MINISTRY OF WATER AND ENVIRONMENT

Investing in Forests and Protected Areas for Climate-Smart Development (IFPA-CD) Project

STAKEHOLDER ENGAGEMENT PLAN

Ministry of Water and Environment
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ACRONYMS

ADC	Austria Development Cooperation
AfD	French Development Agency
AfDB	African Development Bank
BINP	Bwindi Impenetrable National Park
BSA	Benefit Sharing Arrangements
CAO	Chief Administrative Officer
CFR	Central Forest Reserve
CSO	Civil Society Organization
DEA	Directorate of Environment Affairs
DFID	Department for International Development
DLG	District Local Government
BMCA	Bwindi and Mgahinga Conservation Area
BMCT	Bwindi and Mgahinga Conservation Trust
ECO	Ecological Conservation Organization
ECOTRUST	Environmental Conservation Trust of Uganda
ED	Executive Director
ESCP	Environment and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
EU	European Union
FAO	Food and Agriculture Organizations (of UN)
FFI	Fauna and Flora International
FGRM	Feedback and Grievances Redress Mechanisms
FPI	Free, Prior, Informed
FSSD	Forestry Sector Support Department
GAP	Gender Action Plan
GBVAP	Gender Based Violence Action Plan
GCF	Global Climate Funds
GIZ	German Development Agency
GRC	Grievances Redress Committee
GRM	Grievances Redress Mechanism

IFPA-CD Project	Investing in Forest and Protected Areas for Climate Smart Development
IGCP	International Gorilla Conservation Programme
IUCN	International Union for Conservation of Nature and Natural Resources
JGI	Jane Goodall institute
LMP	Labour Management Plan
MFNP	Murchison Falls National Park
MoFPED	Ministry of Finance, Planning and Economic Development
MoGLSD	Ministry of Gender, Labour and Social Development
MTWA	Ministry of Tourism, Wildlife and Antiquities
MWE	Ministry of Water and Environment
NEMA	National Environment Management Authority
NFA	National Forestry Authority
NGO	Non-Government Organization
NP	National Park
NPA	National Planning Authority
NTC	National Technical Committee
NU	Nature Uganda
OPM	Office of the Prime Minister
PA	Protected Area
PAD	Project Appraisal Document (of IFPA-CD)
PAP	Project Affected People
PCU	Project Coordination Unit
PS	Permanent Secretary
PSC	Project Steering Committee
QENP	Queen Elizabeth National Park
SEP	Stakeholder Engagement Plan
SESA	Strategic Environmental and Social Assessments
SLM	Sustainable Land Management
SNP	Semuliki National Park
SOP	Standard Operating Procedures (for COVID-19)
TSP	Technical Support Services

UCOTA	Uganda Community Tourism Association
UN	United Nations
UNDP	United National Development programme
UNHCR	United National High Commission for Refugees
UTA	Uganda Tourism Association
UTGA	Uganda Timber Growers Association
UWA	Uganda Wildlife Authority
VMGMF	Vulnerable Marginalized Groups Management Framework
VMGMP	Vulnerable Marginalized Groups Management Plan
VSLA	Village Savings and Loans Associations
WB	World Bank
WCS	Wildlife Conservation Society
WESWG	Water and Environment Sector Working Group
WR	Wildlife Reserve
WWF	Worldwide Fund for Nature

1. INTRODUCTION/ PROJECT DESCRIPTION

The Stakeholder Engagement Plan (SEP): is for the Uganda's "Investing in Forests and Protected Areas for Climate Smart Development Project (IFPA-CD)". It describes the commitments and process for Stakeholders' engagement during the IFPA-CD implementation (July 2021-June 2026).

Aim of the Project: The project aims to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. This will be achieved by undertaking integrated interventions by Ministry of Water and Evironment (MWE), Ministry of Tourism, Wildlife and Antiquities (MTWA), Uganda Widlife Authority (UWA), National Forestry Authority (NFA), targeted District Local Governments (DLG) and contracted Technical Service Providers (TSPs).

Approach: The project will support a landscape approach to improve management and economic productivity of forest ecosystems in the targeted landscapes. The project will combine investments in forest management in state and community managed lands and will focus on improving the management of forests and increasing revenues for sustaining forests and supporting resilient livelihoods.

Outcomes: The expected project outcomes are:

a. Increased provision of ecosystem goods and services through more sustainably-managed forests and protected areas and enhancement of forest stocks.

b. Increased revenue generation and other benefits from forests and protected areas for communities, government agencies and private sector in the Albertine Rift and West Nile Region.

Project Area: The main project area includes the Albertine Rift and West Nile Region, with focus on target protected areas and 18 refugee host districts within/bordering the Albertine Rift and West Nile Region experiencing high rates of forest cover loss (Figure 1-1). The performance-based subsidy scheme for private plantation development under Component 2 will be implemented at national scale.

The IFPA-CD Project investments target up to 28 Central Forest Reserves (CFRs), 7 National parks (NPs) and 4 Wildlife Reserves (WRs) which are ecologically sensitive areas (Table 1-1). These protected areas are surrounded by communities whose economic activities are dominated by subsistence small holder agriculture communities with significant dependence on natural resources in these protected areas.

Figure 1-1: Map showing Project geographical coverage
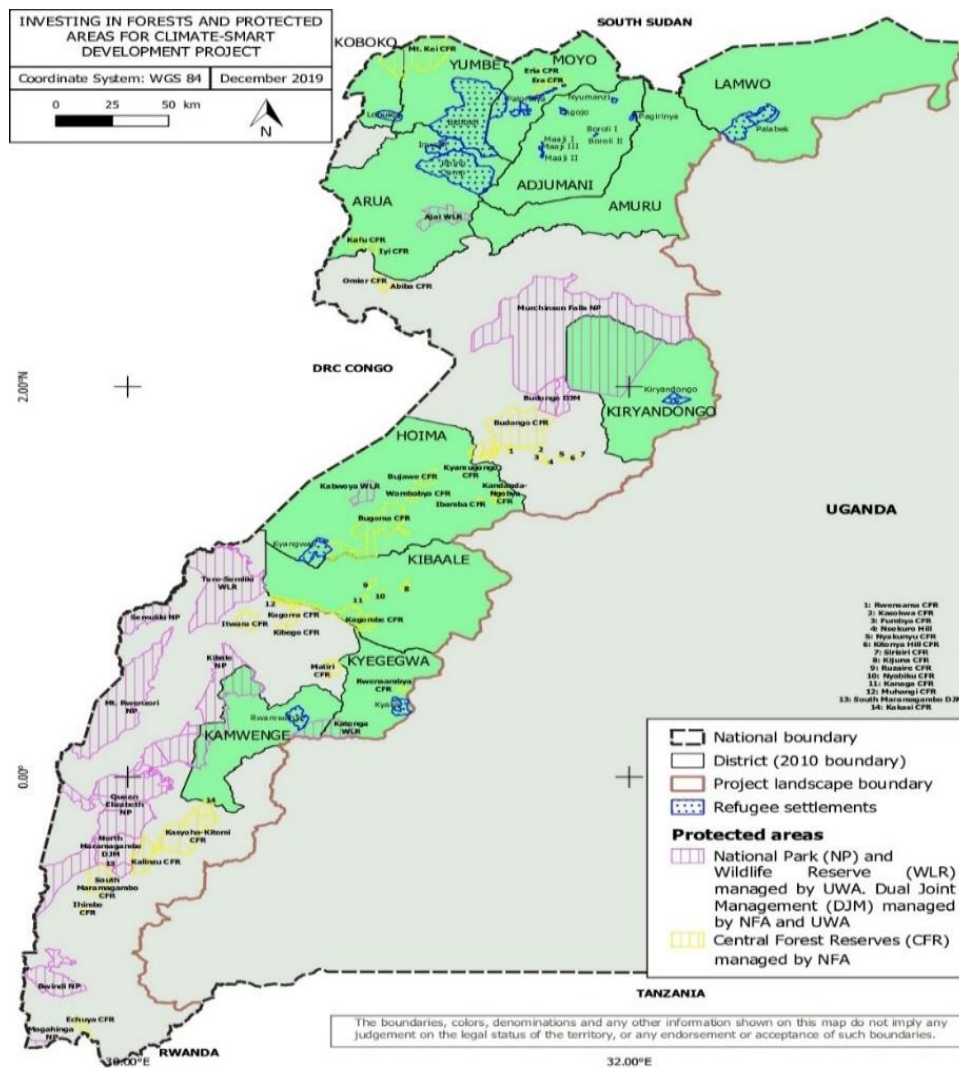
Table 1.1: Targeted Protected areas

National Parks	Wildlife Reserves	Central Forest Reserves	
Bwindi Impenetrable National Park Mgahinga Gorilla National Park Queen Elizabeth National Park Mt. Rwenzori National Park Semuliki National Park Kibale National Park Murchison Fall National Park	Katonga WR Ajai WR Toro Semuliki WR Kabwoya WR	1. Ihimbo 2. South Maramagambo 3. Kalinzu 4. North Maramagambo 5. Kasyoha-Kitomi 6. Kakasi 7. Echuya 8. Bugoma 9. Wambabya 10. Kagombe 11. Nyakarongo 12. Budongo 13. Kasokwa 14. Era	15. Otzi East 16. Otzi West 17. Wati 18. Mt Kei 19. Zoka 20. Itwara 21. Kibego 22. Muhangi 23. Buhungiro 24. Ibambaro 25. Kitechura 26. Matiri 27. Nkera 28. Rwensambya

2 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement activities have been undertaken as part of IFPA-CD project identification and preparation up to October 2020. They include:

a. REDD+ Stakeholder engagement processes (2013-2018): that led to the preparation of Uganda's REDD+ Strategy and Action Plan (2017) and Forest Investment Plan (2017). These processes involved public consultations/engagement at national, district and community levels, including engagements with the Forest dependent indigenous people in Albertine Rift.

b. Environment and Natural Resources Sector working Group (WESWG): the IFPA-CD Project has been discussed at several WESWG meetings. The meeting of WESWG held on 1st March 2018 endorsed the original concept note and recommended its approval by Ministry of Finance, Planning and Economic Development (MoFPED) and onward submission to Green Climate Fund (GCF) and World Bank for funding consideration

c. Joint meeting of the Water and Environment Working Group and Tourism Working Group: that was held on 30th August 2018 harmonized the priorities for the IFPA-CD Project and recommended further IFPA-CD project development as a joint IFPA-CD project for MWE and Ministry of Tourism, Wildlife and Antiquities (MTWA).

d. IFPA-CD project formulation Missions (between June 2019- January 2020); involving stakeholders at national levels, selected districts and communities.

e. Consultations: By April 2020, information on the IFPA-CD project was disclosed in written form and oral presentations at:

    i. Joint Sector Working Group meeting held on 30th August 2018. This was a combined meeting of Water and Environment Sector Working Group and Tourism Sector Working Group.

    ii. Water and Environment Sector Working Group meetings on 1st March 2018.

    iii. Successive Joint Water and Environment Sector Technical Reviews and Joint Water and Environment Sector Review meetings during 2018 and 2019.

    iv. Stakeholder engagements in the project landscape during Project Formulation Mission (June 2019).

    v. Stakeholder engagements during Project Formulation Mission (September 2019).

    vi. Stakeholder engagements during Project Formulation Mission (January 2020).

    vii. Consultation meetings with UNHCR and Office of the Prime Minister of Uganda (OPM) (on Refugee support activities).

    viii. Consultations on REDD+ Strategy options with the leaders of all Batwa communities held on 2nd March, 2019 at Nkuringo Cultural Centre, Kisoro.

    ix. Consultations meeting with Members of Parliament of Uganda on 2nd December 2019.

    x. Members of Parliament Visit to Project area in early March 2020.

xi. Stakeholder engagement during Project negotiations in March 2020.

f. Project planning and approval meetings: several meetings involving project implementing agencies (MTWA, MWE, NFA, UWA, Office of Prime Minister (OPM), Ministry of Finance Planning and Economic Development (MoFPED) during May- October 2020.

All information highlighted above can be accessed from *https://www.mwe.go.ug/library/redd?*

During these engagements, the following major categories of information was disclosed or discussed.

Information Category	Mode of disclosure	Reference
Project rationale, intervention logic, project investment and budgets, project area/sites, implementation arrangements, fiducial arrangement, procurement plan and procedures, monitoring and evaluation mechanisms, safeguards	Meetings and Focused Group discussions Publication and dissemination of project brochure and briefs Electronic PDF documents on MWE websites Field consultations with stakeholders and Vulnerable and Marginalized groups (Batwa) Print and audio media	Project Appraisal Document Project Procurement Strategy for Development Project Implementation Manual
Environmental and Social Risks Safeguards	Meetings and Focused Group Discussions Electronic PDF documents on MWE websites Consultations with Vulnerable and Margined Group	Environmental and Social Management Framework (ESMF) Environmental and Social Commitment Plan (ESCP) Gender Action Plan (GAP) Labour Management Plan (LMP) Grievances Redress Mechanism (GRM) Vulnerable and Marginalized Groups Management Framework (VMGMF)
Stakeholder Engagement Framework	Meetings and Focused Group Discussions Electronic PDF documents on MWE websites	SEP

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1   Stakeholder analysis criteria

Stakeholder engagement process for the IFPA-CD starts with identification, mapping and analysis of stakeholders. It is intended that this Stakeholder Engagement Plan (SEP) clarifies the stakeholder identification procedure at national and project area level during project implementation. This will guide MWE and Implementing Agencies, Local Governments and TSPs to comply with national and World Bank requirements for effective stakeholder engagements.

The following criteria are proposed to be used to identify stakeholders:

a. **Liability:** being community or social groups, especially, those with acknowledged interaction with the targeted PAs to whom project implementation or whose livelihoods and socio-economic aspirations are likely to be negatively affected by project investments directly or indirectly (e.g., Vulnerable and Marginalized Groups (Batwa) and communities adjacent to targeted protected areas).

a. **Influence**: being institutions or community or other social and economic groups that may be able to substantially influence project implementation and operations. This covers institutions with mandates over project supported components (forestry, wildlife, environment, wetlands, water, agriculture, land, biomass energy, tourism, climate, refugees, training in wood value chains, etc.), District Local Governments and institutions who take decisions on project financing (MoFPED, National Planning Authority (NPA), Parliament).

b. **Partnership:** being opportunities for building partnership relations between the project implementers (MWE NFA, UWA, Local Governments) and a given institution, community group or individual households in the framework of the project implementation operations. This covers institutions with interest to complement project activities for impact creation or to advance their investments and benefits through partnerships or collaboration with project (e.g., private sector players in nature based tourism, forestry/wood value chains, commercial forestry; NGOs/CSOs active in environment/natural resources/wildlife conservation and management, land use/land management, agriculture, commercial private tree farming and conservation financing institutions), among others.

b. **Dependency:** being social or community groups, businesses or individuals whose economic or livelihood interests will be dependent on the project operations (e.g. project contractors/employees and their dependents, local suppliers).

c. **Representation:** being individuals or institutions with legitimate right to represent ethnic minority groups (e.g., Batwa) or social groups (e.g., Women, Youth/Elderly/Disabled).

d. **Expressed interest**: being institutions or social groups or individuals not necessarily directly affected by the planned or current activities but have expressed interest to the project (e.g., Media, Civic institutions, etc.).

3.2 Mapping Stakeholders

Broadly, IFPA-CD Project stakeholders are 'people or institutions who have a role in the Project, or could be positively or negatively affect or be affected by the Project, or who are interested in the Project.

IFPA-CD Project stakeholders are grouped into:

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

b. **Secondary stakeholders** being the broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them or influence project decisions and operations. These include government institutions with mandate over environment management, social development, tourism, labour, agriculture, etc, Non-government agencies and organizations, Conservation Trust Funds, UN Humanitarian agencies, Private sector in wood value chains and tourism.

c. **Tertiary stakeholders** being the broader stakeholders who may have interest in project outcomes for the benefit of their interests. These include donors and development partners, research and development organizations,

This categorization requires multiple direct and indirect approaches to engaging stakeholders. For example, indirect engagement of stakeholders through their legitimate representatives of stakeholder groups or direct engagement with households. It is expected that legitimate representatives may consist of:

 a. Elected officials of local, and village councils and self-governance bodies.

 b. Leaders of informal or traditional community institutions such as Collaborative Forest Management groups (CFM), Collaborative Resources Management groups (CRM), Village Savings and Loan Associations (VSLA), etc.

 c. Non-elected leaders that have wide recognition within their community, such as opinion leaders, elders, religious leaders, teachers, etc.

 d. Leaders of community-based organizations, local NGOs and women, youth, elderly and physically handicapped groups.

Note:

 ✓ The project will verify stakeholder representatives in order to confirm that they are legitimate and genuine.

 ✓ For each IFPA-CD Project site and activity, stakeholders will be further analysed using the criteria in order to specify those stakeholders falling under each category and devising appropriate mechanism for their engagement. However, for the Vulnerable and Marginalized Group (Batwa), additional measures have been described in the VMGMF and VMGMPs.

3.3 Stakeholder categorization

For purposes of effective and tailored engagement, stakeholders of the IFPA-CD project(s) are divided into the following core categories namely; **Affected**, **Other Interested** and **Vulnerable Groups**. Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and will enable the project to draw on their local knowledge and experience, pre-existing expertise, mandates, ongoing programmes and initiatives, political and social leverage, networks and agendas.

3.3.1 Affected Parties

The IFPA-CD project "affected stakeholders" are stakeholder's communities likely to be affected by the project positively or negatively. They include refugees and communities, especially those bordering the targeted PAs. The identified likely impacts and commitment to address these impacts have been/incorporated in the Environmental and Social Commitment Plan (ESCP). Table 3-1 presents the modalities for consultation and disseminating information

Table 3.1: Consultations with affected people

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

3.3.2 Other interested parties

The IFPA-CD project scope covers diverse geographical area and activities hence diverse stakeholders with interest in the project. These include; Project contractors and Employees, NGOs/CSOs/Foundations/Trusts active in the project area, Public and Civic institutions (schools, churches, universities, etc.), and cultural institutions among others. For each location and activity, the specific interested parties will be identified and engaged as appropriate.

a. Residents of the other rural settlements within the project area, who can benefit from employment and training opportunities stemming from the project.

b. Civil society groups and NGOs at national and local levels, that pursue environmental and socio-economic interests and may become partners of the project. Organizations within this group are likely to be located outside the project's direct area of influence.

c. Business owners and providers of services, goods and materials within the project area that will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future.

d. Government entities – government officials, permitting and regulatory agencies at the national and local levels, including environmental, technical, social protection and labour authorities.

e. Mass media and associated interest groups, including local and national printed and broadcasting media, digital/web-based entities, and their associations.

f. Project employees.

Specifically, to project employees, the following arrangements will facilitate their engagement (Table 3-2).

Table 3.2: Arrangements for engaging project employees

Affected People	Information	Modality	Language	Mode of Transmission	Responsibility
Project contractors *(employees on project supported activities)*	Outcomes/Decisions of Project Steering and coordination meetings	Briefing Note/Circular Meeting Agenda	English	Electronic/email, Staff meeting	PCU
	Project reviews	Briefing Note/Circular Meeting Agenda	English	Electronic/email Staff meeting	PCU
	Activity Planning	Briefing Note/Circular Meeting Agenda	English	Electronic/email, Staff meetings /Planning meetings	PCU, UWA, NFA, TSP
	Information management	Briefing Note/Circular Meeting Agenda	English	Electronic/email Staff meetings	PCU, UWA, NFA, TSP
		Briefing Note/Circular Meeting Agenda	English	Electronic/email Staff meetings	PCU, UWA, NFA, TSP

3.3.3 Vulnerable and Marginalized groups (Batwa)

The IFPA-CD project areas houses the Batwa ethnic group in/around the Echuya CFR, Mgahinga, Bwindi and Semliki National Parks. The project inherits a long history, structures and processes of engaging Batwa in the management and utilization resources within these PAs. There are several NGOs and other non-state institutions focusing on uplifting the quality of life/livelihoods of Batwa.

The project recognizes that previous or ongoing Batwa engagements in these programmes have faced challenges of:

   a. Social discrimination of Batwa by hosting communities;

   b. Language barriers and low levels of literacy that hinders their participation in development and planning processes;

   c. Cultural attachment to the forests and deep rooted cultural values and practices that undermine their adoption of new technologies and livelihood options; and

   d. None or low representation in political or natural resources governance processes.

In spite of these needs and challenges, the project design/formulation process engaged Batwa in the design of the Environment and Social Management Framework and Plan (ESMF & P), development of the Vulnerable and Marginalized Groups Process Framework (VMGPF). Prior to the IFPA-CD design, Batwa were engaged through an elaborate consultation process on REDD+ Strategy priorities, Strategic Environmental and Social Assessment (SESA), Feedback and Grievances Redress Mechanism (FGRM) and Benefit Sharing Arrangements (BSA). During 2018/2019, Batwa were targeted for capacity building, preparing them for their participation in the implementation of Emission Reduction Programmes, and presently, the IFPA-CD project.

An assessment of the needs of the Batwa to effectively participate in project reveals additional challenges in form of communication and access to information (Table 3-3).

Table 3.3: Batwa communication and information access needs

Group Location	Key characteristics	Language needs	Preferred notification means	Specific needs (accessibility, large print, time to engage, etc.)
Echuya CFR	Small family groups living is clustered settlements Migratory families to other /from other communities around Echuya, Bwindi and Mgahinga	Translation into Kifumbira/ Kinyarwanda /Rukiga		
Mgahinga NP	Small families living in clustered community settlements Households settled on land donated by NGOs Migratory families to other /from other communities around Echuya, Bwindi and Mgahinga	Kifumbira/ Kinyarwanda		
Bwindi NP	Small families living in clustered community settlements Households settled on land donated by NGOs Migratory families to other /from other communities around Echuya, Bwindi and Mgahinga	Kifumbira/ Kinyarwanda/ Rukiga/Swahili		
Semliki NP	Small families living in clustered community settlements Have "cultural head"- King of Batwa Migratory families to other /from other communities around Semliki NP and Democratic Republic of Congo	Rwamba/Swahili	Oral Posters Translator (trusted /familiar people)	Meeting = morning hours Dedicated Batwa forum/meeting (with no participation of non-Batwa) Focused Group Discussion Meals/refreshments

The Project will ensure satisfactory consultations with Batwa following a consultation plan designed for Batwa (Table 3-4)

Table 3.4: Consultations plan for Batwa

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

Prior to the IFPA-CD project effective date, Vulnerable and Marginalized Groups Management Plans (VMGMP) for each location (4 VMGMP) will be prepared following standard procedures. These VMGMP will define the priorities for IFPA-CD project support to Batwa, budget and modalities for its implementation.

Additionally, the arrangements for engaging the Batwa in implementing the project GRM and ESCP will be followed. During implementation of the SEP, reference will be made to these frameworks for further guidance. Table 3-5 presents additional measures for engaging Batwa in project decisions making processes during project implementation phase.

Table 3.5: Arrangement for engaging Batwa in decision making processes

Affected People	Decision making process	Arrangements/modality	Responsibility
Batwa (Mgahinga, Echuya, Bwindi and Semliki)	Project Steering and coordination	PSC will approve the VMGMP and budget for its implementation	PCU
		Representation of Batwa interests by UWA, NFA and District Local Governments	UWA, NFA and DLG representatives
	Technical Coordination	Review and recommendation of VMGMP to PSC for approval	PCU
		Representation of Batwa interests by UWA, NFA and District Local Governments	UWA, NFA and DLG representatives
	Project reviews	Annual review sessions for the VMGMP	PCU, UWA, NFA
		Informants during supervisory missions, midterm review, end of project evaluation	PCU
	Activity Planning	Annual activity planning basing on the VMGMP	PCU, UWA, NFA
	Information management	Translation project information into vernaculars/local dialects	PCU, TSU, UWA, NFA
		Disseminating project information to Batwa	PCU, TSU, UWA, NFA

4.   STAKEHOLDERS ENGAGEMENT PROGRAMME

This section presents information on the planned stakeholder engagement actions and processes during July 2021 – June 2026. Information provided highlights the principles and considerations during consultations and engagement with targeted stakeholders, processes/ approaches and modalities for the engagement.

Overall, stakeholder engagement is intended to be all-inclusive devoid of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information. It will involve providing information and opportunity to contribute towards decisions that influence IFPA-CD project interventions as well as to raise their concerns and opinions as appropriate. Ultimately, effective engagement will ensure that stakeholders understand and own the IFPA-CD project.

4.1   Objectives of the Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project implementation cycle. The SEP outlines the ways in which IFPA-CD (project implementation teams) will communicate with stakeholders and includes a mechanism by which people can raise concerns or make complaints about IFPA-CD project and any activities related to the project and receive feedback on issue raised.

The involvement of the local population is essential to the success of the project(s) in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

The Key objectives of the SEP are to:

a. Provide guidance for stakeholder engagement such that the project meets the standards of International Best Practice.

b. Identify key stakeholders that are affected, interested and/or able to influence the Project and its activities.

c. Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation.

d. Provide a stakeholder's engagement process that provides stakeholders with an opportunity to influence project planning and implementation.

e. Establish formal grievance/resolution mechanisms.

f. Define roles and responsibilities for the implementation of the SEP.

g. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

4.2   General principles

The project shall utilize various methods of engagement that will be used as part of its continuous interaction with the stakeholders aiming at ensuring an effective and meaningful engagement. Some of the methods will be tailored to the targeted stakeholders. For example,

techniques used for consulting with statutory officials shall be different from those of liaising with the local communities with a lesser emphasis on technical aspects.

However, the technique of every consultation activity shall strive to meet general requirements on accessibility, i.e. conducting consultations at venues or e-platforms that are easily reachable and do not impose restrictions of access or cultural inappropriateness (i.e. with due respect to the local customs and norms), and exclusions, i.e. engaging all segments of the local society, including disabled persons, youth, women, the elderly, minorities, and other vulnerable or marginalized individuals. If necessary, logistical assistance shall be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public consultative meetings scheduled by the project.

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

In all stakeholder consultations processes, efforts will be made to ensure compliance with Standard Operating Procedures (SOPs) and other requirements for preventing transmission of COVID-19.

4.3   Proposed strategy for Consultations (FPI)

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

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

a. **Make advance public notification of an upcoming consultation meeting** via publicly accessible locations and channels. The project will keep proof of the announcement/publication (e.g. a copy of the newspaper/radio announcement or notice for meeting) for accountability and reporting purposes. Existing notice boards and such other public avenues in the communities or offices of local CSOs/NGOs, offices or widely visited public premises (e.g., government offices, churches, schools, health facilities, etc.) will used for distributing the announcements as appropriate.

b. **Maintain list of invitees** to the meeting and their contacts. Wherever possible, attendees' signatures or other formats for confirming attendance shall be obtained as a proof of their participation.

c. **Select most accessible or appropriate methods of communication** that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the project. In this regards, Oral communication in vernacular will be preferred as an option that enables the information to be readily conveyed to such persons during consultation meetings or via radio and mobile phone messages.

d. **Keep record of all participants** for purposes of accountability and guiding targeted follow up actions with respective stakeholders.

e. **Keep record of meetings deliberations** for the purposes of transparency and the accuracy of capturing public comments. Meeting records will be made via a combination of taking written minutes of the meeting, audio recording (e.g. by means of voice recorders) and photographing.

f. **Conduct separate meetings** and **Focus Group Discussions** for deserving cases to enable them express themselves without barriers often associated with inferiority, cultural or other factors.

g. **Manage meeting size** by making necessary arrangements to ensure audibility and visibility of the presentation and any demonstrations involved. This may include provisions for use of microphones, proper illuminations, projectors, etc. Meeting size will take into account SOPs and other requirements for preventing transmission of COVID-19.

h. **Evaluate the meetings** in order to capture levels of participant's satisfaction or reservations about the meeting, issues discussed, feedback provided, conclusions or recommendation made, etc.

i. **Provide consultations or meeting Agenda** in a clear and itemized outline of the meeting's structure, sequence, chairperson, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the exchange of ideas). This is intended to give prospective participants an opportunity to prepare their questions and comments in advance.

j. **Allocate sufficient amount of time for a concluding Q&A session** at the end of any public meeting or a hearing thereby providing the audience opportunity to convey their comments and suggestions that can subsequently be incorporated into the implementation or decisions of the project.

k. **Keeping a record of all public comments received and responses provided** during the consultations meetings in order to enhance project accountability for stakeholder's views and inputs. The recorded comments and how they have been addressed by the project will be included in the project regular reporting to the stakeholders.

l. **Disclose project information** in the public domain accompanied by a register for comments and suggestions that can be used by any member of the affected community and general public/stakeholder to provide their written feedback on the

contents of the presented information during the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed agent shall be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.

The following engagement methods and techniques will be applied by project to ensure "**free, prior and informed**" consultations with Stakeholders (Table 4-1).

Table 4.1: Methods and approaches for ensuring "free, prior and informed" engagements

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
Distribution of printed public materials: leaflets, brochures, fact sheets, posters, etc.	Used to convey information on the Project and regular updates on its progress to local and national stakeholders.	Printed materials present illustrative and written information on Project activities, progress as well as impact mitigation measures. Aim at concise contents and adapted to a layperson reader. Use Graphics and pictorials to describe technical aspects. Use language understood by targeted audience	Distribute materials as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as household visits in remote areas. Place materials at the offices of local administrations and NGOs and other venues commonly accesses by public.	Households/communities, local authorities in the Project Area .
Distribution of printed public materials: newsletters/ updates	A quarterly newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the status of the Project	Important highlights of Project achievements, announcements of planned activities, changes, challenges, and overall progress.	Quarterly circulation of the newsletter or update sheet in the Project Area and other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – emailing and physical delivery	Households /communities in the Project Area Public offices at local and national levels, Protected Areas, public institutions such as schools, Tourism offices, etc.
Print Media	Newspaper inserts, announcements, press releases, short articles or feature stories in the printed media	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the community/stakeholders Commemoration of national/international events e.g., World Wildlife/ Forests/Water/	Placement of paid information in local and national printed media, including those intended for general reader and specialised audience	Residents in project area, national level audiences

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
		Environment/biodiversity days, Refugees, etc.		
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Project, Project development updates, solutions for impact mitigation. Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the project area and can reach local audiences. Collaboration with media producers that operate at national level	Residents in project area National levels stakeholders /audiences
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project and related solutions/impact management measures. Updates on Project implementation.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	Affected communities in in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. Authorities and other governmental bodies.
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Place printed announcements and notifications in visible and easily accessible places frequented by the local public	Directly affected communities in the project area
Information Feedback				
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback	Various Project-related materials, ESMF documentation, environmental and social action plans.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	Directly affected communities in the project area

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
	register.			
Dedicated telephone line (hotline)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's Safeguards and Communications staff will be shared with the public	Any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff shall be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration	Local communities within the Project Area. Any other stakeholders and interested parties in general.
Internet/Digital Media	Project website to promote various information and updates on the overall Project, including, impact assessment and impact management process, procurements, employment opportunities, as well as on Project's engagement activities with the public. Web-site shall have a built-in feature that allows viewers to leave comments or ask questions about the	Information about Project implementers, TSPs and collaborating partners Project implementation updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.	A link to the Project web-site should be specified on the printed materials distributed to stakeholders. Other on-line based platforms such as web-conferencing, webinar presentations, web-based meetings, Internet surveys, etc. shall be used.	Affected and beneficiary communities, Project stakeholders and other interested parties that have access to the internet resources.

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
	Project.			
Surveys, Interviews and Questionnaires	Use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project activity and related solutions/impact management measures. Questions targeting stakeholder perception of the Project activity, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	Directly affected households/community in the Project Area.
Feedback & Suggestion Box	Suggestion boxes will be used to encourage residents in the affected communities to leave written feedback and comments about the Project activity. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary. Use of Feedback & Suggestion Box will be applied to construction works.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box shall be selected in a safe public place at the construction sites to make it readily accessible for the community. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	Directly affected households and communities in the Project Area.
Consultation & Participation				
Public hearings	Project representatives	Detailed information on the activity	Wide and prior announcement of	Directly affected communities in the Project

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
	, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	the public hearing and the relevant details, including notifications in local and national mass media. Send out targeted invitations to stakeholders. Public disclosure of activity information and associated impact assessment documentation in Directly affected communities in the Project Area. Give viewers/readers of the activity information are free access to a register of comments and suggestions that is made available during the disclosure period.	Area.
Household visits	Household-level visits shall be conducted to supplement the statutory process of public hearings, particularly to solicit feedback from community members and vulnerable persons who may be unable to attend the formal hearing events.	Description of the Project and activity related solutions/impact management measures. Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.	Visits shall be conducted by Project's designated staff with a specified periodicity.	Directly affected in the Project Area.
Focus Group Discussions and Workshops	Shall be used to facilitate discussion on Project's	Project's specific activities and plans, design solutions and impact	Announcements of the forthcoming meetings are widely circulated to	Directly affected households/community in the Project Area including, youth, elderly, women, and

Method / Tool	Description and Use	Contents	Dissemination method	Target group
Information provision				
	specific issues that merit collective examination with various groups of stakeholders.	mitigation/management measures that require detailed discussion with affected stakeholders.	participants in advance. Targeted invitations are sent out to stakeholders.	other vulnerable groups.
Information centres and field offices (TSPs)	TSPs field offices will be depository of Project-related information with TSP staff available to respond to queries or provide clarifications.	Project-related materials and information. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the field office with open hours for the public, together with contact details, will be provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	Directly affected communities in the Project Area and any other stakeholders and interested parties.
Project Site Visits	Visits to Project activity sites shall be organised for local communities. Targeted invitations will be distributed to selected audience offering Local communities, elected officials, local authorities and the media to demonstrate Project activities and solution. Visitors will be accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour.	Demonstration of specific examples of Project's solutions and approaches to managing impacts.	Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the Project Site. Possible safety restrictions on the site access during active construction works is foreseen.	Local communities elected officials, media groups. NGOs, etc.

4.4 Strategy for providing feedback

4.4.1 Incorporating and providing feedback to views of vulnerable groups

The IFPA-CD Vulnerable and Marginalized Groups Framework (VMGF) and Vulnerable and Marginalized Groups Management Plan (VMGMP), ESMF and GRM provide reference for the actions and procedures that will be applied to receive and respond to the views from these groups.

Views, suggestions and recommendations received from these groups will be responded to during the public consultative meetings or through administrative correspondences or through follow up field visits and discussions with households/community.

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

Issues that qualify to be incorporated in subsequent project implementation activities and processes will be handled during annual VMGMP work planning processes.

4.4.2 Incorporating views and providing feedback from other stakeholders

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

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

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

4.5 Proposed strategy for consultation (Future phases)

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

The process of formulating the "future phases" shall apply the similar stakeholder consultations and engagement process as was applied during the formulation of the project, subject to any modifications to accommodate emerging issues or local circumstances. A

Stakeholder Engagement Framework and plan for guiding stakeholder engagement in formulating the future phases will be approved by the Project Steering Committee.

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

4.6 Strategy for information disclosure

IFPA-CD project information namely; PAD, ESMF, ESCP, SEP, VMGP, GRM, PIM, etc. will be disclosed to stakeholders and general public using any of the approaches highlighted in Table 4-1.

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

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

Electronic copies of PAD, ESMF, ESCP, SEP, VMGP, GRM, PIM, etc. and additional information pertaining to Environmental and social issues will be disclosed through websites of MWE, UWA and NFA. Feedback on comments and or suggestions made on these documents will be provided within 1 month after the closure of date for receipt of comments or suggestions (Table 4-2).

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

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

The outline (Table 4-2) summarizes the main types of information to be shared with stakeholder groups, sources, language and format of presentation as well as time frame for receipt of comments or suggestions from stakeholders.

Table 4.2: Type of information to be disclosed

Information category	Location/access source	Language	Format	Time frame for comments/feedback
Project documents (PAD)	MWE,UWA,NFA,MTWA	English	Electronic PDF Document Printed Hard Copies	n/a
Project Implementation Manual	MWE	English	Electronic PDF Document Printed Hard Copies	3 months
Safeguards	MWE,UWA,NFA	English	Electronic PDF Document	continuous
	UWA, NFA , Districts	VMGF (Rufumbira/ Rukiga/ Lwamba/S wahili)	Printed hard copy	1 month
Procurement contracts	MWE,UWA,NFA	English	Electronic PDF Document	10 days

With regards to disclosing project progress and implementation issues, the following strategies will be applied (Table 4-3).

Table 4.3: Communication and feedback mechanisms

Stakeholder	Communication channels	Feedback Loop
GoU /mandated institutions and agencies	Project progress reports (Quarterly/semi-annual/annual) Project work plans and budgets Technical reports, Publications and briefs Reports from Supervisory Missions, Annual Review, mid-term Review, End of project Evaluation Deliberations/records of meeting of Steering Committee, NTC	Participation during/input into: *Annual work planning and reviews sessions* *Agenda and deliberations of NTC, PSC* *Experience sharing and lessons learning processes* Written responses/correspondences Meetings Supervisory Missions/field visits
Partners and collaborating stakeholders	Project progress Reports (Quarterly/semi-annual/annual) Technical reports, publications and briefs	Annual work planning and reviews Experience sharing and lessons learning processes
Project targeted people/community/beneficiary	Project progress Reports (Quarterly/semi-annual/annual) Technical reports, publications and briefs	Experience sharing and lessons learning processes

4.7 Proposed strategy to incorporate the view of vulnerable groups

The IFPA-CD Vulnerable and Marginalized Groups Framework (VMGF) and Vulnerable and Marginalized Groups Management Plan (VMGMP), ESMF and GRM provide reference for the actions and procedures that will be applied to receive and respond to the views from these groups.

Views, suggestions and recommendations received from these groups will be responded to during the public consultative meetings or through administrative correspondences or through follow up field visits and discussions with households/community.

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

Issues that qualify to be incorporated in subsequent project implementation activities and processes will be handled during annual VMGMP work planning processes.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

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

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

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

5.2 Management functions and responsibilities

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

ensuring that the applicable provisions of SEP have been satisfactory implemented by TSPs and Contractors/Consultants, respectively.

Responsibilities: Within the PCU, the Environmental and Social Safeguards desks will support, monitor and report on the over-all performance of the SEP. The Safeguards Desks at the PCU will support and monitoring implementation of applicable provisions of this SEP by the Technical Service Providers and Contractors/Consultants. The Technical Service Providers and Contractors/Consultants will report on their performance in stakeholder engagement and issues that require attention by MWE/PCU, UWA and NFA.

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

6. GRIEVANCES REDRESS MECHANISM

This section summarises the IFPA-CD Project Grievance Redress Mechanism (GRM), the details of which are provided in Annex 1 to this SEP.

6.1 The GRM for IFPA-CD Project

The IFPA-CD Project Grievance Redress Mechanism (GRM) has been developed to provide an effective avenue for expressing concerns and achieving remedies for communities and other stakeholders, promote a mutually constructive relationship and enhance the achievement of Project development objectives (https://www.mwe.go.ug).

The IFPA-CD Project GRM will be augmented by the MWE and World Bank's Grievance Redress Services (GRS). The latter provides an easy way for Project-affected communities and individuals to bring their grievances directly to the attention of Bank Management. For information on how to submit complaints to the World Bank's corporate GRS, please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.. For information on MWE GRS, please visit https://www.mwe.go.ug/sites/default/files/library/CLIENTS%20CHARTER%202018-2022_0.pdf

6.2 The Scope

Purpose: The GRM is designed to act as recourse for situations in which some stakeholders may have a concern about the project's potential impacts on them. Ultimately the purpose of the GRM is to find a win-win solution and in case the GRM fails, the parties to a grievance may resort to the formal courts at any stage of the grievance resolution process. It is intended to complement, not replace, formal legal channels for managing grievances.

Objective of GRM for IFPA – CD: The main objective is to detect and prevent the grievances before they occur, and mitigate their consequences when they occur, as well as prevent them from escalating. The Specific objectives are:

1. To receive and resolve project related grievances in a timely, appropriate and efficient manner;
2. To build trust among project staff and communities;
3. To promote community empowerment and participation in project decisions that affect them;
4. To provide feedback mechanisms to project affected persons on resolution of their complaints.

Principles of Grievance Redress Mechanism: The GRM has been designed according to the following eight internationally accepted principles for the design of GRM: accessibility, predictability, fairness, rights compatibility, transparency, capability, feedback, and legitimate.

6.3 The GRM Structures

The IFPA-CD Project GRM provides for four level structures in order to ensure grievances emanating from all stakeholders are captured and resolved.

    a. Level 1: Village level GRC (VGRC): This will be the lowest unit upon which all grievances will be channelled and handled before escalating unresolved grievances to higher levels. The committee will comprise of 7 members at most.

b. Level 2: The Sub county level GRC: This will be established to deal with grievances unsettled at the village level and will comprise of 7 members at maximum.

c. Level 3: District level GRC: This will be established to deal with any grievances unsettled at the sub county levels. The GRC at the district will comprise of 7 members.

d. Level 4: The National Level GRC shall be housed at MWE with members from MTWA, UWA, NFA and OPM and will handle all appeals not resolved at district level.

6.4   The GRM Process

The GRM process will involve the following steps: receiving, acknowledging and recording grievances; sorting and categorization; verification and resolution; and giving feedback.

a. **Receiving, Acknowledging and Recording Grievances:** All grievances shall be received, acknowledged and recorded at village level.

b. **Sorting and categorization:** Acknowledgement of grievances received will be followed by sorting and categorizing it for appropriate action. The analysis and categorization will be based on a set criterion.

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

d. **Giving feedback:** Feedback refers to the process of informing the complainant, all GRM users and the public at large about the result of the grievances investigated and resolved as well as the actions taken. Once a grievance has been resolved, the GRC will provide feedback to the complainant.

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

f. **Anonymous grievances:** A grievance received anonymously needs to be assessed to identify whether it is substantial or not and if found substantial, actions shall be taken to resolve it. This may involve holding meetings with community members to disclose the resolution of the GRC.

g. **Right to Appeal:** A complainant who is not satisfied with the response received despite having had the opportunity to request for further clarification or feedback, he/she has the right to make formal communication to the Social Risk Management Specialist.

6.5   Disclosure

The GRM recognizes that Stakeholders need to be informed about the existence of the GRM, its structures and how it operates including mechanisms for channelling grievances. Information, Education and Communication (IEC) materials shall be developed to disseminate information to various stakeholders so that they are provided with information they require on GRC mandate, objectives and operational principles for effective delivery of their functions. The GRM will be disclosed in the project area as much as possible as well as on the MWE's and World Bank websites.

7.0   MONITORING AND REPORTING

7.1   Involvement of Stakeholders in monitoring stakeholder engagement activities

Indicator's for assessing or measuring and reporting on performance of this SEP shall be integrated in the over-all M&E Framework for the project. The following measures will promote stakeholder involvement in monitoring the Stakeholder engagement activities:

a. Reviewing and providing feedback on project progress reports and stakeholder engagement activity reports.

b. Stakeholder acknowledgement of receipt of responses from MWE/implementing agencies to issues/views presented during stakeholder consultations.

c. Monitoring and reporting on implementation of remedial actions or solutions provided to complaints.

d. Invitation to NGOs active in the project area to serve as voluntary third party monitors of project impacts and mitigation actions.

7.2   Reporting back to stakeholder groups

The project will report on the implementation of this SEP using the consultations and information dissemination mechanism presented in section 4. The following are additional or specific reporting process for the SEP.

a. Use of Project Newsletter for disclose the issues and mitigations actions taken during the reporting period.

b. Targeted Communication or reports provided to the affected community/stakeholder providing information on progress of implementing mitigation action or the conclusions and outcome of implementing the mitigating action.

c. Disclosure of reports of the third party monitor (s).

ANNEX 1: IFPA-CD PROJECT GRIEVANCE REDRESS MECHANISM

1. INTRODUCTION

1.1 Background

The Investing in Forests and Protected Areas for Climate Smart Development (IFPA-CD) project is jointly developed and implemented by Ministry of Water and Environment (MWE) as the Lead Agency and Ministry of Tourism, Wildlife, and Antiquities (MTWA). Implementation of the project activities will be led by the MWE (User departments), National Forestry Authority (NFA), and Uganda Wildlife Authority (UWA) with the involvement of MTWA in tourism-related activities. Implementing agencies will collaborate with Office of the Prime Minister (OPM) and United Nations High Commission for Refugees (UNHCR) in activities implemented in the refugee-hosting areas. Implementation will be overseen by the Project Steering Committee, jointly chaired by the MWE and MTWA. The project closes on June 30, 2026, and it seeks to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes.

The project geographic area includes the Albert Rift and West Nile region, with focus on target protected areas (7 National Parks - NPs, 4 Wildlife Reserves - WRs, 28 Central Forest Reserves - CFRs) and 18 refugee host districts[1]. Activities under subcomponent 2.2 will have a national coverage.

The project is structured in four main components and eight sub components (Table 1-1).

Table 1.1: Project components and subcomponents

Component	Sub-component
Component 1. Improved management of forest protected areas	1.1. Improvement of infrastructure and equipment for the management of forest protected areas
	1.2. Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas
	1.3. Restoration of degraded natural forests and habitats in Wildlife and Forest Protected Areas
	1.4. Increased forest protection in CFRs and WRs in close proximity to refugee settlements
Component 2. Increased Revenues and Jobs from Forests and Wildlife Protected Areas	2.1. Investments in tourism
	2.2. Investments in productive forestry
Component 3. Improved landscape management in refugee-hosting areas	3.1. Increased tree cover on community and private land
	3.2. Supporting farm forestry for refugee fuel supply
Component 4. Project management and monitoring	

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[1] Based on the July 2020 boundaries.

1.2 Definition of a Grievance under IFPA-CD project

A Grievance refers to a complaint, a feeling of dissatisfaction, an injustice, a wrong doing, an accusation, or criticism. It may include queries, suggestions and comments. A grievance may be mistaken to be "a case", however, the two concepts are different. A case is a question contested before Courts of justice or an equivalent legal process. Examples of likely grievances are disagreement on boundary between a Protected Area (PA) and private land or damage to crops during construction of an electric fence around a PA. It is therefore important to establish a robust Grievance Redress Mechanism (GRM) for better management of project related grievances as well as serving as a channel for registering positive feedback on project implementation.

1.3 Justification for a robust GRM under IFPA-CD Project

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

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

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

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

Over-all, the GRM will provide the following benefits to the project and affected persons, among others;

   a. Enhance information sharing about the project;
   b. Provide cost effective method for channelling complaints/ grievances;
   c. Provide an avenue for resolving grievances and disputes at the lowest project level;

d. Community will be able to report their grievances with dignity and also receive a fair hearing;

e. Facilitate speedy resolution of conflicts before they escalate;

f. Facilitate access to information;

g. It will help project implementers win the trust and confidence of the community;

h. Prevent adverse impacts to the community; and

i. Help to avoid project delays and cost overlaps thus improving quality of work.

1.4 Implications for not having a GRM

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

2.   THE IFPA-CD PROJECT GRM

2.1   The GRM

A grievance redress mechanism under IFPA-CD refers to the institutions, instruments, methods, and processes through which resolutions to grievances are sought and provided. It spells out the procedure for receiving, assessing and addressing grievances and complaints. It is premised on the anticipation that activities of the IFPA-CD project will generate grievances that may cause negative impacts on the Project Affected Persons (PAPs).

The GRM will provide an effective avenue for expressing concerns and achieving remedies for communities, promote a mutually constructive relationship and enhance the achievement of Project development objectives. It has been learned from many years of experience that open dialogue and collaborative grievance resolution simply represent good business practice both in managing social and environmental risk and in furthering Project and community development objectives. In voicing their concerns, they also expect to be heard and taken seriously. Therefore, MWE, UWA, NFA and districts have to assure people that they can voice grievances and the Project will work to resolve them without bias. The Project GRM will be augmented by the MWE and World Bank's Grievance Redress Services (GRS). The latter provides an easy way for Project-affected communities and individuals to bring their grievances directly to the attention of Bank Management. The GRS will ensure that complaints are directed promptly to relevant Bank Task Teams and/or Managers for review and action, as appropriate. The goal is to enhance the Bank's involvement, responsiveness, and accountability. For information on how to submit complaints to the World Bank's corporate GRS, please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

An IFPA-CD Project specific GRM was recommended in the Projects Environmental and Social Management Framework (ESMF) and the Vulnerable and Marginalised Groups' Framework (VMGF). The frameworks provided an outline for developing a GRM and establishing Grievance Redress Committees (GRC) at various levels as appropriate.

The project GRM will provide a credible and accessible means for Project Affected Persons (PAPs) and other stakeholders to pursue grievances, allowing the Project to address genuine issues in a timely manner and to minimise on the chances of distractions to Project implementation and ownership from disgruntled PAPs/stakeholders. Grievances relating to any aspect of the IFPA-CD Project will be dealt with through negotiations aimed at reaching consensus between the Project and the PAPs, following agreed principles and procedures that will be discussed in later sections. Dedicated Information, Education and Communication (IEC) materials (GRM brochures, pamphlets, posters) will be created to help residents in the project areas to familiarize themselves with the grievance redress channels and procedures.

For effectiveness, the IFPA-CD Project GRM has been designed to encourage and ensure:

- Transparency, fairness and inclusiveness;
- Legitimacy and trustworthiness;
- Scaled to the risks and potential adverse social and environmental impacts of the project;
- It is publicized and accessible;

- Appropriately tailored to all potentially affected persons and communities and other interested parties, irrespective of their literacy levels;
- Free of cost for the PAPs and other stakeholders;
- Includes the anonymity option, where feasible, and guarantees confidentiality in handling requests, if so, requested by the complaint;
- Is guided by engagement dialogue; and
- Is Predictable in terms of process, timeliness, and access to information.

2.2   Purpose

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

2.3   The Objective of GRM for IFPA–CD Project

The main objective is to detect and prevent the grievances before they occur, and mitigate their consequences when they occur, as well as prevent them from escalating. The Specific objectives are:

1. To receive and resolve project related grievances in a timely, appropriate and efficient manner;

2. To build trust among project staff and communities;

3. To promote community empowerment and participation in project decisions that affect them; and

4. To provide feedback mechanisms to project affected persons on resolution of their complaints.

2.4   Principles of Grievance Redress Mechanism

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

1. **Accessibility** – provides adequate assistance to those who wish to access it, including specific groups such as children, women and the disabled accessibility needs to take into consideration language, literacy, awareness, finance, distance or fear of reprisal.

2. **Predictability** – offers a clear and known procedure, with timeframes for each stage, clarity on the types of processes and outcomes it can and cannot offer, and means of monitoring the implementation of any outcome.

3. **Fairness** – all decisions shall be perceived as fair and objective especially in terms of access to information and opportunities for meaningful participation in the final decision

4. **Rights compatibility** – it is with applicable national and international standards; should not restrict access to other redress mechanisms

5. **Transparency –** procedures and outcomes or decisions shall be made public and in a transparent manner

6. Capability – shall have required technical, human and financial resources to deal with issues at stake

7. **Feedback** – Should serve to channel citizen feedback to improve project outcomes for the people

8. **Legitimate:** has clear, transparent, and sufficiently independent governance structure to ensure that there is no bias or interference and the process can be conducted fairly with respect to all parties

In addition to the above principles, the following shall also be considered;

- The grievance redress procedure to be followed will consider existing and effective community and traditional dispute settlement systems.

- The GRM and its application will be widely disseminated to all stakeholders, through Local Council structures, NFA/UWA field offices, GRM structures, NGOs/CBOs;

- Grievance review will be done independently and impartially to foster the trust and confidence of all stakeholders.

- All methods and results of consulting the public including the management of grievances will be documented/recorded and be disclosed to the affected persons as appropriate.

- The principle of confidentiality of the issues/information and anonymity of the complainant will apply to GRM processes as appropriate.

3.   THE GRM STRUCTURE

3.1   Introduction

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

The Composition of the GRC will take into consideration the technical competencies of the GRC members at all levels to receive and resolve grievances. The members shall be formally assigned responsibility to work with the respective committees. In choosing the members, consideration shall be given to the diverse stakeholder interests in the participating project areas and the need for balancing geographical and gender distribution. The GRCs shall co-opt members to the respective committees as and when the need arises.

It is expected that all grievances shall be received and resolved at the lowest level (village level). However, there is provision for referrals in the case of grievances escalating to the next level.

3.2   The GRM Structures

The IFPA-CD Project GRM has adopted a four level structure to ensure grievances emanating from all stakeholders are captured and resolved.

3.2.1   National level

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

3.2.2   Level 1: Village level Grievance Redress Committee (VGRC)

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

The committee will comprise of 7 members and shall be chaired by the Parish Chief in charge of the respective village. The Local Council 1 (LC1) chairperson shall be a member and the 5 members shall be elected in the village. One of the members shall be elected as secretary. The one third gender rule will be applied to ensure representation of women, youths and ethnic balance.

3.2.3   Level 2: The Sub county level Grievance Redress Committee

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

3.2.4 Level 3: District level Grievance Redress Committee

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

3.3 Roles and Responsibilities of Grievance Redress Committees

The roles and responsibilities of the GRC are presented in Table 3-1

Table 3.1: Roles and responsibilities of GRCs

GRC	ROLES AD RESPONSIBILITIES
National Level GRC	Ensure grievance redress processes are developed and functional
	Sensitize GRCs at all levels on their roles and responsibilities
	Ensure complaints registers are up to date
	Follow up on complaints that have been directed to the national level
	Monitor implementation of resolutions made by GRCs at all levels
	Share best practices and general guidance to the IFPA-CD project
	Conduct sensitization and awareness outreach to relevant stakeholders
	Maintain all records of grievances and redress
	Analyze common grievances, lessons learning to inform effective program implementation and mitigation measures in future
District Level GRC	Sensitize Sub county GRC on rights and responsibilities and channels for registering a complaint
	Follow up on complaints that have been directed to the district level and see that they are resolved
	Conduct quarterly review meetings on Sub county GRC report
	Forward unresolved complaints which may require higher level solving to national level GRC
Sub county level GRC	Sensitize village level GRCs and community members on rights and responsibilities and channels for registering complaints
	Follow up on complaints directed to the Sub county level and see that they are resolved
	Ensure complaints registered are properly logged and received appropriately
	Ensure documentation specifically the log book, registers, forms etc. are properly filed and stored
	Forward unresolved complaints which may require district level solving
Village level GRC	Point of contact for beneficiaries and community to file or follow up on grievances
	Sensitize community on rights and responsibilities and channels for registering complaints
	Follow up on complaints registered in the complaints boxes directing as appropriate
	Log complaints received appropriately
	Compile all complaints registered and forward to the Sub county level for review and solving for those that might have not been resolved at community level.

4. THE GRM PROCESS

The GRM is designed with the objective of solving grievances at the earliest possible time, which will be in the interest of all parties concerned. Therefore, the internal complaint resolutions systems (GRCs) of the IFPA-CD Project GRM will be strengthened to minimize on potential escalation of complaints to the national level or courts of law.

Those seeking redress and wishing to state grievances will do so by notifying any member of the GRC or the GRC contacts provided and publicized in the project areas. Should some PAPs register their complaints with project staffs, they should have them registered with the GRC. If the complainant's claim is unresolved, under the village GRC, the matter shall be brought before the Sub- County GRC.

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

4.1 Receiving, Acknowledging and Recording Grievances

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

4.2 Sorting and categorization

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

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

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

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

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

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

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

i. Non inclusive
ii. Quantity of services

iii.   Quality of services

iv.   Timeliness of services

v.   Conflict of interest

vi.   Behaviour of staff

vii.   Recruitment

viii.   Procurement of commodities or services

ix.   Political interference

x.   Bribery

xi.   Embezzlement

xii.   Fraud

xiii.   Data or information provision

xiv.   Environmental degradation

xv.   Environmental pollution

xvi.   Timeliness of services

xvii.   Access to sub project resources

xviii.   Resource based conflicts

xix.   Gender based violence

xx.   Child abuse

4.3   Verification and resolution

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

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

Grievances not resolved at village level will be escalated to the higher level of GRCs for further verification and investigation. GRCs will ensure neutrality in the process and outcome of the investigation. If after exhausting the project institutional structures, beneficiaries are still dissatisfied with explanations and solutions offered, they will have the option of seeking justice through courts of law.

4.4   Giving feed back

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

4.5 Safe handling of grievance records

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

4.6 Anonymous grievances

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

4.7 Right to Appeal

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

5. IMPLEMENTATION AND AWARENESS CREATION

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

5.1   Disclosure of the GRM

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

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

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

5.2   Setting up GRM structures

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

Inducting of GRC members   will be undertaken to ensure awareness on GRM and knowledge of appropriate procedures and steps for managing grievances. The DESSS will take lead in training National and District level GRCs. The District GRCs will train the Sub county GRCs with supervision from the National GRC. The Sub County CDO will take lead in forming and training the village level GRCs with support from the Sub county GRC members. The hand-outs on GRM will be developed from time to time and distributed among the various categories of project stakeholders and in the communities in the project area.

5.3   Grievance prevention

Grievance prevention is key and shall form part of the GRM implementation. The following measures shall be put in place to prevent grievances from occurring;

a. Identify risk areas that are likely to cause grievances and possible mitigation measures.

b. Provide sufficient and timely information to the community and other stakeholders. Many complaints arise as a result of lack of information or insufficient information. Therefore, providing accurate and adequate information about the project and its activities and implementation schedule shall be done regularly. Avenues for information dissemination shall be in form of radio talk shows, Information and Education Materials, and trainings.

c. Conduct meaningful community and stakeholder engagements. Throughout the project implementation, the project shall continue sharing information, progress reports, providing opportunity to community members to raise their concerns, responding to their issues in a timely manner, as well as receiving feedback on interventions.

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

5.4 Logging complaints

Locally available appropriate communication channels shall be established for logging complaints. Grievances shall be received through several ways ranging from formal verbal (including telephone) or written format. These could be from project affected persons, farmer groups, institutions and any other third parties. The aggrieved persons will contact the GRC members (preferably the secretary) either on phone or physically. The complaint will be registered in the grievance registration form, and any supporting information shall be submitted within 48 hours. The GRC will convene a meeting to sort the grievances received within 7 days. For grievance that fall within the mandate of the GRC, a resolution shall be made or it shall be referred to the next level in case it cannot be handled at that level. Those that are outside the mandate of the GRC, it shall be referred to the respective institution. The village level GRC will give feed back to the complainant on the resolution. In the case of referrals, the GRC will have a minimum role to play other than referring the complainant to the respective institution. All complaints shall be registered in the grievance register and Complaints Logbook by the GRC regardless of how they were received.

5.5 Options for settling complaints

The GRCs may use the following options to settle grievances

1. Document agreed actions; the complainant shall be given the resolution by the GRC in writing. This will give confidence to the complainant that issue raised was handled. The complainant will then decide on the next action especially if s/he is not satisfied with the resolution. A copy of the resolution shall also be kept by the secretary to the GRC for future reference.

2. Caution:; The GRC may resolve to caution the project staff involved in the grievance. This may be done in the presence of the complainant.

3. Apology; The concerned project staff might be required to apologize to the complainant, preferably in writing.

4. Restitution/ restoration; in case of damage to the property of the complainant, there shall be restitution or restoration to the damaged property.

5. Giving information; sometimes grievances arise from lack of information or misinformation about the project. The GRC will give such missing information to the complainant.

6. Referral to the next level; where the grievance cannot be handled at the respective level, it will be referred to the next level. This decision will be given to the complainant within the stipulated time.

7. Determining reasonable compensation; where compensation is to be done, it shall be reasonable and in accordance with the laws of Uganda.

5.6 Track, document, evaluate and report results

The GRCs have a responsibility of tracking and monitoring the process of grievance redress and the implementation of the decisions made. They also have a duty to give regular feedback to the complainants about the grievance redress process (using Annex III). Evaluation procedures will also be put in place to assess the overall effectiveness of GRMs.

5.7 Timelines for grievance handling

Prompt handling of complaints is encouraged as they are received, and or addressed and records shall be kept. Where possible, complaints shall be handled instantly especially in cases where complaints are logged in through walk-ins and the toll free option. However, in cases where complaints have been logged through written format i.e. suggestion boxes or complaint logs, periodic analyses shall be undertaken and the corresponding timelines are elaborated below.

1. The village GRC will interrogate the complainant in the language conversant by the complainant and complete a Grievance Registration Form which will be signed by the chairperson of the GRC and the complainant. This will then be logged in the grievance log/register provided. The complainant shall expect a response from the GRC within **seven (7) days** of filing the complaint. If the issue is not resolved, the GRC will forward the complaint to the GRC at the Sub-County;

2. The GRC at the Sub-county will be given a **fourteen (14) day** notice to hold a meeting. Two days after the meeting, the sub-county GRC may call the complainant and village GRC for discussions and resolution. The resolution will be presented to the complainant in written form within the same day of the meeting. If there is no resolution to the grievance, the GRC at the Sub County shall then refer the matter to the GRC at the District

3. The GRC at the District will be given a **fourteen (14) day** notice to hold a meeting. Two days after the meeting, the GRC will call the complaint and Sub county GRC for discussions and resolution. The resolution will be presented to the complainant in written form within the same day of the meeting;

4. If there is no resolution to the grievance, the GRC at the district shall then refer the matter either to the National level GRC

5.8   Referral system

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

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

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

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

a) GBV Referral Paths

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

i)   For all cases relating to physical assault without significant injuries, verbal/emotional abuse; will be reported to Village GRCs to initiate mediation. Failure to agree or the perpetrator is a repeat offender, a written referral will be made to police.

ii)   Report to Police - All capital offences including deaths, rape and defilement

iii)   Report to Medical/Health Practitioners for victims/survivors in critical conditions before reporting to police or other law and order institutions.

iv)   Report to Psycho - Social Service Providers (District Community Development Office, Legal Aid Clinics, and relevant CSOs/CBOs). Victims also have an option of reporting directly to these community institutions.

v)   Report to the Magistrates Court - In adverse/extreme circumstances, even after having taken the above paths, the victim can report the matter to the magistrate's courts.

The training of GRCs will consider the need for a GBV/SEA specialist among the facilitators to ensure the delegated members (female and male representatives) on the committees responsible for dealing with GBV victims/survivors in any complaint are equipped with the necessary skills for purposes of sensitivity, confidentiality and ethics

required in these cases. The IFPA-CD Project's GRM incorporates clear information on how feedback, concerns and grievances can be submitted by any Project Affected Person (PAP)/stakeholder, as well as highlighting the varied ways of submitting a complaint. It also provides information on the way the GRM committees work, both in terms of process and deadlines.

b) Handling GBV/SEA Complaints

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

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

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

i) Protective homes for GBV victims/survivors,

ii) Medical support for incidents involving sexual violence, which may include treatments that need to be administered within 72 hours of the incident to be effective, such as:

- Emergency contraception to prevent unwanted pregnancy
- Post-exposure prophylaxis treatment to reduce the chances of HIV infection.

iii) Psychological support for victims and witnesses, which may need to include trauma counselling for victims of sexual violence or harassment,

iv) Legal advice for victims, whistle-blowers, witnesses, and alleged perpetrators,

v) Measures that support reintegration into the workforce (e.g., counselling), and

vi) Child-protection support services and/or expertise for reports involving children.

There are three key actors involved in handling GBV/ SEA complaints: (i) GRM system, (ii) GBV/ SEA Services Provider, and (iii) representative of NFA/UWA or MoWE. It is therefore essential that prior to GBV/ SEA complaints being received, it is clear who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, appropriate action to be applied to the perpetrator and verifying that the victim has received support.

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

- The GBV complaints team will keep GBV/ SEA allegation reports confidential and, unless the complaint was received through the GBV/ SEA Services Provider

or other identified reporting channels, refer the victim immediately to the GBV Services Provider.

- If a case is first received by the GBV/ SEA Services Provider or through other identified reporting channels, the report will be sent to the GBV/ SEA Complaints team to ensure it is recorded in the system.
- The GBV/ SEA Services Provider provides the necessary support to the victim until it is no longer needed

c) Resolving and closing a GBV/SEA case

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

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

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

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

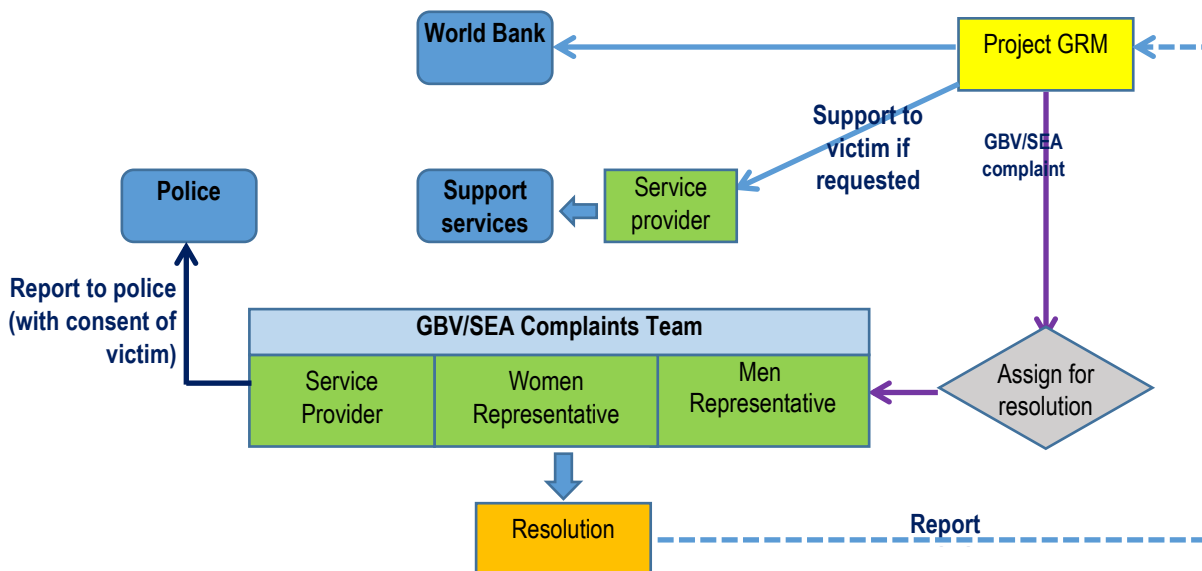A process to resolve GBV/ SEA complaints is shown in the figure below.

Figure 1: Process of resolving GBV/ SEA complaints

5.10 Monitoring and reporting in GRM

Grievances shall be captured for monitoring and reporting using the Grievance Registration Form, logbooks and reporting templates (annex III, IV, V and VI). The Grievance Registration Form (Annex I) shall be filled for each grievance case (relevant to the project) by GRM parties at District, Sub-County and village level where the grievance was logged.

The District Focal Persons will coordinate GRM activities with members of GRC at district, Sub-county, and village levels on a weekly basis to update GRC's database.

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