities will be part of the implementation of various GROW frameworks and plans. Activities include, but not limited to; VMG involvement and participation, sensitization and awareness creation, compensation and restoration of livelihoods, collaboration with the leadership and community structures as well as working with the contractors to observe the laws and regulations governing workplaces and employment.

1 INTRODUCTION

Project Background Information

The Government of Uganda plans to acquire credit from the World Bank towards the implementation of the Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project. The proposed project will support the country's efforts to provide increased access to finance for women's enterprises; build business and digital skills; enhance women's social networking, provide opportunities for relevant exposure and mentorship. Furthermore, the project will address social norms and negative cultural practices that constrain women's economic empowerment. This is in line with Uganda's Vision 2040; "a transformed Ugandan society from a peasant to a modern and prosperous Country". The project will build on earlier World Bank interventions in the social sector and it is estimated to run for a period of five (5) years.

The Vulnerable and Marginalized Group's Framework (VMGF) has been developed in tandem with a Resettlement Policy Framework (RPF), Environment and Social Management Framework (ESMF) and Stakeholder Engagement Framework (SEF), as a set of due diligence instruments required to address and manage the environmental and social risks and impacts associated with the GROW Project. The framework has been prepared to meet the Government of Uganda's and the World Bank's Environmental and Social Risk Management standards and will be disclosed as part of the project appraisal process. Ministry of Gender, Labour and Social Development (MGLSD) and Private Sector Foundation Uganda (PSFU) will be responsible for implementing the provisions and recommendations outlined in the VMGF. There shall be collaboration with Makerere University Business School (MUBS) to develop and conduct a tailored Core or General course for effective GROW project roll out. MUBS is a government institution of higher learning specializing in business education. Collaborations will also be developed with other service providers offering demand-driven menu of sector-specific trainings. These institutions will be expected to comply with the provisions and recommendations stipulated in this plan.

The proposed GROW contributes to Uganda's Vision 2040's and the NDP-III goal of increased household income. Similarly, the project will contribute to the MGLSD vision of a better standard of living, equity and social cohesion. The GROW project is to be implemented mainly by the Ministry of Gender, Labour and Social Development (MGLSD) and Private Sector Foundation, Uganda (PSFU).

Project Components

The project will have the following components:

1.1.1 Component 1: Support for Women Empowerment and Enterprise Development Services (total IDA US\$40 million, including WHR US\$7.85 million)

This component will focus on supporting enterprise development services and increasing access to social and business networks. The component will (a) expand access to tailored packages of personal and enterprise development support for women's business growth, with a tailored module for refugee needs (b) expand access to mentorship, social and business networks, and (c) tackle social norms constraining women's economic participation and productivity through mind-set trainings for women and men, sessions on social norms and engagements with men and wider community. The support will be integrated for refugees and host community members and underpinned by principles of Green, Inclusive, Resilient Development (GRID).

This component has four subcomponents, Subcomponent A would support the mobilization of women entrepreneurs through support to existing and new women platforms and identification of the beneficiaries of the project. Subcomponent B supports a “core course” required of all women entrepreneurs choosing to participate in GROW. Subcomponent C will focus on support for trade/sector specific skills trainings. The subcomponent D would support a “Women Entrepreneurship Workplace Placement Program”.

1.1.1.1 Subcomponent 1A: Supporting creation and strengthening of women platforms, community mobilization, and mindset change (IDA US\$2 million, including WHR US\$300,000)

This subcomponent will establish and strengthen platforms to promote supportive social norms for women entrepreneurs, business growth and connect women with business networks, markets and infrastructure and advocate on policy and enabling environment for women businesses (such as access to and effectively utilize credit for business growth, access to productive resources, enabling taxation policies and laws, public procurement etc.). The platforms will be at the district level and across districts (as they develop and mature) and have representation at the national level. For integration of refugee women platforms will be created or existing ones strengthened in refugee settlements. The platforms will be formed with membership of women councils, associations such as Uganda Women Entrepreneurs Association, Council for the Economic Empowerment of Women in Africa, Uganda Small Scale Industries Association. Through these platforms, MGLSD will be able to reach and mobilize women for entrepreneurship development. The participation of women entrepreneurs in these platforms enables them to be part of a network and engage in peer learning and sharing and have access to mentors that would support their enterprise growth and transition.

The platform will serve as the foundation for engaging communities, identifying beneficiaries, and delivering other components and subcomponents. The subcomponent will support establishment of a digital platform for women entrepreneurs, database for women businesses, support policy research on issues such as impact of Covid on women businesses, advocating on issues related to taxation and export certification for women businesses. The subcomponent will finance an outreach and communications campaign that promote social norms supportive of women’s economic empowerment, generates excitement about the project, and educates communities about the eligibility and benefits of the project. This subcomponent directly links to the Parish Development Model (PDM) Pillar 5: Community Mobilization and Mindset Change. It will include appropriate messaging and means of communication for women refugees building on the work of UNHCR and its NGO implementing partners. The communication campaign will promote social norms that are supportive of WEE, prevention and response to GBV, engage community male champions, women business leaders and parliamentarian to promote women’s entrepreneurship. In line with PDM Pillar 5: Community Mobilization and Mindset Change this subcomponent will implement a systematic approach to mentorship, counselling, and mobilizing the women to identify the issues that affect them. The platforms will work with women (including refugee and host community women) to put them at the center of decision making and support their pathways to economic empowerment.

The platforms would support the implementation of the communication and outreach strategy, in coordination with the MGLSD’s ongoing national communications campaign on WEE including the rollout of PDM, relevant efforts of local governments, and with ongoing programs such as UWEP, DRDIP, and others. The platforms would also facilitate training and peer-to-peer learning on climate-related changes and traditional knowledge and practices from supporting livelihoods resilience. The women entrepreneurs in the platform would be encouraged to apply for enterprise development support under the project. The communication campaign will ensure appropriately targeted messages for refugee women and host community women in refugee hosting districts. Given the constraints and

barrier refugee women face the platform will provide the forum for their integration, linking to markets and information on enterprise development services.

1.1.1.2 Subcomponent 1B: Support for core business development for micro and small enterprises (IDA US\$13 million, including WHR US\$1.95 million)

This subcomponent will support a core package of training in topics known to enhance success of entrepreneurs of all enterprises. The content and curriculum of the package would vary depending on if transition is from M2S or S2M. The MGLSD will contract Makerere University Business School (MUBS) to develop the curriculum and conduct a “Train the Trainers” program on how to effectively roll it out. The MGLSD, the World Bank, and the PSFU will provide inputs and ensure quality. In addition, best practice and experiences will be drawn on from Bank-financed women economic empowerment and local-led climate action projects in Ethiopia and Nigeria, and youth employments projects in Kenya and South Africa. The MGLSD will implement this subcomponent. Given the broad geographic scope of the project, the MGLSD will contract multiple trainers/service providers who will provide a standardized training course. Technically qualified training providers will be selected through a competitive process soon after project approval, to allow the trainings to start soon after project effectiveness. The training providers will need to demonstrate experience in delivering practical business development courses in both rural and urban settings. The curriculum design and training service provision will be modified for targeting of refugee women. Given their unique constraints and challenges the core course training will have a modified module for refugee women.

The core course for micro enterprises transitioning to small will include topics such as standard business practices such as bookkeeping, accounting, auditing, development of business strategies and plans, market research, psychology-based trainings that enhance women’s socio-emotional skills and encourage an entrepreneurial mindset, digital skills and green jobs and sectors. The core course for small to medium enterprises will have an advanced curriculum with topics such as procurement certification for applying for government contracts, advanced training on management of human resources etc. The courses will be provided in local languages and tailored to the literacy levels of participating women entrepreneurs. In addition, transportation and childcare support will be provided. The core course It will also go into greater depth on GBV, the barriers it poses for business growth and how women can support one another to prevent and respond to it. The project will finance a GBV service provision/training contractor that can organize women into peer networks giving them tools to support each other on addressing harmful gender norms (including GBV) that impede their functioning as entrepreneurs as well as strategies to seek help or report if they wish to.

In RHDs, the enterprise development support and training will be provided in a manner that responds to the average educational attainment levels of the different settlements/district demographic and be designed for low literacy women and provide pathways for numeracy skills support. It will be in accessible languages based on country of origin and provide for transportation and childcare support for participants as necessary. This subcomponent will tailor the content of the core package of business development training for refugee women to focus on a module with (a) a lower literacy model, (b) a psycho-social component, and (c) a component looking at issues of social cohesion and refugee business rights and regulations. In recognition of the psychosocial support needs of refugees, the project will engage a skilled service provider for the provision of training component covering socio-emotional support and building group social support and cohesion between GROW entrepreneurs. The provider will provide group and individual support and enable referrals to other appropriate service providers where available.

1.1.1.3 Subcomponent 1C: Support for trade/sector specific skills (total IDA US\$20 million, including WHR US\$4 million)

This subcomponent will support advanced, sector-specific training (for example, in climate smart agribusiness, e-commerce, hotel management, tourism, and others) for women entrepreneurs who successfully complete the core course and want to avail trade specific trainings. This sector specific trainings will be part of the continuum of enterprise development services provided to those women enterprises that have the growth potential and want to move to the next stage. The subcomponent will also support those women that have existing enterprises and don't necessarily need the GROW provided core course but will benefit from sector specific training that allows for value-addition, expansion of their enterprise. Hence, this subcomponent will cover the need for trade/sector specific skills in the market for all those women entrepreneurs that that growth potential. The PSFU will implement this subcomponent and will be responsible for contracting the service providers to deliver the trainings. The implementation and selection of service providers will be similar to the successful Skills Development Fund, implemented by PSFU under the WB financed education project. In refugee settlements PSFU will liaise with OPM and ensure appropriate service providers that can deliver trade specific trainings within the refugee settlements targeting the specific needs of both refugees and host communities.

1.1.1.4 Subcomponent 1D: Women entrepreneurship work placement program (total IDA: US\$9.5 million, including WHR US\$1.9 million)

This subcomponent will support promising women entrepreneurs through work-based learning to enable them to break the skills barriers that hinder them from operating in male-dominated high-quality sectors. This will be a pathway for enterprise development support for women entrepreneurs that focuses not only on skills training but experience and exposure to the sector-specific dynamics, contacts and requirements of the sector. The component will expand women's access to apprenticeship in high-demand careers across a range of industries including in fields where women are traditionally under-represented, such as science and technology, manufacturing, engineering/construction, oil and gas. This subcomponent will also support the refugees and host communities in skills acquisition for employability enhancement and easy job transition in sectors that are male dominated.

The major focus will be to organize work placements in key sectors such as manufacturing, construction, oil and gas. The MGLSD will take lead in the implementation of this subcomponent using the existing Uganda National Apprenticeship Framework which the Cabinet approved in August 2018. The MGLSD will work closely with PSFU where the latter will be responsible for mobilization of the private sector, especially women entrepreneurs and their companies to provide workplace opportunities for apprenticeship. The Ministry will coordinate the selection of host companies, provision of stipends and identification of mentors for the successful female participants. The Ministry and PSFU will identifying suitable host communities to place female refugees.

The host companies will include both male and female owned businesses with the necessary human resources to conduct the work-based training. Those that show interest will be assessed and evaluated on their compliance to occupational safety and health standards as well as their technical, logistical and human resource capacity to train and mentor apprentices. The program will be demand based ensuring that the women and girls to be enrolled on the program are profiled and matched with host companies that fit their areas of interest and qualifications. The MGLSD will explore hiring a firm/sub-contractor to potentially coordinate the outreach, selection of entrepreneurs, provision of stipends, reach agreement with companies willing to provide the on-the-job training, and identify mentors for the successful female participants, provision of safety equipment, and the like. This subcomponent

will also include supporting companies/individuals who partner with the project on women entrepreneurship work placements to be made fully aware of the law, the corporate policy, the standards for the project and their options for support in case they experience harassment to violence.

1.1.2 Component 2: Access to Finance for Women Entrepreneurs (total IDA US\$110.5 million, including WHR US\$17.5 million)

This component will support access to finance for women entrepreneurs to transition from micro enterprises to small and medium enterprises. This component will address the key constraint of access to larger scale finance for women entrepreneurs to expand their business. Currently few commercial financial institutions (FIs), such as Banks, and micro-finance institutions (MFIs) offer women specific financing products. Women entrepreneurs can mostly obtain small scale financing (\$1,000 – 3,500) from banks and MFIs. Together with Component 1, the component will simultaneously address the demand and supply side constraints accessing finance (see context section above). Specifically, Component 1 will invest in the “investment readiness” of women entrepreneurs and Component 2 the capacity of financial sectors to serve women entrepreneurs as well as incentivize credit provision through matching grants linked to lending from participating financial institutions (PFIs). In doing so, GROW will address the existing market constraints that are particularly pronounced in RHDs and have impeded women entrepreneurs from expanding their operations and achieving more resilient businesses.

1.1.2.1 Subcomponent 2A: Grant support for micro enterprises through business competition (total IDA: US\$20 million, including WHR US\$3.5 million)

This subcomponent will support women entrepreneurs with grants to expand innovative or high impact interventions. The business plan competition will seek business plans from high-potential women entrepreneurs interested in expanding their enterprises with ventures that have the potential to create jobs especially for women and youth, focus on social enterprises such as childcare facilities etc. The objective of this activity will be to support financing of those businesses that usually would not be financed through credit from financial institutions and to incentivize expansion in these non-traditional areas.

This subcomponent will support grants for microenterprises who want to consolidate/expand their business. These grants will be for those women entrepreneur that have an interest in expanding their business. This grant will provide up to US\$7,000 for women-led businesses with a focus on youth women. The final grant amounts will be set after the business plan competition design is finalized during effectiveness period. The business plan competition will support up to 3,000 women entrepreneurs (500 from RHDs).

The Project Operations Manual (POM) will clarify upfront the selection criteria (including those related to completing the core course), and information on selected candidates will be widely disclosed to minimize abuse. The successful enterprises will be selected on the basis of their economic viability and the potential to expand. Within RHDs, weighting will be given to enterprises that employ or are managed by refugees. The grants competition will be implemented in the following steps: (a) the communication and outreach campaign of the platforms (under component 1) information will be disseminated about the grants competition, (b) the successful grantees will receive enterprise development support. The implementing agency will conduct sessions with the successful grantees before it makes disbursements of each tranche. These sessions will be used to develop entrepreneurship plans outlining the investments and expenditures to be financed by the grant. The tranches will be conditional on appropriate verification by the managing firm that the firm remains in

operation, and is advancing in its business plan. The grants will be disbursed in two tranches. Before receiving the first award, the professional management company will be responsible for verifying the legal status of the firm to be awarded, its overall financial situation and that it follows appropriate financial processes.

Subcomponent Implementation: The MGLSD will competitively select and manage the contract for an independent professional management company of international reputation to manage the business plan competition, including the selection of awardees.

1.1.2.2 Sub-component 2B: Facilitating access to credit for enterprise growth (total IDA: US\$83 million, including WHR US\$12.5 million)

This subcomponent will support women entrepreneurs, including refugees and women entrepreneurs from host communities, to meet the capital needs for business expansion and growth. The subcomponent will adopt an innovative approach to enable the target beneficiaries to access the credit they need to expand their enterprises. It involves the project providing a complementary grant that leverages PFIs to provide the credit component from their existing capital as well as relevant credit lines. During the initial phase, the project will focus on the matching grant scheme while exploring options to establish a line of credit or fund that would enable financial institutions to secure the long-term sustainability of the mechanism.

GROW will leverage grant financing of US\$83 million to provide a total of US\$255.5 million in capital to 25,000 women entrepreneurs and their enterprises, including 3,600 women in RHC locations. The table below summarizes the financing needs of the micro and small enterprises, the targeted beneficiaries, and the estimated credit and grant amounts that GROW will mobilize.

Table 1-1: Financing needs of micro and small enterprises, beneficiaries, and estimated credit and grant amounts

Women Enterprise Type	Target Beneficiaries	Financing Needs (US\$)	Credit Mobilized (US\$)	Grant Leveraged (US\$)	Total Capital Facilitated (US\$)
Micro enterprises (of which RHC beneficiaries)	22,000 (RHC: 3,300)	5,000-10,000*	99,000,000 (RHC: \$15m)	51,000,000 (RHC: \$9m)	150,000,000 (RHC: \$24m)
Small enterprise (of which RHC beneficiaries)	3,000 (RHC: 300)	30,000-50,000*	73,500,000 (RHC: 7m)	32,000,000 (RHC: \$3.5m)	105,500,000 (RHC: \$10.5m)
Total	25,000 (RHC: 3,600)	N/A	172,500,000 (RHC: \$22m)	83,000,000 (RHC: \$12.5)	255,500,000 (RHC: \$34.5m)

Note: * the midpoints of \$7,500 and \$40,000 are used to calculate the total capital provided for micro- and small enterprises respectively. Overall financing needs are expected to be lower in RHC locations.

The complementary grants will be provided to eligible women enterprises as a complement to loans offered by the project's PFIs. The process for the scheme will be as follows:

- Women enterprises will prepare a bankable proposal (with support from the enterprise and skills developed interventions under component 1);
- Participating financial institutions (PFIs) will appraise the financing proposal; if the project is considered viable, it will apply safeguards screening procedures established by PSFU;
- The beneficiary contributes 10 percent of the capital needs from existing savings or profits (5 percent for eligible refugee beneficiaries); the project contributes in grant (30 percent, or 35 percent for refugees) and the beneficiary contracts a loan with the PFI for the balance (60

percent);

- The matching grant will be released once the loan is repaid; and
- PSFU will transfer the grant to the PFI or hold it until the loan has been repaid in the case of MFIs, which cannot hold deposits.

The complementary grant will ensure women entrepreneurs with strong growth plans can access affordable credit to grow their enterprises. Specifically, the grant will, therefore, serve both as a collateral and a repayment incentive for the loan, thereby reducing the risk and the costs (including the interest rates) charged to the borrower. Going through financial institutions will allow for proper screening and appraisal of projects and will ensure that the projects are market-based and viable. The complementary grant will allow the PFI to reduce their risk and therefore costs, including the interest rate. Although the interest will be set based on an assessment of each individual borrower and their business proposal, it is expected that it will enable the PFIs to reduce their interest rates to qualified women entrepreneurs.

This approach works through existing financial institutions, enabling them to better deploy their existing capital and credit lines, and will complement INVITE (see Box 2). It will address the issue of lack of collateral for women entrepreneurs and refugees, improving repayment rates, and reducing nonperforming loans (therefore reducing the risk for the PFI), and defray the high transaction costs associated with lending to women entrepreneurs. The eligibility criteria, minimum allocation per district, maximum amount per grant, and operating procedures—including a negative list of activities—will be presented in a grant manual approved by the World Bank. Positive weighting will be applied in the eligibility criteria to businesses employing refugees. This subcomponent will build on the experience of the INVITE project and complement the ‘restart loan’ line of credit that provides one-off loan to micro firms including women firms, including in RHDs, to enable them to restart or continue their operations post Covid (see Annex 4 for a summary of INVITE). It will also draw on the technical and implementation experience of the Socio-Economic Inclusion of Refugees and Host Communities in Rwanda Project (P164130), which is currently using this model to meet the business financing needs of refugees and host communities in Rwanda.

Box 2: INVITE Complementarities

GROW will complement INVITE in four main ways:

- **Complementary business support** – GROW will also provide enhanced support to enable women entrepreneurs to access financing that is broader in scope than INVITE’s targeted support for larger
- **Complementary sectors** – GROW will support entrepreneurs in a broader range of local growth sectors including male dominated sectors, going beyond INVITE’s targeted support for manufacturing and export supply chains.
- **Complementary financial instruments** – GROW’s matching grant design in this component will complement INVITE’s ‘restart loan’ line of credit that provides one-off loan to micro enterprises, including women enterprises and RHDs, to enable them to restart or continue their operations post Covid.
- **Complementary infrastructure** – GROW will prioritize small-scale infrastructure closer to micro and small enterprises with childcare and other gender sensitive upgrades, complementing INVITE’s financing for economic assets such as grain storage facilities or collection centers, cold storage, laboratories, SME Centers, industry and manufacturing hubs.

1.1.2.3 Subcomponent 2C: Enhanced Loan Products and Processes for Women Entrepreneurs (total IDA \$7.5 million, including WHR US\$1.5 million)

Under this subcomponent, GROW will address the supply side systemic constraints that financial institutions participating in the project face in meeting the financing needs of female entrepreneurs. The funding for the activities under this subcomponent will be provided to PFIs as part of their contracts for implementing subcomponent 2b, with the PFIs being required to specify the capacity and system investments they would make as part of the competitive selection process.

The technical support will therefore be available to the selected PFIs to implement mechanisms and business tools to address barriers. This includes:

- *Strengthening risk assessment and management skills.* Establish dedicated risk management resources and staffing to (a) prioritize women entrepreneurs, (b) streamline loan underwriting and management process. Develop improved data systems for loan generation, loan compliance, monitoring and reporting.
- *Training on cash flow and trade finance-based financing.* Develop products such as receivable-based financing and operating leases. Develop FI's risk management team's capacity to assess and lend against the cash flows generated by the business. Integrate insurance products into the loans.
- *Application of digital tools and tech-enabled methodologies.* Application of artificial intelligence, data systems, and risk analytics to better assess and measure repayment performance and risk associated with women entrepreneurs and reduce costs. Support the development and testing of PFI psychometric tools building on the learnings of the World Bank financed *Ethiopia Women Entrepreneurship Development Project (P122764)* that piloted this work with refugees that lacked capital.
- *Mobile, branch and agent accessibility.* Reduce barriers for women to access finance by developing mobile loan application tools and mobile money solutions. For in-person loan processing, provide improved facilities in the branch and agent network that specifically cater to women entrepreneurs. Train network agents to support women loan applicants.

The PSFU will solicit proposals from four to eight lending organizations to strengthen their capacity to meet the financing needs of women entrepreneurs. By making such investments, the lending institution will be in an improved position to achieve the goals of supporting the programs under 2a and 2b, and to put the institution in a position to continue extending credit to women entrepreneurs post the completion of the GROW program. Grants will be disbursed in several tranches, (a) upfront at the initiation of the program to cover the "set-up" costs in establishing such capacity strengthening, and (b) periodically based on continued successful performance under 2a and 2b. In extending grants under this window, the PSFU will monitor the amount of new loans extended to women entrepreneurs. Incentive mechanism will be put in place to reward PFIs for increasing their level of women-led enterprises in their portfolio.

Component Implementation: The PFSU will be the main implementing organization for subcomponents 2A and 2B, with MGLSD playing an important oversight role as the lead agency for the GROW project. The PSFU will lead development of the POM and relevant grant manual (which require World Bank review and approval) in close consultation with relevant stakeholders, implement a competitive procurement process to select and contract the PFIs, establish contract monitoring system including for the grants administered by the PFI, operate the GROW integrated digital platform in relation to the activities under Component 2, implement the Environment and Social Framework (ESF) requirements relevant to the component (including ensuring PFI compliance as required),

conduct process evaluations and project supervision activities (including with MGLSD and/or the Bank as required), and product regular reports including those reports required to report on the Results Framework. In relation to this component, MGLSD will oversee its implementation overall, ensure the integrated GROW digital platform is adapted to the needs of implementing Component 2, conduct impact evaluations, and consolidate reports.

Participating Financial Institutions (PFIs): The PSFU will select and engage with a limited number of domestic financial institutions to operate as the component's PFIs, with government-supported PFIs constituting about half of those engaged. The key criterion for engagement is the organizational commitment to target and support women entrepreneurs. Without this aligned motivation, overcoming the systemic barriers and implementing a multi-pronged approach for access to finance will be unsustainable. In addition, the PFIs are expected to partner with local experts in business development services, accelerator, and business competition models. As such this integrated consortium will need to meet a number of technical eligibility requirements. The key criteria include:

- Commitment to developing women entrepreneurs as a core customer base,
- Access to a suite of sectors-specific skills and post-financing support for women entrepreneurs,
- Capacity to implement rigorous business competitions to assess and select women,
- Appropriately broad geographic branch coverage, ability to reach RHDs and refugee populations
- Technical capacity to operate in high-growth sectors as identified by the refugee and gender sensitive value chain assessment (to be conducted in the effectiveness period)
- Willingness/capacity to develop financing products specific for women entrepreneurs at this early stage of their growth trajectory, and target the specific needs of refugee women entrepreneurs.
- Ability and commitment that the PFI intends to use the funding support and operating mechanism developed in this Component 2 to increase their capacity to sustain an on-going capability to provide financing to women entrepreneurs

The PFIs will manage the multi-year financial accelerator facility implementing the subcomponents above and benefiting from the capacity grant. PSFU will select a cohort of PFIs that complement each other in terms of geographic coverage, sub-sector lending expertise, and the design of their business development support/lending integrated delivery models.

1.1.3 Component 3: Enabling Infrastructure and Facilities for Women Enterprise Growth and Transition (total IDA: US\$80 million, including WHR US\$12 million)

Component 3 finances investments in infrastructure and facilities that address constraints women face in expanding and growing their micro, small and medium enterprises. Studies from Uganda, Sub-Saharan Africa, and around the world conclude that access to skills, enterprise development and credit services are not in themselves sufficient for women to grow and improve the performance of their enterprise.¹ In addition, women need access to basic infrastructure and facilities that enable them to

¹ Suresh de Mel, David McKenzie and Christopher Woodruff (2009), 'Are Women More Credit Constrained? Experimental Evidence

reduce the time they spend on household production tasks, such as cooking, cleaning and childcare, and increase the time they spend on market work including growing and increasing the productivity of their business.² The type of infrastructure investments that can change the nature of home production include childcare facilities, safe transportation, markets.³ The component will also strengthen women's voices and leadership in local government planning processes. In RHDs, this component will build on the value-chain analyses and market information captured by DRDIP and, through MGLSD's MoU with DRDIP, will support priority infrastructure that will support women entrepreneur's needs.

1.1.3.1 Sub-component 3A: Multi-purpose service and production facilities to boost women enterprise productivity (US\$20 million including WHR US\$3 million)

This subcomponent will support women entrepreneurs in collaboration with local governments, existing entrepreneur associations and UIA to identify opportunities to invest in multi-purpose service and production facilities that align with the Uganda Investment Authority's (UIA) regional industrial parks. These multi-purpose facilities will integrate multiple services that support women to access skilling, business development, and production related services including workspaces for women micro, small, and medium enterprises, ICT and digital access facilities, multi-purpose meeting and training rooms, and relevant production facilities. It will also integrate breastfeeding, childcare, and GBV response facilities that women entrepreneurs will be able to access when they use the facilities for training, business development, skilling, and other activities.

Up to ten multi-purpose facilities that align with the UIA's industrial park strategy will be financed. The MGLSD will explore partnerships with existing government agencies that support similar multi-purpose facilities including State House's support for Common User Facilities, UIRI's Technology Transfer, Incubation and Skilling Workshops, the MLG's Industrial Hubs/Regional Skilling Centers, and the centers supported through the Skills Development Project including Centers of Excellence and the Vocational Training Institutes as well as partnerships with the private sector for construction and maintenance of the facilities. In RHDs these will target the joint needs of refugees and host community members.

This subcomponent will finance three main activities. First, the project will finance detailed technical assessments, based on articulated demand from women entrepreneurs, of each candidate location for a multi-purpose facility, including a user analysis of the women enterprises that will use the facility and assessment of the technical, operational, and financial elements of the facility. Second, the project will finance the design and construction or upgrading of ten multi-purpose service and production

on Gender and Microenterprise Returns' *American Economic Journal: Applied Economics* 1 (3), pp. 1-32; World Bank (2012) *World Development Report 2012: Gender Equality and Development*. World Bank: Washington D.C.; Solene Delacourt and Anne Fitzpatrick (2021), 'Childcare Matters: Female Business Owners and the Baby-Profit Gap', *Management Science* 67 (7), pp 4455-4474;

² Taryn Dinkelman and L. Rachel Ngai (2022), 'Time Use and Gender in Africa in Times of Structural Transformation', *Journal of Economic Perspectives* 36 (1), pp. 57-80.

³ As noted above, social norms also about women's home and market work also restrict women from re-allocating time from home work to market work. These social constraints are tackled in Component 1 above. Women are also at risk of gender-based violence (GBV) if they do not conduct household work, further constraining their ability to re-allocate time to growing their business. See Oxfam (2018), *Gender Roles and the Care Economy in Ugandan Households: The Case of Kaabong, Kabale and Kampala Districts*, p 48.

facilities. Third, it will finance multi-purpose equipment and training for operationalizing the facilities, based on the specifications of the feasibility assessment for each facility., the project will finance the provision of equipment for the facility and relevant training for operationalizing the facilities. The subcomponent will also support coordination with relevant sector agencies and programs to ensure these facilities have adequate access to energy, water and internet systems, including the following World Bank-financed projects and programs: the Electricity Access Scale Up Project (P166685), the Integrated Water Management and Development Project (P163782), and the Uganda Digital Acceleration Project (P171305).

**Box 3: Gender Inclusive Workplace Infrastructure:
Existing Facilities Accessible to Women**

An assessment of priority infrastructure for women entrepreneurs found that many public and common user facilities, such as markets, common production facilities, schools, etc. are not gender inclusive. While these facilities are accessible to women and their enterprises, they lack the basic facilities that would enable women entrepreneurs to expand and grow their business. This includes childcare facilities, bathrooms and breastfeeding spaces, and adequate lighting.

- **Markets.** There are about 102 markets in Kampala and about 2,000 rural markets across Uganda; in Kampala less than 10 new markets are known to have childcare facilities and rural markets do not have childcare facilities.
- **Schools.** Schools are one of the most accessible common facility (there are an estimated 30,000 schools) and are frequented by women entrepreneurs, but very few provide access to childcare facilities.
- **Skill centers.** An assessment of MLG's 9 regional skill centers supported by the President's Initiative found that none had access to childcare facilities. Partnering with the skilling center leadership can pave way for incorporation of childcare facilities, particularly for younger women.
- **Common production facilities.** An assessment of 26 common-user facilities established by State House found that none included access to childcare, bathrooms, and adequate lighting that this was a critical constraint to their active utilization by women.
- **Industrial parks.** Of the 25 proposed industrial parks in the various parts of the country, UIA currently operates 9 public industrial and business parks, none of which have access to functional childcare facilities.

Implementation: The MGLSD will implement this subcomponent in partnership with MLG, UIA, the State House, the OPM, and the UIRI. It is therefore proposed that the UIA, the MLG, the OPM and the UIRI provide technical advice through membership in the project's Steering Committee and Technical Committee.

1.1.3.2 Sub-component 3b: Enabling Access to Gender Inclusive Workplace Infrastructure (US\$60 million including WHR US\$9 million)

GROW will adopt a workplace approach to upgrading existing facilities that are close to their enterprise premises or regularly utilized as part of their business activities. As detailed in Box 3, this will include markets, schools, skill centers, and common user production facilities. This will ensure the facilities are as close as possible to the enterprises of the target beneficiaries that enable them to spend more time on growing their enterprises.

The subcomponent will target increasing access to gender inclusive facilities for 150,000 women entrepreneurs (including refugees and host community members whose number will be determined at a later stage before project commencement). The project will support women entrepreneurs to

establish a social enterprise to operate the facility that serves a group of women entrepreneurs that either live in close proximity or share a common facility, such as a market.

This subcomponent will finance the following infrastructure upgrades:

- (a) Childcare facilities including the construction, rehabilitation or upgrading of childcare facilities, provision of equipment, and training and capacity building;
- (b) Digital access points;
- (c) Bathrooms and breastfeeding spaces.
- (d) Lighting and safety upgrades.

The subcomponent will also support coordination with relevant sector agencies and programs to ensure these facilities have adequate access to energy, water and internet systems. The MGLSD will partner with the Ministry of Education and Sports to provide training and capacity building for the local department of education as well as local Women's Councils for ensuring the quality of childcare meets national standards. Through component 1, it will also support women enterprises to establish social enterprises and public-private partnerships to manage these facilities where appropriate.

Demand articulation and selection criteria. Demand articulation and technical sector partnerships will be critical to ensuring sustainability and complementarity of the two subcomponent's infrastructure investments. The project will therefore utilize the PDM infrastructure identification process (Pillar 2 on Infrastructure and Economic Services) and the regular local government planning process to ensure alignment with priority infrastructure and facilities in consultation with women entrepreneurs and their communities. In RHDs, this will be complemented by DRDIP learning and market information. This will ensure all activities financed by the project align with local needs and will ensure local ownership. The process will be detailed in the POM and work through the women entrepreneurship platforms established and/or strengthened under component 1.

Investment proposals will be assessed against the following eligibility criteria, which will be included in the POM and updated as necessary.

Table 1-2: Selection Criteria for investments under Component 3

Criteria	Eligibility description
<i>Demand-driven</i>	The facility is prioritized by women entrepreneurs participating in the entrepreneurship platforms as addressing critical infrastructure gaps to enterprise growth
<i>Annexed to existing common facility with available land or space</i>	The proposed subproject has access to land or space from an existing common facility, for example, market, skill center, common-user facility, cultural, faith-based facilities, and the like.
<i>Shared benefits for host community and refugee women enterprises (RHDs)</i>	In RHDs, the subproject will support the growth of micro and small enterprises of host and refugee community members.
<i>Addresses concerns of marginalized groups</i>	The subproject addresses the concerns of marginalized groups including ensuring any infrastructure is accessible to PWDs as relevant
<i>Long term sustainability</i>	The government (district or national) guarantees operations and maintenance with budget provision and staffing to ensure subproject sustainability where relevant
<i>No significant adverse negative social or environmental impacts</i>	The proposed subprojects do not have potential adverse social and environmental impacts.

<i>PDM integration</i>	The prioritized subproject is identified via a women's entrepreneur forum that is part of and incorporated into the PDM planning process (PDM Pillar 2)
<i>Consistent with sub-county, district, and regional investment plans as appropriate</i>	The subproject is identified as a priority in the Sub-County Development Plan, the District Development Plan and relevant regional or sub-regional investment plans (including sub-regional industrial zone as appropriate)
<i>Gap-financing, not substitution</i>	The proposed subproject fills an existing gap but does not substitute for other available sources of funds.

Implementation. MGLSD will implement this subcomponent in partnership with district local governments, OPM, townships, the Ministry of Education and Sports, and the MLG. It is therefore proposed that MES, MLG and OPM provide technical advice through membership in the project's Steering Committee and Technical Committee.

1.1.4 Component 4: Project Management Support, Policy Innovation, and Evidence Generation (total IDA: US\$15 million, including WHR US\$2.35 million)

Objective. The objective of this component is to strengthen the capacity of government institutions to deliver a coordinated and high-quality package of "wrap around support" to the targeted beneficiaries as well as to tackle policy constraints that impede women's economic empowerment. It consists of two subcomponents: (a) project management support for high-quality implementation; and (b) policy innovation and evidence generation.

1.1.4.1 Subcomponent 4A: Project management support for high-quality implementation.

The objective of this subcomponent is to enhance the capacity of national, district, and community institutions to implement the project. This includes financing of Project Support Teams (PSTs) at the key implementing agencies (MGLSD, PSFU, and MLG) as well as financing capacity building activities. The capacity building activities will include (a) orientation and sensitization of district, sub-county, parish-level and refugee settlement stakeholders; (b) formation and orientation of technical and implementation support teams at district and sub-county/settlement levels; (c) capacity building of the national, district, sub-county, parish, refugee settlement and implementation support teams; and (d) development of key partnerships including the holding of quarterly review meetings for all stakeholders involved in the project at the regional and district levels.

1.1.4.2 Subcomponent 4B: Policy innovation and evidence generation.

The objective of this subcomponent is to implement a learning agenda for the project as well as generate evidence that will underpin dialogue and reforms on creating an enabling policy environment for female entrepreneurship and women's economic empowerment (WEE). This will include financing of additional data collection efforts (beyond the information gathered through the project's management information system and digital delivery platforms), analysis and publication of data from project and non-project datasets on female entrepreneurship, climate resilience and WEE, establishment of a data portal, and research workshops and policy forums on female entrepreneurship and WEE. In addition, the learning agenda could also include the design and implementation of innovative pilot activities within the GROW project to test what works to address the key gender constraints faced by the beneficiaries targeted under the project. This work will be designed and conducted in collaboration with the World Bank's Africa Gender Innovation Lab (AFRIGIL) as well as other local research institutes and development partners. The team will hold a research

workshop to explore the possibility of including a rigorous impact evaluation of a program component or one or more of the pilot interventions. The impact evaluation (IE) will complement the information gathered through regular monitoring and evaluation (M&E) activities. The research design of the IE will establish a causal link between the program and any key outcomes of interest to help provide rigorous evidence of the program's impact.

The project will seek to close some of the significant evidence gaps for what works to support refugee and host women entrepreneurs grow their business and revenues and build pathways to self-reliance. The World Bank's Africa Gender Innovation Lab will also work on refugee elements as part of the broader research agenda. Areas for possible research and learning agendas for RHDs will be explored further in the research workshop and include questions such as what combination of business development support best meets the needs of refugee women entrepreneurs, what levels of technical support is effective to support enterprise growth. It will also look to gain lessons from the effectiveness of psycho-social support and behavioral requirements to female refugee entrepreneurs. Consideration will be given to quasi-experimental models of support applied across different RHDs to strengthen the evidence base for what works in Uganda.

Climate Change. Activities across the project's four components will target climate vulnerabilities and resilience of women entrepreneurs. Targeting and selection of districts and enterprises will include climate risk and vulnerability criteria. Mapping exercises of existing women's platforms will include climate change-related groups and networks, and communications campaigns and materials and training will incorporate climate change-related topics. A key focus will be on GRID principles, and the provision of training and reskilling for women in new technologies applicable for green growth, in line with national strategies for green growth. Women's networks will be leveraged to facilitate training on climate change as well as peer-to-peer exchange for supporting livelihood resilience and autonomous adaptation. Climate risks and green growth opportunities will be assessed for micro and small enterprise business plans, and a participatory climate risk assessment will be included in the selection process for enabling infrastructure and facilities. The climate change awareness and capacity of national, district, and community institutions will be enhanced and climate change will be integrated into the project's learning agenda.

Citizen Engagement. The project will work on strengthening citizen engagement, and beneficiaries are key partners in its implementation. Specifically, the project will utilize the following citizen engagement mechanisms: a) participatory decision making and mobilization of women entrepreneurs through support to existing and new women platforms at the village and district levels: b) participatory planning in the design of inclusive infrastructure for women, including childcare facilities and prevention and response to GBV, c) grievance mechanism. The project GRM will ensure that queries or clarifications about the project are responded to in a timely manner, and that grievances are addressed efficiently and effectively. The proposed project will further solicit periodic feedback from beneficiaries through beneficiary satisfaction surveys as well as spot checks and monitoring of project delivery.

Project Beneficiaries

The primary beneficiaries of the project are the women and their enterprises that receive direct support under the project. The project aims to reach about 30,000 female owned enterprises (including refugee owned business) and about 185,000 women entrepreneurs (including refugees and host community members) with a package of assistance, including access to finance, training, business support services, and childcare among others. It aims to support micro enterprises transitioning to small and small enterprises transitioning to medium. In addition, the Bank team will ensure that GROW does not duplicate the support envisaged under the Bank-financed project, INVITE, which also aims to

support small and medium enterprises. The GROW project implementation will support complementarity by linking women entrepreneurs to the INVITE-financed credit lines after they have transitioned and grown from micro to small and small to medium.

- **Under component 1:** The project aims to support about 5,000 women entrepreneur platforms targeting nearly 150,000 women entrepreneurs with networking and leadership support, GBV sessions, and a training course on core business skills, climate change, and green jobs. In addition, under this component about 20,000 women enterprises will receive trade-specific skills training, benefiting nearly 60,000 women (these women will be both the enterprise owners as well as women employed by the enterprise). This includes an estimated 600 platforms in RHC districts benefiting approximately 13,320 women entrepreneurs in RHC districts.
- **Under Component 2:** The project aims to support 25,000 women micro enterprises to transition to small enterprises with bridging finance. The project aims to support 3,000 women small enterprises to transition to medium enterprises with bridge finance. This includes approximately 2,200 micro enterprises and 110 small enterprises in RHC districts.
- **Under Component 3:** The project aims to support 55,360 women entrepreneurs and employees (direct beneficiaries) as well as 3.8 million local citizens (indirect beneficiaries) with access to climate resilient and adaptive infrastructure and facilities. The project aims to support 42,000 female direct and 2.5 million indirect beneficiaries with access to local infrastructure and facilities (subcomponent 3.A) and 13,360 female direct and 1.3 million indirect beneficiaries with access to regional facilities. This includes an estimated 6,600 women entrepreneurs and employees as well as 456,00 indirect beneficiaries (men and women) in RHDs.

Table 1-3: Categorization of Enterprises Based on Size and Turnover

Micro enterprise	Fewer than 5 workers and annual turnover of less than UGX 10 million (less than US\$2,810)
Small enterprise	Having 5–49 workers and annual turnover of UGX 10-100 million (US\$2,810 – US\$28,100)
Medium enterprise	Having 50–100 workers and annual turnover of UGX 100-360 million (US\$28,100 – US\$101,100)
Large enterprise	Having more than 100 workers and annual turnover of more than UGX 400 million (US\$112,360)

The project will operate nationwide, including in the Kampala district. The distribution of project funds across regions will be determined based on more in-depth mapping of the women enterprises and the value chain analyses that are planned. Sector selection will be based on the outcome of the value chain analyses and on growth prospects for women enterprises in a given sector as well as opportunities for moving into greener jobs and sectors. However, a negative list of sectors linked to environment and social standards will be developed to ensure there are no safeguard issues during project implementation. Beneficiaries of the project will be selected through criteria yet to be agreed. These may include (a) having a bank account; (b) being formally registered; (c) evidence of filing tax returns (for the transition from small to medium enterprises); (d) having focus on annual revenue performance over the course of the year, rather than at just one point; and (e) having a business plan for expansion, including the perspective of current and future climate risks, impacts, and opportunities for supporting women's movement into greener jobs and sectors.

The project will also support women in addressing GBV and the institutions that serve them through sessions with women entrepreneurs who are part of the platforms. The platforms will include support

to adolescent girls' transition from school to work. The project will also benefit the families of the women who receive support and the communities in which they live by raising women's incomes benefiting about 650,000 individuals.

Purpose and objectives of the VMGF

This VMGF sets out principles for management of risks that may be occasioned to Vulnerable and Marginalised Groups (VMGs) during implementation of the GROW project and has undertaken a social assessment to identify the risks and propose mitigation measures; Establish the requirements of ESS7, organizational arrangements, and design criteria to be applied to subprojects or project components required during project implementation when VMGs may be present in, or have collective attachment to, the project area. Following identification of the subproject or individual project components and confirmation that VMGs are present in or have collective attachment to the project area, a specific plan, proportionate to potential risks and impacts, is prepared. Project activities that may affect VMGs do not commence until such specific plans are finalized and approved by the Bank.

The VMGF sets out:

- a) The types of subprojects likely to be proposed for financing under the project.
- b) The potential positive and adverse impacts of such programs or subprojects on VMGs.
- c) A plan for carrying out the social assessment for such programs or subprojects.
- d) A framework for ensuring the meaningful consultation tailored to VMGs and in the specified circumstances, a framework for ensuring their Free, Prior and Informed Consent, when relevant, during project implementation.
- e) Institutional arrangements, including capacity building where necessary, for screening project-supported activities, evaluating their effects on VMGs, preparing VMG Plans (VMGPs) and addressing any grievances.
- f) Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project.
- g) Disclosure arrangements for VMGPs to be prepared.

Rationale of the VMGF

This document has been developed as VMGF because the specific sub projects and their locations are not yet known at this stage of project preparation. At project implementation stage, each sub project shall develop the respective VMGPs.

It is envisioned that the implementation of GROW sub projects will have some positive impacts that should be enhanced while the negative environmental and social impacts on VMGs shall be avoided, minimized or mitigated at the implementation stage. And as such, the Ministry of Gender, Labour and Social Development has prepared a Vulnerable and Marginalized Groups Framework (VMGF). The framework provides a layout of anticipated benefits of the project, perceived risks on socio-economic livelihoods and social set up of the VMGs and strategies to enhance the benefits and avoid, minimize or mitigate the risks.

The VMGF has been prepared in line with the Environmental and Social Standard 7 (ESS7) of the World Bank's Environmental and Social Framework (2018) and relevant Ugandan social development policies and laws.

This VMGF will be used to:

- In conjunction with the ESMF and RPF, address any adverse impacts on the livelihoods of VMGs and/or their assets or resources.
- Propose measures to ensure that the VMGs have access to culturally appropriate benefits from relevant project interventions, and will thus contribute to the achievement of the mandate of the Equal Opportunities
- Target the indigenous groups that are considered as ethnic minorities, internationally considered as indigenous peoples and these include the Batwa, Benet, Tepeth and Ik.

Approach and Methodology in VGMF Preparation

Preparation of this VGMF has been done in accordance with applicable World Bank Environmental and Social Framework specifically ESS7- Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities, ESS10 Stakeholder Engagement and Information Disclosure and Uganda's country environmental impact assessment requirements, (National Environment Acts, EIA Regulations and guidelines).

It also involved literature reviews; stakeholder consultations and discussions with relevant sector institutions, including but not limited to MGLSD, OPM, UNHCR and PSFU among other members. Principally, the preparation of this VGMF was undertaken with the use of online engagements on platforms such as Zoom, WhatsApp, Google meet, WebEx, email correspondences as well as telephone-based consultations with relevant key stakeholders. Details about the purpose of the VGMF and other ESF instruments (ESMF, RPF, ESCP and this SEF) in regard to Generating Growth Opportunities for Women (GROW) Uganda were communicated through an official email from MGLSD, with an introductory letter (See Annex 4) about the project attached. The stakeholders identified (see Table 1-4) were invited to respond to a specific questionnaire/checklist (See Annex 1) relating to the Generating Growth Opportunities for Women (GROW) Uganda project and were also encouraged to make additional comments during the consultation process.

1.1.5 Literature Review

Some of the key documents that were reviewed include:

- a) The World Bank Environmental and Social Framework 2017 Washington DC
- b) The World Bank- Generating Growth Opportunities and Productivity of Women Enterprises (Grow) Project-2021
- c) Relevant National Laws, Policies and Constitution
- d) National Development Plan (NDP 2010-2014)
- e) Appraisal Environmental and Social Review Summary, 2022

1.1.6 Stakeholder Consultations

ESS 10 recognizes the importance of inclusive and meaningful engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. In keeping with the requirements of ESS10, the MGLSD took cognizance of the existing World Bank (March 2020) and Ministry of Health 2020 guidelines in relation to physical meetings, and used online platforms such as Zoom, Google meet, Webex, WhatsApp and Email exchanges to conduct extensive, meaningful and timely consultations. The stakeholder consultations were planned and carried out between 23rd March and 20th April 2022 (Table 1-4) and are still ongoing.

The views from these consultations were recorded, analysed and appropriate measures recommended as part of the VGMF where necessary. A summary of the views about the project provided by the stakeholders, and responses to some inquiries is captured under Annex 5 of stakeholder consultations.

Table 1-4: Stakeholders consulted and mode of engagement

Stakeholder	Key personnel consulted	Date	Method of Engagement	Gender		
				Male	Female	Total
Uganda Investment Authority	Officer	23/02/22	Virtual Meeting (Zoom)		1	3
	Officer	23/02/22	Virtual Meeting (Zoom)		1	
		23/02/22	Virtual Meeting (Zoom)	1		
Ministry of Finance, Planning and Economic Development	Officer	23/02/22	Virtual Meeting (Zoom)	-	1	1
National Planning Authority	Officer	23/02/22	Virtual Meeting (Zoom)	-	1	1
Ministry of Local Government	Officer	23/02/22	Virtual Meeting (Zoom)		1	1
Ministry of Trade Industries and Cooperatives	Officer	23/02/22	Virtual Meeting (Zoom)	1		1
Ministry of Tourism, Wildlife and Antiquities	Officer	23/02/22	Virtual Meeting (Zoom)		1	1
Office of the Prime Minister	Officer	24/03/22	Virtual Meeting (Zoom)	1		1
United Nations Development Programme	Officer	24/03/22	Virtual Meeting (Zoom)	-	1	1
Kyambogo University	Officer	24/03/22	Virtual Meeting (Zoom)	-	1	3
	Officer	24/03/22	Virtual Meeting (Zoom)	-	1	
	Officer	24/03/22	Virtual Meeting (Zoom)	-	1	
Makerere University Business school	Officer	24/03/22	Virtual Meeting (Zoom)	-	1	1
National Forestry Authority	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	3
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
National Environmental Management Authority	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	1
United Nations Development Programme	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	1
Inter Religious Council of Uganda	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	4
	Officer	25/03/222	Virtual Meeting (Zoom)	1		

Stakeholder	Key personnel consulted	Date	Method of Engagement	Gender		
				Male	Female	Total
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
National Union of the Disabled Persons of Uganda-NUDIPU.	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	5
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
	Officer	25/03/222	Virtual Meeting (Zoom)	1		
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
	Officer	25/03/222	Virtual Meeting (Zoom)	-	1	
The Southern and Eastern Africa Trade Information and Negotiations Institute – (SEATINI) Uganda	Officer	1 st April 2022	Virtual Meeting (Zoom)	-	1	1
	Officer	1 st April 2022	Virtual Meeting (Zoom)	-	1	1
Council for Women Economic Empowerment in Africa, Uganda (CEEWA)	Officer	1 st April 2022	Virtual Meeting (Zoom)	-	1	1
Oxfam Uganda	Officer	1 st April 2022	Virtual Meeting (Zoom)	-	1	1
Mercy Corps Uganda	Officer	1 st April 2022	Virtual Meeting (Zoom)	1		1
Women of Uganda Network (WOUGNET)	Officer	1 st April 2022	Virtual Meeting (Zoom)	-	1	1
CARE International	Officer	1 st April 2022	Virtual Meeting (zoom)	1		1
CARE International	Funding Lead	1 st April 2022	Virtual Meeting (zoom)	-	1	1
Kaabong district Commercial officer Thomas Lemu	Officer	21/April/22	Telephone call	1		1
Total				38		

2 UNDERSTANDING THE VULNERABLE AND MARGINALIZED GROUPS (VMGS) IN UGANDA

Context

2.1.1 Indigenous and Marginalized Groups

ESS7 refers to a distinct social and cultural group possessing the following characteristics in varying degrees:

- a) Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and
- b) Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas; and
- c) Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and
- d) A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

ESS7 also refers to communities or groups of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities who, during the lifetime of members of the community or group, have lost collective attachment to distinct habitats or ancestral territories in the project area, because of forced severance, conflict, government resettlement programs, dispossession of their land, natural disasters, or incorporation of such territories into an urban area. In Uganda this applies to the Tepeth and IK in Karamoja, the Benet who live in Mountain Elgon and Batwa from Rwenzori Forest Reserves respectively.

It should be noted that the ESS7 contributes to poverty reduction and sustainable development by ensuring that projects supported by the World Bank enhance opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being. The ESS7 further recognizes that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development. In many instances, they are among the most economically marginalized and vulnerable segments of the population. Their economic, social, and legal status frequently limits their capacity to defend their rights to, and interests in, social issues at hand and may restrict their ability to participate in and benefit from development projects. In some instances, they do not receive equitable access to project benefits, or benefits are not delivered in a form that is culturally appropriate, and they may not always be adequately consulted about the design or implementation of projects that would profoundly affect their lives or communities. This ESS7 therefore, recognizes that the roles of men and women in indigenous cultures are often different from those in the mainstream groups, and that women and children have frequently been marginalized both within their own communities and as a result of external developments, and may have specific needs. It should be noted that the situation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities varies from community to community and from region to region. The particular national and regional contexts and the different historical and cultural backgrounds will therefore, form part of the Environmental and Social Assessment of the project. In this way, the assessment will be to support identification of measures to address concerns that project activities may exacerbate tensions between different ethnic or cultural groups. The following are the

objectives of the ESS7 that should be taken into consideration during the project development and implementation.

Objectives of ESS7

- To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.
- To avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate, and/or compensate for such impacts.
- To promote sustainable development benefits and opportunities for Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities in a manner that is accessible, culturally appropriate, and inclusive.
- To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities affected by a project throughout the project's life cycle.
- To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the three circumstances described in this ESS.
- To recognize, respect, and preserve the culture, knowledge, and practices of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to provide them with an opportunity to adapt to changing conditions in a manner and in a time frame acceptable to them.

As such, although the Ugandan Constitution does not expressly recognize indigenous peoples it makes provision for addressing some of the negative effects arising from ethnic imbalances. The Constitution, in the section on National Objectives and Directive Principles of State Policy, provides that every effort shall be made to integrate all peoples while at the same time recognizing the existence of, amongst others, their ethnic, religious and cultural diversity. In this regard, the Constitution requires that everything necessary be done to promote a culture of co-operation, understanding, appreciation, tolerance and respect for each other's customs, traditions and beliefs.

2.1.2 Ethnic Minority Groups

It is possible to argue endlessly about the meaning of the term 'minority' in the Ugandan context (and sub-Saharan Africa) and whether a particular group of individuals form a separate minority (MRG, 2001). Similarly, no definition of the term 'minority' has proved universally acceptable. However, the UN Human Rights Committee came up with a working definition as: "any disempowered group, regardless of its numerical size could be considered a minority" (Ibid).

2.1.3 Marginalized Groups

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

2.1.4 Vulnerable Groups

Vulnerability refers to the conditions determined by physical, social, economic and environmental factors or processes, which increase the susceptibility of a community to the impact of hazards. A vulnerable group is therefore a population with specific characteristics that put it at a higher risk of falling into poverty than others living in project areas. Vulnerable groups thus include the elderly, disabled people, HIV/AIDS infected and affected individuals and households, women, and orphans and vulnerable children (girl child, street children, children from extremely poor households, HIV/AIDS infected and affected children, children with disabilities, children living with elderly or disabled parents, and children in paid employment). On average, the Karamoja sub region is recognized as vulnerable, marginalized and poor. Therefore, there are very little differences between the persons identified as vulnerable/marginalized and the entire population of the region.

Recognizing VMGs in Uganda

Uganda does not have an official definition of VMGs neither does it have a criterion for their identification. According to Uganda's 1995 Constitution, there are 65 ethnic groups referred to as its indigenous communities as from the date of 1st February 1926. Ethnic diversity plays a major role in shaping the behaviours and ways of life of people as their cultural and social life differ from one ethnic group to another. The term 'indigenous' as referred to in the Constitution is used to describe the different ethnic groups that have historically resided within Uganda's borders. This understanding differs markedly from the manner in which the term is used by international and regional organizations and by experts on VMGs' issues. Uganda uses ethnic minorities, to the exclusion of other factors, as the only method of identifying VMGs.

The African Commission on the 3rd periodic report (concluding observations) on the Republic of Uganda, observed that one of the factors restricting the enjoyment of the rights enshrined in the African Charter on Human and Peoples' Rights (ACHPR, 2009) is the apparent lack of political will to take measures to realize the rights of VMGs especially the Batwa, Ik, Tepeth and Benet as guaranteed under the Charter. The commission recommended that Uganda adopts measures to ensure the effective protection of the rights of VMGs especially of the Batwa people as guaranteed under the Charter by establishing laws that protect land rights and natural resources of VMGs (ibid). These groups are not recognized as Indigenous People (IPs) by the GoU which prefers to call them Vulnerable and Marginalized Groups or Ethnic Minorities.

2.1.5 The Vulnerable and Marginalized Groups of Uganda

A number of ethnic minority groups in Uganda have been identified according to the World Bank's ESS7, on the identification of VMGs. They include traditional hunters and gathers' communities of:

- Batwa, also known as Twa or Pigmies who live primarily in south-western Uganda;
- Ik, who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong district, Karamoja;
- Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, and
- Tepeth, also referred to as the Soo. They live in Mount Moroto and neighbour the Turkana and the Pokot of Kenya. They are also said to have been the original people of Moroto but due to ethnic wars with the Karimojong they were driven up the top of mount Moroto.

The VMGs of Uganda are commonly characterised by:

- Historical and continued suffering, disempowerment and discrimination on economic, social, cultural and political grounds;
- Reliance on their land and environment to sustain themselves both physically (in terms of food, fuel and habitat) and culturally;
- Threatened livelihoods mainly due to dwindling access to land and natural resources on which they depend as hunters and gatherers;
- Much lower health and education indicators than those of the dominant community, often due to difficult access. This means that they are particularly vulnerable to changes in their socio-economic and physical environments; and
- Social exclusion, deprivation from mainstream government services, lack of participation in development processes that affect them, and in most cases uncertainty of land and natural resource tenure.
- Their economic systems exist separately from that of the mainstream or dominant community, and tend to have minimal interaction (if any) with the socioeconomic and legal systems of national governments;

Some of the key factors that continue to affect and maintain the marginalization of VMGs communities include:

- (a) Dispossession of ancestral lands including lack of access and/or no control or legal recognition of such land and other natural resources.
- (b) A focus on modern agriculture versus preservation of livelihoods of hunter and gatherers and pastoralist groups.
- (c) Limited access to education, resulting in inability to compete for employment opportunities.
- (d) Ignorance and limited access to information on government programs and basic entitlements
- (e) Limited access to agricultural and other social services such as health, etc.
- (f) Unequal development of health care and other social infrastructure; and
- (g) Limited access to justice and increased conflict and a deteriorating security situation and recurrent inter-ethnic conflicts.
- (h) Limited access to livelihoods, financial, banking and credit facilities

Socio-Demographic Information of VMGs

A desk review of the VMGs that meet the ESS7 category shows that there are varying socio-demographic characteristics that any development intervention should consider. Most of the features demonstrate limited opportunities to access basic development opportunities. Below are descriptions of basic characteristics various categories of vulnerable groups in Uganda.

Gender and other socio-cultural aspects of VMGs in Uganda

Generally, power and gender relations between the men and the women favour men and women continue to suffer very high time burdens in pursuing their livelihood strategies (Uganda Gender Policy, 2007). All consultations with men and women revealed the prevalence of this form of negative masculinity. Both men and women largely do the gender ascribed jobs in the community, largely the traditional subsistence cultivation of traditional crops.

Among the Batwa for example, cultural values and norms do not allow a male healthcare provider to attend to women during delivery and hence this makes female Batwa reluctant to seek medical services from the health centres that have male staff. There is still substantial use of the traditional herbs to cure malaria, respiratory tract infections and pneumonia which unfortunately has led to a high mortality rate. The relationship between the marginalised and vulnerable groups and their dominant neighbours is characterised by 'discrimination, marginalisation and stereotyping'. For example, the Batwa community are described as short, lazy and 'irresponsible people' by the other surrounding tribes (Kabanankye, 2016). The concept of patriarchy and gender segregation applies across most tribes in Uganda.

VMG communities have significant cultural sites. Although some of these sites have been gazetted as National Parks or Tourist sites, most members of vulnerable and marginalized groups still rely on them for subsistence and livelihoods.

2.1.6 Ethnic minorities in Uganda

The Ik, Batwa, Benet and Tepeth have been dispossessed of their ancestral land through various developments. Many still live in small huts made of sticks and grass.

- **Poverty:** High poverty levels in these communities caused by highly undependable climate, low produce and low market prices, for their produce even if the communities depend on farming.
- **Inadequate land for settlement:** The Ik, Batwa, Benet and Tepeth are mobile due to land tenures systems, their social life or various uncertainties. They move when their lands are acquired from them or when they need to grow crops, away from where animals threaten to destroy them. When they are not assured of permanent settlement, they construct temporary shelters.
- **Economic activities** Similarly, these indigenous groups such as the Batwa, face challenges that limit their participation in economic activities for example cultural practices that limit their survival to particular areas, social exclusion by the majority groups and their cultural lifestyle is not based on cash economy. However, there have been some efforts to improve their self-reliance. Kanungu District, for instance, has persistently provided various crop seeds through their agricultural initiatives but the Batwa have in turn sold such agricultural inputs. Although they are known as hunters, they also do other forms of labour at low pay. Some do basic jobs or agriculture, while others make handicrafts and jewellery for sale to locals and tourists. They also do singing and dancing as form of entertainment for payment by visitors. Tourists pay some money to the dancing groups to be entertained.
- **Education:** For most ethnic these groups, (Ik, Batwa, Benet and Tepeth), access to education remains a challenge. This is attributed to their unique social cultural practices such as their nomadic lifestyle, scarce school facilities in their localities, discrimination and stigma, and fear of the unknown. Yet education would allow for social transformation, self-sufficiency and promote self-esteem. Education offers the potential to undertake training in technical skills or to access employment, all of which would help these ethnic groups overcome the poverty they live in.
- **Health service access:** Access and utilization of health care services remains a challenge for most of the Ik, Batwa, Benet and Tepeth. Factors such as limited awareness and acceptance of modern medicine, stigmatization by health workers, distance from health centers, over reliance on traditional medicine as well as high costs associated with access to health care. This has exposed them to the risk of high disease burden, high levels of infant and maternal mortality, high HIV prevalence etc.
- **Social dynamics:** Women participation in social and community management activities is minimal compared to men. There are small numbers of women that participate in community meetings and this reflects the power dynamics in society; few women among them have the

level of education needed to take up positions in local governance or obtain government employment.

- **Poor road network and other services:** Further still, the Ik, Batwa, Benet and Tepeth tend to live in areas characterised by very bad terrain and poor road network which renders them hard to reach. As such accessibility to them is a problem mainly due to the mountainous nature of their locations. This limits access to markets and other social services.
- **Socio-cultural issues:** It is also pertinent to note that the communities where these ethnic minorities live are characterized by social problems such as extreme and abject poverty, child marriages, alcohol/substance abuse and domestic violence. The relationship between the marginalised and vulnerable groups and their dominant neighbours is characterised by 'discrimination, marginalisation and stereotyping'. For some of these ethnic minorities, the concept of patriarchy and gender segregation is dominant, as is the case in most other tribes in Uganda.
 1. Eviction of VMGs from their homelands (Natural Forests) has limited their access to food, medicine, and shelter. As a result, some of them are plagued by starvation, sickness and exposure. For instance, the number of Batwa in Bundibugyo and Kisoro Districts are said to be reducing and therefore on the verge of total extinction due to the HIV/AIDS, which they have acquired as a result of integration with other communities who believe that one can get cured of the infection after canal knowledge with a Mutwa woman (Kabanankye, 2016).
 2. As traditional hunters/gatherers, the Ik have witnessed the depletion of wild game in their areas due to cutting down of trees and the widespread use of illegal guns; Timu forest which is a center for their rituals and traditions is slowly becoming depleted causing gathering methods to be more difficult and greatly affecting the performance of their rituals and traditions. The Dodoth and Turkana graze in Ik lands during which they cut down trees for fencing their homestead and kraal; Frequent attacks from hostile ethnic groups especially the Tepeth in Moroto are attacked by the Pokot and Turkana from Kenya. The Ik are attacked by other Karamojong ethnic groups.
 3. The Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, are on the verge of extinction due to takeover of Mt. Elgon by Uganda Wildlife Authority as a protected area for wildlife.
- **Leadership:** Since the ethnic minorities lack numeric advantage, their participation in leadership at all levels is minimal. For example, it was only in 2015 that the Ik community were given affirmative action constituency and they got their first representation in Parliament of the Republic of Uganda in the 10th Parliament. Local leadership is optimistic that such representation can help to advocate for further recognition of such groups to ensure the effective participation in leadership, governance and the achievement of the NDP III goal.

According to International Work Group for Vulnerable and Marginalized Affairs (IWGIA), a global human rights organization dedicated to promoting, protecting and defending vulnerable and marginalized peoples' rights, dispossession of traditional lands and territories is one of the major problems faced by VMGs in Africa. Development paradigms in the Sub-Saharan region tend to perceive VMGs' modes of production (pastoralist, hunting, and gathering), as primitive, non-productive and unaligned with today's modernization aspirations of African States. Therefore, many development policies are either directly or indirectly unfavourable to VMGs' modes of production.

Key concerns and issues common to Vulnerable and Marginalized Groups in Uganda.

The National Equal Opportunities Commission policy recognize a number of VMGs. These include women, persons living with disabilities, children living on streets, albinos, persons prone to disaster,

populations living near mines, populations living near national parks, internally displaced persons etc. Some of the major challenges and concerns faced by these groups in Uganda are:

- The Land Act of 1998 and the National Environment Statute of 1995 protect customary interests in land and traditional uses of forests. However, these laws also authorize the government to exclude human activities in any forest area by declaring it a protected forest, thus nullifying the customary land rights of VMGs. Nevertheless, the National Land Policy 2013 seeks to address the issue of dispossession of VMGs' ancestral lands as will be seen in the next section;
- Political participation of VMGs remains limited and their socio-economic rights are ignored by the State and society;
- Eviction from their homelands has limited Uganda's VMGs' access to natural forest food, herbal medicine, and shelter leaving some of them plagued by starvation and sickness

Summary/ Conclusions

A number of ethnic minority groups in Uganda have been identified according to the World Bank's ESS7, on the identification of VMGs. They include traditional hunters and gathers' communities of: Batwa, also known as Twa or Pigmies who live primarily in south-western Uganda; Ik, who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong district, Karamoja; Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, and Tepeth, also referred to as the Soo. They live in Mount Moroto and neighbour the Turkana and the Pokot of Kenya. Therefore, for this GROW project and in line with ESS7, this VMGF will cover these four groups. Other VMGs in Uganda include: refugees and the associated host communities, people living with disabilities, female youth, elderly females, people living with HIV, survivors and those at risk of GBV. The needs of these groups have been included in the design of the consultation processes as described in the SEF and the project design and mitigation as outlined in the ESMF.

3 LEGAL POLICY AND INSTITUTIONAL FRAMEWORK FOR VMGS

In this section the policies, legal, regulatory and institutional framework relevant vulnerable and marginalized groups in Uganda are discussed.

Government of Uganda (GoU) has formulated and implemented a number of policies, programmes and enacted laws intended to improve livelihoods of vulnerable and marginalized groups.

The vulnerabilities faced by certain categories of the population such as ethnic minorities, older persons, children, youth, women and persons with disabilities do not only directly impact on their livelihoods but also tend to slow national development. Bringing these groups to the frontline of development and enhancing their contribution to the development process requires specific social protection instruments that address the peculiar risks and vulnerabilities they face.

Attempts are made to relate the laws, policies and institutions with relevant components of the GROW project.

Relevant Legal Framework

3.1.1 The Constitution of the Republic of Uganda, 1995 As Amended

Under its National Objectives and Directive Principles of State Policy, the Constitution of the republic of Uganda provides that every effort shall be made to integrate all peoples including ethnic minorities while at the same time recognize the existence of, amongst others, their ethnic, religious and cultural diversity. In this regard, the Constitution requires that everything necessary be done to promote a culture of cooperation, understanding, appreciation, tolerance and respect for each other's customs, traditions and beliefs. The Constitution, however, offers no express protection for indigenous peoples but Article 32 places a mandatory duty on the state to take affirmative action in favour of groups who have been historically disadvantaged and discriminated against. An equally important relevant constitutional provision with respect to the situation of the historically marginalized indigenous communities is contained in Article 32. This article enjoins the state "to take affirmative action in favour of groups marginalized on the basis of gender, age, disability or any other reason created by history, tradition or custom for purposes of redressing imbalances that exist against them." In this regard the Constitution mandates Parliament to enact appropriate laws, including laws for the establishment of an Equal Opportunities Commission (EOC), for the purpose of giving full effect to Article 32(1).

Thus, while the promulgation of the 1995 Constitution was a positive step in the recognition of the rights of indigenous people in Uganda, the provisions fall short of international standards in regard to recognition of Indigenous People.

3.1.2 Equal Opportunities Commission Act, 2007

The Act makes provision in relation to equal opportunities pursuant to articles 32 (3) and 32 (4) and other relevant provisions of the Constitution; to give effect to the State's constitutional mandate to eliminate discrimination and inequalities against any individual or group of persons on the ground of sex, age, race, colour, ethnic origin, tribe, birth, creed or religion, health status, social or economic standing, political opinion or disability, and take affirmative action in favour of groups marginalized

on the basis of gender, age, disability or any other reason created by history, tradition or custom for the purpose of redressing imbalances which exist against them; and to provide for other related matters.

3.1.3 The Workers' Compensation Act, Cap 225

The Act provides for the compensation of injured workers, treatment of injuries and illnesses in the course of employment, and continued payment of wages to ill or injured workers during temporary incapacitation. It requires employers to be insured against any injuries that might affect their employees during the course of employment/injuries at work or in transit to and from work. Seeks to ensure that injured workers are compensated to alleviate any burden that might present to the families and the project. Workers from the VMGs that will be injured or ill during the implementation of the GROW will be compensated so as to reduce the burden of reliance on their families.

3.1.4 The Employment Act, 2006

The Act provides for the recruitment, contracting, deployment, remuneration, management and compensation of workers. The Act prohibits employment of children under 12 years. A child of 12-14 years can only be employed for light work under supervision of an adult and not during school hours. Additionally, according to the Act any form of discrimination or preference in employment on the basis of race, colour, sex, religion, political opinion, natural extraction, social origin, HIV status or disability is unlawful. Labour conditions and relations during the implementation of GROW will be governed by the employment Act, most especially prohibiting any discrimination of vulnerable and marginalized groups during the implementation of the Project.

3.1.5 Employment (Sexual Harassment) Regulations, 2012

The regulations provide for prohibition of sexual harassment at work place. The project will employ members of the VMGs and the provisions in these regulations shall protect the employees irrespective of their social status. The Regulations prohibit (a) use of language whether written or spoken of a sexual nature such as unwelcome verbal advances, sexual oriented comments, request for sexual favours, jokes of a sexual nature, offensive flirtation or obscene expressions of sexual interest that are addressed directly to the person; (b) use of visual material of a sexual nature such as display of sexually suggestive pictures, objects or written materials or sexually suggestive gestures; and (c) showing physical behaviour of a sexual nature such as unwanted and unwelcome touching, patting, pinching or any other unsolicited physical contact; which directly or indirectly subjects the employee to behaviour that is unwelcome or offensive to that employee and that, either by its nature or through repetition, has a detrimental effect on that employee's employment, job performance or job satisfaction.

3.1.6 The Local Government Act (1997)

The Local Government Act, 1997 provides for the local governments as the institutions responsible for the protection of the environment at the district and lower levels. This therefore, implies that local governments shall be consulted on projects to be located within their areas of jurisdiction and on matters that affect their environment. During this study, the neighbouring local communities/Villages and other stakeholders surrounding the Program area districts including relevant district technical staff were consulted. Leaders at these levels of local administration are closer to residents and therefore important in effective community mobilization, sensitization and dispute resolution. Similarly, local government structures are important for mobilizing support for the project as well as monitoring its social-

environmental impacts both during implementation and operation phases in the beneficiary communities and VMG communities.

Policy Frameworks

3.1.7 The Uganda Vision 2040

This is Uganda's blueprint for socio-economic transformation from a subsistence-based economy to an industrialized one. This vision recognizes the importance of the social economic transformation of all, including VMGs.

3.1.8 National Development Plan III

The goal of this Plan is "To Increase Household Incomes and Improve Quality of Life of Ugandans. The Plan has identified human capital development, private sector development and community mobilization and empowerment programs as some of the eighteen (18) programs designed to deliver the required results under this Plan. The NPD III prioritizes social economic development as a key catalyst for development of Uganda. The GROW aims at increasing economic productivity of the women and VMGs which will contribute to the achievement of this goal. This will contribute to eradicating poverty as well as sustaining economic growth, enhancing social inclusion regardless of gender creed or cultural beliefs to improve welfare and creating opportunities for employment and decent work for all, while maintaining the healthy functioning of the ecosystems.

3.1.9 The Equal Opportunities Policy, 2006

The MGLSD has also developed an Equal Opportunities Policy which provides for vulnerable and other marginalized groups to equitable access and benefit from government development projects. Gender and vulnerability are some of the priority areas with a focus on equitable access and control of resources, and addressing negative cultural practices that limit opportunities for marginalized men and women.

The Policy provides for vulnerable and other marginalized groups to equitable access and benefit from government development projects. Gender is one of the priority areas with a focus on equitable access and control of resources, and addressing negative cultural practices that limit opportunities for marginalized men and women. This project aims at ensuring equitable access to opportunities irrespective of socio-economic status and cultural beliefs of VMGs.

3.1.10 The Uganda Gender Policy, 2007

The goal of the Policy is to achieve gender equality and women's empowerment as an integral part of Uganda's socio-economic development. One of the policy's objectives is to reduce gender inequalities so that all women and men, girls and boys, are able to move out of poverty and to achieve improved and sustainable livelihoods. The policy is a guide to all stakeholders in planning, resource allocation, implementation and monitoring and evaluation of programmes with a gender perspective.

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applies to inclusion and special preference for women, VMGs and single female-headed households. It also promotes non-discrimination in recruitment of construction labour for component one of the GROW activities where women should have equal opportunity as men for available jobs at all levels of the project management. The recruitment process will be carried out in conformity with this policy.

3.1.11 The Uganda National Culture Policy (2006)

This Policy seeks to promote community action on cultural practices that promote and that impinge on human dignity. It provides guidance on any development to avoid impingement on the culture of vulnerable and marginalized persons' The GROW will collaborate with the Department of Culture in ensuring proper preservation of positive cultural practice with the VMG communities.

3.1.12 The National Policy on Elimination of Gender Based Violence (2016) (GBV) in Uganda

This Policy was developed to address the critical problem of GBV in the Country including what occurs at workplace. The GROW is expected to have contractors who will employ workers from the vulnerable groups. Vulnerable and marginalized communities usually suffer in silence either due to fear of repercussions of reporting or lack of awareness of their rights and services available. The GROW Project will collaborate with other Government institutions to ensure that risk of Gender Based Violence on the vulnerable communities as a result of implementation activities is prevented or minimized within the VMG communities and the wider community.

3.1.13 National Child Labour Policy, 2006

This policy prohibits employment of children. Children are more prone to accidents at workplaces. The policy defines child labour as work that is mentally, physically, socially and/or morally dangerous and harmful to children. In addition, child labour is perceived as work or activities that interfere with children's school attendance. Hazardous work which by its nature or the circumstances under which it is performed jeopardizes the health, safety and morals of a child. The project will ensure that no children are employed to work during the implementation of the proposed project. Ministry of Gender, Labour & Social Development (MGLSD) is the institution responsible for the implementation of this policy. Under GROW, the Project Coordination Unit will ensure child labour, especially in Vulnerable and Marginalized Groups communities is not engaged by any of the project implementing agencies.

3.1.14 The National Equal Opportunities Policy 2006

The policy objectives amongst others are geared towards guiding the planning processes, affirmative action, and implementation of programmes and allocation of resources to all stakeholders. It also seeks to empower the marginalized and vulnerable groups for their full participation in all development processes. It is noted that, discrimination and stigmatization may serve as a barrier for the indigenous and marginalized in selected project areas to accessing employment and support opportunities, therefore this policy will act as a guiding principle to ensure that all groups are included in the planning and implementation process.

3.1.15 The National Land Use Policy

The overall policy goal is to achieve sustainable and equitable socio-economic development through optimal land management and utilization in Uganda. The policy recognizes amongst others, the need for the protection and sustainable use of land resources through conducting environmental assessments and implementation of measures geared towards sustainable land use. The policy takes cognizance of the fact that women, children, minority groups and PWDs have been denied access to land rights as a result of discriminatory laws, customs and practices. Additionally, by recognising that the land and resources that the IPs/VMGs live in and depend on are inextricably linked to their identities, cultures, livelihoods, physical, and spiritual well-being, the policy seeks to ameliorate their continued marginalization.

3.1.16 The National Gender Policy, 1997

The government adopted a National Gender Policy of 1997, a tool to guide and direct the planning, resource allocation and implementation of development programs with a gender perspective. The adoption of the gender policy has facilitated Uganda's gender mainstreaming programs in all sectors of the economy (implying, the planned works project should equally integrate gender into the implementation of works. During project implementation, OPM will be obliged to deliberately mainstream gender interventions into the project including VMG communities.

3.1.17 National Policy on HIV/AIDS and the World of Work, 2007:

The policy provides the principles and a framework for a multi-sectoral response to HIV/AIDS in Ugandan's world of work. The policy obliges developing entities to mainstream HIV/AIDS interventions to their planned development interventions. It also applies to all aspects of work, both formal and informal. The Project will take deliberate measures to mainstream HIV/AIDS interventions into its plans and activities. MGLSD will be obliged to mainstream HIV/AIDS interventions to their planned development interventions and include the VMG communities.

3.1.18 National Policy for Older Persons (2009)

This policy is clearly set within the framework of the Constitution of the Republic of Uganda and other laws that promote the rights of older persons among other vulnerable groups. It provides a framework for enhancing the recognition of the roles, contributions and potentials of older persons in the development process among others. The policy targets older persons aged 60 years and above with special emphasis on the vulnerable. The older people are often discriminated and neglected. As the implementing entity, MGLSD will need to roll out the project with focus on older person being integral to the development agenda for both the wider communities and VMG communities.

Institutional Framework

The nationwide coverage of the GROW indicates the participation of various government and private institutions. This section highlights the key institutions relevant for the implementation of the project and their anticipated roles in light of project activities in VMG communities.

3.1.19 Ministry of Gender, Labour and Social Development

The Ministry's mandate is to empower communities to harness their potential through cultural growth, skills development and labour productivity for sustainable and gender responsive development. The vision of the Ministry is "a better standard of living, equity and social cohesion,

especially for poor and vulnerable groups in Uganda.” The mission of the ministry is “promotion of gender equality, labour administration, social protection and transformation of communities”. The MGLSD being the lead implementing entity, will ensure smooth implementation of the GROW by the various implementing partners under the project. The Ministry will ensure that the required instruments for managing E&S risks with emphasis on VMGs are prepared and implemented including: VMGPs, ESCP, ESMF, RPF, SEP, ESIA, ESMPs and RAPs.

3.1.20 The Uganda Human Rights Commission

The UHRC is Uganda’s national human rights institution created by the Constitution, with mandate, amongst others, “to investigate violations of human rights and to monitor government compliance with its human rights obligations detailed in the Constitution.” This is in addition to making recommendations to Parliament on measures to promote human rights. The Commission has since its establishment played a very important role in highlighting human rights violations in the country and making recommendations for rectification. The Commission has on several occasions investigated and published its findings with regard to the human rights problems of marginalized groups and made recommendations on how these could be rectified.

3.1.21 The Equal Opportunities Commission

The mandate of the Commission is “to eliminate discrimination and inequalities against any individual or group of persons on the ground of sex, age, race, colour, ethnic origin, tribe, birth, creed or religion, health status, social or economic standing, political opinion or disability, and take affirmative action in favour of groups marginalized on the basis of gender, age, disability or any other reason created by history, tradition or custom for the purpose of redressing imbalances which exist against them, and to provide for other related matters.” ***The EOC also has powers to hear and determine complaints by any person against any action, practice, usage, plan, policy programme, tradition, culture or custom which amounts to discrimination, marginalization or undermines equal opportunity.***

3.1.22 International Work Group on Indigenous Affairs (IWGIA)

IWGIA is an international human rights organization staffed by specialists and advisers on indigenous affairs. IWGIA supports indigenous peoples' struggle for human rights, self-determination, right to territory, control of land and resources, cultural integrity, and the right to development. The aim was to establish a network of concerned researchers and human right activists to document the situation of indigenous peoples and advocate for an improvement of their rights. IWGIA works at local, regional and international levels to further the understanding and knowledge of, and the involvement in, the cause of indigenous peoples. IWGIA publishes a wide range of books, reports, handbooks, and audiovisual material about indigenous peoples' rights and the human right situation of indigenous peoples around the world. For the GROW project, the IWGIA will work to secure and mainstreaming of indigenous people's rights on the GROW project. They also ensure that marginalized groups are not discriminated against in particular ways because of their particular culture, mode of production and subordinate positions.

3.1.23 Minority Rights Group International

Minority Rights Group International (MRG) is a nongovernmental organization (NGO) working to secure the rights of ethnic, religious and linguistic minorities and indigenous peoples worldwide, and to promote cooperation and understanding between communities. Their activities are focused on international advocacy, training, publishing and outreach. It is guided by the needs expressed by our worldwide partner network of organizations, which represent minority and indigenous peoples. The MRG would be help during engagements and sensitisation exercise during project implementation of the GROW project.

International Treaties and Commitments on Vulnerable and Marginalized Groups

This section highlights international and regional commitments and treaties which Uganda is a signatory and are relevant for the framework.

3.1.24 International Labour Organization

The first international standard on populations was International Labour Organisation (ILO) 107 (1957), was revised and reformulated in 1989 and amended in ILO 169. In this Convention, indigenous peoples are defined in Article 1(1) as:

- i) Tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations.
- ii) Peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all their own social, economic, cultural and political institutions.

According to a new ILO report, released to mark the 30th anniversary of the Indigenous and Tribal People's Convention 1989 (No. 169), indigenous peoples are nearly three times as likely to be living in extreme poverty as their non-indigenous counterparts.

The ILO has been engaged with indigenous and tribal peoples' issues since the 1920s. It is responsible for the Indigenous and Tribal Peoples Convention, 1989 (No. 169), the only international treaty opens for ratification that deals exclusively with the rights of these peoples. The ILO's Decent Work Agenda, with gender equality and non-discrimination as a cross-cutting concern, serves as a framework for indigenous and tribal peoples' empowerment. Access to decent work enables indigenous women and men to harness their potential as change agents in poverty reduction, sustainable development and climate change action.

3.1.25 The Vienna Declaration and Program of Action 1993.

The Vienna Declaration and Programme of Action (VDPA) is a human rights declaration adopted by consensus at the World Conference on Human Rights on 25 June 1993 in Vienna, Austria. The convention emphasizes the need to give great importance to the promotion and protection of human rights of all persons rendered vulnerable including migrant workers.

3.1.26 East African Community Gender Policy, 2018

The East African Protocol under the Section of Gender, Community Development and Civil Society emphasizes the need to adopt common approaches towards the disadvantaged and marginalized groups, including women, children, the youth, the elderly and persons with disabilities aimed at employment creation, poverty alleviation and improving working conditions.

ESS 7: Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities

This standard contributes to the Bank's mission of poverty reduction and sustainable development by ensuring that the development process fully respects the dignity, human rights, economies, and cultures of Indigenous Peoples.

For all projects that are proposed for Bank financing and affect Indigenous Peoples, the Bank requires the borrower to engage in a process of meaningful engagement, to promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies, the Borrower will undertake an engagement process with affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, as required in ESS10. This engagement process will include stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation in a culturally appropriate and gender and intergenerationally inclusive manner. For Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, the process of meaningful consultation will also:

- Involve Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' representative bodies and organizations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members;
- Provide sufficient time for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' decision-making processes; and
- Allow for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' effective participation in the design of project activities or mitigation measures that could potentially affect them either positively or negatively.

Furthermore, the borrower will obtain the Free Prior and Informed Consent (FPIC) of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in accordance with paragraphs 25 and 26 of ESS7 in circumstances in which the project will:

- Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
- Cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities from land and natural resources subject to traditional ownership or under customary use or occupation; or
- Have significant impacts on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' lives.

The Bank provides project financing only where free, prior, and informed consent results in broad community support to the project by the affected Indigenous Peoples. The policy establishes processing requirements: screening, social assessment, consultation with communities involved, preparation of plan or framework, and disclosure.

The GROW Project will be implemented in areas where the Benets in Mt. Elgon slopes inhabit, the Batwa in South Western Uganda, the Iks and Tepeth in the Karamoja region who meet the criteria for ESS7.

ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The Bank obligates the Borrower to consider feasible alternative project designs to avoid the relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities from communally held or attached land and natural resources subject to traditional ownership or customary use or occupation. If such relocation is unavoidable, the Borrower will not proceed with the project unless free, prior, and informed consent (FPIC) has been obtained as described above; the Borrower will not resort to forced eviction, and any relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will meet the requirements of ESS5 and ESS7. Where feasible, the relocated Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will be able to return to their traditional or customary land, should the cause of their relocation cease to exist. For these reasons, the overall objectives of the Bank's ESS5 policy on involuntary resettlement are the following:

- i) To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- ii) To avoid forced eviction.
- iii) To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement

As indicated in the RPF, it is not anticipated that the project will involve any significant land acquisition or involuntary resettlement. Some activities under component 3 may require land (mainly on existing local government land) which will be managed in accordance with the requirements of ESS5, the RPF and outlined in the project operations manuals as appropriate.

Table 3-1: Uganda and World Bank Social Standards

Legal Framework	Uganda	World Bank Guidelines	Gap
<p>The Constitution of Uganda, 1995</p>	<p>According to Uganda’s 1995 Constitution, there are 65 ethnic groups referred to as its indigenous communities as from the date of 1st February 1926. The term ‘indigenous’ as referred to in the Constitution is used to describe the different ethnic groups that have historically resided within Uganda’s borders. Uganda uses ethnic minorities, to the exclusion of other factors, as the only method of identifying VMGs like the IK and Batwa under Third Schedule article 10(a).</p> <p>The Constitution offers no express protection for indigenous peoples but Article 32 places a mandatory duty on the state to take affirmative action in favour of groups who have been historically disadvantaged and discriminated against. The Constitution also mandates Parliament to enact appropriate laws, including laws for the establishment of an Equal</p>	<p>This ESS recognizes that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development.</p> <p>The development process to foster full respect for human rights, dignity. Aspiration, identity, culture and natural based livelihoods of indigenous peoples</p> <p>Under Paragraph 23 of ESS7: Meaningful Consultation and Participation. To promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies, the Borrower will undertake an engagement process with affected Indigenous Peoples.</p>	<p>Uganda has no specific policy on indigenous peoples. However, the Constitution of the Republic of Uganda, 1995 under its National Objectives and Directive Principles of State Policy, provides that “every effort shall be made to integrate all peoples while at the same time recognizing the existence of, amongst others, their ethnic, religious and cultural diversity”. In this regard, the Constitution requires that effort be done to promote a culture of co-operation, understanding, appreciation, tolerance and respect for each other’s customs, traditions and beliefs. It however offers no express protection for indigenous peoples although Article 32 (of the Constitution) places a mandatory duty on the state to take affirmative action in favour of 13 groups who have been historically disadvantaged and discriminated against. Article 32 therefore, enjoins the state to take affirmative action in favour of groups marginalized on the basis of gender, age, disability or any other reason created by history, tradition or custom for purposes of redressing imbalances that exist against them. In this respect, the Constitution mandates Parliament to enact relevant laws, including laws for establishment of an Equal Opportunities Commission (EOC), for giving full effect to Article 32.</p>

Legal Framework	Uganda	World Bank Guidelines	Gap
	<p>Opportunities Commission (EOC), for the purpose of giving full effect to Article 32. Overall, the Constitution provisions fall short of international standards in regard with recognition of Indigenous People.</p>		<p>Conversely, the World Bank's Social Standard on Indigenous Peoples (EES7) is specific in underscoring the need for borrowers and the Bank staff to identify indigenous peoples, consult with them, ensure that they participate in and benefit from Bank funded operations in a culturally appropriate way and ensuring that the adverse impacts are avoided, minimized or mitigated.</p>
National Gender Policy, 2007	<p>Under Section 6: Gender and Governance, specific strategies (d) calls for Promoting social protection interventions for poor and vulnerable women and men; and (e) developing strategies to eradicate the child labour incidence with emphasis on the exploitation of the girl child.</p>	<p>Under objective of ESS2, the Bank emphasizes protection of project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p> <p>Additionally, under the World Bank's, Good Practice Note that addresses Gender Based Violence, the World Bank Group considers that no country, community, or economy can achieve its potential or meet the challenges of the 21st century without the full and equal participation of women and men, girls and boys.</p>	<p>Although Uganda has policies in place on protection of project workers including women. There are always gaps during implementation. While Uganda's legal and policy framework is comprehensive, critical gaps in terms of policy implementation remain. Government agencies at national and local levels experience challenges particularly with the provision of integrated services for survivors of GBV. During project implementation, MGLSD will be obliged to deliberately mainstream gender interventions into the project.</p>

4 KEY ISSUES AND POTENTIAL IMPACTS ON VMGs

Overview

It is anticipated that in the process of implementing the proposed program in the districts that are home to the VMGs, activities of these component will trigger social risk and impacts which may range in size and complexity. Below is a summary of social impacts expected to be caused during the implementation of the Program beyond land take:

4.1.1 Positive and Negative impacts

Table 4-1: Risk and Impact Analysis

Project component	Impacts	Enhancement /Mitigation Measures
Positive Impacts		
Component 1: Access to finance would primarily focus on offering credit to women entrepreneurs	<p>Access to credit to women entrepreneurs will enhance business growth and thriving of women owned businesses.</p> <p>Increased production, employment, improved household income.</p>	<ul style="list-style-type: none"> • Putting in place realistic requirements (collateral) that is available to women from VMGs to enable them to access the funds, noting their access to collateral may vary based on cultural differences. • General sensitization of communities and advising on livelihood activities that will contribute to increased earning, welfare and business success of VMGs, which are aligned with their aspirations for development which may vary significantly from the wider community. • Technical assistance to build the skills for empowering women from VMG, for management and leadership in business • Provision of technical assistance to VMG women's associations • Promotion of women's engagement in business. • Structure the access to credit in a way that is flexible to all entrepreneurs including VMGs • Enhance VMGs women businesses leading to increase profits, and job creation) right from the onset of the project
Component 2: Enterprise Development, Sub-component 1 would be a "core course"-	Entrepreneurship training will provide women entrepreneurs with the aptitude to identify business opportunities, self-esteem, knowledge and skills to act on them. These skills include digital skills, marketing, branding and packaging.	<ul style="list-style-type: none"> • Diversify communication tools, language and format, and simplify messages; ensuring to test messages with VMG groups and refine as needed to ensure understanding. • Entrepreneurial learning should be given an early priority right from project commencement to hone entrepreneurship skills among the women based to their own needs and interest • In rural and remote areas Programs should be designed in line with the specific businesses that the women from VMGs are engaged in.

Project component	Impacts	Enhancement /Mitigation Measures
Sub-component 2 demand-driven menu of sector-specific training.	<p>Women will be empowered through these training and gain a greater sense of autonomy, value, and confidence within their respective line of business.</p> <p>Sector specific training will augment the skills base and innovation of the participants which will broadens the women's growth opportunities.</p>	<ul style="list-style-type: none"> Establish the specific skills needs required for provision of appropriate programs and detailed inclusive selection criteria which considers VMG put in place will ensure no one is excluded in the process
Component 3: Demand-Driven Social and Economic Infrastructure and Facilities	<p>Creation of employment opportunities for the VMGs under ESS7 in Project districts. The Program will directly or indirectly create employment opportunities depending on required skill sets especially during the construction of the Common user facilities and well as their operation.</p> <p>Improvement in services within and around enterprise location</p>	<ul style="list-style-type: none"> To optimize this benefit, priority in the recruitment of unskilled and semi-skilled manpower shall be given to VMGs during works in their locations provided that they meet the minimum requirements and express interest. Ensuring consultation with VMGs so that such facilities are also designed and operated in a manner that meets their needs Manage shared facilities equitably, affordably and appropriately to maximise VMG participation access and utilization. Clearly define the roles and responsibilities of service providers and users in relation to equipping, cleaning, servicing and maintaining facilities in serviceable order.
Negative Risks/Impacts		

Project component	Impacts	Enhancement /Mitigation Measures
	Loss of cultural and natural resources	<ul style="list-style-type: none"> MGLSD will need to carry out identification and evaluation of land, based on meaningful consultation with the affected VMGs' communities, to establish measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, including FPIC for the development; and ensure that the VMGs receive culturally appropriate benefits under the GROW project.
	Risk of HIV/AIDS -Effect on VMGs health status as they may be exposed to new interactions with people (workers) to be engaged in the civil works and other people new persons in the community which may lead to an increased risk of spreading infectious diseases like STIs and HIV/AIDS owing to fraternization.	<ul style="list-style-type: none"> Continuous sensitization about HIV/AIDS prior to project implementation and after should be carried out by MGLSD to prevent VMGs and vulnerable groups from contracting/spreading STIs and HIV/AIDS
	Risk of child labour in VMGs communities. Children may be abused in ways such as underage employment in civil works, sexual harassment of girls in the community, as a result of an influx of workers for construction activities. According to UBOS,2020 child labour prevalence by regions that are home to indigenous groups was indicated to be 29.9% and 26.9%for Toro and Kigezi where the Batwa live and 21.9% for Karamoja.	<ul style="list-style-type: none"> MGLSD in collaboration with the district local governments should ensure that existing child protection mechanisms (policies and laws on children's rights, labour etc.) are adhered to in line with national laws, ESS2 and the Labour Management Procedure in the ESMF to guide civil works and minimize any risk associated with it including influx of labour. Engagement with VMGs on issues related to child labor, SEA/SH in appropriate languages and formats.

Project component	Impacts	Enhancement /Mitigation Measures
	<p>Risk of gender-based violence-While promoting women's entrepreneurship may improve women's earnings and relative economic position, it could also potentially lead to increased intimate partner violence (IPV) as a form of backlash against loss of male control over women's time, labour, and disruption of traditional gender roles (Institute of Development Studies 2020, Macmillan and Gartner 1999). Men may also view women's economic gains as undermining their power and status this is evinced by the reported 22% physical, 28% sexual, 35.6% emotional and 34.6% physical and sexual violence cases in the Uganda⁴.</p>	<ul style="list-style-type: none"> Referral pathways to provide support for women should be built in from the beginning to address any backlash which does occur, for instance in the occurrence of GBV as a result of women's engagement in entrepreneurial activities. Ensure that mechanisms are in place so that SGBV survivors within the VMG communities can confidentially report incidents through their representatives in the GRM structures and have timely and non-discriminatory access to services and support, including medical, psychosocial, legal and material assistance, as well as safe spaces where needed. <p>The GBV redress mechanism should adopt a survivor-centred approach that:</p> <ul style="list-style-type: none"> Treats every survivor with respect. Ensures the safety of survivors and their families. Respects the choices, wishes, rights and confidentiality of survivors and their families. The identity of a survivor should never be revealed without his or her prior consent.

⁴ Uganda Bureau of Statistics (2021). Uganda Violence Against Women and Girls Survey 2020.

Project component	Impacts	Enhancement /Mitigation Measures
		<ul style="list-style-type: none"> Provides services and support without discrimination on any grounds. Provide and implement a gender-based violence strategy, which will form one of the Contractor's clauses. Gender sensitization campaigns in the project held; with specific focus on men and the need for spousal support in business. Ensure that information on the GRM and campaigns are provided in written and non-written forms in the relevant local languages throughout implementation.
	Risk of Contracting and Spreading COVID-19	<ul style="list-style-type: none"> Covid-19 management plan and SOPs both on-site and offsite
	Risk of poor use and maintenance of established infrastructure	<ul style="list-style-type: none"> Ensure that VMGs communities in general and their organizations/local leaders are not excluded by any means in activities of selection, design, and implementation processes. Best practices emphasize that projects should be demand-driven and encourage grassroots participation to ensure community ownership especially for the established infrastructure as a lack of it can result in 'white elephants'. Infrastructure investments should be completed with meaningful local community input to mitigate the risk of lack abandoning the facilities and lack of maintenance.

Organizations and Responsibility in implementation of VMGF

The implementation of the VMGF will involve a range of stakeholders, each with specific mandate and responsibility. Irrespective of their mandate and level of engagement, the following organizations will participate in prevention/avoidance, minimizing or mitigation of the social impact on the VMGs.

Table 4-2: Roles and responsibilities in the implementation of the VMGF

Implementing Partners/Contractors	VMGF Roles and Responsibilities
Ministry of Gender, Labour and Social Development	<p>MGLSD will be responsible for ensuring that there are adequate personnel for technical backstopping, monitoring and supervision of the implementation of the VMGF activities. MGLSD will also be responsible for allocation of funds and budget for implementation of the VMGF/VMGP.</p> <p>The Ministry through its Departments of: Community Development, Children and Youth Affairs, Gender and Women Affairs, Culture and Family Affairs will collaborate with MGLSD to undertake sensitization and community mobilization for inclusive access to the project among women and female headed households. MGLSD will also carry out regular statutory inspections to ensure good health and safety practices in the work place.</p> <p>MGLSD's Safeguards Specialist will be the focal person for the project who will coordinate social issues including inclusion of IKs, Batwa, Benet and Tepth for the GROW Project including</p> <ul style="list-style-type: none"> • Provide technical assistance and facilitation to LGs and target communities to implement the project. • Develop the sub-project specific VMGPs and fund the process of its preparation. • Consult on the VMGPs with stakeholders, including any requirements for FPiC, with special attention paid to including all affected indigenous communities and relevant Government agencies. • Ensure the Plan has adequate resources to enable effective implementation. • Implement monitoring and reporting of the Plan, including arranging and paying for any independent monitoring that might be deemed necessary. • Notify the World Bank of any substantial change in the course of the Plan implementation. • Carry out sensitization meetings with VMGs including HIV/AIDS awareness programs.
Service providers and other private sector actors	<p>These will ensure that implementation and supervision of sub projects under GROW project observe strict codes of conduct as per the law and incorporate standards and safeguards for protection of vulnerable and marginalized groups.</p> <p>Other interested groups such as the Civil Society Organizations have the responsibility of community engagements and advocating for an equitable</p>

Implementing Partners/Contractors	VMGF Roles and Responsibilities
	and fair engagement of all stakeholders. These might be contracted under the project during the elaboration and implementation of relevant plans.
District Government Local	<p>Collaboration with the PITs to undertake District and sub-county level monitoring of the implementation of the VMGF/VMGP.</p> <p>Undertake social screening to confirm presence as well as the participation of VMGs communities in their area of jurisdiction.</p> <p>Mobilize the relevant communities/create awareness about the project.</p> <p>Monitor mitigation measures intended to involve participation of the VMG communities in GROW Project.</p> <p>Monitor the implementation of the VMGP on ground.</p>
The World Bank	The World Bank is a vital source of financial and technical assistance. The Bank will provide technical and financial support to ensure that the project is inclusive in implementation and does not promote any form of discrimination, human rights abuse or injustice among the Vulnerable and marginalized groups.
VMGs: Beneficiary Vulnerable and marginalized women's entrepreneur groups will be part of the actual implementers of the proposed project	<p>Among their roles will be:</p> <ul style="list-style-type: none"> • Attend and make contributions during stakeholder meetings; • Participate in project implementation on the ground; • Participate in the monitoring of VMGP implementation; and • Safeguard and maintain project infrastructure as applicable.
Local/Community Based Organisations, NGOs:	<p>If deemed necessary, active local organisations such as, Bwindi Mgahinga Conservation Trust (BMCT), Mount Elgon Benet Indigenous Ogiek Group (MEBIO) and United Organisation for Batwa Development in Uganda (UOBDU) operating in the affected VMGs' communities may be called upon to support the DCDO and project personnel in not only mobilising VMGs to actively participate and benefit from the project but also in sharing their experiences and knowledge of working with VMGs.</p> <p>A number of NGOs have been instrumental in helping the VMGs stand up for their rights and continuous consultations with such NGOs is critical. Their roles include:</p> <ol style="list-style-type: none"> a. Providing capacity building services to ensure participation of the IP groups. b. Sensitizing VMG communities on social and gender related issues c. Sensitizing about livelihoods, savings, and their rights as IPs.
OPM	Will coordinate the implementation of the project in the refugee community areas

A Situational Analysis and Enhancement of Capacities for VMGP implementers

Although MLGSD has a team of specialists in place working on the preparation of the safeguard's documents, they lack adequate institutional capacity to implement this VMGF. As such the capacity to plan and implement the measures outlined in this VMGF will require capacity building and continuous strengthening for a robust vulnerable and marginalized people management. MLGSD will utilize its close working relationship with the Bank to help build and enhance capacity of its personnel on the GROW project to manage social safeguards issues. Furthermore, the GROW project will need to hire Environmental and Social Safeguards Specialists to provide conceptual and operational technical guidance on the core GROW environmental and social development activities.

Similarly, they will actively participate in projects implementation of all social issues including safeguards; facilitate the preparation of action plans and review implementation of social issues and preparation of any documentation and reports required by the project implementing entities and the World Bank to ensure that social issues have been adequately addressed and that the project is in compliance with the World Bank and Government of Uganda Safeguard Policies, particularly those on Involuntary Resettlement and social inclusion.

5 FRAMEWORK FOR FREE, PRIOR, AND INFORMED CONSENT (FPIC)

The ESS7 provides a framework process to guide the Free Prior and Informed Consent (FPIC) of affected Indigenous Peoples communities/Sub-Saharan African Historically Underserved Traditional Local Communities (in this case the Ik, Batwa, Benet and Tepeth) for the project activities (in a specific set of circumstances) that affect them, reached through a culturally appropriate process. FPIC may exist even if some individuals or groups object to such project activities.

5.1 The Elements of FPIC

Project impacts analysis shows the affected people may be affected by the loss of, alienation from or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, as per ESS7 FPIC is required when project activities:

- a) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
- b) cause relocation of VG from land and natural resources subject to traditional ownership or under customary use or occupation; or
- c) have significant impacts on the cultural heritage of VG that is material to their identity and/or cultural, ceremonial, or spiritual aspects of their lives.

To achieve FPIC the Ik, Batwa, Benet and Tepeth, will be consulted in good faith based on sufficient and timely information concerning the benefits and disadvantages of a project and how the anticipated activities occur. The FPIC principles are as follows:

- (i) Free – affected people are able to freely make decisions without coercion, intimidation or manipulation
- (ii) Prior – sufficient time is provided for the affected people to be involved in the decision-making process before key project decisions are made and impacts occur
- (iii) Informed – affected people are fully informed about the project and its potential impacts and benefits, and the various perspectives regarding the project (both positive and negative)
- (iv) Consent – refers to the collective support of affected Sub-Saharan African Historically Underserved Traditional Local Communities for the project activities that affect them, reached through a culturally appropriate process

According to the ESS7, when the FPIC of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (In this case the Ik, Batwa, Benet and Tepeth) cannot be ascertained by the Bank, the aspects of the project relevant to those affected Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities for which the FPIC cannot be ascertained will not be processed further. Where the Bank has made the decision to continue processing the project other than the aspects for which the FPIC of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities cannot be ascertained, the Borrower will ensure that no adverse impacts result on such Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities during the implementation of the project.

5.2 FPIC Process

The process for achieving FPIC, if required, will need to be developed for each affected group taking into account their distinct characteristics, decision making structures and the project impacts. The

process will be included in the VMGPs that will be developed and will include the following key steps:

- *Screening of the Need for FPIC:* The project will identify the need for FPIC based on the activities being undertaken and if any of the conditions outlined in Section 5.1 will be met. This will be undertaken in consultation with the VMGs as part of the development of the VMGP. The screening will be verified by the World Bank.
- *Sensitisation of the VG and Community:* The Project will inform VG about the project process and proposed outcomes, potential beneficiaries and geographical scope of the project. The community will also be informed about the principles of FPIC, their right to refusal and what will be needed to achieve FPIC.
- *Ongoing Consultation:* ongoing engagement will be undertaken to discuss project benefits and impacts, the concerns and any other issues that the VMG have including any barriers to the achieving consent (recognising that unanimity is not needed) etc. FPIC should be established through good faith negotiations between Project and the VG.
- *FPIC:* When ready the VG will demonstrate consent (or lack thereof) through agreed processes that are appropriate to that group. The agreements will be documented in the appropriate manner and languages.

The project will build on and expand the process of meaningful consultations and will ensure good faith negotiation among the affected parties. The project will take the responsibility of documenting: (i) the mutually acceptable process to carry out good faith negotiations as agreed upon and (ii) the outcome of the good faith negotiations including all agreements reached as well as dissenting views;

5.3 Strategy for Participation and Consultation with VMGs

Participation of VMGs in selection, design and implementation of the subprojects usually to a great extent determines the extent to which the VMGP objectives would be achieved. To ensure benefits have as wide a reach as possible the GROW project will undertake prior and informed consultations with the affected VMGs and those who work with and/or are knowledgeable of these people's livelihood issues and concerns. To facilitate effective participation, the VMGP will continue to follow a schedule to consult VMGs at different stages of the project program cycle, especially during preparation and implementation of the VMGPs. The primary objectives will be to examine the following:

- a) To seek their inputs/feedback on how to maximize benefits accessibility and how to avoid or minimize the potential adverse impacts associated with the required works;
- b) To identify culturally appropriate impact mitigation measures; and
- c) To assess and adopt economic opportunities, which will be promoted to complement the measures required to mitigate the adverse impacts.
- d) Understand the need for and approach to achieving FPIC.

Consultations will be carried out broadly in two stages. First, prior to final selection of any subproject located in an area inhabited by VMGs, the GROW project will consult the VMGs about the need for, and the probable positive and negative impacts associated with civil works. Second, prior to detailed impact assessment, ascertain how the VMGs in general perceive the need for undertaking physical works for the subproject and gather any inputs/feedback they might offer for better outcomes, which would eventually be addressed in VMGPs and design of the physical works.

The VMGPs communication strategy will therefore:

- Facilitate participation of VMGs with adequate gender and generational representation; customary/traditional VMG organizations; community elders/leaders; and civil society organizations on VMGs development issues and concerns.
- Provide them with relevant information about the project, including that on potential adverse impacts, organize and conduct the consultations in manners to ensure free expression of their views and preferences.
- Document details of all consultation meetings, with VMGs perceptions of the proposed activities and the associated impacts, especially the adverse ones and any inputs/feedbacks offered by VMGs; and an account of the FPIC by VMGs.

The EA will assess the detailed impacts at household and community levels, with a particular focus on the adverse impacts perceived by VMGs and the probable (and feasible) mitigation and community development measures. To ensure continuing informed participation and more focused discussions, the communication strategy will provide affected VMGs with the impact details of the proposed project works. Consultations will cover topics/areas concerning cultural and socioeconomic characteristics, as well as those VMGs consider important. Consultations will continue throughout the preparation and implementation period, with focus on the households directly affected.

6 GRIEVANCE REDRESS MECHANISM

Overview

ESS10 requires that concerns and grievances of project-affected parties related to the environmental and social performance should be addressed and responded to by the developer/project proponent in a timely manner. Additionally, ESS 7 emphasises that grievance mechanism should be culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.

This is to put in consideration that Vulnerable Marginalized Groups, they may encounter a grievance or a complaint against the project, its staff or during project implementation. To be effective, the mechanism shall utilize culturally appropriate existing local VMG administrative and community structures. The established GRM will ensure that queries or clarifications about the project are responded to in a timely manner, and that grievances are addressed efficiently and effectively.

All grievances will be addressed to and collected by the appropriate community VMG leader. The GRM under ESS7 will be linked and follow the appeal processes of the community GRM with the participation of the VMG community leader

Grievance Redress Mechanism

Many factors can give rise to conflict between VMGs and proposed project investments, but these will be mitigated through the implementation of: (i) Stakeholder Engagement Plan (SEP) that will clearly spell out the consultation process with VMGs; and (ii) the VMGP and the GRM that will be prepared for the project.

VMGs may encounter a grievance or a complaint against the project, its staff or contractors during project implementation. Some of the factors that may lead to conflict, if not well managed, include but are not limited to:

- i) Inadequate or inequitable compensation for affected persons
- ii) Inequitable and unbalanced distribution of benefits;
- iii) Broken promises and unmet community expectations of benefits;
- iv) Failing to generate opportunities (e.g., employment, training, supply) for local population
- v) Gender based violence (economic, verbal abuse, battering, harassment, etc.)
- vi) Sexual exploitation and abuse
- vii) Disruption to amenities and lifestyle;
- viii) Loss of livelihoods;
- ix) Violation of human rights.

To address or resolve grievances, a mechanism describing procedures, roles and responsibilities in grievance management process is explained in this section. In areas with VMGs, the project level GRCs will be augmented by the presence of a VMG representative on the committee. To be effective, the mechanism shall utilize existing local leadership, administrative and community structures. All grievances concerning non-fulfilment of contracts, levels of compensation, exclusion from sub project benefits, or take of assets without compensation shall be addressed to the Local council 1 Chairperson of their community/or cultural leader and VMG coordinator.

The Social Safeguards Team at the MGLSD and PIUs shall work with community leaders including leaders of the VMGs in the project area to set up Grievance Redress Committees to be the first point where grievances shall be lodged and addressed. The LC1 Grievance Committee shall comprise the LC1 Chairperson; LC1 Secretary for Women and Children Affairs, VMGs' Chairperson and representation from each of youth, women, elderly and People with Disability (PWD) group from VMG community and elected community representative in the event that the community is mixed.

Entities seeking redress and wishing to record grievances will do so by notifying their Local Leader (LC 1 Chairperson) who will chair a Local Grievance Committee at LC 1 level set up with guidance of the Social Development Specialist. The Local Leader will inform and consult with the district administration to determine validity of claims. If valid, the Local Leader will convene a meeting of the LC1 Grievance Committee to resolve the grievance and notify the complainant of the outcome. If the complainant's claim is rejected, the matter shall be brought before the sub-county or district local government for settlement.

Any objections or grievances related to exclusion/marginalization shall be made in writing, in the language that the VMGs understand and are familiar with, to the Local Leader.

The Local Leaders who will be trained by the PIUs Social Safeguards team using standard training materials shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made. The procedure for handling grievances should be as follows:

- a) The affected person should file his/her grievance orally or in writing, to the Local Leader who will record it in a grievance record book. The grievance note should be signed and dated by the aggrieved person. Where the affected person is unable to write, s/he should obtain assistance to write the note and emboss the letter with his/her thumbprint.
- b) The Local Leader should respond within 7 days during which any meetings and discussions to be held with the aggrieved person should be conducted. If the grievance relates to valuation of assets, a valuer may need to revalue the assets. In this case, the aggrieved person must be notified by the Local Leader that his/her complaint is being considered.
- c) If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time s/he can lodge his grievance to the District Local Administration.
- d) The Local Administration will then attempt to resolve the problem (through dialogue and negotiation) within 7 days of the complaint being lodged.

GROW GRMs shall be Sub-project-based grievance redress procedure and will not in any way replace existing legal processes.

It is common that most of the vulnerable and marginalized communities have traditional means and mechanisms of managing a community conflict or misunderstanding. As is normal practice under customary law, attempts will be made to ensure that the traditional and/or religious leaders have the first opportunity to resolve all disputes in communities after a thorough investigation of the facts. The traditional/communal dispute resolution structures existing for each of the VMGs will be used as the first step in resolving grievances. They will be handling issues regarding rightful property ownership where there is a dispute especially where there is no legal documentation of those properties in question.

Based on consensus, the project GRM will seek to resolve issues quickly in order to expedite the resolution, without forcing the community to resort to expensive and time-consuming legal actions.

All attempts shall be made to settle grievances amicably before resorting to courts of law. Every effort will be made towards ensuring that the grievance redress procedures are made simple, least bureaucratic and administered as fast and far as possible

The complainants shall have recourse to the courts of law in the country any time they feel aggrieved. However, given the fact that legal process can be daunting, expensive and at most confusing especially for the poor and vulnerable, the project GRM shall endeavour at all times to be the first point of call for grievances. If the grievance procedure fails to provide a result, complainants are free to seek legal redress in the Uganda Courts of Law.

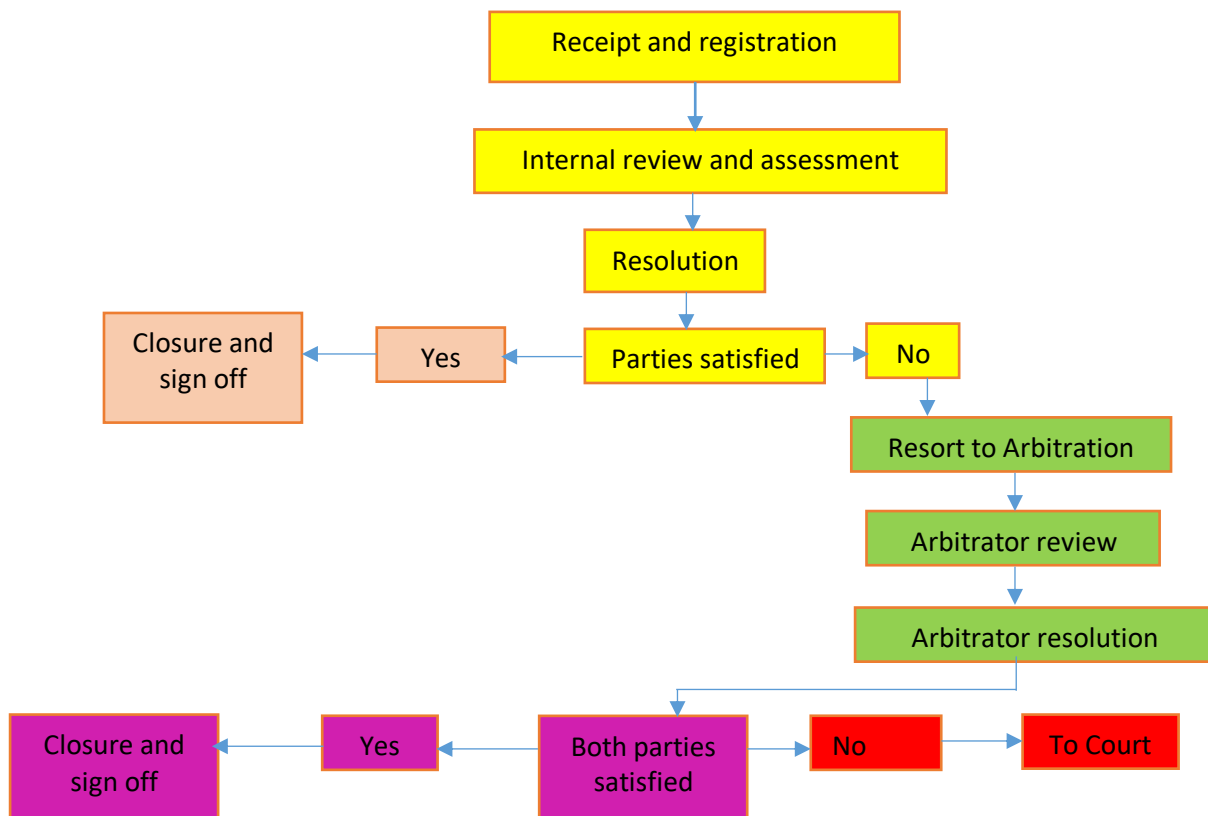


Figure 1: Grievance Management System

Documentation and Recording

Documentation of complaints and grievances is important, including those that are communicated informally and orally. These should be logged, assessed, assigned to an individual for management, tracked and closed out or “signed off” when resolved. These should be done ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution. Records provide a way of understanding patterns and trends in complaints, disputes and grievances over time. While transparency should be maintained – for example, through regular reports on issues raised and rates of resolution – provision should also be made for confidentiality of information or anonymity of the complainant(s) whenever necessary especially in cases of sexual violence, gender-based violence.

A grievance log (see example Annex 2) will be established by the GROW PIUs Social Safeguards teams and copies of the records kept with all the relevant authorities at the district, sub-county and village levels and will be used in monitoring of complaints and grievances.

Data on community interactions from low-level concerns and complaints to ongoing disputes and higher-order grievances shall be collected routinely so that patterns can be identified, and project management alerted to high-risk issues. Effective monitoring may also help to prevent the escalation of lower-level disputes into more serious conflicts.

World Bank Redress Service

The World Bank has a Grievance Redress Service (GRS) whose objective is to make the Bank more accessible for project affected communities and to help ensure faster and better resolution of project-related complaints. The GRS is open to all those who believe they have been affected or harmed by a Bank-financed project and who feel their issues have not been resolved by the implementing Agency's PIUs. The GRS ensures that complaints received are promptly reviewed in order to address pertinent concerns. Affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit <http://www.inspectionpanel.org>.

7 GUIDELINES ON PREPARATION OF THE VULNERABLE AND MARGINALIZED GROUP PLAN

Introduction

Vulnerable and Marginalised Group Plans will be prepared when activities have been identified in areas where Vulnerable and Marginalised Groups are present or in which they have a collective attachment to land. This process will be undertaken as part of the screening activities outlined in the ESMF. A VMGP will address;

- (i) Aspirations, needs, and preferred options of the effected VMGs,
- (ii) Potential positive and negative impacts on VMGs;
- (iii) Measures to avoid, mitigate, or compensate for adverse project effects;
- (iv) Measures to ensure project benefits will accrue to VMGs;
- (v) Measures to strengthen the capacity of Local Governments and relevant government departments to address VMGs issues;
- (vi) The possibility of involving local organizations and non-governmental organizations with expertise in VMGs issues;
- (vii) Detailed budget allocations for implementation of VMGP; and
- (viii) Monitoring framework for VMGP.

Steps in Preparation of the VMGP

7.1.1 Determining the Presence of VMG

After the project locations are identified, or when activities have been identified in areas where Vulnerable and Marginalized Groups are present, MGLSD and PSFU PIU including the social safeguard specialist will undertake screening as part of the screening activities outlined in the ESMF to determine the presence of VMGs.

Screening is a necessary requirement prior to implementation to determine if vulnerable and marginalized people are present in the project area or have an attachment to the land. In conducting this screening, the PIU team as well as social safeguard specialist with knowledge on the social context in the project area will be included.

Consultations with the VMGs concerned and the executing agency will be undertaken. The existing administrative structures at district levels where the VMGs are located (Batwa, IK, Benet and Tepeth) will be used to inform the vulnerable and marginalized communities about the proposed project and arrange for consultative meetings. Community leaders as well as VMG leaders will also be involved in dissemination of information about the meetings where need arises. Local radio stations may be used to communicate the meeting dates, venues, and purpose.

To ensure inclusive participation:

- a) Consultations should be conducted in local languages where the Batwa, IK, Benet and Tepeth are found
- b) Representatives of the vulnerable and marginalized groups in collaboration with the local administration in the project area will agree on a venue that is considered by way of mutual consensus as appropriate.
- c) Provide adequate notice for the consultation meetings and allow time for consensus building, and the articulation by VMGs of their views and preferences.

- d) Ensure the time chosen for the meetings is appropriate for majority of the VMGs to attend.

Screening will be done using a screening check list in a collaborative and consultative approach. The GROW Environmental and Social Specialists will prepare the screening forms for the Vulnerable and Marginalized Groups Framework (VMGF). A sample screening form is shown in Annex 3. If the results show that there are VMGs in the project, a Social Assessment (SA)/analysis will be undertaken.

7.1.2 Social Assessment

The social assessment is a variant of what is generally known as a Social Impact Assessment (SIA) and will be done during the VMGP project preparation. It will gather relevant information on demographic data (social, cultural and economic situation) and assess potential impacts. A screening form (See Annex 3) will be one of the tools used to carry out specific social assessments. Additional information will be gathered through separate group meetings within the vulnerable and marginalized communities, including leaders, NGOs, CBOs, and affected persons. Discussions will also focus on potential positive and negative impacts of the subprojects; measures to enhancing positive impacts and strategies/options to minimize and/or mitigate negative impacts.

The social assessment includes the following elements, as needed:

- A review, on a scale appropriate to the project, and institutional framework applicable to vulnerable and marginalized groups.
- Gathering of baseline information on the demographics, social, cultural and political characteristics of the affected vulnerable and marginalized groups' communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- Taking the review and baseline information into account, the identification of key stakeholders and the elaboration of a culturally appropriate process for consulting with VMGs at each stage of project preparation and implementation.
- An assessment, with the affected VMGs communities, of the potential adverse and positive effects of the activities relative vulnerability of the VMGs, risks to land and natural resources as well as their lack of access to opportunities relative to their social groups in the communities, regions, or national societies in which they live.
- The identification and evaluation based on meaningful consultation with the VMGs communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that VMGs receive culturally appropriate benefits under the subproject.

7.1.3 Stakeholder Consultations

To ensure ongoing informed participation and focused discussions, the Project will provide affected VMGs with information on an ongoing basis. Consultations will cover topics/areas concerning cultural and socioeconomic characteristics and other issues that VG consider important. Consultations will continue throughout the preparation and implementation period, with focus on the beneficiaries. Consultation stages, probable participants, methods, and expected outcomes are suggested in the VG consultation matrix below (Table 7.1) and in Chapter 8.

Table 7.1: Indicative VG Consultation Matrix

Consultation	Consultation Participants	Consultation Method	Expected Outcome
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Stages			
Preparation of VMGPs	VG, organizations, Community leaders/elders, adversely affected VG, other informed stakeholders	Focus Groups Discussion Key informant Interviews	Preparation of VMGP to avoid or minimize adverse impacts, and VMG
Implementation of VMGPs	Individual VG, CBOs, leaders/ elders & other informed stakeholders	Meetings with local leaders Meetings with NGOs. CSOs etc	Timely resolution of issues and effective implementation of VMGP/ Project
Monitoring & Evaluation of VMGPs	VG organizations/ groups and individuals	Participation of VMG in review and monitoring	Identification & resolution of implementation issues, effectiveness of VGP, lessons learned for future scale up/design of similar interventions

7.1.4 Requirement for FPIC

The VMGP will also outlined if FPIC is required and the approaches that have been taken to achieve FPIC based on Chapter 5 of this VMGF and the specific needs of the VG.

7.1.5 Contents of a VMGP

The Vulnerable and Marginalized Groups Management Plan shall be prepared in a flexible and implementable manner, and its level of detail will depend on keys issues and nature of effects to be addressed. The VMGP shall, among other things, include the following elements:

- a) A summary of the Social Assessment
- b) A framework for ensuring free, prior, and informed consent with affected VMGs' communities during project implementation.
- c) A summary of results of the free, prior, and informed consent with the affected VMGs' communities that was carried out during sub project preparation and that led to broad community support for the project.
- d) An action plan of measures to ensure that VMGs receive social and economic benefits that are culturally appropriate, including, if necessary, to enhance the capacity of the project implementing agency.
- e) Appropriate action plan which includes measures to avoid, minimize, mitigate, or compensate for the adverse effects.
- f) The cost estimates and financing plan for the VMGP.

- g) A summary of the engagement undertaken during planning and approach to ongoing engagement.
- h) Accessible procedures appropriate to the project to address grievances by the affected VMGs' communities arising from project implementation.
- i) Mechanisms and benchmarks appropriate to the subproject for monitoring and evaluating and reporting on the implementation of the VMGPs. The monitoring and evaluating mechanisms should include arrangements to monitor consultation, FPIC and the implementation of the mitigation measures.

MGLSD and the implementing agencies will submit the VMGP to the Bank for review and approval prior to commencement of project works. As part of this review the Bank will ascertain if FPIC, where relevant, has been achieved in line with para 27 of ESS7.

8 STAKEHOLDER IDENTIFICATION AND CONSULTATION

ESS7 requires a developer to ensure that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities present in or with collective attachment to the project area are fully consulted about, and have opportunities to actively participate in, project design and the determination of project implementation arrangements. It also requires the developer to prepare a consultation strategy and identify the means by which affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will participate in project design and implementation. As such, the stakeholder process should follow the following steps:

Stakeholder Identification

All the interested and affected stakeholders will be identified with specific focus of the vulnerable and marginalized groups and will include an elaboration of a culturally appropriate process for consulting with the VMGs at each stage of project preparation and implementation. A stakeholder mapping exercise will be conducted for each of the proposed sub-projects where there is a likelihood of VMGs being affected and the stakeholder mapping process will ensure that all the interested and affected stakeholders are identified and included in the social assessment process including impact identification and mitigation.

Stakeholder Consultation

Once screening has been conducted and an investment found to be located in an area where vulnerable and marginalized groups are present, the existing administrative structures –county and sub county leaders will be used to inform the vulnerable and marginalized communities about the proposed sub project. District technical leaders in collaboration with GROW will facilitate and arrange for consultative meetings with members of the vulnerable and marginalized groups and in these meetings, there will be free and prior information about the proposed sub project, the proposed location, and potential adverse impacts of the project on the marginalized and vulnerable groups. Such consultation will include use of indigenous languages, allowing time for consensus building, and selecting appropriate venues to facilitate the articulation by VMGs of their views and preferences. Representatives of the vulnerable and marginalized groups in collaboration with the local administration in the sub project area will select a venue that is considered by way of mutual consensus as appropriate.

Engagement will be based on honest and open provision of information, and in a form that is accessible to VMGs. Engagement will begin at the earliest possible stage, prior to substantive on-the-ground activity implementation. Engagement, wherever possible, will be undertaken through traditional authorities and structures within communities and with respect for traditional decision-making structures and processes. However, recognition of the limitation these structures sometimes pose for some groups, such as women and young people will be taken into account.

Good practice community engagement, in the context of Vulnerable and Marginalized Groups and projects, will aim to ensure that:

- Vulnerable and Marginalized Groups have an understanding of their rights
- Vulnerable and Marginalized Groups are informed about, and comprehend the full range (short, medium and long-term) of social and environmental impacts – positive and negative – that can result from the proposed investment
- Any concerns that Vulnerable and Marginalized Groups have about potentially negative impacts are understood and addressed by the GROW
- Traditional knowledge informs the design and implementation of mitigation strategies and is treated respectfully

- There is mutual understanding and respect between the GROW and the Vulnerable and Marginalized Groups as well as other stakeholders
- Vulnerable and Marginalized People aspirations are taken into account in project planning so that people have ownership of, and participate fully in decisions about, community development programs and initiatives
- The project has the broad, on-going support of the Vulnerable and Marginalized Groups
- The voices of all in the Vulnerable and Marginalized Groups are heard; that is, engagement processes are inclusive.

Preliminary Stakeholder Consultations

Consultations were undertaken with various stakeholders for the preparation of this VMGF. Details of the consultations (who was consulted, where, when and issues that emerged) can be found in section Annex 5. The consultations were mainly to establish the impacts, both positive and adverse, of the GROW subprojects on VMGs which have been presented in the previous section. Additionally, the consultations were to get the views of the stakeholders; and to check with the VMGs, on their own views as well as seek broad stakeholder /institutional support for the proposed GROW.

Due to limited time to undertake extensive consultations, consultations with VMGs were only carried out with representatives of the IK in Kabong district as detailed under Table. Since stakeholder consultation is a continuous process, MGLSD and PSFU will be committed to undertake consultations with all VMGs (ie IK, Benet, Tepeth and Benet) and their representatives during the design, planning and implementation phases of the project. Below is the summary of the views from the VMGs representatives and coordinators:

Table 8-1: Summary of stakeholder views related to VMGs

Stakeholder	Issues/concerns	Action plan
District Commercial Officer Kaabong- 20/04/2022-Thomas Lemu -	Need to be mindful of the low literacy levels among the IK communities and therefore any capacity building and training need to be mindful of this	Project is cognizant of this challenge and will strive to have inclusive trainings for all groups including VMGs
	Currently there are credit service in the region provided by Micro Finance Support Centre	Noted
	Currently, some members of the community access money through SAGE	Noted
	On the issue of GRM, when faced with complaints within the community -The IK always use their traditional GRM structures headed by elders known as 'Mgikaskou'.	Noted, the project will integrate the local community-based structures to build a robust and functional GRM structure that will serve the community and the IK

	Issues resolved by the clan leaders include Marital issues	
	Conflict over land. However, for issues that are criminal nature the formal grievance redress structures are used	
	In terms of livelihoods, women in Kaboong are normally involved in farming and Apiary	The GROW project will ensure that it taps into existing livelihood activities to enhance women's growth opportunities in this area.
	Similar projects such as 'Emyooga' and NUSAF have been implemented in the area so women can be mobilised to benefit from the project	Noted, GROW project will draw lessons from this project to inform the implementation of the project among the IK

Disclosure of VMGF and VMGPs

This VMGF and sub-project VMGPs will be made available to the affected VMGs in an appropriate and accessible form, manner, and language. Once this VMGF is approved by World Bank, it will be disclosed in the print media, on MGLSD website <https://www.gou.go.ug/ministry/ministry-gender-labour-and-social-development> and on the World Bank's website.

During implementation MGLSD will prepare social monitoring reports including safeguard issues, avail these to affected VMGs, post these on its website, and submit to the Bank for review. The project will explore opportunities for disclosure/translation in a local language. Specifically, to ensure that VMGs aren't excluded from the project, MGLSD will support the translation and dissemination of GROW related information into preferred languages of VMGs and also explore dissemination of project related information through efficient channels including NGOs, cultural leaders of respective communities. Additionally, the project should diversify communication tools and format, and simplify messages; ensuring to test messages with target group.

9 MONITORING AND REPORTING ARRANGEMENTS

Monitoring

Baseline data collection on the socio-economic status and cultural practices of VMGs will be carried out during, as necessary and the development of ESMPs. These will form the basis for establishing baseline data to monitor the project impacts on VMGs. The subsequent VMGPs where required, will also specify systems of data collection and monitoring of the anticipated changes and will include Terms of Reference (ToR) for the monitoring agency/consultant. The respective PIUs will submit monitoring reports to the World Bank for review.

Reporting Mechanisms

The M&E mechanisms adopted for the project will ensure that in addition to process and outcome indicators, appropriate impact indicators are defined related specifically to impacts on vulnerable groups and their livelihoods. These will include: how many vulnerable people participated actively and benefitted from project activities and documentation of their opinions on project impacts and if any of their specific concerns were addressed during implementation. In measuring the extent and quality of participation, it will be important to understand and capture how gender differences will affect the participation of girls and women in scheme activities. Gender analysis will therefore be an integral part of monitoring and evaluation of scheme activities.

The monitoring and evaluation mechanisms for the project will ensure that in addition to process and outcome indicators appropriate impact indicators are defined related to specifically to impacts on vulnerable groups and their livelihoods. It is recommended that an impact evaluation be undertaken about 6 months before project completion to assess the changes in the overall living standards compared to the time before project implementation.

Indicators for the implementation of the Plan and Framework

Monitoring indicators for VMGs will include gender and vulnerability specific indicators, and monitoring reports will present data disaggregated by gender, vulnerability and location. To effectively monitor project impacts on VMGs, the baseline data for the project will include data on representative VMGs' households. The socioeconomic baseline indicators will be used for measuring participation, outcomes and impacts on vulnerable and marginalized communities.

Key indicators for both benefits and VMGs' participation are indicated in Table 9-1 below.

Table 9-1: Indicators for the monitoring the implementation of the VMGF

Proposed Activities	Indicators	Source of data
VMG consultations	Number of consultations with VMGs at all stages of project implementation	Consultative meeting reports
Target VMGs (Batwa,IK,Benet and Tepeth among the benefiting enterprises	Number of VMG households benefitting from project intervention	Quarterly Progress reports

Train VMG group members in the VMG communities about entrepreneurship and other business-related skills	Number of training and attendance by VMG communities	Training reports Field/Activity reports
Formation of Grievance redress committees in the VMG communities	Number of VMGs on both the local project committee and Grievance Redress Committee	GRM Reports
Conduct extensive awareness on shared benefits of equitable access to finance and resources	Number of people sensitized on benefits of equitable access to project resources	Sensitization reports
Identify and train champions in the VMG communities to support local level interventions on safety and management of accidents associated with implementation of the project	Number of VMGs' established and trained in VMGs' communities	Training reports Field/Activity reports
Formation and training of Grievance redress committees in the VMG communities on reporting cases and supporting a GBV/SEA referral mechanism within the local governance structures	Number of VMGs on both the local project committee and Grievance Redress Committee to manage and support GBV/SEA referrals	GRM Reports

Negative impact, if any shall also be monitored to determine how project implementation has triggered negative impact and to what extent the negative impact has been reduced.

Some of the GROW Project outcome indicators will include:

- Number of VMGs' households and individuals physically or economically displaced by the project;
- Number of VMGs' in the project reach that have not benefited from the project;
- Number of VMGs' that have been exposed to GBV and VAC in relation to the project;
- Number of VMGs' registered grievances.

Participatory Impact Monitoring (PIM)

The PIM will be based on the data gathered through the screening process and social assessments, the organizations of the VMGs, the relevant governmental structures (lands, forests, development and social) at district and sub-county levels, etc.

The selection of the facilitators will be in close collaboration with the community leaders. It will be advisable to choose people who are able to elaborate on the basis of the PIM reports, which reflect the situation on the ground in a transparent and plausible way.

10 IMPLEMENTATION OF THE VMGF

Phases of Implementing the VMGF

- 1) District and VMG sites disclosure of the VMGF: This will entail sharing the VMGF details through county forums and specific VMG sites. During this disclosure forums and meetings additional comments and views will be gathered and included in the VMGF design process as well as ensuring broad support of the GROW project by the District Local governments and VMGs. Continued disclosure will be required after VMGF has been disclosed at the national level and there remains many stakeholders from Local governments and community levels who are not been able to attend this disclosure forum.
- 2) Development of standardized Capacity Development Manuals. The manuals will be developed to include the consultation process; Participatory Impact Monitoring (PIM), conflict redress process and grievance redress mechanism.
- 3) Capacity Development and Training of Relevant Stakeholders: Capacity development and training activities will entail training session for various stakeholders such as MGLSD PIU, PSFU DLGs, Sub- County community workers, VMGs NGOs, CBOs etc. In addition, during the VMGF implementation training session will be mounted on the project activities to ensure any negative impact on the VMGs are mitigated and/or avoided and that they share benefits that accrue from the GROW project.

Specific capacity-building for VMGs

As the target groups become clearer and awareness of the social and economic inclusion principle of the project is widely shared, the VMGs members will be invited to participate in training and capacity building sessions. The VMGs may have specific capacity building needs, and dedicated skills training funded through potentially dedicated funding. Youth and elderly from the VMGs like in other communities may need separate training programs, tailored to their needs and lifestyle.

GROW will develop a training program targeting relevant project actors at the national, District, sub-county and community levels with each target with relevant training module and knowledge, skills and practice areas.

- a) Nation and District Institutions: The institutions to be trained will include: National and District Local government Project Coordination Teams
- b) Grievance Redress Committees, CSO, NGO, FBO's among others.
- c) VMGs: The training will focus on whole community with awareness creation session and the VMGs representatives with the respective training modules.

Terms of Reference and the selection process for facilitators and trainers will ensure that candidates who can deliver training modules in an inclusive way to be hired. Also, language and tools to be used in documents and training should factor in potential barriers these media can pose to the participation of certain excluded groups in capacity building measures. MGLSD should explore the possibility and ensure the language and modality of training provision would not exclude certain groups of members.

10.1.1 Roles and Responsibilities

MGLSD specifically the environment and social safeguard specialists will remain responsible for:

- (i) Screening for projects affecting Vulnerable and Marginalized Groups;
- (ii) Review project proposals, ensuring that they adequately apply the World Bank's Indigenous Peoples Policy;
- (iii) Assess the adequacy of the assessment of project impacts and the proposed measures to address issues pertaining to affected indigenous communities. When doing so project activities, impacts and social risks, circumstances of the affected indigenous communities, and the capacity of the applicant to implement the measures should be assessed. If the risks or complexity of particular issues
- (iv) Assess the adequacy of the consultation process and the affected indigenous communities' broad support to the project—Monitor project implementation, and include constraints and lessons learned concerning VMGs and the application of this VMGF in its progress and monitoring reports; it should be assured that affected VMGs are included in monitoring and evaluation exercises

10.1.2 Non-Governmental Organizations

The NGOs present and active in the area will be used during the social assessment studies as well as during the monitoring and evaluation of each sub project. The formation of Grievance Redress Committees and Steering Committees for each sub project investment will also include representation by NGOs.

10.1.3 World Bank

The Bank will receive all the VMGPs prepared and review and provide a No Objection or otherwise prior to sub project implementation. During implementation, the Bank will also conduct field monitoring and evaluation. The Bank will also approve the VMGF.

11 BUDGET

Introduction

The cost for implementation of the VMGF will be incorporated in the project cost and the administrative costs for social assessment, and preparation of VMGs will be financed under Project. Additional costs to specifically cater for VMGs include; implementation of Free Prior Informed Consent (FPIC) including mobilization, translation of reports, and special focus meetings and capacity building for project staff dealing with social issues including both staff at sub-county and district level.

All mitigation activities and benefits included in the Social Assessment and the VMGP will be budgeted under the project. Detailed budget breakdown will be provided during the development of the Vulnerable and Marginalized Groups Plan (VMGP) Specific activities for the implementation of this framework are provided below.

Proposed VMGF Budget

Table 11-1: Proposed VMGF Budget

Component/Activity	Timing	Responsibility	Amount (USD)
Implementation of FPIC including translation of reports, and special focus meetings for IK, Tepth, Batwa and Benet	Before and during project implementation	MGLSD-PIU and PSFU project implementation partners	500,000
Development and implementation of the Vulnerable and Marginalised Groups Plan (VMGP) for IK, Tepth, Batwa and Benet	Before and during project implementation	MGLSD-PIU and PSFU project implementation partners	1,000,000
Awareness and sensitisation of communities on equitable access and utilisation of resources for IK, Tepth, Batwa and Benet	During project implementation	MGLSD PIU, and PSFU	500,000
Stakeholder consultations including district leadership meetings on management of social impacts of the project for IK, Tepth, Batwa and Benet	Monitoring to be done every quarter throughout project implementation	MGLSD PIU, PSFU, OPM, MGLSD, District LGs and other relevant departments	500,000
Composition and training of a Grievance Redress Committees (training materials, transportation, venues, allowances, etc) for IK, Tepth, Batwa and Benet	During project implementation, composition of committees at respect districts of the IK, Tepeth, Benet and Batwa.	MGLSD -PIU, GRCs	250,000
Total (USD)			2,750,000

REFERENCES

1. Global Alliance for Clean Cook stoves and USAID. 2016. Gender-Based Violence in Humanitarian Settings: Cookstoves and Fuels, a systematic review of the evidence base.
2. International Labour Organization report 2019.
3. Kabanankye, I. Kabann (2016): Ethnic – Racial Minorities: Movement towards Political Inclusion: The Case of the Batwa in Uganda. Kampala, 2016.
4. Laws of Uganda, Revised Edition, 2000. Game (Preservation and Control) Act, Cap 226
5. Laws of Uganda, Revised Edition, 2000. Uganda Wildlife Act, Cap 200.
6. Ministry of Gender, Labour and Social Development. The various policies of Ministry of Gender, Labour and Social Development.
7. Ministry of Gender, Labour and Social Development (2006). *The Uganda Culture Policy, 2006*. Republic of Uganda, Kampala 2006.
8. Ministry of Gender, Labour and Social Development (2009). *The National Policy for Older Persons 2009*. Republic of Uganda, Kampala 2009.
9. Ministry of Lands, Housing and Urban Development (2013). *The National Land Policy 2013*. The Republic of Uganda, Kampala 2013.
10. Ministry of Tourism, Trade and Industry (1999). *The Uganda Wildlife Policy*. The Republic of Uganda, Kampala. June 1999.
11. Minority Rights Group (2008). *The Right to Learn: Batwa Education in the Great Lakes Region of Africa*.
12. Patricia Maria, Fernandes, 2017. Uganda - Enhancing Social Risk Management and Gender Equality Project: Indigenous Peoples Plan (English). Uganda
13. The Republic of Uganda, 1994. *The National Environment Policy for Uganda 1994*. Ministry of Water and Environment, Kampala.
14. The Republic of Uganda. (1995). *The Constitution of the Republic of Uganda*. [Kampala], Republic of Uganda.
15. The Republic of Uganda. National Parks Act, Cap 227.
16. The Republic of Uganda. The Land Acquisition Act, Cap. 226
17. Uganda Bureau of Statistics (UBOS). 2016. *National Service Delivery Survey - 2015 Report*. Kampala Uganda;
18. Uganda Wildlife Statute, No. 14 of 1996
19. United Organization for Batwa Development in Uganda (UOBDU) Annual Reports and Publications. Website: <https://uobdu.wordpress.com/publications/>
20. World Bank (2011). *Implementation of the World Bank's Indigenous Peoples Policy A Learning Review (FY 2006-2008)*
21. World Bank Country Partnership Strategy (CPS) for Kenya (March 2010-2012).
22. World Bank Indigenous Peoples Policy OP. 4.10

ANNEXES

ANNEX 1: VMGF CONSULTATIVE TOOL

MINISTRY OF GENDER, LABOUR AND SOCIAL DEVELOPMENT

ENHANCING GROWTH OPPORTUNITIES AND PRODUCTIVITY FOR WOMEN ENTERPRISES (GROW) PROJECT

INTRODUCTION

The Government of Uganda plans to acquire credit from the International Development Association (IDA)/World Bank towards the implementation of the GROW Project. The proposed project will support the country's efforts to uplift the social economic status of all Ugandans including for refugee and host communities, industrial parks and commercial enterprises, health and education facilities, as enshrined in Uganda's Vision 2040 and other policy documents.

The GROW project is to be implemented mainly by Ministry of Gender, Labour and Social Development (MGLSD) and Private Sector Foundation, Uganda (PSFU).

It is a requirement for projects of this nature to identify and consider environmental and social concerns during implementation of the project. The MGLSD is conducting stakeholder consultations to identify issues and concerns for vulnerable and marginalized groups in the project areas.

You have been identified as a key stakeholder in this exercise. This is to request for your little time to respond to some of these questions.

COMMUNITY LEVEL QUESTIONS

Date of Meeting	
Venue/Place/Village	
Sub-county/District	
Key contacts	
Facilitator	

Target districts: All districts of Uganda

Questions	Responses
1) Whom would you categorise as vulnerable and marginalized people in this community?	
2) Why are they categorised as vulnerable people?	

3) What are the main means of livelihoods in this community? (<i>Probe crop farming, businesses, cattle keeping, other sources of income, etc.</i>)	
4) The Government of Uganda is preparing a project to improve the social economic status of women in Uganda. How do you think this project can benefit this community?	
5) How do you think this project might affect the sources/means of livelihoods in this community? (Negatively and positively).	
6) What are the possible negative effects from this project (probe labour influx, livelihoods, land, cultural practices)?	
7) What should the project do to mitigate/minimise or address the negative effects of this project?	
8) What resources are needed to enable vulnerable and marginalized people participate in the implementation of this project?	
9) Who are the key stakeholders involved in addressing challenges faced by the vulnerable and marginalised groups in this area? And who should be involved?	

Names	
Age bracket	
Sex	
Religion	
Title	
Agency/Organisation	
Telephone/email contact:	

Questions	Responses
1. Whom would you categorise as vulnerable and marginalized people in this country?	
2. Why are they categorised as vulnerable people?	
3. What is your mandate in addressing the issues of vulnerable and marginalised groups? (<i>any policy/laws/frameworks, strategies, byelaws, plans, programs, budgets etc.</i>)	
4. What programs/projects are currently being undertaken in your sector towards improving the life of vulnerable groups. How do you integrate aspects of vulnerability and marginalization in planning and implementation of activities.	

5. How do you think GROW project might positively affect the livelihoods of vulnerable and marginalised groups? What do you think would be the contribution of the project to the vulnerable and marginalized groups?	
6. What are the possible negative effects to the vulnerable and marginalised groups in the project areas?	
7. What should the project do to mitigate/minimise or address the negative effects of this project on the vulnerable and marginalised groups?	
8. What opportunities should the project provide for vulnerable groups in refugee settings	

ANNEX 2: GRIEVANCE LOG AND RESOLUTION FORM

Name (Filer of Complaint):
ID Number (PAPs ID number):
Contact Information (house number/ mobile phone):.....
Nature of Grievance or Complaint:
Date Individuals Contacted and Summary of Discussion:
Signature..... Date:
Signed (Filer of Complaint):
Name of Person Filing Complaint (if different from Filer):
Position or Relationship to Filer:
Review/Resolution
Date of Conciliation Session:
Was Filer Present? Yes/No
Was field verification of complaint conducted? Yes/No
Findings of field investigation:.....
Summary of Conciliation Session
Discussion.....
Issues.....
Was agreement reached on the issues? Yes/No
If agreement was reached, detail the agreement below/if agreement was not reached, specify the points of disagreement below:
Signed (Conciliator): Signed (Filer).....
Signed:
(Independent Observer)
Date:

ANNEX 3: VMG SCREENING AND IMPACT CATEGORIZATION

a) Identification of VMGs in the sub-project areas

Name of the District/Project Area				
Potential Impact	Not known	Yes	No	Remarks
Are there VMGs in the project locations?				
Do they maintain distinctive customs or economic activities that may make them vulnerable to hardship?				
Are there any of the following vulnerable groups in the project area Orphans and Vulnerable Children (OVCs), Child Mothers, Widows, Persons with Disabilities (PWDs), Elderly?				
Will the project restrict their economic and social activity and make them particularly vulnerable in the context of the project?				
Will the project change their socioeconomic and cultural integrity?				
Will the project disrupt their community life?				
Will the project positively affect their health, education, livelihood or social security status?				
Will the project increase conflict between VMGs and other communities?				
Will the project alter or undermine the recognition of their knowledge, preclude customary behaviours or undermine customary institutions?				
In case of no disruption of vulnerable and marginalized community life as a whole, will there be loss of housing, strip of land, crops, trees and other fixed assets owned or controlled by individual vulnerable and marginalized households?				

Annex 4: Introductory Letter

TELEPHONE:
SWITCHBOARD:

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Ministry of Gender, Labour
and Social Development
P.O. Box 7136
Kampala,
Uganda.

In any correspondence on **ADM 141/183/01**
this subject please quote No

16th March 2022

(See Attached Distribution List)

ENHANCING GROWTH OPPORTUNITIES AND PRODUCTIVITY OF WOMEN ENTERPRISES (GROW) PROJECT – ENVIRONMENTAL AND SOCIAL FRAMEWORK CONSULTATIONS

The Government of Uganda through the Ministry of Gender, Labour and Social Development in partnership with the Private Sector Foundation Uganda (PSFU) is designing a women's economic empowerment project that would support achievement of the NDP III's Human Capital Development Program objective. The project arises out of the need to respond to the needs of women entrepreneurs who have been seriously affected by COVID-19 impacts and want to grow their businesses, sustain their self-employment and also create more jobs. The project will focus on and prioritize transition of women enterprises: from the micro to small enterprises; and small to medium enterprises.

The proposed project design consists of four (4) components; namely:

- a) **Support for Women Empowerment and Enterprise Development Services.** This component will focus on supporting enterprise development and strengthen social and business networks. The component will (a) expand access to skills development tailored packages of personal and enterprise development support for women's business growth, (b) expand access to mentorship, social and business networks, and (c) tackle social norms constraining women's economic participation and productivity through mind-set trainings for women.
- b) **Bridging Finance for Supporting Female-owned Enterprise Growth and Transition.** This component will support access to finance through the creation of revolving funds that provides credit to women entrepreneurs and supporting women enterprises to access formal financial services. This will focus on providing affordable credit to women entrepreneurs transitioning from micro to small enterprises and small to medium enterprises.
- c) **Demand-driven Enabling Infrastructure and Facilities for Enterprise Growth and Transition.** This component will finance enabling infrastructure and facilities that address constraints and gaps preventing female-owned enterprises from growing and generating jobs. The component will both strengthen the voice of female entrepreneurs in articulating demand for growth-enabling public infrastructure and facilities and finance investments that will support the growth of their enterprise
- d) **Project Management Support, Policy Innovation and Evidence Generation.** This will support project supervision and management, research, innovation and policy reviews.

One of the key project requirements for Project approval is formulation of Environmental and Social Framework which will clearly spell out how environment and social aspects will be taken care of during project preparation and execution.

Accordingly, the Ministry has embarked on drafting the following Environmental and Social Framework instruments;

- i) Environmental and Social Commitment Plan (ESCP)
- ii) Environmental and Social Management Framework (ESMF)
- iii) Resettlement Policy Framework (RPF)
- iv) Stakeholders Engagement Framework (SEF)
- v) Vulnerability and Marginalized Groups Framework (VMGF)

In light of the above, the Ministry has planned to undertake stakeholder consultations to gather views about the project and how best to improve the design.

The purpose of this letter, therefore, is to request you to nominate five (5) technical officers to participate in the proposed virtual consultations which shall be held via zoom from 23rd - 26th March 2022 at 10:00am daily. The link for the meeting will be shared in due course.

For further clarifications and feedback, please contact Ms. Priver Atwiine on Telephone no. 0701407979 and Email privertwesi@gmail.com.



Alex Asiimwe

For: PERMANENT SECRETARY

Copy to: Minister of Gender, Labour and Social Development

Annex 5: Stakeholder views

Stakeholder	Issues/concerns	Response/Action plan
Ministry of Local Government	There is need to include the vulnerable and marginalized groups in this intervention to ensure that they are extricated from the pangs of poverty.	All components will integrate disability inclusion, using best practices on how to best run entrepreneurships and jobs platforms for women with disabilities and digital platforms for female entrepreneurs
	The project should have updated gender disaggregated data to inform the design and implementation of the GROW project.	Review and analysis of data regarding entrepreneurship in Uganda will be done and presented in the safeguards documents to inform project design and implementation.
	<p>On the issue of DLGs capacity to implement such projects-The DLGs have the capacity and structures to help in project implementation and monitoring.</p> <p>However, they need to be involved right from inception so that they can have full appreciation of the project objectives, intended outcomes and target groups.</p>	Noted, further training and capacity building will be done specifically for this project to ensure that concerned personnel are fully aware of the expectations of the project in relation to social and environmental safeguards in line with the WB ESF,2017
Ministry of Trade, Industry and Cooperatives	Women should be encouraged to formalize businesses so that they can tap into this government led intervention.	Noted
	There is need to teach the women entrepreneurs value addition skills for purposes of competitiveness and growth in business	Noted-Through training, the project intends to deliver Core course and sector specific training to respective women's groups and through these trainings they will be equipped with various skills such as processing, marketing branding and the like.
	Women entrepreneurs should be encouraged to join business forums to ensure that they get free mentorship and expert views and ideas on the dos and don'ts of where they can pick crucial tips for business growth and success	Noted

Ministry of Gender Labour and Social Development (MGLSD)	The project will work with local governments to ensure that the project is a success since they will be carrying out most of the verification and monitoring of these projects	Noted
	Project beneficiaries can be given autonomy to change the business portfolio for as long as they notify the monitoring officer-to spread the risk and make the intervention more sustainable.	Noted
	<p>The project should also include the Vulnerable and marginalized groups for example under UWEF, Indigenous groups in Bundibugyo and Kabale such as the Batwa, IK in Kaabong were considered for funding</p> <p>Majority are involved in agriculture, art and craft, weaving, tailoring and embroidery and cosmetology.</p>	Noted, the project is going to include women regardless of culture and location.
	There is also need to sensitize the men to help diffuse and alleviate any misconceptions about women enhancing and boosting their enterprises. Most men have a tendency of abdicating responsibility once they realize that their spouses are earning an income.	Before implementation sensitization will be carried in beneficiary communities and men will be invited to fully appreciate the objectives of the project and also stress the need for spousal support for the women
United Nation Development Programme (UNDP)	Project should follow the Do No Harm principle, to ensure that through this intervention social and environment risk aren't triggered and where it is inevitable mitigate measures for negative effects on the social fabric should be instituted especially among the Vulnerable and Marginalized groups such as indigenous persons, the old, sick and infirm, refugees among others.	Noted
Makerere University Business School	There is need to understand the level where entrepreneurs are in terms of their operations	Noted
	Training materials for all the targeted groups will need to be translated and simplified for easy understanding.	Noted, this will help to ensure that beneficiaries can easily acquire skills and knowledge regardless of their literacy levels.

	Peer learning will need to be used by the project so that entrepreneurs can have hands on experience	Noted- the project intends to use peer learning to enable sharing ideas and experiences. Similarly, entrepreneurs will have access to mentors that would support their enterprise growth and transition
	The project will need to carry out a needs assessment and have a clear understanding of the training needs.	Noted, this will help to assess the specific training needs of the potential beneficiaries.
	The project should have a ToT (Training of trainers) strategy in the respective regions to help train the various women led entrepreneur groups	For purposes of extending the training to rural areas and hard to reach areas, the project intends to use this strategy to ensure that quality trainings are delivered to all groups
	There is need engage husbands to be part of the training so that they can appreciate what the project objectives and goals	Before implementation sensitization will be carried in beneficiary communities and men will be invited to fully appreciate the objectives of the project.
	The project proponent can work reputable NGOs and CSOs such as Council for Economic Empowerment for Women of Africa - Uganda Chapter (CEEWA- U) who have experience of working with women entrepreneurs.	Noted
Kyambogo University	The project should have mitigation measures for Gender based violence.	The project will have GBV action plan to guide on how best GBV issues can be handled
	What type of women are being targeted?	The women being supported are those whose businesses are at small and medium and need their businesses to be transitioned to the next stage of business growth
	There is need to benchmark this project from previous projects.	Noted
	Specifically what type of vulnerable groups are being targeted?	Vulnerable groups include the disabled, refugees and indigenous and marginalized groups such as the Batwa and IK
Makerere University Kampala	The project should explore options of a teaching and learning center for the children in the child care center	Noted

	The project should consider training care givers for the children.	Noted
	Training should be carried out with due consideration to the different literacy levels.	Noted
National Environment Management Authority (NEMA)	There is need to follow the law when deciding on the assessments to be done especially for infrastructure projects.	Before implementation the respective laws and international best practices regarding Environmental and social safeguards will be followed through the requisite assessments
	There need to for proper identification of impacts, this will guide on the type safeguards documents that have to be prepared such as ESIA, Project briefs, RAP and the like.	Noted
Private Sector Foundation Uganda (PSFU)	Sensitization should be carried out within the beneficiary communities on risks associated with the project.	The project proponent will have a stakeholder engagement plan to guide the sensitization and area specific community outreach activities related to the project.
	The project will use existing structures to prepare for prevention and response to risk associated the project such as sexual exploitation and assault	Noted
	There is need to incorporate environmental and social sustainability in the project	Noted, all these will be followed to the letter through various E& S studies related to the project activities.
	The project also needs to come out strongly on issues related to GBV	The project will have GBV action plan to guide on how best GBV issues can be handled. Specifically, WB guidance noted 2018 on management of GBV risks will be used together with MGSLD guidelines on GBV.
National Forestry Authority (NFA)	NFA is already conducting projects in forested areas that are home to indigenous groups such as the Batwa and it has entered into arrangements such as collaborative forest management with the adjacent communities to help support and enhance their livelihoods	Noted

National Union for Disabled Persons Uganda-(NUDIPU)	There is need to build capacity of project personnel on issues related with disabled persons	MGLSD and MLG will support training and technical assistance for local government staff on all issues related to the project
	Will this credit be for paying back?	Yes, the project will be for paying back and the proposed interest rate is between 6-8% per annum
	The Common User Facilities should have assistive devices for the visually impaired, rumps for those with wheel chairs to enable them access and utilize these facilities	Noted
	There is need to give the beneficiaries proper training	Noted
	Training materials should be designed and produced to benefit all including the disabled, the visually impaired and the illiterate.	Noted
	What specific measures are to mitigate loss and ensure that successes are scaled up?	The project will put in place appropriate mechanisms to ensure that beneficiaries are held accountable in case they default on payment.
	How can the project leverage from the so many women with disabilities that NUDIPU has mobilized from VSLA groups and have started IGA under the iSAVE inclusive economic empowerment program?	This is noted, further consultations will be held with NUDIPU to ensure that the groups referred to fit the selection criteria.